CULTIVATING CONNECTIONS
MONTANA

Donor Privacy and Confidentiality Policy

1. Purpose

Cultivating Connections Montana ("CCMT") values the trust of the individuals, businesses, foundations, and community partners who support our mission to Build Community Through Food. CCMT is committed to respecting donor privacy and protecting personal and financial information entrusted to the organization.

This policy establishes how CCMT collects, uses, stores, shares, and protects donor information and how donors may express preferences regarding communications, recognition, and use of their personal information.

2. Scope

This policy applies to information received from former, current, and prospective donors through all methods of giving and communication, including:

- CCMT's website and online donation platforms;
- Checks, cash gifts, and other offline donations;
- Event registrations and fundraising activities;
- Telephone, email, mail, and in-person communications;
- Grants, sponsorships, and in-kind contributions;
- Planned gifts, matching gifts, and donor-advised fund distributions; and
- Social media or third-party fundraising campaigns benefiting CCMT.

This policy applies to CCMT's Board members, employees, volunteers, interns, and other individuals who are authorized to access donor information.

3. Donor Information CCMT May Collect

Depending on the donor's interaction with CCMT, the organization may collect and maintain:

- Name;
- Mailing address, email address, and telephone number;
- Donation amount, date, type, payment method, and giving history;
- Gift designation, restrictions, or intended purpose;
- Employer or matching-gift information;
- Event attendance, sponsorship, volunteer participation, or other involvement with CCMT;
- Donor communication preferences;

- Tribute, memorial, or honorary gift information;
- Comments, correspondence, requests, and other information voluntarily supplied by the donor;
- Information necessary to issue acknowledgments, receipts, and required reports; and
- Limited technical information collected through CCMT's website or authorized service providers.

CCMT will seek to collect only the information reasonably necessary to process and acknowledge gifts, maintain accurate records, communicate with supporters, comply with legal obligations, and advance CCMT's charitable mission.

4. How Donor Information May Be Used

CCMT may use donor information to:

- Process, record, and acknowledge donations;
- Provide charitable donation receipts and year-end giving summaries;
- Honor a donor's gift designation or restrictions;
- Communicate about CCMT programs, events, accomplishments, volunteer opportunities, and giving opportunities;
- Respond to donor questions, requests, and concerns;
- Maintain accurate financial, development, and organizational records;
- Recognize donors and sponsors when permission has been given or when recognition preferences have otherwise been established;
- Evaluate and improve CCMT's fundraising and donor-stewardship efforts;
- Prevent fraud, unauthorized transactions, or misuse of CCMT resources; and
- Fulfill applicable legal, accounting, grant, audit, and reporting requirements.

CCMT will not use donor information in a manner that is inconsistent with this policy or with a donor's documented instructions.

5. Sale, Rental, or Exchange of Donor Information

CCMT will not sell, rent, trade, exchange, or provide its donor lists or donors' personally identifiable information to other organizations for their independent fundraising, marketing, or commercial purposes.

CCMT will not send communications to its donors on behalf of another organization unless the donor has given permission or the communication is part of an authorized CCMT partnership and does not disclose the donor's personal information to the partner.

6. Service Providers and Authorized Disclosures

CCMT may provide limited donor information to trusted service providers when necessary to perform services for CCMT, such as:

- Processing donations and payments;
- Maintaining donor or accounting records;
- Distributing authorized mail or email communications;
- Registering participants for events;
- Providing technology support;
- Conducting financial reviews or audits; or
- Providing legal, accounting, insurance, or professional services.
- Service providers should receive only the information reasonably necessary to perform their authorized services. When practical, CCMT will use providers that maintain appropriate privacy and security practices and restrict the use of donor information to the work performed for CCMT.

CCMT may also disclose donor information when:

- The donor has authorized the disclosure;
- Disclosure is necessary to complete a donor-requested transaction;
- Disclosure is required by law, court order, tax reporting requirement, audit, or governmental inquiry;
- Disclosure is necessary to protect CCMT, a donor, or another person from suspected fraud, unlawful activity, or a credible threat to safety; or
- Information is provided in an aggregated or de-identified form that does not reasonably identify an individual donor.

