



POLICY SUBJECT:	DATA PRIVACY & DISCLOSURE
LAST REVISED:	05/25/2018

The University of South Dakota Foundation (“Foundation”) is an independent 501(c)(3) nonprofit corporation organized under the laws of the State of South Dakota. The Foundation’s purpose is to inspire, solicit, facilitate, and manage charitable gifts for the benefit of the University of South Dakota (“University”), which is a separate legal entity from the Foundation.

The Foundation gathers information about University alumni, donors, and others for purposes of efficient, impactful, and meaningful outreach and stewardship. Common examples, consistent with industry practices, include: names, physical addresses, phone numbers, email addresses, giving histories, and notes from visits. While much of this information may be – and often is – gathered from public sources, the Foundation takes seriously its responsibility to reasonably protect all data that could be deemed sensitive. This Data Privacy & Disclosure Policy (“Policy”) is intended to outline the Foundation’s commitment to responsibly managing and disclosing information that may become part of the Foundation’s Central Relationship Management system or is otherwise collected or stored by the Foundation.

The Foundation is committed to protecting constituent privacy and maintaining public trust. As an independent, private entity, the Foundation reserves the right to hold all records and data in strict confidence. Notwithstanding, there are limited circumstances under which the Foundation may disclose certain, appropriately tailored information:

- As required by law, e.g., Internal Revenue Service reporting.
- For purposes of donor recognition, e.g., printed donor honor rolls. Such information is generally limited to name, class, and gift amount, and will remain confidential if a donor has requested anonymity.
- In pursuit of strategic partnerships that advance the Foundation’s mission to support the University. Under no circumstances will the Foundation sell or release for commercial purposes the information it collects and stores. However, the Foundation may share limited data with University leadership, vendors, volunteers, and other parties deemed necessary to advancing the Foundation’s mission of support. An expectation of confidentiality extends to all such relationships, and the Foundation may require this be formalized in a non-disclosure/confidentiality agreement.
- To inform family members and other designated contacts in cases where memorial or honorary funds have been established at or are directed to the Foundation.

From time to time, parties will seek information from the Foundation about alumni and others who share or might share common philanthropic objectives, e.g., classmates, members of Greek houses, or teammates. The Foundation is eager to assist motivated volunteer leaders but may not accommodate all requests. Under no circumstances will information be disclosed to advance purposes inconsistent with the University’s or Foundation’s interests. Where intent is consistent with such interests, privacy concerns will remain paramount. Accordingly, subject to time and resource limitations, the Foundation

may act on behalf of a requesting party to facilitate communications. For example, the Foundation may send out a letter under the requesting party's signature to all members of an identified class inviting them to open lines of communication. In other circumstances, as described above, the Foundation may disclose information upon execution of a non-disclosure/confidentiality agreement. Whether such arrangements are appropriate is determined at the Foundation's sole discretion.