

CONFIDENTIALITY POLICY

SECTION 1. INTENT AND PURPOSE

Mankato Area Foundation ("*MAF*") requires directors, board members, officers, volunteers, and employees (collectively, "*Personnel*") to respect the privacy of donors, prospective donors, grantees, prospective grantees, trusted advisors and their firms, staff, volunteers, and board members. This privacy extends to any information not known generally to the public, including any information which is confidential, privileged, or proprietary ("*Confidential Information*"). Personal information, financial information, personnel files, board meeting content, and computer records are all examples of Confidential Information. Confidential Information must not be disclosed or discussed with anyone without prior permission or authorization from MAF's President/CEO or Board Chair.

SECTION 2. EXPOSURE TO, HANDLING, AND DISPOSAL OF CONFIDENTIAL INFORMATION

During the time of their association/employment with MAF, Personnel may be exposed to Confidential Information. All Confidential Information is to be securely stored with access limited to authorized users and is not to be left out where it may be inadvertently disclosed. Any waste copies of documents containing Confidential Information must be properly disposed.

It is the policy of MAF that Confidential Information must be kept private and confidential both during and after employment or volunteer service with MAF. Personnel must immediately return any materials containing Confidential Information at the time of separation from MAF.

SECTION 3. RATIONALE

By necessity, personal and private information is disclosed to MAF and its Personnel in the course of MAF's work. Most information gained about individual clients or donors is confidential in nature and subject to this policy. Improper disclosure of any Confidential Information would not only damage MAF's relationship with the client or donor and MAF's reputation generally, but may also be in contravention of applicable laws.

- Confidentiality of Donor Information:
Except as required by law or otherwise agreed by the donor, MAF will not disclose information about a donor or a donor's gift. However, unless otherwise requested by the donor, MAF may publish the names of individual donors in the Annual Report and other reported listings. In the case of memorial gifts, MAF will provide the names of donors to members of the immediate family unless the donor has requested anonymity. MAF will not disclose the amount of any gift without the donor's consent. MAF may accept anonymous gifts on a case by case basis.
- Confidentiality with respect to Grant Applicants and Grantees:
MAF 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 to it. This includes information provided by applicants for grants to individuals, such as scholarships. MAF will generally disclose the identity of grantees and the amount awarded.
- Confidentiality of Foundation Business:
Except as authorized by MAF's board or by an appropriate board committee, discussions and records of MAF's operations are generally not to be disclosed. This includes information about MAF's financial operations, fundraising, investments, personnel, grantmaking, and contractual relationships. The opinions of individual directors, officers, employees, agents, fiduciaries, and

volunteers should not be disclosed, even within MAF, except in the course of official MAF 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 MAF. 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:

- MAF's annual report or financial review once it has been accepted by the board.
- MAF's Form 990 as required to be publicly disclosed. Note this does not include the names and addresses of donors as that information is not required to be disclosed.
- MAF's documented and approved policies.

SECTION 4. CONSEQUENCES FOR FAILURE TO MAINTAIN CONFIDENTIALITY

Any unauthorized disclosure of Confidential Information is a violation of this policy. Any violation of this policy may result in termination of employment/service, other disciplinary action, or any other remedy allowed by law. Any disclosure of Confidential Information in contravention with applicable laws will be referred to the proper authorities.

SECTION 5. CERTIFICATION

I, _____ have read MAF's policy on confidentiality presented above. I agree to abide by the requirements of the policy and inform MAF's President/CEO or Board Chair immediately if I believe any violation (unintentional or otherwise) of the policy has occurred. I understand that violation of this policy will lead to disciplinary action, up to and including termination of service with MAF.

Signature

Date

Originally Approved: February 28, 2018

Amended: December 2022