



Development and Alumni Relations Policy on Confidentiality and Sharing of Constituent Information

Sharing constituent information with strategic partners is essential to building and advancing philanthropic relationships that create a stronger future for Grinnell. We (Development and Alumni Relations) take very seriously our responsibility to ethically collect and protect constituent data.

This policy establishes the DAR definition for various audiences and the types of information that may and may not be shared with each of them. When sharing intelligence with strategic partners, DAR commits to limit the information we share and with whom we share it to a need-to-know basis.

Prior to sharing personal data this document must be read and agreed to by returning a signed copy to our office. **All personal data shared with faculty, staff, students, and volunteers, should be destroyed after they are finished using it for the specified purpose.**

Definitions

A volunteer is defined as an individual who dedicates their time to advance Grinnell College. Volunteers are not paid for their service to the College.

Faculty and Staff includes all Grinnell College part-time and full-time employees, including student employees.

Students: all part-time and full-time students.

DAR professionals are included under the category of staff of Grinnell College. DAR staff will have the greatest access to information due to the nature of their work.

Constituent information consists of all data (electronic or paper) contained in a constituent's record managed by DAR. This includes bio information from student days, current residence and employment, gift history, event participation, volunteer roles, awards and activities, and various other attributes and interests relevant to the work of DAR.

DAR's public data refers to information in a constituent file that can be released to the public (e.g., newspaper, social organization, etc.) with little or no risk to the College and includes name, degree, and graduation year. Public data is most often already accessible through publicly available means, such as Grinnell College yearbooks, LinkedIn, and various other online resources.

DAR's directory data refers to information from a constituent record made available to alumni, students, faculty, and staff within DAR's online directory - this includes phone, email, address, education, and employment. Although this information is shared within our community and intended to ease connection and collaboration amongst our community, it is protected behind a firewall and requires a password to gain access. At any point a constituent can request for DAR to apply a "Do Not Release" to their record which will block them from the directory and other methods of personal outreach or attempted contact. At any point the DAR office can remove an individual's access to the directory.

DAR's personal data refers to sensitive information maintained by DAR that requires documentation for audit, tracking, and reporting, etc. This includes things such as amount and types of gifts to Grinnell, attendance history at events, conversational notes containing personal interests and plans, publicly available wealth information, details about social and professional engagements, etc.

DAR's confidential data consists of data whose unauthorized disclosure may have serious adverse effect on the College's and/or the individual's reputation, resources, or services. This includes data protected under federal or state regulations and data that must be kept private due to proprietary, ethical, strategic or privacy considerations, including GDPR, FERPA, etc. Confidential data also includes completely confidential gifts and confidential gift conversations/strategies.

Sharing of Information

As determined by business needs and shared on a need-to-know basis, the DAR office may securely share personal DAR data with faculty, staff, and volunteers in an effort to support and/or advance constituent engagement.

Common reasons to share personal DAR data with faculty, staff, and volunteers includes:

- Helping to engage constituents with College programming
- Screening/vetting folks for leadership roles at the College

- Helping to create gift strategy or soliciting gifts
- Attendance at meetings with the constituents, either one-on-one or with a DAR professional, to further the relationship between the College and the constituent.
- Constituent stewardship

Constituent information that may be shared with faculty, staff, and volunteers includes:

- DAR's public data
- DAR's directory data
- DAR's personal data

Constituent information that may not be shared with faculty, staff, and volunteers includes

- DAR's confidential data

When constituent information is sent to faculty, staff, or a volunteer, the sender must distribute the information in accordance with [Grinnell's Written Information Security Program](#). The sender should indicate confidential information is included and provide instructions that the information cannot be shared with anyone else. Proper disposal of confidential information includes manual and electronic shredding or return of information to the Office of DAR.

External request from to release personal information

Forward Requests

If an individual or organization contacts our office requesting release of someone's directory information, we will forward the request to the individual, notifying them of the request, identifying the party(ies) that originated the request, and allowing the individual to determine on their own if and how they would like to respond.

Confirming Degrees

Requests from prospective employers and others should be directed to the Office of the Registrar.

Law Enforcement Agencies

Requests from law enforcement agencies for constituent information should be directed to the Office of the President.

Subpoena or Court Order

Information will be released pursuant to court order or a lawfully issued subpoena. Questions regarding court orders and subpoenas should be directed to the Office of the President.

Denied Requests

Requests for personal data will be denied, unless approved by DAR leadership.

Tracking Signed Agreements

The preferred method for receiving signed agreements is via electronic submission of the form found @ <http://alumni.grinnell.edu/confidentialityagreement>.

For those unable to submit the online form, a signed confidentiality agreement can be submitted to DAR's Data and Records Assistant by:

1. emailing a scanned copy or photo of the signed document to Raisersedge@grinnell.edu
2. faxing the signed document to our office 641/269-4313
3. postal-mailing the signed document to:
Grinnell College
Development and Alumni Relations
733 Broad Street
Grinnell, IA 50112.



DEVELOPMENT AND ALUMNI RELATIONS

**FACULTY, STAFF, STUDENTS AND VOLUNTEER
CONFIDENTIALITY/ NON-DISCLOSURE STATEMENT**

In performing their duties on behalf of Grinnell College, DAR may need to provide students, faculty, staff, and volunteers with confidential information about Grinnellians and potential donors. Due to the sensitive nature of constituent information, the “Policy on Confidentiality and Sharing of Constituent Information” must be read and agreed to prior to the release of any confidential information. Confidential constituent information must not be discussed with others. Not all confidential information can be released from the DAR office. Proper disposal of confidential information includes manual and electronic shredding or by returning the information to the Office of Development and Alumni Relations.

My signature below indicates my understanding of and agreement to comply with the Development and Alumni Relations Policy on Confidentiality and Sharing of Constituent Information.

Name (Print) _____

Signature _____ Date _____

Class Year (if Applicable) _____

Faculty/Staff/Volunteer Position (as applicable) _____

For questions regarding confidential information or to return the signed confidentiality document, please email raisersedge@grinnell.edu.