Purpose

The Financial Manager or any other person designated by the Chief Executive Officer is responsible for updating and safeguarding EVAWI’s donor/customer database. This includes determining what type of information needs to be kept, how it will be used, and who will be allowed access to it.

Policy

We understand that donors/customers may be concerned about privacy issues that surround the use of their personal information. We will therefore strictly limit who has access to information in our donor/customer database. Care will be taken to protect a donor's confidential information at all times. On-Line credit card donations will not be stored by the organization in any way. If for some reason a donor prefers to make a credit card donation using a form or by providing information over the telephone, once the transaction is complete, all credit card information will be immediately destroyed utilizing a cross cut shredder.

Donors may also choose to make their donations anonymously.

Conditions

The Chief Executive Officer, or designated person, with approval from the Financial Committee, may provide access to donor/customer database information subject to the following conditions:

a. Purpose
   The user must inform the Financial Manager in writing, why the information is being sought. Requests for information must be made not less than thirty days before the information is required. If the database will be used to contact donors/customers, a sample of the proposed message (e.g., mailing, email) is required before approval will be granted. The final decision to release donor/customer database information rests with the Financial Committee.

b. Disclosure to Third Parties
   The information received will not be disseminated by the approved user to other groups or individuals who are not directly associated with the
approved project. In the case of information supplied to a third party as an agent of the user, that agent will also be required to abide by these conditions.

c. **Data Corrections and Update**
The user or representative of an approved user agrees to provide EVAWI with the information needed to correct or update individual records, (e.g., place of residence, occupation, job title, employer's address).

d. **Data Retention**
The data provided to the user or representative of an approved user will remain the property of EVAWI and is returnable upon request. Furthermore, individuals, groups or organizations that have been provided information will not establish an independent database with this information.

**Penalties**

An approved user, or a representative of an approved user, who violates any of these conditions may be denied subsequent access to information. In the case of a flagrant violation, such as the sale of mailing lists to outside parties, EVAWI may consider legal action.

**Data Access Restrictions**

Data released to users will be restricted as defined below:

a. **Confidentiality of Giving Records**
   All individual Giving Records maintained by EVAWI are classified as confidential and will not be released without the approval of the donor, or as required by law, or as may be released on a confidential basis to fundraising officers or campaign leaders during the course of their duties. Publication of bequests and other donations that are a matter of public record are excluded from this restriction. EVAWI may also release donor gift statistics in a non-nominative format.

b. **Restrictions on Supplementary Data**
   Specific information maintained in the database may be restricted at the request of a donor/customer, so it will not be released to other users without the written permission of the donor/customer providing that specific information.
c. **Ordering**

Any requests for donor/customer data must be submitted to the Financial Manager using the Donor/Customer Database Request Form (Appendix A). Following an initial review for compliance, all requests for donor information will be submitted to the Chief Executive Officer who will submit it to the Financial Committee for approval.

**Database Breach**

In the event of a database breach, EVAWI will immediately notify donors / customers, in writing as soon as possible.