

# DONOR-DONATION PRIVACY POLICY NOTICE

## Action Pathways Privacy Policy

Respecting the privacy of our clients, donors, members, staff, and volunteers of Action Pathways is of paramount importance. Personal and financial information is confidential and should not be disclosed or discussed with anyone without permission or authorization from the individual and/or the Chief Executive Officer. Care shall also be taken to ensure that unauthorized individuals do not overhear any discussion of confidential information and that documents containing confidential information are not left in the open or inadvertently shared.

Employees, volunteers, members of the Board of Directors, and members of program Advisory Boards may be exposed to information which is confidential and/or privileged and proprietary in nature. It is the policy of Action Pathways that such information must be kept confidential both during and after employment or volunteer service. Staff and volunteers, including board members, are expected to return materials containing privileged or confidential information at the time of separation from employment or expiration of service. Unauthorized disclosure of confidential or privileged information is a serious violation of this policy and will subject the person(s) who made the unauthorized disclosure to appropriate discipline, including removal/dismissal.

All information concerning donors, clients, former clients, staff, and volunteers of Action Pathways is confidential. "Confidential" means that you are free to talk about Action Pathways and about your program and your position, but you are not permitted to disclose clients' names or talk about them in ways that will make their identity known, unless written permission is obtained and recorded. Donor history, records, financial information, and personal contact information should never be disclosed to organizations or individuals outside of the organization. Anyone with access to such information shall be bound by this confidentiality policy. No information may be released without appropriate authorization. This is a basic component of client care and business ethics. The board of directors, staff and our clients rely on paid and volunteer staff to conform to this rule of confidentiality.

Action Pathways expects you to respect the privacy of donors and clients and to maintain their personal and financial information as confidential. All records dealing with specific donors or clients must be treated as confidential. General information, policy statements, or statistical material that is not identified with any individual or family is not classified as confidential. Staff members are responsible for maintaining the confidentiality of information relating to other staff members and volunteers, in addition to clients.

Failure to maintain confidentiality may result in corrective action or termination of service. This policy is intended to protect you as well as Action Pathways because in extreme cases, violations of this policy also may result in personal liability.

## **Action Pathways Online Donations**

Action Pathways utilizes a unique online donation system interface for ease of access for donors. The Second Harvest Food Bank of Southeastern North Carolina, a program of Action Pathways, additionally employs a virtual food drive interface to engage donors. Donors choosing to make an online donation through our website or SHFB's Virtual Food Drive are directed to a payment page that encrypts the payment information for increased security. CCAP uses Secure Sockets Layer (SSL) technology to encrypt all data submitted to and from their site over the web. SSL renders donors' personal information, including credit card numbers, virtually unreadable to anyone who intercepts it. Donor and payment information is only decrypted by the Action Pathways Chief Financial Officer for processing. SSL is supported by all major browsers, including Microsoft Internet Explorer and Netscape Navigator.

## **Opt Out—Direct Mail**

Action Pathways and its associated program areas may select an outside consultant to print and distribute direct mail pieces for fundraising and/or informational purposes. The third party vendor is prohibited from using, retaining, or redistributing any contact information under penalty of law. Donors and contacts may choose not to receive direct mail or marketing materials from Action Pathways by contacting our offices or emailing [communications@actionpathways.ngo](mailto:communications@actionpathways.ngo) with your name, address and phone number and requesting to be put on our "Do Not Mail" list. Upon receipt and processing of any "opt out" request, Action Pathways will, within a reasonable amount of time, remove their information from any future marketing communications.

## **Opt Out—Email**

Action Pathways uses Constant Contact for email marketing and appeals. Email addresses in our database are collected from donors, community partners, and volunteers. An opt-out clause appears in each email sent through this service. Contacts who choose to be removed from email communications can self-unsubscribe using the link mass emails or by emailing their request to [communications@actionpathways.ngo](mailto:communications@actionpathways.ngo). Contacts who unsubscribe or who opt-out from our list using the links contained in emails are taken from our active lists and automatically added to the Do Not Mail list. Removing yourself from this list will prevent your email address from being re-added by mistake. If you choose to receive emails again, you will need to re-subscribe yourself—Action Pathways staff will not be allowed to make these addresses active again.

## **Published Donor Recognition**

Action Pathways does not share our donor's names and addresses outside the organization. Action Pathways never sells, trades, or rents donor information. We do, however, publish a list of contributors, partners, and donors in the organization's annual report. Donors also have the option to give anonymously to our organization by selecting the "Anonymous Donor" option on response forms returned electronically, in person, or via direct mail. Alternately, individuals can send a request to remain anonymous or unpublished to [communications@actionpathways.ngo](mailto:communications@actionpathways.ngo).

## ANONYMOUS DONOR CLAUSE

*For use in all print, electronic, and web-based appeals.*

\_\_\_ You may include my name in published donor recognition materials.

\_\_\_ I prefer to remain an **Anonymous Donor**. (For more information on our Donor Privacy Policy, please visit [actionpathways.ngo](http://actionpathways.ngo).)

Language must be added to the following:

- Add to all direct mail pieces through Alpha Dog.
- Add to any in-house forms or marketing material.
- Add to online donation form/virtual food drive.