

Alumni and Donor Database

Procedures

The Alumni and Donor Database is the sole source of data to be used by the Foundation and all University units for directing newsletters, invitations, solicitations or other structured communication with alumni and non-alumni donors, and other constituents. 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 regarding use of the Alumni and Donor Database to support unit initiatives.

Purpose, Responsibility and Ownership

The University of Montana is responsible for maintaining data used to facilitate ongoing communications and engagement between the University of Montana and its alumni. The University is responsible for maintaining the sufficiency, currency, and accuracy of data for all alumni who have been awarded an academic degree by The University of Montana and on many non-degree alumni. 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 and Donor Database and is known as Alumni Directory Data. The University owns and controls the use and distribution of all Alumni Directory Data.

The University of Montana Foundation is responsible for maintaining non-alumni donor data and all giving data used to facilitate ongoing engagement, cultivation, solicitation, and stewardship of donors. The Foundation is responsible for maintaining the sufficiency, currency, and accuracy of data for non-alumni donors and Foundation-related constituents as well as all giving data. This information is included in the Alumni and Donor Database and is known as Foundation Data. The Foundation owns and controls the use and distribution of all Foundation Data. The Foundation also licenses and manages the software, CRM Advance, that houses the Alumni and Donor Database. The responsibilities and objectives of the Foundation relating to the Alumni and Donor Database and management of CRM Advance are further defined in an operating agreement between the University and the Foundation (required by Section 901.9 of the Montana University System Policies).

The University and the Foundation may seek either jointly or separately to expand the number of entities in the Alumni and Donor Database to support their missions. Once added to the Database, the added data shall still be governed by the parties as described above.

Database Maintenance

The Foundation is responsible for the support and maintenance of CRM Advance. This includes: database administration services, maintaining user security roles and rights, maintaining system integrations, regular backup of the Alumni and Donor Database, providing technical support, and working with the vendor hosting CRM Advance when support issues require the vendor's assistance.

Privacy

The University values the privacy and confidentiality rights of alumni and constituents. The University will not disclose the contents of Alumni Directory Data to anyone outside of the University other than a University or Foundation employee, or an authorized representative or vendor of the University who is conducting official business on behalf of and in support of the University's mission or as otherwise required by law..

Likewise, the Foundation values the privacy and confidentiality rights of alumni, donors, prospective donors, and constituents. The Foundation will not disclose the contents of Foundation Data to anyone other than a Foundation employee, an authorized University employee, or an authorized representative or vendor of the University 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, but not limited to, addresses, telephone numbers, email addresses, places of employment, and financial ratings and capacities. Such transfers will be undertaken in a manner that seeks to ensure the data is only used for the intended purpose, and is not used by the vendor for unauthorized purposes or otherwise exposed.

Any individual, business, or organization whose information is contained in the Alumni and Donor Database 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. Provided, however, that communications which the University has determined have a 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.

Use and Confidentiality

All individuals granted access to or extracts from the Alumni and Donor Database are bound by confidentiality. All employees of the Office of Alumni Relations and the UM Foundation will sign a confidentiality and use agreement. Other individuals may also be asked to sign a confidentiality and use agreement as a condition to access.

Any employee of either the University or the Foundation found to be improperly using the Alumni and Donor Database or extracted data will face appropriate consequences, up to and including dismissal. The University and Foundation may share necessary information with each other regarding misuse of data or other violations of this policy and procedure to facilitate disciplinary action.

The use of the Alumni and Donor Database by any University 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 or the President and CEO of the Foundation, respectively.

Access to Alumni Directory Data

The University may grant access to Alumni Directory Data 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.

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.

Affiliate organizations approved by the Office of Alumni Relations may request Alumni Directory Data using the data request form provided on the Office of Alumni Relations website. Alumni Directory Data 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 and must be destroyed when that purpose no longer exists. 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.

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).

Access to Foundation Data

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 Foundation Data. For example, the presence of Foundation Data on University owned or operated computers, the transmission of Foundation Data over University networks, and the storage of Foundation 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 Foundation Data , maintaining the data itself, and distributing specific information does not represent consent for use of Foundation Data.

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.

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. Any violation of this requirement may make the user subject to disciplinary action. In addition, the Foundation, at its sole discretion, may exclude any individual who has violated confidentiality and use agreements relating Foundation Data from receiving and using such data in the future.

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 donor or prospective donor engagement.

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