



University of Dallas

Advancement

**Security of Donor and
Alumni Data Policy**

POLICY AVD

Responsible Executive:
Vice President for Advancement
Responsible Office:
Office of Advancement
Issued: 9.10.21
Revised: n/a

1. PURPOSE

The University recognizes the expectation of its donor and alumni community to protect the privacy of personal information and has adopted this policy to protect Personal Donor and Alumni Data and to provide donor and alumni with appropriate control over the use, accuracy and availability of their personal data.

- 1.1. **Scope.** This policy applies to all University offices that interact with donor and alumni data.
- 1.2. **Applicability.** All faculty, students, staff, volunteers, and contractors are expected to comply with this policy with respect to any solicitation activity or receipt of donations involving the University of Dallas.

2. UNIVERSITY DONOR AND ALUMNI RECORDS

The University maintains a central database of Personal Donor and Alumni Data subject to the authority of the Vice President for University Advancement. No other database of Personal Donor and Alumni Data shall be maintained by any other faculty, college, unit or department of the University with the exception of the Office of Personal Career Development which may maintain alumni records for the purpose of facilitating the activities of that office and not for the purposes of facilitating philanthropic activities or alumni-oriented outreach, service, development and engagement programs as described in this policy.

- 2.1. **Process for Requesting Access to Personal Donor and Alumni Data.** Faculty, colleges, units and departments may request access to Personal Donor and Alumni Data for use consistent with this Policy by submitting a written request to the Vice President for University Advancement, including specific details regarding the intended use, to confirm permissible disclosure as set forth in this Policy. Upon approval by the Vice President for University Advancement, the requestor assumes ultimate responsibility: (1) to protect the security of the requested Personal Donor and Alumni Data, (2) to limit use of the Personal Donor and Alumni Data to the objective set forth in the request for disclosure, and (3) to destroy the requested Personal Donor and Alumni Data after the objective of the project is achieved.
- 2.2. **Donor and Alumni Requests Not to Disclose Personal Data.** Donor and Alumni who provide personal data to the University will be provided the opportunity to request confidentiality and nondisclosure of their personal information. Personal data for any donor or alumni requesting confidentiality of their personal information shall be excluded from any information disclosed in accordance with the terms of this policy.
- 2.3. **No Disclosure of Social Security Numbers.** The University will only collect donor and/or alumni social security numbers in very limited circumstances to facilitate tax reporting obligations. The

University will take specific measures to secure the social security numbers of donors and alumni and under no circumstances will any donor or alumni social security numbers be disclosed except in accordance with law.

3. RESTRICTIONS ON THE USE AND DISCLOSURE OF PERSONAL DONOR AND ALUMNI DATA

Except as specifically provided for in this policy, the University will not use or disclose Personal Donor and Alumni Data to any individual or organization other than University officials for the purpose of facilitating philanthropic activities or alumni-oriented outreach, service, development and engagement programs. Within this limited scope of disclosure, Personal Donor and Alumni Data will only be disclosed on a “need to know” basis which will be specifically confirmed in writing and approved by the Vice President for University Advancement prior to disclosure.

- 3.1. **Volunteers.** Personal Donor and Alumni Data may be shared with approved University volunteers engaged in annual solicitation events and/ or alumni events upon confirmation by the Vice President for University Advancement that disclosure of the data is necessary for the purposes of conducting University business and will not otherwise compromise donor and/ or alumni privacy protections. Prior to any volunteer service, University volunteers must provide written confirmation of their agreement not to disclose Personal Donor or Alumni Data for any purpose other than the scope identified in their volunteer project.
- 3.2. **Alumni Organizations.** The University may provide alumni clubs, affinity groups, student groups, regional representatives, class representatives and other volunteers with access to Personal Donor and Alumni Data upon confirmation that: (1) the data will only be used in a manner consistent with this policy and with any privacy protections expressed by the donor or alumni and, (2) upon written agreement by a representative of the group that they will abide by all privacy and security requirements related to Personal Donor and Alumni Data.
- 3.3. **Service Providers.** The University may provide Personal Alumni Data to organizations that offer products and services that provide a significant and desired benefit to alumni upon confirmation that the data will be used consistently with any privacy protections expressed by the alumni and upon written agreement to abide by specific privacy and security requirements.
- 3.4. **Students and Alumni.** On a case-by-case basis, the Vice President for University Advancement may approve requests for limited and specific disclosure of Personal Alumni Data to students or alumni indicating an interest in networking with University alumni to pursue professional opportunities. Personal Alumni Data will not be disclosed in regard to alumni specifically requesting privacy of their personal data.
- 3.5. **Legal Requirements.** The University will provide Personal Alumni Data consistent with authority established in federal law including directory information unless disclosure is specifically prohibited as provided for in the Family Education Rights and Privacy Act, information required to be disclosed in connection with judicial or administrative proceedings, or if such disclosure is necessary to protect health, safety or property.

- 3.6. **No Disclosure to Third Parties.** Except as provided for in section 3.3 of this Policy and in order to facilitate delivery of University mailing, the University will not disclose Personal Donor and Alumni Information to any third party for their independent use not associated with University alumni or fundraising activities unless specifically authorized by the individual donor or alumni in advance.
- 3.7. **No Disclosure for Political Purposes.** In accordance with regulations governing tax exempt organizations as set forth in Internal Revenue Service regulations, the University will not disclose Personal Donor and Alumni Information for any political purpose, under any circumstances.

4. DEFINITIONS

- 4.1. **“Personal Donor and Alumni Data”** means personally identifiable information collected from University donors and graduates of the University of Dallas after the individual is no longer a student. Information may include the donor or graduate’s name, address, telephone number, email address, employer, occupation, year of graduation and degree conferred by the University.
- 4.2. **“University Donor and Alumni Records”** means the database of donor and alumni records maintained in the Office of University Advancement that are subject to the oversight of the Vice President for University Advancement.
- 4.3. **“University”** and **“the University”** mean the University of Dallas.

5. RESPONSIBILITIES

Responsible Party	List of Responsibilities
Office of General Counsel	1. Oversee compliance with this Policy.
Office of Advancement	1. Monitors compliance with this Policy. 2. Maintain University Donor and Alumni Records.
Other Offices / Departments	1. Work with the Office of Advancement, and in accordance with this Policy, when using Personal Donor and Alumni Data.

6. PROCEDURES

Task	Procedure
Maintain and manage University Donor and Alumni Records	1. Gather relevant Personal Donor and Alumni Data. 2. Update Personal Donor and Alumni Data in University Donor and Alumni Records, as needed.
Coordinate use of Personal Donor and Alumni Data	1. Receive requests to use Personal Donor and Alumni Data. 2. Evaluate and decide requests. 3. Coordinate persons using Personal Donor and Alumni Data.

7. POLICY ENFORCEMENT

Enforcement	The Office of General Counsel or Office of Advancement will investigate suspected violations of this Policy, and take appropriate action in accordance with University policy.
Reporting Violations	Report suspected violations of this Policy to the Office of General Counsel or Office of Advancement.

8. RELATED DOCUMENTS

Policy or Document	Web Address
Office of Advancement	https://www.udallas.edu/offices/advancement

9. CONTACTS

Subject	Office or Position	Telephone Number	Office Email or URL
Policy Clarification	Office of General Counsel	(972) 721-5363	hlachenauer@udallas.edu
Implementation	Office of Advancement	(972) 721-5148	advancement@udallas.edu
Web Address for this Policy		https://udallas.edu/about/university-policies/index.php	