

## **IDAHO COMMUNITY FOUNDATION, INC. CONFIDENTIALITY POLICY**

The nature of the Idaho Community Foundation, Inc.'s role as a funder, fundraiser, leader, convener, and decision maker in the community results in the acquisition of extensive information that is, or may be considered, confidential. Much of this information is acquired by the Foundation due to its reputation for trust, its efforts to make fair decisions, and its ability to advocate for the good of Idaho. To safeguard the Foundation's integrity in its various roles, to protect its capacity to gather the data necessary to fulfill those roles, and in an effort to uphold the standards of the industry, the Foundation subscribes to the following policy regarding confidentiality.

Except to the extent necessary to engage in the business of the Foundation and to comply with applicable laws and regulations, Foundation Board members, Committee members, Grants Panel members, volunteers and employees should not engage in the discussion of, use or disclose to any other person or entity confidential Foundation information without the express authorization of the Foundation's President or his designee. For purposes of this policy, confidential Foundation information includes but is not limited to:

- donor records, donor financial statements or any other information, whether written or oral, related to or provided by individual donors or potential donors;
- information related to Board members, committee members, panel members or volunteers, not including lists of their names;
- employment information regarding Foundation personnel;
- detailed financial records of the Foundation, not including audited financial statements which are a matter of public record;
- information related to the Foundation's strategic investment strategies.

The President shall outline in writing annually the individuals who may share information about ICF and the scope of the information that each may share. The scope of the information that may be disclosed may include:

- information regarding the Foundation's services, methods of operations, operating practices, marketing plans, systems or strategies;
- any other information regarding the business affairs or operating policies or procedures of the Foundation.

The Foundation also has a role to share information about itself. This is evidenced by the Annual Report and similar information. Such items are not confidential information for purposes of this policy.

Individuals, including board members, employees and volunteers who have knowledge of or information related to violations or possible violations of this policy shall report their concerns to the President of the Foundation or his designee, or the chairperson of the Foundation's Board of Directors. Employees who violate this policy are subject to disciplinary action up to and including termination. Others who violate this policy also are subject to remedial action which may vary depending on their relationship with the Foundation.

This Confidentiality Policy is effective the 18th day of November, 2010 and is intended to replace all prior versions.