

DATA SHARING AND USE POLICY

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Foundation

I. Introduction

This policy governs the use and release of all information held by the University of Wisconsin Oshkosh Foundation ["Foundation"] about its donors and University of Wisconsin Oshkosh ["University"] alumni. The Foundation has full ownership and control of this information regardless of where the data may be located or in what format. This policy does not apply to any documents that are legally required to be shared with the public.

Information in the possession of the Foundation and discussions of Foundation business should generally be presumed to be confidential. All Foundation personnel and all University personnel working with the Foundation are responsible for maintaining confidentiality of this information.

The Foundation's Executive Director shall be responsible for maintaining confidentiality and for approving the release of information to internal or external audiences for purposes that benefit the University or Foundation. Each individual is responsible for ensuring that data released to them is used in an appropriate manner for its authorized purpose and for maintaining the confidentiality of the information pursuant to these guidelines.

II. Alumni and Donor Records

The University's primary source of information about donors and alumni is the Raiser's Edge database. All information contained within this database is confidential and to be used solely for constituent relations, fundraising, or analytical purposes.

Access to the Raiser's Edge alumni/donor database is limited to staff authorized by the Foundation's Executive Director. Users must read, sign, and comply with the "Database Confidentiality Agreement."

The Raiser's Edge database is the central repository for constituent information and there should be no separate databases maintained on campus. If information has been collected in separate databases by colleges, programs, or departments, it should be shared with the Raiser's Edge database administrator so the database can be updated if necessary. This ensures that all campus areas have access to the most current and accurate information available and that alumni and donors' communication preferences are honored.

III. Alumni and Donor Data Requests

Campus personnel may request reports, mailing, or email lists from the Raiser's Edge database. Mailing or email lists will only contain information that is pertinent to the respective communication method and purpose of the request.

A. *Submitting a Data Request*

Requests for alumni information must be made using the Alumni Data Request Form.

Advancement staff may request donor information using the Alumni/Donor Data Request Form.

The Foundation's Executive Director will review and approve appropriate requests. Timing of alumni mailings or email communication must also be approved by University Marketing and Communications ["UMC"] before requests are processed.

A minimum of 14 calendar days must be allowed for requests to be reviewed, approved, and processed. Special consideration may be given for last minute requests and will be evaluated based on available resources.

B. Security and Compliance

It is the responsibility of the individual requesting and receiving the information to ensure that any electronic files or print documents are secure while in their possession and properly disposed of (i.e. deleted or shredded) immediately when the users are finished with them.

All UW Oshkosh email communications must be in compliance with the CAN-SPAM Act of 2003:

- False or misleading header information is not permissible. An email's "From," "To," and routing information – including the originating domain name and email address – must be accurate and identify the person or business who initiated the email.
- Subject lines must accurately reflect the content of the message.
- Email recipients must have an opt-out method.
- Emails must include the sender's valid physical postal address.
- Opt-out requests must be honored promptly. Any opt-out mechanism offered must be able to process opt-out requests for at least 30 days after the message is sent. Opt-out requests must be honored within 10 business days.

All alumni data provided from the Raiser's Edge database is provided on a one-time use basis for the purpose identified in the data request. Lists must be used within a reasonable timeframe (generally one week for email lists and one month for mailing lists). If timing of the communication changes, a new list must be requested and UMC must be notified.

It is the responsibility of the data user to comply with opt out requests and provide information received from alumni as a result of the communication. Opt out requests and alumni updates including new address, employment, or other biographical information should be sent to alumni@uwosh.edu immediately upon receipt so the University remains in compliance with the law and the Raiser's Edge database can be properly maintained.

It is the responsibility of the data user to ensure the unsubscribe language provided to them is included in their email communication.

IV. Release of Constituent Information Without Prior Consent

If an individual requests contact information for another constituent, the requestor's contact information will be provided to the constituent, who will then choose whether or not to respond.

Information will not be released to groups or individuals outside the University, unless specifically authorized by the Foundation's Executive Director.

V. Release of Scholarship Recipient Information

Scholarship recipients' "directory information" (including but not limited to name, address, phone number, email address, and major) will be released to their respective scholarship donor(s), along with any post-acceptance information submitted by the student in Academic Works.

Any scholarship recipient who has submitted the Nondisclosure Form through the Registrar's Office will be contacted for approval to release their information to their scholarship donor(s).

VI. Release of Donor Information to Scholarship Recipients

The scholarship donor's name and contact information will be provided to the award recipient for stewardship purposes.

VII. Release of Fund Information

Only the establishing donor, invested family members, and the appropriate campus fund managers (authorized signatory and their delegate) are authorized to receive fund balances.

The establishing donor and invested family members will receive an annual report which shall include the fund balance(s), the total amount of gifts that were made to the fund during the past year, the names of the donors who made gifts to the fund during the past year, and a brief summary of how funding was used over the past year.

Campus fund managers shall receive fund balances upon their request. Fund managers may also request to receive monthly or quarterly reports, if necessary. These reports shall only include summary balances for each of the funds they manage. A report including past expenditure detail shall be provided upon request.

VIII. Release of Gift Information for Stewardship Purposes

Coordinators of specific fundraising efforts may request names and contact information of donors by submitting an Alumni/Donor Data Request Form. Total amount received (not individual gift amounts) may be shared.

Names and contact information of donors may be released to University administrators for stewardship purposes upon their request. Individual gift amounts will only be shared if necessary.

Names and contact information of honor or memorial gift donors may be released to the honoree or appropriate family member at their request, unless otherwise specified by the donor. Total amount received (not individual gift amounts) may be shared.

IX. Requests for Anonymity

Each graduating class is imported into the Raiser's Edge database. Students who have requested their directory information not be released as part of the federal Family Educational Rights and Privacy Act (FERPA) will be coded and treated accordingly.

Donors who request their gift to remain anonymous will be coded accordingly and their gift information will not be released or publicized.

X. Communication Preferences

Constituents have the ability to indicate their communication preferences.

The following designations are used in the Raiser's Edge database to track communication preferences of constituents:

- Alumni do not contact: Alumnus does not wish to receive communication regarding alumni events, University/department newsletters, etc.
- FERPA: Alumnus submitted Nondisclosure Form as a student; alumnus receives no communication and is not publicly acknowledged as a former student.
- Foundation do not contact: Constituent does not wish to receive solicitations or other communication from the Foundation.
- No Phone Calls: Constituent does not wish to receive gift solicitations via phone.
- No contact from either office: Constituent does not wish to receive any communication.
- No emails: Constituent does not wish to receive email communications.
- No outside solicitations: Constituent does not wish to receive communication from external organizations.