



ICAN Privacy Policy

MEMBER CONFIDENTIALITY POLICY

I. Purpose

To protect member privacy and ensure confidentiality of information

CR 2.01-05, RPM 6.01-05, RPM 7.01-07, RPM 8.01-04, YD 3.04-05

II. Policy

ICAN recognizes the right of Youth Members to privacy, and therefore, maintains a high level of confidentiality for information regarding Youth Members. Upon program eligibility approval, a member application file is created for each youth. In protecting the file from loss, damage, or alteration, the file is maintained in a locked filing cabinet and remains in ICAN possession throughout the course of service to that Youth Member. All files are maintained for a minimum of seven years.

DONOR CONFIDENTIALITY POLICY

I. Purpose

To articulate ICAN's position and practices regarding donor confidentiality

II. Procedure

In adherence with our Donor Confidentiality Policy, the following procedure exists:

- The CEO shall be responsible for maintaining the confidentiality of donor and prospect records and will ensure that all staff have clear direction regarding the confidentiality of records through the establishment of appropriate operating procedures. He/she may, in his/her discretion, make all or part of any record available to staff members or volunteers if essential to them in executing

their responsibilities. Disclosure decisions will honor the wishes of donors related to disclosure unless a larger legal issue is related.

- To carry out its responsibilities, the Board of Directors may need to review donor/prospect records. All directors shall respect ICAN's interest in protecting the sensitive nature of those records and shall maintain these policies for donor confidentiality.
- ICAN's auditors are authorized to review donor and prospect records as required for the purposes for which they are engaged.
- Fund agreements are considered "strictly confidential information" and are not public documents. Particulars of a fund document will not be shared with the general public or with fund recipients unless the donor has granted permission to do this or unless these details are essential to be shared in order for the fund to be administered as desired by the donor.
- The names of all individual donors will be listed in ICAN's annual report and/or in similar public relations communications. Exceptions will be made for any donor who specifically requests anonymity.
- ICAN will not publish the specific amount of any donor's gift without the permission of the donor. Additionally, ICAN will not share personal information of the donor, without consent of said donor. Donors making gifts to ICAN by bequest or other testamentary device are deemed to have granted such permission.
- The names of donors of memorial or honor 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 express consent of the donor.
- The CEO is authorized to accept anonymous gifts to ICAN. In the event the CEO is uncertain about the desirability of accepting an anonymous gift, he/she shall consult with the Executive Committee. The CEO shall disclose to the Executive Committee, upon a request by a majority of the Executive Committee, the names of any anonymous donors.
- ICAN will not sell, trade, or share a donor's personal information with anyone else.
- ICAN will not send mailings on behalf of other organizations to ICAN donors.

Note: Donations made through ICAN's website are made via a third-party application, and are subject to third-party privacy and/or data policies which may override ICAN's own privacy policy.