



## Donor Confidentiality Policy

Barth Syndrome Foundation ("BSF") recognizes that its efficient operation requires the maintenance and management of extensive donor and prospect records. ("Records," as used herein, is construed to mean all files, including electronic data, containing information on donors or prospective donors to BSF.) These records may contain sensitive information that has been shared with or developed by BSF staff or volunteers on a confidential basis. Donors and prospects may be attracted to BSF on the basis of its ability to assure temporary or permanent anonymity. Protecting donor confidentiality is an essential part of providing good service to donors. BSF maintains the highest level of confidentiality with respect to donor information. Additionally, care is taken to preserve confidentiality of discussions that take place and information that is shared in the course of conducting BSF business.

This policy codifies the position of BSF on Donor Confidentiality.

- 1. Confidentiality of Records:** The Executive Director shall have ultimate responsibility for maintaining the confidentiality of donor and prospect records. Records will normally be available to staff as needed to fulfill their duties. At the discretion of the Executive Director, staff may make all or part of any record available to BSF's Board of Directors and other related parties to assist them in executing their specific responsibilities. BSF's auditors, legal counsel and other contractors are authorized to review donor/prospect records as required for the purposes for which they are engaged. All persons accessing donor/prospect records in the conduct of BSF business shall maintain the confidentiality of said records in accordance with BSF policies.
- 2. Publication of Donor Names:** Unless otherwise requested by the donor, the names of all individual donors and those recommending donor advised fund gifts may be printed in BSF's annual report and in other appropriate listings. BSF will not publish the amount of any donor's gift without the permission of the donor. Unless otherwise specified in the document, donors making gifts to BSF by bequest or other testamentary device are deemed to have granted such permission.

3. **Memorial/Tribute Gifts:** The names of donors of memorial or tribute gifts may be released to the honoree, next of kin, or appropriate member of the immediate family, unless otherwise specified by the donor. Gift amounts are not to be released without the express consent of the donor.
4. **Anonymous Gifts:** Provision will be made in all written and on-line solicitations from BSF to allow a donor to request anonymity. The Executive Director is authorized to accept anonymous gifts to BSF, and to handle them appropriately. The name of the donor and size of the gift may be withheld from the Board of Directors at the Executive Director's discretion. When made known to Board members, they will respect the anonymity of any such gift.
5. **Giving Categories:** If giving categories have been stipulated for a specific fund drive, challenge grant, or project, or as part of BSF's ongoing recognition program, then the donors, unless they otherwise specify, are deemed to have given permission for BSF to publish their names associated with the particular giving category. Similarly, BSF may publish giving categories associated with donor names in its annual report, and unless a donor specifies otherwise.
6. **No Disclosures to Third Parties:** Except as otherwise set forth herein, BSF shall not release to third parties or allow third parties to copy, inspect or otherwise use BSF records or other information pertaining to the identification of a donor or donor's gifts. No disclosures to third parties of such information, including addresses and demographic information, shall be made without the donor's consent, except where required by law.
7. **Public Disclosure:** BSF will comply with both the letter and spirit of all public disclosure requirements, including the open availability of its Form 990 Tax Return. This Confidentiality Policy shall not be construed in any manner to prevent BSF from disclosing information to taxing authorities or other governmental agencies or courts having regulatory control or jurisdiction over BSF. However, all staff, volunteers, and contractors must hold strictly confidential all information of a private nature, including, but not limited to, all items explicitly discussed in this policy.
8. **Consequences of Policy Violation:** Violations of the Confidentiality Policy are very serious, and may result in disciplinary action, including dismissal for employees or contractors, or removal from the Board or any committee for volunteers.