

## **Donor Privacy Policy**

The Urban League Metropolitan Denver ("ULMD") is committed to respecting the privacy of our donors ("Donors"). We have developed this donor privacy policy ("Policy") to ensure Donors that all personal information of Donors ("Donor Information") is properly collected, used only for the purposes for which it is collected, and is irretrievably disposed of in a secure and timely manner when it is no longer needed.

This Policy applies to collection of information, including information collected on our website. By submitting your information to us or any of our staff, you consent to the terms and conditions of the policy and to our processing personal information for the purposes stated below.

#### **Personal Information**

In this Policy, "personal information" means information that is recorded in any form, both fact and opinion and that can be used to distinguish, identify or contact a specific individual. "Donor" refers to any individual or organization that contributes funds, securities or property to ULMD. For purposes of this Policy, "Employee" describes both paid and volunteer workers for ULMD. Here are the types of donor information that we may collect and maintain:

- Contact information: name, organization/church, mailing address, phone number, email address; DOB, gender, and
- Payment information: credit card number and expiration date, and billing information.



# Urban League of **Metropolitan Denver**

*Empowering Communities. Changing Lives.* 

ULMD and its employees are responsible for all Donor Information in our possession. ULMD shall establish, maintain, and revise practices and procedures to ensure compliance with this Policy. All employees, agents, affiliates, volunteers and contractors of ULMD are individually required to safeguard Donor Information.

Donors may notify ULMD of a privacy-related issue or grievance by contacting info@urbanleaguemetrodenver.org. We will provide information about our privacy procedures and investigate the complaint. If a problem is discovered during the review, we will take all appropriate steps to revamp our policies and procedures if necessary.

#### **Use and Disclosure of Personal Information**

ULMD collects, uses and discloses personal information only for certain purposes that are identified to a Donor. We may use it to establish and manage our relationship with a Donor, as well as providing requested information. Personal information can also help us understand a Donor and identify preferences and expectations. The main uses will involve raising money to reach our campaign goals and to process gifts and return appropriate receipts.

ULMD holds special events to create publicity for our campaign, thank supporters, and raise funds. At some of these events, a ULMD employee may obtain personal information of a Donor. If so, Donors will be advised of this fact and the information related to the event will be disposed of properly when it is no longer needed.

We collect Donor Information for internal use only, and just to the extent required for our purposes. We obtain relevant personal information about Donors lawfully and fairly.

#### Sharing or Selling of Personal Information



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ULMD will not sell, trade or rent the information and contents of Donor files to others. ULMD will not share Donor e-mail address to third parties.

#### **Donors' Consent**

ULMD only uses and discloses personal information with Donor permission. Donor permission can be in writing or implied, either verbally and/or electronically. A Donor may withdraw permission to collect, use, and disclose personal information at any time by giving ULMD reasonable notice, subject to legal or contractual obligations. A Donor may opt out of sharing of any information, including name and address, by contacting ULMD via email info@urbanleaguemetrodnver.org. When a Donor has communicated to ULMD a desire to opt out of the disclosure of his or her information, ULMD will not include the Donor's data to another organization or third party. External auditors, regulatory agency personnel, attorneys and persons operating pursuant to legal process who may be conducting audits, reviews, or other investigations, may require access to all hard copy and/or electronic Donor Information files and records in order to conduct their work. Access shall be granted for these limited purposes, subject to confidentiality agreements, to the extent possible, and with no permission allowed for further disclosure of these confidential records.

Donors who wish to avoid any public recognition may inform ULMD when making a pledge or gift. The option to remain anonymous shall be made available to Donors by ULMD and its appropriate employees. This request for anonymity shall be honored by ULMD until the Donor informs us otherwise.

#### **Custody and Care of Personal Information**

### Urban League of Metropolitan Denver

#### *Empowering Communities. Changing Lives.*

The personal information in our possession shall be kept accurate and up-to-date. Donors may always correct their personal information if they believe that our records are not correct. If a Donor feels that any of our information about them is inaccurate or incomplete, the Donor has the right to ask us to change it or delete it. If a Donor's personal information is wrong in any way, ULMD will make the required changes.

ULMD operates under the assumption that any Donor or Donor prospect has the right to review his or her record maintained by our organization. Donors may request in writing to see personal information about them that is in the possession of ULMD. Donors also have the right to know how the information is obtained and used. We will respond to Donor requests within a reasonable time, within 30 days, by either providing copies of the documents or access to the information. ULMD will generally respond at no charge to the Donor, but depending on the nature of the request and the amount of information requested, we reserve the right to charge a reasonable amount. In some situations, ULMD may not be able to provide access to all the personal information held on a Donor. Exceptions will be limited and specific as permitted or required by law, and the reasons for non-disclosure shall be communicated to the requesting party.

ULMD will keep Donors' personal information only as long as it is necessary to satisfy the purposes for which it was obtained, or as legally required. Access to Donor file materials containing personal information is restricted to ULMD employees and its affiliates which need it to do their jobs.