



Central City Concern Online Donation Privacy Policy

I. GENERAL STATEMENT OF POLICY

Central City Concern (CCC) is committed to the security of all personal information that is collected or submitted on the CCC website. This includes information collected as a result of the website or by third-party vendors who process financial donations for CCC. CCC, its employees and vendors shall comply with all federal or state laws addressing the security of an individual's personal information, including but not limited to all IRS tax statutes and the Oregon Identity Theft Protection Act of 2007.

II. ADMINISTRATION

The Community Partnerships & Strategic Development (CPSD) department, CCC Accounting department, and CCC IT department work with a third party vendor ensure the security of all personal information submitted by CCC donors. Additionally, CCC's Risk Management department periodically monitors the vendor's system to verify the Online Donor Privacy Policy is being followed and the security of the information being collected.

III. PROCEDURE

- A. Personal donor information is collected through a third party vendor. The information is stored on a secured and protected database.
1. The information provided by the donors is used only to complete the transaction and to complete all necessary legal filings with applicable government and compliance agencies. Personal donor information is not rented, leased, or otherwise sold to individuals or other companies or nonprofit organizations.
 2. Donor email addresses are used solely for requests for email correspondence. Donor email addresses are not shared with outside parties, except as required by authorized government or compliance agencies.
 3. Appropriate physical, electronic and procedural safeguards are established to secure information collected online as determined by the Risk Management department. Central City Concern may contract with an online vendor to process financial donations through a secure platform, and said secure platform is solely determined by CCC.

4. Donors may access the CCC Online Donor Privacy Policy on CCC's website or by contacting CCC administrative offices and CCC's Online Donor Privacy Policy will supersede any privacy policy of third party vendors.
 5. The Accounting Department of CCC shall use collected personal information as necessary for required IRS tax filings for CCC, but CPSD shall provide any reporting as required by state and/or federal laws for individual donor contributions. The Risk Management department has responsibility for compliance with all applicable laws and compliance.
- B. The following procedures are in place to ensure that the Online Donor Privacy Policy is being effectively carried out:
1. A random selection of approximately 5% of online donor transactions will be audited on an annual basis, under the supervision of the CCC Quality Manager to ensure internal compliance with policy and applicable laws and regulations.
 2. CPSD will conduct semi-annual review of the third party vendor's privacy protection and security and ensure that the vendor complies with the Central City Concern Online Donation Privacy Policy.
 3. CPSD will monitor the availability of the Online Donation Privacy Policy will be available to donors.
 4. The Online Donor Privacy Policy will be available to employees on the Central City Concern intranet. The Policy will also be emailed to CPSD, IT, Risk Management and Accounting staff including reminders as necessary.
 5. An annual review with the CCC Quality Manager on how online donation information is handled shall ensure the objectives of the Online Donation Privacy Policy are carried out, including but not limited to security and privacy, compliance, and timely submission of required reporting.