

## Confidentiality Policy

The role of the Southwest Florida Community Foundation, Inc. (“Foundation”) as a funder, leader, convener and decision maker in the community results in the acquisition of extensive information that is considered privileged. Much information is shared with the Foundation because of its reputation for trust and its ability to make fair decisions. To safeguard the Foundation’s integrity as a responsible decision maker, and to protect its capacity to gather data necessary to make those decisions, the Foundation subscribes to specific policies on confidentiality.

Foundation trustees, senior advisors, committee members, staff, volunteers, and others doing work on behalf of the Foundation (e.g., consultants, fiduciaries, outside contractors and members of their firms), hereinafter called “Foundation workers”, should not engage in private discussion of Foundation matters (except when engaged in the business of the Foundation) or allow the dissemination of Foundation documents or meeting materials.

The positions or statements of individual trustees, committee members, or employees should not be discussed outside of official Foundation meetings and processes.

Content of Foundation business, including documents (including print and digital) or Foundation analysis of documents, should not be discussed or shared outside official meetings and processes, except as required by law.

This policy is applicable to information about donors and prospects of the Foundation, including, but not limited, to donors’ contributions, donors’ funds, agreements, distribution information, and any related matters and shall remain confidential to the Foundation without the explicit approval of the donors, except as required by law. However, unless requested by the donors, the Foundation may publish the names of individual donors in the Foundation’s published reports.

This policy is applicable to information about grantees and prospects of the Foundation including, but not limited to, grant applicants, grantees and distributions and any related matters and shall remain confidential to the Foundation, and its funders if applicable, without the explicit approval of the grantees, except as required by law. However, unless otherwise requested by the grantees, the Foundation may publish the names of grantees in the Foundation’s published reports.

Foundation workers subject to this confidentiality policy are responsible for ensuring that others acting on their behalf (such as family members or staff) also adhere to this policy.

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 the President and Chief Executive Officer.

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

- The Foundation’s annual audited financial statements once it has been accepted by the Board of Trustees.
- The Foundation’s IRS Form 990 once it has been accepted by the Board of Trustees. This does not include Schedule B of the IRS Form 990 that includes the names and addresses of donors.
- The Foundation’s investment and spending policies.

I have read and agree to comply with the Foundation’s Policy as outlined above.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Please check as appropriate:

_____ Trustee	_____ Senior advisor	_____ Committee member
_____ Employee	_____ Volunteer	_____ Consultant/Contractor
_____ Fiduciary	_____ Other (please describe): _____	