Advancement Alumni & Donor Data Sharing Policy

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Purpose

It is University policy to reasonably and appropriately protect the confidentiality, integrity, and availability of the University's information assets commensurate with their risk and value while at the same time maintaining accessibility. This Policy governs the use and release of all information and data managed by Advancement about alumni, parents, donors, and donor prospects (collectively "advancement constituents"). The information and data are considered institutional data and an essential resource in delivering Advancement's core mission. The information about advancement constituents includes information and data of any kind and in any medium, whether created by, acquired by, maintained by, disposed of, or granted access to by Advancement, in addition to the associated information technology system, software, and applications provided by the University or external third-party vendors that store, access, process, or transmit the information and data.

This policy governs the use and release of all information and data about advancement constituents by Advancement to members of the University community, internal users, and third-party vendors.

By implementing this policy, the University will:

- Ensure reasonable controls, processes, practices, and procedures are established and maintained by Advancement to manage and safeguard the information and data about the advancement constituents and the associated technology assets, including the granting of access to the information and data to approved University community, internal and external parties,
- Govern the use of information and data about the University's advancement constituents by Advancement and Alumni Engagement personnel and other users of the information and data to promote the responsible use of the information, maintain positive relationships, foster engagement with the alumni and donor community, and ensure the advancement constituents' privacy is respected and protected,
- Comply with all Federal, State, and local laws, regulations, University policies, and applicable agreements binding the University, and ensure activities related to the stewardship of the

information and data about the advancement constituents operate effectively, responsibly, and ethically,

- Ensure this Policy is consistently applied and monitored through the use of a compliance program.

Scope

This policy applies to all members of the University of San Francisco community, both internal and external, and includes but is not limited to students, faculty, staff, affiliates, contractors, and volunteers in all locations, both on- and off-campus.

Responsibilities

- The Vice President of Advancement (VP-Advancement) owns this policy and is responsible for the advancement, deployment, and maintenance of this policy with consultation from the Office of the General Counsel (OGC) and the Vice President and CIO, Information Technology Services (VP-CIO).
- Assistant Vice President, Advancement Operations (AVP-Advancement Operations) and the Assistant Vice President, Engagement (AVP-Engagement) are key stakeholders and contributors to this policy.
- The remainder of the advancement leadership team, along with the VP-Advancement are responsible for upholding and disseminating this policy among their respective staffing areas.
- The AVP-Advancement Operations is responsible for ensuring the information assets are secure from unauthorized access (to maintain appropriate confidentiality), unauthorized alterations (to maintain integrity), and granting access to approved authorized Users (to maintain availability), enabling the University to meet its mission in an effective and timely manner.
- The University Leadership Team is responsible for championing this policy and supporting processes and practices in their respective Divisions, Schools, and Colleges, and any substantive revisions as recommended by the AVP-Advancement.
- The AVP-Advancement Operations is responsible for approving and ensuring ongoing compliance with this policy and will be involved in partnership with the VP-Advancement in any proceedings relating to applicable parties' failure to comply.
- Both internal and external users with access to the information about the advancement constituents are responsible for safeguarding and maintaining the privacy of the information assets they use, access, and interact with, even if they do not have primary responsibility for managing them, and for complying with this Policy.
- The VP-CIO coordinates the ITS response to information security incidents, violations, or crimes committed under this policy. The Department of Public Safety is responsible for working with AVP-Advancement and ITS to conduct investigations, prepare reports for the appropriate

authorities, and support authorities conducting their own investigations.

- All Users, including third parties, entrusted with the University's information and data are responsible for being familiar with and complying with this Policy. All Users have individual and shared responsibilities to protect the confidentiality, integrity, and availability of the information about advancement constituents in accordance with University policies, Federal, State, and local laws, regulations, and agreements binding the University. Users are required to take information security and awareness training appropriate to their role in support of this Policy.
- The information assets are for University use and must not be used for non-University purposes without prior approval.
- The Office of General Counsel (OGC) will provide legal guidance to this policy.
- Failure to comply with this policy can result in actions to limit, suspend, revoke, or deny access to the University’s information assets. Members of the University community who knowingly violate this policy may be subject to disciplinary actions that include but are not limited to the policies and procedures contained in the Staff Handbook, the Student Handbook (Fogcutter), applicable Collective Bargaining Agreements, and laws which may include civil and criminal prosecution.