

# A Million Thanks, Inc.

## Confidentiality Policy and Procedures

### A. General Policy

All information that is not publicly known concerning donors, former donors, staff, former staff, volunteers, former volunteers, award applicants, award recipients, (“Covered Persons”) including but not limited to financial information, medical information, or other personal information, as well as other business information of A Million Thanks, Inc. (including that of any Fictitious Business Names (“FBN”) operating under A Million Thanks, Inc.) is confidential (“Confidential Information”).

Employees, board members, and committee members are free to discuss Confidential Information with other employees, board members, or committee members, or with professional advisors to AMT, if they either already know or have a need to know such information, but they are not permitted to disclose Confidential Information at other times or with other individuals.

AMT expects all Covered Persons to respect the privacy of such Confidential Information strictly. General information, policy statements or statistical material that is not identified with any individual or family is not classified as confidential. Staff and volunteers are responsible for maintaining the confidentiality of all Confidential Information.

### B. Specific Requirements of the Policy

The operation of A Million Thanks (“AMT”) requires the maintenance and management of donor and applicant records. These records may contain sensitive information that has been shared with or developed on a confidential basis. Protecting donor and applicant confidentiality is an essential part of fulfilling AMT’s exempt purposes.

1. **Confidentiality of Records:** We will maintain the confidentiality of donor and applicant records, as well as fund information. Records will normally be available to staff as needed to fulfill their duties. AMT’s auditors, legal counsel and other contractors are authorized to review donor, applicant, and fund records as required for the purposes for which they are engaged. Other third parties are not to be provided such information.

All persons accessing donor/prospect or fund records in the conduct of AMT business shall maintain the confidentiality of said records. Staff may share information with donors, fund beneficiaries, and grantees pertaining to their own gifts, funds, grants, etc. Except in those instances, any copies of Confidential Information shall not be held outside the office for extended periods, and are to be destroyed as soon as possible.

2. **Publication of Donor Names:** We will not publish identifying information of a donor or the amount of any donor’s gift without the permission of the donor. We are required to provide donor information on our Forms 990, Schedule B (as indicated below), but we will not publish that information.

3. **Memorial/Tribute Gifts:** The names of donors of memorial or tribute gifts may be released to the honoree, next of kin, or an appropriate member of the immediate family, unless otherwise specified by the donor. Gift amounts are not to be released without the express consent of the donor.
4. **Anonymous Gifts:** Anonymous gifts to AMT may be accepted and the name of the donor and size of the gift may be withheld from the directors, if so requested by the donor.
5. **Confidentiality of AMT Business:** Discussions that take place in the context of AMT's operations require discretion, including discussions pertaining to grantmaking, personnel issues, development activities, operational fundraising, investment management, etc. The positions or statements of individual board members, advisors, or staff should not be discussed outside of official meetings and processes. The content of AMT business, including any documents and the analysis of such documents, should not be discussed or shared outside official meetings and processes.
6. **Discussion of Information:** Confidential Information about donors, applicants, grantees, and their families and friends will not be discussed for any reason except on a need-to-know basis.
7. **Required Disclosures:** AMT will comply with all public disclosure requirements, including the open availability of its Forms 990 information returns. This Confidentiality Policy shall not be construed in any manner to prevent AMT from disclosing information to taxing authorities or other governmental agencies or courts having regulatory control or jurisdiction over AMT. However, all staff, volunteers, and contractors must hold strictly confidential all information of a private nature, including, but not limited to, all items explicitly discussed in this policy.