

Subject: Constituent Privacy Policy	California State University Stanislaus	Effective Date: August 1, 2011 Page 1 of 2
	New Policy	Approved By: Hamid Shirvani President, California State University Stanislaus

Background:

University Advancement is charged with the responsibility of coordinating the fundraising effort on behalf of California State University, Stanislaus and the California State University, Stanislaus Foundation. In order to facilitate the successful execution of this duty and to safeguard the sensitive data of various University and Foundation constituents, the Division of University Advancement is designated the steward, custodian, and office of record for data pertaining to donors and fundraising activity.

This includes information on prospects, donors, and other stakeholders that is held on behalf of the California State University, Stanislaus and managed for the Foundation by the Division of University Advancement. It is recognized that constituent data may be stored in physical files, electronic files, or in information storage and retrieval systems. For the purposes of this policy, privacy is defined as the protection of the collection, usage, storage, destruction, and dissemination of personal information on prospects, donors, and other stakeholders.

Policy:

All personally identifiable information pertaining to fundraising constituents is to be treated as confidential and proprietary. No information will be shared, rented, or exchanged with unrelated third parties and will be used by the University solely to fulfill its educational directives, fundraising activities, informational mailings, or as required by law.

While all fundraising constituent information is to be treated as confidential in nature, in accordance with the University's Information Security Policies (dated May 12, 2008), the following data elements are to be treated as especially sensitive in nature:

- Social Security Number
- Credit card information
- Income and credit history
- Bank account information
- Tax return
- Asset statement
- Medical records
- Library records

Except where specified in certain agreements with units or departments of the University by the Foundation, the Division of University Advancement serves as the primary steward, custodian, and office of record of fundraising constituent documents and information. In cases where it is deemed desirable or necessary to store fundraising information, either electronically or in hard copy form, outside of the Division of University Advancement, express permission must be granted by an authorized representative of the Foundation.

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Anyone handling fundraising constituent information in hard copy should take all appropriate measures to secure it physically, which includes, but is not limited to, maintaining it while stored in a locked office or cabinet and, during use, under close personal supervision. Anyone in possession of fundraising constituent information should be mindful of the sensitivity of that information, and use appropriate judgment about its handling and storage management.

General Requirements for Storage and Use of Foundation Information and Documents:

- Only University employees who have been authorized by University Advancement and who have a need to know in order to perform an authorized Foundation or University function may access fundraising constituent information. Fundraising constituent information shall be used solely for development purposes and in accordance with applicable policies.
- Employees of California State University, Stanislaus and volunteers of the California State University, Stanislaus Foundation who have been granted access to personally identifiable information will be required to sign a confidentiality agreement.
- All requests for access to constituent lists are to be routed to the Foundation’s Chief Development Officer for consideration on a case-by-case basis.
- Documents containing fundraising constituent information must be secured so they are accessible only to authorized personnel. “Secured” means locked in a drawer, filing cabinet, or a hard-wall, private, office.
- Documents containing fundraising constituent information may never be left unattended in a public area.
- When no longer needed for daily operations, documents containing confidential Foundation information must be destroyed or moved to a secure archive facility in accordance with the California State University, Stanislaus Records/Information Retention Policy (August 1, 2011) and the CSU Chancellor’s Office Records Retention and Disposal Policy found here:
http://www.calstate.edu/recordsretention/documents/University_Advancement.pdf
- When documents containing confidential information need to be destroyed, a secure disposal service or a cross-cut shredder must be used.