



Effective Date: October 1, 2025

Afya Donor Privacy and Confidentiality Policy

PURPOSE

This Donor Privacy and Confidentiality Policy outlines the commitment of Afya Foundation, Inc. (referred to as "the Organization") to safeguard the privacy and confidentiality of donor information. The Organization recognizes the importance of maintaining the trust of its donors and is dedicated to protecting the personal and financial information provided by individuals, foundations, corporations, and other entities.

SCOPE

This policy covers all aspects of donor information collected, stored, processed, and used by the Organization, whether through online platforms (i.e., donor database, donor research software), physical documents, or any other means of communication and correspondence, including phone and email. A donor is considered a current, lapsed, or prospective supporter of the Organization in the form of monetary gifts, in-kind gifts, or volunteer time.

POLICY

Information Collection

The Organization may collect personal and financial information from donors to process donations, solicit gifts, acknowledge contributions, provide updates on activities, events, and initiatives, and comply with legal and regulatory requirements. Such information may include, but is not limited to:

- Name
- Contact information (address, email, phone number)
- Employment history
- Philanthropic, academic, social and political affiliations
- Donation history to the organization
- Payment details (credit card information, bank account details)
- Any publicly available information provided by the donor

Use of Donor Information

The Organization may use donor information for the following purposes:

- Processing donations and providing tax receipts
- Communicating with donors about organizational activities and updates
- Expressing gratitude and acknowledgment for contributions

- Understanding who our donors are and how we may improve our services to meet their preferences and expectations
- Completing financial audits or preparing required financial forms
- Inviting donors to events and activities
- Internal record-keeping, research and analytics
- Complying with legal and regulatory obligations or in the good faith belief that such action is necessary to conform to the requirements of law or comply with the legal process served on us
- Protecting against potential fraud

Confidentiality

The Organization is committed to maintaining the confidentiality of donor information. It will not sell, trade, or share donor personal information for third-party fundraising or marketing purposes.

To carry out the Organization's responsibilities, the Board of Directors, organization staff, and volunteers may need to review donor or prospect records. All individuals will respect the significant interest in protecting the sensitive nature of donor records and maintain these policies for donor confidentiality.

In cases where donor information is shared with trusted third parties, such as research and analytics software or auditors, the Organization will ensure that appropriate confidentiality agreements are in place.

Security

The Organization employs industry-standard security measures to protect donor information from unauthorized access, disclosure, alteration, or destruction. Access to donor information is restricted to authorized personnel with a legitimate need to access such information.

Publicity of Donor Names

The names of donors may be listed in the Organization's annual report, on the website, and/or in similar public relations communications. Exceptions will be made for any donor who explicitly requests anonymity. Unless required by law or legal process, the Organization will not publish the specific amount of any donor's gift without the donor's permission.

Honor/memorial gifts

The names of donors of memorial or honor gifts may be released to the honoree, next of kin, or individual(s) designated by the immediate family unless otherwise specified by the donor. Gift amounts are not to be released without the express consent of the donor unless disclosure is required by law or legal process.

PROCEDURES

Opt-Out and Corrections

Donors can opt out of receiving communication from the Organization, request corrections or

updates to their information, or see the Organization's data on their own donor information. Donors may contact donor_support@afyafoundation.org or call 914-920-5081. The Organization will promptly honor such requests and provide mechanisms for donors to manage their preferences.

Consent

By providing their information to the Organization, donors consent to the collection, use, and disclosure of their data in accordance with this policy.

Changes to the Policy

The Organization may update this policy from time to time to reflect changes in practices or legal requirements.

Contact Information

If donors have any questions, concerns, or requests about their information or this policy, they can contact donor_support@afyafoundation.org

REFERENCES

Association of Fundraising Professionals. *Developing Fundraising Policies and Procedures: Best Practices for Accountability and Transparency*. 2018.