

Alumni Foundation Database

Procedures

The Alumni Foundation Database is the sole source of data to be used by all University units for directing newsletters, invitations, solicitations or other structured communication with alumni and non-alumni supporters. Units are explicitly prohibited from maintaining any database to support these types of communications.

This requirement covers all such communication whether delivered physically or electronically. (It is understood that employees will have personal contact lists consisting of phone numbers, email and address lists useful to their University responsibilities. These lists are, however, not to be used for the types of communication described.) The purpose of this requirement is to properly secure personal data and to centralize all contact information to assure greater accuracy, avoid duplicate messaging and enhance the currency and dimension of the database. See Access section below for direction for to use of the Alumni Foundation Database to support unit initiatives.

Purpose, Responsibility and Ownership

The University is responsible for maintaining data used to facilitate ongoing contact and communications between The University of Montana and its alumni. The Foundation is responsible for maintaining donor contact, biographical and giving data, as well as maintaining the overall database to serve as a comprehensive tool for stewardship of existing donors and development of future donors.

The University is responsible for maintaining the sufficiency, currency and accuracy of the Directory Information¹ (except employer name and title or position), of all alumni who have been awarded an academic degree by The University of Montana. The University also maintains similar information on many former students who have earned twelve or more credit hours but did not receive a degree and certain current students of The University of Montana. Finally the University also maintains similar information on other University-related constituents (for example current and past regents, state legislators, Alumni Association board members, etc.). This information is included in the Alumni Foundation Database and is known as the Alumni Directory Data. The University owns and controls the use and distribution of all Alumni Directory Data.

The Foundation is responsible for maintaining the sufficiency, currency and accuracy of the (1) Directory Information¹ of all non-alumni constituents not described above, namely non-alumni donors

and potential donors as well as other Foundation-related constituents whether foundations, businesses or individuals, (2) information on the dates, amounts and designations of all gifts and pledges made to the Foundation whether from alumni or non-alumni constituents, and (3) supplemental information beyond basic Directory Information¹ on all alumni and non-alumni constituents in the Alumni Foundation Dataset. The Foundation may (at its sole discretion) also procure, enter and maintain employer information, included as Directory Information¹ as it relates to alumni. (The Foundation makes no representation to the University as to the sufficiency, currency and accuracy of this employer information.) The Foundation owns and controls the use and distribution of all data included in the dataset that is not Alumni Directory Data (known as Foundation Data).

The Foundation and the University may seek either jointly or separately to expand the number of people in the dataset in both existing and new classes, such as alumni, event attendees, or specific groups, to support their missions. Once added to the dataset, the added data shall still be governed by the parties as described above.

Database Maintenance

The Foundation is responsible for the general support and maintenance of the Alumni Foundation Database. The Operating Agreement between the University and The Foundation shall govern where the database is hosted, who provides security, DBA support, and who is responsible for business continuity including data backup, data restoration, and disaster recovery.

The Operating Agreement shall address compensation paid to the University and the Foundation for these services.

Privacy

The University values the privacy of its students and alumni and will ensure their rights are respected. Likewise the Foundation values and will respect and protect the privacy and confidentiality rights, requests and demands of its friends, constituents, donors and prospective donors, especially as they relate to gifts and pledges made to the Foundation. Neither the University nor the Foundation will disclose the contents of the Alumni Foundation Dataset to anyone other than an employee or authorized representative of the University or the Foundation, as determined by the Office of Alumni Relations or the Foundation, who is conducting official business on behalf of and in support of the University's or the Foundation's mission.

The University or the Foundation may transfer extracts of data to external vendors to validate data including addresses, telephone numbers, email addresses, places of employment, and financial

ratings and capacities. These transfers will all be done in a way that guarantees the data is only used for the intended purpose, and is not exposed or used by the vendor after the update is complete.

Any individual, business, or organization whose information is contained in the dataset shall have the right and opportunity to choose not to receive communications from the University or The Foundation by “opting out” of either all communications or specific subsets of communications defined by the University or the Foundation, except that communications deemed necessary to send by the University because such communications have direct and material effect on the recipients may be sent regardless of constituent “opt out” status. Furthermore, the University and the Foundation will use best efforts and industry practices to ensure the data is kept confidential and used only for appropriate University-related purposes. Any employee of either the University or the Foundation found to be improperly using the Alumni Foundation Database or extracted data will face appropriate consequences, up to and including dismissal and legal action. Employees of both the Office of Alumni Relations and the Foundation shall sign a confidentiality statement regarding the access and use of information contained in the Alumni Foundation Database.

