# Donor \ Investor Privacy

We value your trust and confidence. This policy states the Moravian Ministries Foundation in America's (MMFA) position on donor and investor confidentiality and anonymity. It will guide the actions of the Board of Directors, the CEO, and staff and committee members who may serve the foundation regarding the rights of investors, donors, and potential donors to confidentiality regarding their transactions with the foundation.

MMFA recognizes that the foundation's operation requires the maintenance and management of extensive investor, donor, and prospect records. These records often contain sensitive information shared with or developed by foundation staff on a confidential basis. "Records" means all files, including electronic data, containing information on investors, donors, or prospective donors to the foundation. "Investor" means any church or agency investing in the Moravian Common Fund.

Records are handled with respect and confidentiality. MMFA employees and volunteers are not permitted to use this information for any purpose other than to perform the services they are performing for the benefit of MMFA.

#### **Policies**

## **Confidentiality of Records**

The CEO shall be responsible for maintaining the confidentiality of investor, donor, and prospect records and will ensure that all staff have clear direction regarding the confidentiality of records through internal processes and systems. The CEO may make all or part of any record available to staff members or volunteers if essential to executing their responsibilities. Disclosure decisions will honor donors' wishes related to disclosure unless otherwise required by law. The MMFA will not sell, share, or trade your personal information for third-party fundraising or marketing purposes. MMFA does not sell or share its mailing lists, except to provide a mailing list to the Moravian Interprovincial Board of Communication for the Moravian Magazine.

The Board of Directors or committee members may need to review records to carry out their responsibilities. They shall respect the foundation's significant interest in protecting the sensitive nature of those records and maintain these confidentiality policies.

The foundation's auditors are authorized to review investor, donor, and prospect records as required for their respective purposes. Gift agreements are considered "strictly confidential information" and are not public documents. The particulars of a gift agreement will not be shared with the general public unless the donor has granted permission.

#### **Publication of Donor Names**

The names of investors and donors may be listed in the foundation's annual report, on the website, and/or in similar public relations communications. Exceptions will be made

for anyone who specifically requests anonymity. The foundation will not publish the specific amounts of any investment account or donor gift without the permission of the fund representative or donor. Donors making gifts to the foundation by bequest or other testamentary device are deemed to have granted such permission unless otherwise noted.

## Honor/Memorial Gifts

The names of memorial or honor gift donors may be released to the honoree, next of kin, or individual(s) designated by the immediate family unless otherwise specified by the donor. Gift amounts are not to be released without the express consent of the donor.

## **Anonymous Gifts**

The CEO is authorized to accept anonymous gifts to the foundation. If the CEO is uncertain about accepting an anonymous gift, he/she shall consult with the Executive Committee of MMFA's Board of Trustees. Upon a request by a majority of the Executive Committee, the CEO shall disclose the names of any anonymous donors to the Executive Committee.

## **Kinds of Information**

The foundation defines "personal information" as information that can distinguish, identify, or contact a specific individual, church, or agency. It does not include publicly available business contact information, names, addresses, and telephone numbers published in public sources such as telephone directories or websites. Credit card information is handled by a secure third-party host and used only to process payments initiated by a person contacting MMFA.

# How We Use Information

The foundation collects, uses, and discloses personal information concerning our investors and donors for the following reasons:

- To establish a relationship and communicate with investors and donors
- To understand who our investors and donors are and how we may improve our services to meet their preferences and expectations
- To process a donation (e.g., a credit card transaction)
- To issue a tax receipt
- To recognize contributions
- To meet requirements imposed by law

# How We Protect Your Information

Please refer to the privacy policy to learn how the foundation protects your information.

If you have questions about this policy, please contact the foundation's CEO at <u>cspaugh@mmfa.com</u> or 336-725-2589.