

Donor Privacy and Confidentiality Policy

Overview: Healthy Acadia's fundraising is grounded in our organizational values of collaboration, compassion, excellence, health equity, integrity, service, and stewardship. The foundation of our development systems and relationships is respect, trust, partnership, and equity, and we strive to reflect this emphasis in all aspects of our community engagement. Healthy Acadia prioritizes the privacy of its donors* and prospective donors** and recognizes that it is of paramount importance to maintain the trust and confidence of all. The goal of this Donor Privacy and Confidentiality Policy ("Policy") is to provide transparency as to Healthy Acadia's practices, policies and procedures for the collection, use, and protection of information which is provided to Healthy Acadia by donors and prospective donors ("Donor-Related Information"). Programmatic policies that contain more restrictive information-handling requirements, including grant funder reporting requirements, will take precedence over this policy.

Collection of Donor-Related Information: Healthy Acadia collects the following information when it is voluntarily provided or is public information: 1) Contact information, including name, organization/company affiliation, title, addresses, phone numbers, fax numbers, email addresses, dates of birth, family members and emergency contacts. 2) Donation information, including amounts donated, date(s) of donation(s), donation designation(s), and payment method(s). 3) Payment information, including credit card or debit card numbers, expiration dates, security codes, billing addresses and other information necessary to process a donation or event registration. 4) Information on print and electronic materials received. 5) Information concerning events, some types of programmatic engagement, and hours volunteered. 6) Donor comments and suggestions, and other communications between donors and Healthy Acadia team members. Healthy Acadia may collect information about donors or prospective donors under the age of 18 when voluntarily provided by parents, caregivers, legal guardians, or other approved authority, or when the age of the donor or prospective donor is unknown.

HealthyAcadia.org may contain electronic images known as web beacons (single-pixel gifs, or cookies). They are not used to access personally identifiable information; they are a technique used to compile aggregated statistics about our website usage. Web beacons collect only a limited set of information including a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. Website visitors may not decline web beacons; however, web beacons can be rendered ineffective by the website visitor declining all cookies or modifying the browser setting to notify them each time a cookie is tendered and permit them to accept or decline cookies on an individual basis.

Use of Donor-Related Information: We use information obtained from donors and prospective donors to respond to donor inquiries; to inform donors of relevant programs and services through newsletters, notices, and direct mail pieces; to understand donors' interests in our mission; to update them on the organization's plans and activities; to maintain records of donations; to issue donation acknowledgements; to analyze overall giving and engagement patterns in order to make more accurate budget projections; to develop strategies and present gift proposals; to inform planning about who receives future fundraising appeals; to organize and promote fundraising events; to analyze our website usage; and to comply with the law or with any legal process served on Healthy Acadia, for IRS purposes. Our service providers sometimes have limited access to Donor-Related Information in the course of providing products or services to Healthy Acadia related to gift processing and acknowledgements. Such access is subject to confidentiality obligations covering this information. Moreover, access to Donor-Related Information by these service providers is limited to the information reasonably necessary for the service provider to perform its function for us. For example, donations may be processed through a third-party service provider, and our donors' information will be shared with such service providers to the extent necessary to process the

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donation. Healthy Acadia may also use Donor-Related Information to protect against potential fraud. We may verify with third parties the information collected in the course of processing a gift, event registration or other donation. If donors use a credit or debit card on a Healthy Acadia website, we may use card authorization and fraud screening services to verify that the card information and address matches the information supplied to us and that the card being used has not been reported lost or stolen. Unless otherwise requested by the donor, the names of all individual donors may be printed in Healthy Acadia reports and other internal and external communications. Healthy Acadia will not publish the amount of a donor's gift without the permission of the donor, unless required by law or best fiscal practice, with the exception of business gifts, which we recognize publicly. Unless otherwise specified by the donor, the names of donors of memorial or tribute gifts may be released to the honoree, next of kin, appropriate member of the immediate family or executor of estate. When a donor requests that a gift or fund be treated as anonymous, all possible measures will be taken to ensure that the donor's wishes are honored.

Healthy Acadia may use Donor-Related Information as follows (*Donors only*): Receipting and thanking. (*Donors and prospective donors*): Providing e-newsletter access; annual report and a select number of other organizational mailings; name inclusion on print and electronic donor lists; and invitations to organizational events. Healthy Acadia may share Donor-Related Information internally with staff as required for development and programmatic purposes. Healthy Acadia complies with all federal and state laws in the use of Donor-Related Information. Donors and prospective donors may ask to be removed from our email, mailing, or phone lists at any time. If a community member determines that information in our database is inaccurate or has changed, they may modify personal information by emailing us at Development@HealthyAcadia.org or by calling us at 207-667-7171.

Use of Donor-Related Information for Donors under the age of 18: When the age of the donor or prospective donor has been voluntarily disclosed as under the age of 18 or can reasonably be surmised from context (e.g. attending high school or elementary school), Healthy Acadia will maintain these records only for limited resource development needs (e.g. maintaining accurate household records) or programmatic purposes and ordinarily will not use this information for the purposes listed in this Policy unless given consent for further engagement/recognition by a parent or guardian. However, donors or prospective donors may not always be identified at the time of data collection as under the age of 18 and exceptions to these preferred practices may occur.

Disclosure of Donor-Related Information: Protecting the confidentiality of Donor-Related Information is an essential part of the work done by our Development Team. All Donor-Related Information that is obtained by Healthy Acadia from our website, social media platforms, postal mail, email, and in-person is handled internally on a confidential basis, except as otherwise disclosed in this Policy. We never sell, rent, or lease personal information with other organizations. The use of Donor-Related Information is limited to internal purposes, by authorized individuals, and to advance resource development or programmatic efforts that require donor information. All Healthy Acadia team members are required to sign a Confidentiality Agreement for Donor-Related Information, and are expected to demonstrate professionalism, good judgment and care to avoid unauthorized or inadvertent disclosures of Donor-Related Information. Team members may share information pertaining to their own gifts, funds and grants with donors, fund beneficiaries, and grantees.

Protection of Donor-Related Information: We have established and implemented reasonable and appropriate physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access, maintain data security and ensure the proper use of Donor-Related Information. In particular, Healthy Acadia secures the personally identifiable information provided on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure. When payment information (such as a credit card number) is transmitted to other websites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol. Moreover, credit card numbers are not retained by Healthy Acadia once processed. Although we have implemented reasonable and appropriate measures to safeguard against unauthorized disclosures of Donor-Related Information, our security measures may not prevent all losses and we cannot ensure that information will never be disclosed in a manner that is inconsistent with this Policy. In the event of such security

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failures or disclosures in contravention of this Policy, Healthy Acadia will provide notice in a timely manner. Healthy Acadia is not responsible for any resulting damages or liabilities.

This Policy applies to all Healthy Acadia team members, including full and part time staff, interns, contractors, fiscal grantee partners, and volunteers. The obligations of confidentiality will apply during the term team member employment/engagement with Healthy Acadia and will survive indefinitely upon termination employment/engagement. We reserve the right to amend and modify this Policy from time to time with or without notice to donors or prospective donors. We will post any updates on the website.

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