Access

The use of this database by any unit except the Office of Alumni Relations (with respect to the Alumni Directory Data) and the Foundation (with respect to the Foundation Data) is strictly prohibited without prior approval of the Office of Alumni Relations or The University of Montana Foundation, respectively. Decisions of the Office of Alumni Relations or the Foundation regarding use of database records may be appealed to the President of The University of Montana or the President/CEO of the Foundation, respectively.

The University may grant access to Alumni Directory Data (as well as employer information related to Alumni) to any authorized campus department, division or office as well as to the Foundation. The use of Alumni Directory Data by those campus entities and the Foundation must comply with all Montana University System policies, including MUS 1302, 1303.1, 1303.2 and 1303.3, as well as existing state constitutional and statutory provisions involving privacy, the public right to know, and state government agency mailing list use restrictions.

As Foundation Data is owned by the Foundation, a private corporation, that data is exempt from the Freedom of Information Act and any other public disclosure requirement applicable to the University. Nothing in the operating agreement between UM and the Foundation, and no actions taken related to that operating agreement shall be construed as waiving the Foundation’s complete control of the Foundation’s data. For example, the presence of the data on University owned or operated computers, the transmission of data over University networks, and the storage of the data on

University data backup systems shall not infer any grant or consent of access by the Foundation. Actions taken in the day-to-day business practices needed to operate and maintain the system containing the data, maintaining the data itself, and distributing specific information may detract from the Foundation's ability to prevent disclosure of data to UM employees. Such disclosures shall not represent consent for use of that data except as explicitly granted by the Foundation.

When the Foundation does grant access to Foundation data, such grants are understood to be for only the data values disclosed, not for a class or set of data. All grants of access are, by default, limited to the term of the project or activity for which that data is specifically needed. Recipients of the data shall not retain the data or copies of the data in any form after the completion of the activities for which the data was provided.

University academic and administrative units must coordinate with the Office of Alumni Relations to use Alumni Directory Data to contact alumni about upcoming events, changes to the unit's programs, or other department or college news.

Notwithstanding the above, it is expressly understood that the University provides approval to the Foundation to use Alumni Directory Data in conducting the Foundation's routine work without the need for any further authorization. The Foundation recognizes, however, the need to coordinate with the Office of Alumni Relations when using Alumni Directory Data to invite alumni to an event organized more as alumni outreach than as a fundraising appeal.

Affiliate organizations approved by the Office of Alumni Relations may request dataset information using the data request form provided on the Office of Alumni Relations website. Dataset information contained in an approved report will not be provided to either University academic or administrative units or affiliate organizations for the purpose of creating their own address book or database.

Reports provided by the Office of Alumni Relations may be retained and used only for the duration of the authorized activity or event. The data may not be used for any purpose or activity not expressly approved in advance by the Office of Alumni Relations. Any violation of this requirement may make the user subject to disciplinary action. The Office of Alumni Relations reserves the right to determine the best method of information distribution to contacts listed in a database report.

All access to Foundation Data shall be solely governed and controlled by the Foundation. Such control is necessary in order to allow the Foundation to protect the identity of its donors and prospective donors. Donor privacy is crucial to the continuing success of the Foundation in support of its mission as an independent foundation to raise private funds for the benefit of the University. Nothing in this Policy is intended to nor shall it be interpreted to require the Foundation to provide access to the Foundation Data to the University or any other party.

The above responsibilities are further described in in the Operating Agreement between the University and Foundation (required by Section 901.9 of the Montana University System Policies).

This document supersedes any agreements, requests, discussions, understandings or procedures previously agreed upon, and shall be applied accordingly.

“Directory Information,” as used in this policy, means name, spouse, status (living or deceased), age, gender, marital status, opt-in/out preferences, contact status (lost), mailing addresses, telephone numbers, email addresses, employer name and title or position, date of birth, dates of graduation, degrees awarded, major and minor fields of study, participation in officially recognized activities including clubs, fraternity and sorority associations, sports participation, activities in support of the University, and awards received . It is understood that Alumni Directory Data does not in any way supersede or replace information retained by the University’s Office of the Registrar as required by the Federal Education Rights Privacy Act, 20 U.S.C. § 1232g(5)(a).