



## CU Advancement Data Sharing Policy for Employees and Volunteers

Please review this policy before completing the form.

After completing the [CU Denver Advancement Data Request Form](#) and a staff member will follow up with you accordingly.

Approved by Advancement Data Council (ADC) Executive Committee 2019  
Announced February 2020

### Introduction

**This document is to provide employees and volunteers of the University of Colorado Office of Advancement with the principles around data sharing, in order to safeguard the interests of our organization, our employees, our volunteers and donors.** The advancement process rests upon the relationships we create with and among our supporters, and the need to protect those relationships is one of our highest priorities. The nature of the work we do often involves information of a confidential nature, requiring us to exercise care and caution in protecting the privacy of others. These guidelines build upon established organizational and professional policies and offer specific instructions for the careful management of sensitive data.

**Discretion in sharing data outside of Advancement must always be taken.** There are situations where sharing requested data should not occur. Understanding the business needs and purpose for the data is paramount before sharing ANY data outside of Advancement. **Advancement staff should consult with their managers for questions or concerns in sharing data outside of Advancement.**

### General Principles

All employees and volunteers of the University of Colorado are responsible for following the established policies and standard operating procedures regarding the appropriate use of confidential, proprietary, and highly sensitive information with the goal of protecting the privacy of our constituents.

There are multiple laws that may apply to data on donors and prospective donors to the University of Colorado, including but not limited to Family Education Rights and Privacy Act (FERPA), Health Insurance Portability and Accountability Act of 1996 (HIPAA), and General Data Protection Regulation (GDPR).

We abide by:

- ☐ [CU Privacy Policy](#)
- ☐ CU campus privacy statements
  - [CU Boulder](#)
  - [CU Denver/Anschutz](#)
  - [UCCS](#)

We are further guided by ethical policies and guidelines of relevant professional associations, notably:

- ☐ [AFP Code of Ethical Standards](#)

- 🔗 [APRA Statement of Ethics](#)
- 🔗 [AFP Donor Bill of Rights](#)

Data gathered and maintained by employees, volunteers or consultants of the University of Colorado – at the international, national, regional, and local levels – is considered institutional data. **The University of Colorado owns institutional data, and each authorized user of this data is responsible and held accountable for its appropriate and authorized use.**

**Use of donor data for purposes other than for Institutional Advancement, especially for commercial, personal, or political purposes, including the sale of data, is strictly prohibited. Advancement purposes include engagement, cultivation, and solicitation.**

Information maintained in hard copy or electronic files as part of an official university record shall be viewed only by authorized University of Colorado employees and representatives (including selected volunteers) who need such information for legitimate institutional advancement business.

**Data shared outside of the Advancement Division is prohibited to be stored outside of Advancement’s CRM and any documents shared must be shredded.**

**Only the minimally needed confidential information should be provided by Advancement staff to non-Advancement staff and volunteers.**

## Definitions

Please refer to The University of Colorado’s [Data Classifications & Impact Guidelines](#) for full definitions (<https://www.cu.edu/ois/data-classifications-impact>)

**Highly Confidential Information** – This category includes data elements that require protection under laws, regulations, contracts, relevant legal agreements and/or require the institution to provide notification of unauthorized disclosure/security incidents to affected individuals, government agencies or media. Advancement related highly confidential items includes things like:

- Protected health information
- Social security numbers
- Payment card numbers
- Financial account numbers: including university account numbers, student account numbers, and faculty and staff direct deposit account numbers
- Driver’s license numbers
- Health insurance policy ID numbers
- Level 4 and 5 of Student Data (SSN, NID, Financial Aid (except work study), loan and bank account numbers, health information, disability, race, ethnicity, citizenship, legal presence, visas, religion, sexual orientation, sex at birth)

**Confidential Information** – This category includes data elements not usually disclosed to the public but are less sensitive than Highly Confidential data. If a legally required and applicable Colorado Open Records Act (CORA) request is submitted, these records may be released. Advancement related confidential items includes things like:

- Contents of project files, strategic plans, terms, and conditions of gift agreements completed or under negotiation

- Donor information such as appraisals and giving histories
- Any donor or fundraising strategy information that would pose a problem to CU were it accessed by unauthorized individuals through a breach of data security is considered confidential. Donor contact information and non-public gift amounts, including but not limited to:
  - o Records of gifts that a donor wishes to be publicly anonymous
  - o Any document mentioning a specific gift or range of gifts connected to a donor or group of donors not approved for public release
- Fundraising information
- Non-public policies
- University and employee ID numbers
- Internal memos and email, and non-public reports
- Proprietary information limited to authorized employees and selected volunteers of CU. Examples of Proprietary information would include:
  - o Fundraising status reports that do not include specific donor names
  - o Fundraising activity reports
  - o Information about specific programs that does not include discussion of specific donor strategies

**Donor/alumni names and contact information are considered confidential and cannot be shared for non-Advancement purposes. When donors and alumni wish to contact each other, no information can be released to the inquiring person. Instead contact information can be collected from the inquiring person and shared with the person being inquired after.**

**Public Information** – Information is considered public when the University of Colorado does not place limits on media in which it may appear or the persons who may have access to it. Advancement related public items includes things like:

- Donor names with designated gift levels to be published in any form of annual report and/or posted on CU web sites. (excluding anonymous)
- Donor-approved press releases, announcing specific gifts
- Information about donors who provide named funds shared in materials about programs their funds support. In general, only information the University of Colorado chooses to make public for recognizing contributions and/or attracting similar support from other potential donors will be considered public. Even data gathered from public sources, such as wealth screening information, which is then converted to CU donor data, shall be treated as