



## **Confidentiality and Privacy Policy**

Revision 1, 1/26/2021

### **Policy Statement:**

The Palos Verdes Estates Foundation (PVE Foundation) maintains and manages information that must be kept confidential. This includes information about donors, prospective donors, grantees, prospective grantees and wealth advisors and their firms.

The effective functioning of the PVE Foundation also requires respecting the confidentiality of discussions that take place and information that is shared in the course of conducting PVE Foundation business.

Information in the possession of the PVE Foundation and discussions of business should be presumed to be confidential. All employees, Board members and volunteers at every level are responsible for maintaining confidentiality.

While this policy addresses some common confidentiality concerns, it is not an exhaustive list of all situations where a confidentiality obligation may arise. Questions about whether information is confidential or about situations in which confidential information may be released or discussed should be directed to the Board or the PVE Foundation President.

Note: at the time of this revision, the PVE Foundation does not have paid employees or staff nor does it have a physical location. This document has been written to cover these possibilities at the point that they are added.

### **Confidentiality and Privacy Policy Details**

#### ***Confidentiality of Donor Information:***

Except as required by law, the PVE Foundation will not disclose information about a donor or a donor's gift. However, unless otherwise requested by the donor, the PVE Foundation may publish the names of individual donors in the PVE Foundation Annual Report and other reported listings.

In the case of memorial gifts, the PVE Foundation will provide the names of donors to members of the immediate family unless the donor has requested anonymity. The PVE Foundation will not disclose the specific amount of any gift without the donor's consent. The PVE Foundation may accept anonymous gifts on a case by case basis.

Fund information and agreements may only be shared with authorized persons, unless authorization is obtained from the Board.

***Confidentiality with respect to Grant Applicants and Grantees:***

The PVE Foundation will not disclose the identity of grant applicants except as necessary to process the application and will protect financial and personal information that applicants submit.

***Confidentiality of Foundation Business:***

Except as authorized by the PVE Foundation Board, or by an appropriate Board committee, discussions and records of the PVE Foundation operations are generally not to be disclosed.

This includes information about PVE Foundation financial operations, fundraising, investments, personnel, grantmaking, and contractual relationships. The positions of individual directors, officers, employees, agents, fiduciaries, and volunteers should not be discussed, even within the PVE Foundation, except in the course of official PVE Foundation meetings and processes where those subjects are discussed.

***Exceptions:***

This policy does not apply to disclosures to attorneys, accountants and other professionals providing assistance to the PVE Foundation. It also does not apply to disclosures to tax authorities, government agencies, courts, or as otherwise required by law.

The following are considered public documents and information contained in them is not subject to the confidentiality requirements of this policy:

1. The PVE Foundation independent audit once it has been accepted by the Board.
2. The PVE Foundation Form 990 as required to be publicly disclosed. This does not include the names and addresses of donors as that information is not required to be disclosed.
3. The PVE Foundation investment and spending policies.

***Protection of Confidential Information:***

Employees and volunteers who have executed a copy of this policy may access confidential information necessary to the performance of their functions. Employees and volunteers are expected to exercise sound judgment in securing information used in their homes or accessed from its network or systems.

Any physical information removed should be returned as soon as possible and deleted from laptops or other personal devices. Security procedures including locked files, secured electronic devices, safe passwords and shredding will be used, as appropriate.

***Penalties:***

Penalties for violating this policy can include sanction or termination of employees and removal of Board members and volunteers.