



Policy on Confidentiality

Approved May 11, 2016

Northfield SHARES maintains and manages much information that must be kept confidential. This includes information about donors, prospective donors, grantees, prospective grantees, and wealth advisors and their firms. The effective functioning of Northfield SHARES also requires respecting the confidentiality of discussions that take place and information that is shared in the course of conducting Northfield SHARES business.

Northfield SHARES Board has adopted this Policy on Confidentiality to assist its directors/officers, employees, agents, fiduciaries and volunteers in fulfilling their confidentiality obligations and commitments. While the policy addresses some common confidentiality concerns, it is not an exhaustive list of all situations where a confidentiality obligation may arise. Questions about whether information is confidential or about situations in which confidential information may be released or discussed should be directed to the Board Chair or the highest ranking staff member. As used in this Policy, the term "personnel" includes Northfield SHARES directors/officers, board members, committee members, employees, interns, agents, fiduciaries, consultants and volunteers.

General Rule: Information in the possession of the Northfield SHARES and discussions of Northfield SHARES business should generally be presumed to be confidential. All Northfield SHARES personnel at every level are responsible for maintaining confidentiality.

Confidentiality of Donor Information: Except as required by law, the Foundation will not disclose information about a donor or a donor's gift. However, unless otherwise requested by the donor, Northfield SHARES may publish the names of individual donors in Northfield SHARES Annual Report and other reported listings. In the case of memorial gifts, the Foundation will provide the names of donors to members of the immediate family unless the donor has requested anonymity. Northfield SHARES will not disclose the amount of any gift without the donor's consent. Northfield SHARES may accept anonymous gifts on a case by case basis.

Confidentiality with respect to Grant Applicants and Grantees:

Northfield SHARES will not disclose the identity of grant applicants except as necessary to process the application and will protect financial and personal information that applicants submit. Except in the case of hardship assistance grants to individuals, Northfield SHARES will generally disclose the identity of grantees and the amount awarded.

Confidentiality of Northfield SHARES Business: Except as authorized by Northfield SHARES board, or by an appropriate board committee, discussions and records of Northfield SHARES operations are generally not to be disclosed. This includes information about Northfield SHARES financial operations, fundraising, personnel, grantmaking, and contractual relationships. The positions of individual directors/officers, employees, agents, fiduciaries, and volunteers should not be discussed, even within Northfield SHARES, except in the course of official meetings and processes where those subjects are discussed.

Exceptions: This policy does not apply to disclosures to attorneys, accountants and other professionals providing assistance to Northfield SHARES. It also does not apply to disclosures to tax authorities, government agencies, courts, or as otherwise required by law.

The following are considered public documents and information contained in them is not subject to the confidentiality requirements of this policy:

- Northfield SHARES annual report or financial review once it has been accepted by the board.
- Northfield SHARES Form 990 as required to be publicly disclosed. This does not include the names and addresses of donors as that information is not required to be disclosed.
- Northfield SHARES investment and spending policy.

Protection of Confidential Information: Northfield SHARES personnel who have executed a copy of this policy may access confidential information necessary to the performance of their functions. Northfield SHARES personnel are expected to exercise sound judgment in securing information taken outside Northfield SHARES offices or copied from its network. Any information so removed should be returned as soon as possible and deleted from laptops or other personal devices.

Penalties: Penalties for violating this policy can include sanction or termination of employees and removal of board members.