7. Payment Information

Credit and debit card transactions may be processed through third-party payment platforms or financial institutions. CCMT will not intentionally retain full credit or debit card numbers in its general donor, accounting, or administrative records.

Payment providers may collect and maintain information according to their own privacy and security practices. CCMT will limit access to payment-related information to individuals who require it for authorized organizational responsibilities.

8. Donor Recognition and Anonymity

CCMT is committed to maintaining private donor anonymity and to keeping private donor names and donation information confidential. Sponsors may be recognized in annual reports, event materials, newsletters, social media, donor displays, grant reports, or other communications. However, donors may request:

- Recognition;
- Recognition under a different name;
- Recognition without disclosure of the gift amount; or
- Recognition within a general giving range.

CCMT will make reasonable efforts to honor a donor's documented recognition preferences. Anonymous treatment in CCMT's public communications does not prevent CCMT from retaining information internally or making disclosures required by law.

9. Donor Communication Preferences

Donors may request at any time to:

- Stop receiving fundraising solicitations;
- Stop receiving mail, email, telephone, or text communications;
- Receive communications less frequently;
- Correct duplicate or inaccurate contact information;
- Change their preferred method of communication; or
- Continue receiving program updates while opting out of fundraising requests.

CCMT will make reasonable efforts to record and honor these requests promptly. CCMT may retain limited information necessary to document and respect an opt-out request and may still send legally required notices, donation receipts, or communications concerning an active transaction.

10. Access and Correction

A donor may contact CCMT to request a review or correction of the personal information maintained about them. CCMT may take reasonable steps to verify the identity and authority of the person making the request before providing or changing information.

CCMT may decline a request when retaining the information is required by law, necessary for financial accountability or fraud prevention, or required under CCMT's Board-approved Document Retention and Destruction Policy.

11. Confidentiality and Access

Access to identifiable donor information will be limited to individuals who require the information to fulfill authorized responsibilities on behalf of CCMT. Board members, employees, volunteers, interns, and others with access to donor information shall:

- Use donor information only for authorized CCMT purposes;
- Avoid discussing confidential donor information in public or inappropriate settings;
- Refrain from copying, downloading, photographing, removing, or sharing donor records without authorization;
- Protect passwords, devices, files, and paper records;
- Store donor information only in locations and systems approved by CCMT;
- Promptly report lost records, misdirected communications, suspicious activity, or unauthorized access or disclosure; and
- Return or securely dispose of donor information when access is no longer required.

These confidentiality responsibilities continue after an individual's employment, service, volunteer role, Board term, or contractual relationship with CCMT ends.

12. Information Security

CCMT will take reasonable administrative, physical, and technological measures appropriate to the organization's size and resources to protect donor information against unauthorized access, loss, misuse, alteration, or disclosure.

No method of storage or electronic transmission can be guaranteed to be completely secure. If CCMT becomes aware of an incident involving donor information, the organization will evaluate the circumstances, take reasonable corrective action, and provide any notification required by applicable law.

13. Record Retention and Destruction

Donor and donation records will be retained and destroyed in accordance with CCMT's Board-approved Document Retention and Destruction Policy, applicable legal requirements, accounting needs, gift restrictions, and grant or audit obligations.

When donor information is no longer required to be retained, CCMT will take reasonable steps to dispose of it securely.

14. Policy Administration

The Executive Administrator, or a person designated by the Executive Administrator, is responsible for implementing this policy, maintaining donor communication and recognition preferences, addressing questions or complaints, and ensuring that individuals with access to donor information understand their responsibilities.

Material privacy or security concerns involving donor information shall be reported to the Board of Directors as appropriate.

15. Contact Information

Questions, corrections, communication preferences, or privacy requests may be directed to:

Executive Administrator
Cultivating Connections Montana
175 Skalkaho Highway
Hamilton, MT 59840
Email: support@cultivatingconnectionsmt.org
Phone: 406-363-6627

16. Review and Amendment

The Board of Directors will review this policy periodically and may amend it as necessary to reflect changes in CCMT's practices, technology, service providers, legal obligations, or organizational needs.

Adopted by the Board of Directors on: 10/14/2026

Board Chair Signature: _____

Board Chair: Gerald A. Johnson

Board Secretary Signature: _____

Board Secretary: Mary Garber