



Policy on Confidentiality

The Community Foundation for McHenry County (CFMC) maintains and manages much information that must be kept confidential. This includes information about donors, prospective donors, grantees, prospective grantees, and wealth advisors and their firms. The effective functioning of CFMC also requires respecting the confidentiality of discussions that take place and information that is shared in the course of conducting CFMC business.

CFMC's Board has adopted this Policy on Confidentiality to assist CFMC's directors, officers, employees, consultants, agents, fiduciaries and volunteers in fulfilling their confidentiality obligations and commitments. While the policy addresses some common confidentiality concerns, it is not an exhaustive list of all situations where a confidentiality obligation may arise. Questions about whether information is confidential or about situations in which confidential information may be released or discussed should be directed to CFMC Executive Director. As used in this Policy, the term "CFMC personnel" includes CFMC's directors and officers, employees, agents, fiduciaries, consultants and volunteers.

General Rule: Information in the possession of CFMC and discussions of CFMC business should generally be presumed to be confidential. All CFMC personnel at every level are responsible for maintaining confidentiality.

Confidentiality of Donor Information: Except as required by law, CFMC will not disclose information about a donor or a donor's gift. However, unless otherwise requested by the donor, CFMC may publish the names of individual donors in CFMC's Annual Report and other reported listings. In the case of memorial gifts, CFMC will provide the names of donors to members of the immediate family unless the donor has requested anonymity. CFMC will not disclose the amount of any gift without the donor's consent. CFMC may accept anonymous gifts to it on a case by case basis.

Confidentiality with Respect to Grant Applicants and Grantees: CFMC will not disclose the identity of grant applicants except as necessary to process the application and will protect financial and personal information that applicants submit to it. This includes information provided by applicants for grants to individuals such as scholarships and hardship

assistance. Except in the case of hardship assistance grants to individuals, CFMC will generally disclose the identity of grantees and the amount awarded.

Confidentiality of CFMC Business: Except as authorized by CFMC's Board, or by an appropriate Board Committee, discussions and records of CFMC's operations are generally not to be disclosed. This includes information about CFMC's financial operations, fundraising, investments, personnel, grantmaking, and contractual relationships. The positions of individual directors, officers, employees, consultants, agents, fiduciaries, and volunteers should not be discussed, even within CFMC, except in the course of official CFMC meetings and processes where those subjects are discussed.

Exceptions: This policy does not apply to disclosures to attorneys, accountants and other professionals providing assistance to CFMC. It also does not apply to disclosures to tax authorities, government agencies, courts, or as otherwise required by law.

The following are considered public documents and information contained in them is not subject to the confidentiality requirements of this policy:

- CFMC's annual report or financial review once it has been accepted by the Board.
- CFMC's Form 990 as required to be publicly disclosed. This does not include the names and addresses of donors as that information is not required to be disclosed.
- CFMC's investment and spending policies.
- Any other documents CFMC routinely discloses such as reports on investment performance.

Protection of Confidential Information: CFMC personnel who have executed a copy of this policy may access confidential information necessary to the performance of their functions. CFMC personnel are expected to exercise sound judgment in securing information taken outside CFMC's offices or copied from its network. Any information so removed should be returned as soon as possible.

Penalties: Penalties for violating this policy can include sanction or termination of employees and removal of board members.

Approved by the Board of Directors:


Board Chair

8/19/2025
Date

9/16/2025
Date