

<u>Subject:</u> Constituent Privacy Policy	California State University Stanislaus Foundation	<u>Effective Date:</u> August 24, 2011 Page 1 of 2
	Constituent Privacy	Approved By:

Background:

The California State University, Stanislaus Foundation is committed to protecting the privacy of its constituents (both individuals and organizations) whose information is held by the Foundation through responsible information management. This includes information on prospects, donors, and other stakeholders that is held on behalf of the California State University, Stanislaus Foundation by the Division of University Advancement. It is recognized that Foundation 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 Foundation 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 Foundation information is to be treated as confidential, the Foundation recognizes, in accordance with the University's Information Security Policies (dated May 12, 2008), that 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, the Division of University Advancement serves as the primary steward, custodian, and office of record of Foundation documents and information. In cases where it is deemed desirable or necessary to store Foundation information, either electronically or in hard copy form, outside of the Division of University Advancement, express permission must be granted by the Foundation or its designee.

Anyone handling Foundation 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 Foundation information should be mindful of the sensitivity of that information, and use appropriate judgment about its handling and storage management.

<u>Subject:</u> Constituent Privacy Policy	California State University Stanislaus Foundation	<u>Effective Date:</u> August 24, 2011 Page 2 of 2
	Constituent Privacy	<u>Approved By:</u> CSU Stanislaus Foundation Board of Directors

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

- Only University employees who have been authorized by the Foundation and who have a need to know in order to perform an authorized Foundation or University function may access donor information. Donor 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 for the purposes of providing service to the Foundation 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 Director for consideration on a case-by-case basis.
- Documents containing Foundation 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 Foundation 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 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.
- The Foundation agrees to the standards and requirements set forth in California State University's Office of Information Technology's Security Policy, dated May 12, 2008.

I hereby certify that the Foundation Constituent Privacy Policy was approved at the August 23, 2011 CSU Stanislaus Foundation Executive Committee Meeting.

Matthew Swanson
President, California State University, Stanislaus Foundation

8-23-2011
Date

Hamid Shirvani
President, California State University, Stanislaus
Chairman of the Board, California State University, Stanislaus Foundation

8-23-2011
Date