

Policy AD001: Data Requests / Confidentiality

Recommended for Approval by: James Geiger

James Geiger, Vice President for University Advancement

Approved by:

Dr. Dale-Elizabeth Pehrsson, President

Effective Date: 2/24/23

A. Intent

To provide guidelines for the use and release of biographical information that is maintained by PennWest University and its campuses (California, Clarion, and Edinboro). If data is contained in a database administered by any of the university's respective foundations, both their data request policy and this one will be followed.

B. Definition)

The University Advancement division is charged with supporting the ongoing activities of the university by providing assistance for programs, communications and events that bring together alumni, donors and friends of the University. As the primary custodian of alumni, donor and external constituent demographic and relationship information, the University Advancement division has primary oversight to ensure that external outreach to stakeholders is as accurate, timely and effective as possible. In order to provide the best possible service to those with legitimate needs for such information, and at the same time maintain the confidentiality of the information entrusted to us, the following policies have been developed.

C. Policy.

Alumni and Donor Data Confidentiality Policy—PennWest University respects the privacy of our alumni and university community and is committed to guarding against the unauthorized use or distribution of personal alumni information. Alumni and other constituent records are proprietary information maintained by the university for official university use and are not released to the general public or business community.

Official university use includes, but is not limited to solicitations, dissemination of university news and publications, invitations to university, athletic, and alumni events, class reunion planning and activities, sanctioned university student clubs and organizations, alumni activities, and other authorized campaigns of the university. Authorized third party solicitations endorsed by the

university, such as affinity credit cards and alumni directory publications may be utilized as well.

Alumni lists or labels may be released to university volunteers only if they are to be used for university activities or projects pre-approved or endorsed by the Advancement division (Sr. VP of Advancement, VP of Development, or AVP of Alumni Engagement).

Constituent information released to volunteers may not be copied, reproduced or otherwise distributed without the specific consent of the university office that provided the information. Individuals or groups may not use PennWest University alumni lists or labels for personal, commercial, or political uses. Additionally, individuals and groups are prohibited from using lists or labels obtained from the university for creating and/or maintaining independent databases.

D. Procedure(s)

Complete the Database Request Form / Online Request Form <u>PennWest IT Services</u> (samanage.com).

- to ensure that the request is placed into the listing of requested projects and assigned to the proper Advancement Services staff member.
- If the database is managed by a campus foundation, contact both the foundation and PennWest Advancement Services to ensure request approval and data accuracy.

E. Related policies

- Mass Communication Policy—The PennWest University Advancement division (Alumni Engagement, Annual Giving and Communications departments) is the primary mass communicators to the alumni, donor and external stakeholder communities. Other offices that wish to communicate with these audiences should complete a database request form and work through the University Advancement division procedures for data requests. Every effort will be made to ensure stakeholder requests for privacy, inclusion, etc. All externally focused communication to alumni, donors and stakeholders must be approved by the Vice President for Development, Associate Vice President for Alumni Engagement or their designee.
 - Fundraising Clearance Policy—PennWest University operates a centralized development/fundraising program, with the focus on the highest annual and long-term priorities as established by the President and the university Cabinet. To this end, all fundraising initiatives directed toward external constituents (alumni, current parents, past parents, corporations, foundations, neighbors) must be approved by the Vice President for Development or their authorized designee.

F. Contact Information

Jenny Norton, Director of Advancement Services

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PennWest IT Services (samanage.com)

G. Policy Review Schedule

All policies will be reviewed every two years or on an as needed basis if a change in BOG, PASSHE or Pennsylvania law would create the need for an immediate change.