

## **PRIVACY POLICY**

The Early Care & Learning Council, (hereinafter the “Council”), is committed to protecting our donors’ privacy. Our donors expect that we will use their support wisely. They also place their faith and trust in us concerning the personal information that they may share with their gifts. We value our donors’ trust and we recognize that maintaining this trust requires us to be transparent and accountable to our supporters and the public at all times. An organization that deals with individuals and information about individuals in its daily operations and fundraising activities must secure that information. This policy will help ensure that all personal information is properly collected, used only for the purposes for which it is collected, and is irretrievably disposed of in a secure and timely manner when it is no longer needed.

In this Policy, “personal information” means information that is recorded in any form, both fact and opinion and that can be used to distinguish, identify or contact a specific individual. It does not include publicly obtainable information such as names, addresses and telephone numbers. “Donor” refers to any individual or organization that contributes funds, securities or property to the Council. For purposes of this policy, “Employee” describes both paid and volunteer workers for The Early Care & Learning Council.

It is vital for the Council to have knowledge about its supporters and those people who provide the necessary funding. In order to be successful during a campaign, strong donor relationships must be established and cultivated. Information is the key to any relationship. Due to the sensitive nature of personal information disclosed by a Donor or obtained by the Council, the Council shall at all times abide by this Policy.

### **Accountability**

The Council and its employees are responsible for all Donor personal information in our possession. Each department of the Council shall establish, maintain, and revise practices and procedures to ensure compliance with this Policy. Every reasonable precaution shall be taken to protect and preserve the confidentiality of our Donors’ personal information. All employees, agents and authorized service providers of the Council are individually required to safeguard each individual Donor’s personal information. Any outside contractors or third party service providers are selected with due care and must abide by this Policy. External service providers shall be required to agree to protect any personal information of Donors, use it for only the purposes set out in the scope of the contract with the Council, and to not keep the personal information on file.

Donors may notify the Council of a privacy-related issue or grievance by contacting the Executive Director. We will provide information about our privacy procedures and investigate the complaint. If a problem is discovered during the review, we will take all appropriate steps to revamp our policies and procedures if necessary.

### **Use and Disclosure of Personal Information**

The Council collects, uses and discloses personal information only for certain purposes that are identified to the Donor. We may use it to establish and manage our relationship with a

Donor, as well as providing requested information. Personal information can also help us understand a Donor and identify preferences and expectations. The main uses will involve raising money to reach our campaign goals and to process gifts and return appropriate receipts. To publicly recognize and thank them for their generosity, we occasionally release a list of our Donors. In such cases, other organizations and third parties will have access to our Donor names and in some cases donation amounts.

The Council holds special events to create publicity for our campaign, thank supporters, and raise funds. At some of these events, Employees may obtain personal information. If so, Donors will be advised of this fact and the information related to the event will be disposed of properly when it is no longer needed.

We collect Donor information for internal use only, and just to the extent required for our purposes. We obtain relevant personal information about Donors lawfully and fairly.

### **Sharing or Selling of Personal Information**

The Council does not sell, trade or rent the information and contents of active Donor files to others. The Council will not share Donor e-mail address to third parties. The Council may share Donor postal mailing lists with other organizations for a single use. An organization that receives the Council's mailing list must agree to strict parameters which limit the use of the data. For example:

- The names and mailing addresses will only be used for a specific project;
- The Council must approve the contents of the mailing piece before it is sent to the members of our Donor list;
- The data file containing the Donor mailing list will not be forwarded to any other person or entity except when necessary to complete the specific project;
- No copies of any type of the data file will be made by the receiving organization; and
- The data file of the names and addresses will be returned or destroyed when the project is completed.

### **Donors' Consent**

The Council only uses and discloses personal information with Donor permission. Donor permission can be in writing or implied, either verbally and/or electronically. A Donor may withdraw permission to collect, use, and disclose personal information at any time by giving the Council reasonable notice, subject to legal or contractual obligations. A Donor may opt out of sharing of any information, including name and address, by calling or emailing the Development & Community Engagement Department. When a Donor has communicated to the Council a desire to opt out of the disclosure of his or her information, the Council will not include the Donor's data to another organization or third party.

Donors who wish to avoid any public recognition may inform the Council when making a pledge or gift. The option to remain anonymous shall be made available to Donors by the Council and its appropriate employees. This request for anonymity shall be honored by the Council until the Donor informs us otherwise.

### **Custody and Care of Personal Information**

The personal information in our possession shall be kept accurate and up-to-date. Donors may always correct their personal information if they believe that our records are not correct. If a Donor feels that any of our information about them is inaccurate or incomplete, the Donor has the right to ask us to change it or delete it. If a Donor's personal information is wrong in any way, the Council will make the required changes.

The Council operates under the assumption that any Donor or Donor prospect has the right to review his or her own record maintained by our organization. Donors may request in writing to see personal information about them that is in the possession of the Council. Donors also have the right to know how the information is obtained and used. We will respond to Donor requests within a reasonable time (within 30 days or less) by either providing copies of the documents or access to the information. The Council will generally respond at no charge to the Donor, but depending on the nature of the request and the amount of information requested, we reserve the right to charge a reasonable amount. In some situations, the Council may not be able to provide access to all the personal information held on a Donor. Exceptions will be limited and specific as permitted or required by law, and the reasons for non-disclosure shall be communicated to the requesting party.

The Council will keep Donors' personal information only as long as it is necessary to satisfy the purposes for which it was obtained, or as legally required. Access to Donor file materials containing personal information is restricted to Council Employees and authorized service providers who need it to do their jobs.

The Council has established appropriate technical, physical and organizational security procedures to protect Donors' personal information against loss, theft, unauthorized use, disclosure, or modification. These procedures will be monitored and reviewed at least annually and when needed to ensure their continued effectiveness. The safeguards employed by the Council include, but may not be limited to, the use of limited access storage areas, locked files, and the use of encryption, secure servers, and computer workstation passwords. Appropriate measures will be undertaken when personal information is destroyed in order to prevent access or inadvertent disclosure to any unauthorized parties.