

Dakin Pioneer Valley Humane Society

# Policy on Donor Data Confidentiality

---

Dakin Pioneer Valley Humane Society (DPVHS) has established the following Donor Data Confidentiality Policy Guidelines (“Policy” or “Guidelines”) to ensure that there is a common understanding regarding use of the data gathered in the process of establishing, developing, and maintaining donor relationships. This policy is designed to work in concert with the DPVHS Donor Privacy Policy, which represents our public commitment to donors to safeguard the privacy of their information.

## I. **Definitions**

- A. “Public Source” means any information of a non-confidential nature that is publicly available, either through internet search means, information service subscription, or materials created and sent to members of the public (e.g., annual reports, letters to members, etc.) that have not been deemed confidential to the organization distributing the information.
- B. “Private Source” means information gleaned through conversations about personal relationships, or any other non-public source. For purposes of Section II(C) below, Private Source information excludes first-hand personal knowledge independently acquired.
- C. “Donor” for purposes of this Policy means any individual (or company) who (that): currently contributes money, goods, or services; has contributed money, goods, or services in the past; or has been identified as a possible contributor of money, goods, or services in the future.
- D. “Data” means all information, financial and non-financial, pertaining to a donor, a donor’s family, a donor’s business, and a donor’s capacity.
- E. “Organization Personnel” for purposes of this policy means all board members, paid staff members, and any volunteers who assist in the donation management process.
- F. “Confidential” means that information is exchanged only on a “need to know” basis for the purpose of furthering the DPVHS mission, and shared only with DPVHS personnel who have a common understanding and commitment to DPVHS Policies.

## II. **Guiding Principles**

All DPVHS personnel will:

- A. Adhere to all guidelines set forth in the DPVHS Donor Privacy Policy, incorporated herein by reference;
- B. Respect requests for source confidentiality, even within the organization and among other DPVHS personnel;

- C. Never use Private Source information for purposes other than furtherance of the DPVHS mission, which includes both situations of personal gain and use on behalf of other organizations;
- D. Use good judgment in revealing the extent of personal information acquired so that neither donors nor sources are ever uncomfortable with interactions with DPVHS;
- E. Maintain data in a confidential manner, either in a password-protected donation management database or in physical donor files to which there is restricted access; and
- F. Record any and all personal information in a respectful fashion.

### III. **Situations Not Contemplated by this Policy**

Should situations be encountered that are not covered by the Guidelines outlined within this Policy, it is expected that DPVHS personnel will act in a manner that demonstrates ethics and integrity and protects the reputation of DPVHS, its relationship with supporters, and the privacy of donors and information sources.

---

#### **Policy Acceptance:**

By signing this document I am agreeing to the terms and conditions herein and will abide both in practice and in spirit by the requirements outlined in this Policy. I understand that accepting this Policy is a condition of working with the DPVHS donation management process, and that the data discussed within the context of my work with DPVHS belongs to the DPVHS and will remain confidential both during my active involvement with DPVHS and if or when I am no longer actively involved in the donation process. No information gained as a part of this process may be shared with others not bound by the same agreement either now or at any time in the future.

---

Signature

---

Date

---

Printed Name