

Policy on Confidentiality

The Greater Milwaukee Foundation (GMF) maintains and manages much 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 Foundation also requires respecting the confidentiality of discussions that take place and information that is shared in the course of conducting Foundation business.

The Foundation's Board has adopted this Policy on Confidentiality to assist the Foundation's directors, officers, employees, agents, fiduciaries and volunteers in fulfilling their confidentiality obligations and commitments. While the 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 one of the following: the Vice President of Human Resources, the President/CEO, the chair of the GMF Board or the chair of the Human Resources Committee of the Board. As used in this policy, the term "Foundation personnel" includes the Foundation's directors and officers, employees, agents, fiduciaries, consultants and volunteers.

General Rule: Information in the possession of the Foundation and discussions of Foundation business should generally be presumed to be confidential. All Foundation personnel at every level are responsible for maintaining confidentiality.

Confidentiality of Minor Information: Except as required by law, the Foundation will take special care and not disclose information of a sensitive nature related to an individual minor. The range of the information includes but is not limited to social security numbers, financial information and other personal information that the public would not ordinarily have access to. All foundation staff and volunteers at all levels will exercise a reasonable level of care in handling this sensitive information.

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

Confidentiality with Respect to Grant Applicants and Grantees: The 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 to the Foundation except in cases where a release of disclosure is obtained. This includes information provided by applicants for grants to individuals such as scholarships and hardship assistance.

Confidentiality of Foundation Business: Except as authorized by the Foundation’s Board, or by an appropriate board committee, discussions and records of the Foundation’s operations are generally not to be disclosed. This includes information about the Foundation’s financial operations, fundraising, investments, personnel, grant making, and contractual relationships. The positions of individual directors, officers, employees, agents, fiduciaries, and volunteers should not be discussed, even within the Foundation, except in the course of official Foundation meetings and processes where those subjects are discussed. The Foundation’s Board and Staff may disclose general operating actives in response to donor inquiries. Board discussions and minutes are generally not considered public records.

Exceptions: This policy does not apply to disclosures to attorneys, accountants and other professionals providing assistance to the 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:

- The Foundation’s annual report or financial review once it has been accepted by the Board.
- The Foundation’s 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.
- The Foundation’s investment and spending policies.
- The Foundation’s investment options and historical investment performance.

Protection of Confidential Information: Foundation personnel who have executed a copy of this policy may access confidential information necessary to the performance of their functions. Foundation personnel are expected to exercise sound judgment in securing information taken outside the Foundation’s offices or copied from its network. Any information so removed should be returned as soon as possible and deleted from laptops or other personal devices. In addition, the Foundation has an electronic communications policy and systems/equipment usage policy that is provided to all employees upon hire.

Breach of Duty to Maintain Confidentiality: Any unauthorized release or carelessness in the handling of confidential information is considered a breach of the duty to maintain confidentiality. Any breach of this duty could be grounds for immediate dismissal and/or possible liability in any legal action arising from such breach.

I have read the Policy on Confidentiality and agree to comply with it.

Printed Name

Signature

Date

I am a:

Board Member/
Director Officer Employee Consultant/
Contractor Volunteer Fiduciary
or Agent