

POLICY AND PROCEDURES TO ENSURE DONOR
NAMES AND RECORDS ARE SECURE AND HELD PRIVATELY BY
NETWORK KNOWLEDGE AND THAT DONATED AND ANY OTHER
FUNDS WILL NOT BE USED FOR POLITICAL OR LOBBYING PURPOSES
September, 2015

Network Knowledge does not and will not provide in any manner to any political party or to any candidate for any political office the names or identities of donors. Further, donor names and identities will be kept internally secure and will not be shared with a third party unless compelled to do so by legal means. A statement providing public information about the process of security of donors and donor records is maintained on the website of Network Knowledge. Periodic reviews of the system that ensures donor confidentiality and its efficacy are conducted by the Director of Advancement.

In those cases where donors wish to receive public recognition by virtue of their gift, their name or affiliation may be disclosed and used in appropriate manners such as in an underwriting credit, with the consent of the donor. In such cases, donors will be periodically asked about the continuation of the use of their identities.

For all donors, Network Knowledge will ensure security of donor information by a system of secure data entry, data retention and the security of related materials and information. Special care will be used in consultation with third-parties who may be involved in mailings, fund-raising events and computer support of the donor base.

The process of ensuring confidentiality of donor information in accordance with the above-stated policy will consist of the following processes. All mail-delivered or hand-delivered contributions will be secured initially in the office of the Coordinator of Membership and Community Engagement. The Coordinator will make a copy of the check or cash and then enter the data needed on the Allegiance Membership system. At that time, the data is secure and not subject to alteration. In similar manner, any pledge made by phone, email or entry on the website will be secured along with the information from the credit card system. Cash will be counted and delivered to the Office Manager for bank deposit. Records will be maintained of daily cash transactions.

A copy of the data entry will be attached to the copy of the check or pledge document and then stored in a secured file in the locked office of the Coordinator for ninety day. After working hours the building is both locked and alarmed, providing full security for stored hard-copy data. The electronic system of Allegiance is also secured by password access on password-secured computers and only two employees in the office have access to the Allegiance system. After

ninety days, the hard-copy of the check and data entry sheet will be moved to storage in a secured area in the building where it will be accessible in the event of need by an approved employee of Network Knowledge but will be secure from non-employees or employees who have no need for access. Volunteers who occasionally assist in a variety of activities will not be given access to either the Allegiance system on the computer or data related to donors. The only exception will be during pledge events when volunteers will take telephone pledges and in those cases, the pledge information will be submitted to a staff member who is supervising the event who in turn will secure the donor pledge information for processing as noted above.

Only the Coordinator and the Director of Advancement will have access to the Allegiance system and hence, to the donor data-base. As needed, information from the system and data-base may be internally shared with the CEO and with the Office Manager. Donor names and gift amounts will not under any circumstances be shared with volunteers of Network Knowledge or with the Community Advisory Board members and will only be shared in general terms under unique circumstances with staff of Network Knowledge who need to be aware they may be dealing with a donor to the stations. That will also be the case with members of the Board of Directors.

Network Knowledge does not and will not engage in political lobby activities as defined by The Communications Act, 396(k)(2)(A) and does not and will not engage in political and legislative activities as defined by Internal Revenue Service 26 USC 501(c)(3).