Policies and Procedures – Information Technology

<table>
<thead>
<tr>
<th>Policy Title:</th>
<th>Advancement Services Information Technology – System Access, Security, and Compliance</th>
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<td>Policy #:</td>
<td>6.01</td>
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<tr>
<td>Effective Date:</td>
<td>August 19, 2019 Updated Jan. 17, 2023</td>
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<td>Responsible Department:</td>
<td>Advancement IT</td>
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<td>Cross Reference:</td>
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<td>Approved by:</td>
<td>DGC Executives &amp; CUF Senior Staff Policy Owner Sr. Dir. of Adv. Services</td>
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**DEFINITIONS:**

CCIT: Clemson Computing and Information Technology. This is the Clemson University IT Department.

**Data Collaboration Agreement (DCA):** The DCA is the Agreement describing the usage of the fundraising database. Any entity that desires to utilize the fundraising database shall sign onto the DCA. The DCA contemplates that the Clemson University Foundation Information Technology department will maintain security, maintenance, and provide for ready use the fundraising database and shall have the authority to prescribe policies and procedures for the use of such system, so long as such policies and procedures do not contradict with the DCA.

**Data Governance Council (DGC):** The DGC is a group of users from each user entity that represents the entity in making decisions for the overall use of and consistent production and execution of data between entities.

**Executive Leadership Team of the DGC:** This group makes the final decisions based upon recommendations presented to it for use of the data contained with the fundraising database. This team consists of President & CEO of the CU Foundation, VP for Development & Alumni Relations, President of IPTAY, Director of Athletics, Sr. Dir. of Advancement Services, and Director of Finance & Business Operations for IPTAY.

**Fundraising Communications: Blackbaud Internet Solutions (BBIS):** BBIS is the content management system for websites and mass electronic communications that integrates with Blackbaud CRM. This is the primary system supported for use in providing the development intranet, collecting online fees and gifts, sending mass electronic communications, generating receipts and acknowledgements, and facilitating event registration. The Advancement Services Information Technology department supports the fundraising communications for the Development and Alumni Relations division which is currently the Blackbaud NetCommunity and is transitioning into Blackbaud Internet Solutions.

**Fundraising Database:** This is the primary system of donor and alumni constituent information, including but not limited to the giving history, contact information, development reports, and event attendance of constituents. The Advancement Services Information Technology department supports the fundraising database for the Development and Alumni Relations division which is currently the Raiser’s Edge and is transitioning into Blackbaud CRM.
POLICY:

The Office of Advancement Services, specifically the Information Technology (IT) department has under its purview the fundraising database(s). The IT department is a part of the Clemson University Foundation and serves the needs of the Development and Alumni Relations division with regard to the fundraising database.

Roles and Responsibilities

This group is responsible for maintaining security, accessibility requirements, access rights, maintenance, reporting, and general training on this database(s). Advancement Services also supports the hardware and IT infrastructure of the division in coordination with the CCIT group from Clemson University. Advancement Services adheres to the rules set forth by Clemson University’s IT department and the Foundation's internal and external auditors.

Database Access

To protect the confidentiality and privacy of the database constituency, access to the fundraising database is granted on a need-to-know basis once the employee is trained. Restricting access to information to employees who truly need it to perform their jobs lessens the possibility of misuse of the data. Printouts of information will be treated in the same manner as electronic files, downloads, or photocopies of alumni files.

The users of the fundraising database shall be prescribed by the DCA to which the users of the fundraising database shall agree to operate. Through the DCA, the IT department shall develop policies and procedures, in conjunction with the DGC when appropriate, for the use and operation of the fundraising database.

Security and Privacy

The IT department is responsible for the security and privacy of the data contained within the fundraising database and may audit the use of such data by other departments or users on a periodic basis. In the event that breaches of data usage are discovered, the IT department shall present those breaches to the Executive Leadership Team of the Data Governance Council (DGC). The Data Collaboration Agreement (DCA) in conjunction with the consensus of the Executive Leadership of the DGC shall prescribe the appropriate recourses for such breach.

The IT department’s responsibility for the security of the fundraising database shall include but not be limited to the input and extraction of any data contained within the database. This authority shall include and extend to the use of the fundraising database data when the only use of the data is directing constituents to other software systems. The IT department must approve all software that may have any effect on the fundraising database or donor data.

All users with access to fundraising data are responsible for data security and privacy for any data extracted from the fundraising system.
Compliance

IT Team will annually collect and review SOC2’s (Service Organization Control Reports) from any vendor system that stores donor contact and non-public gift information considered confidential.

New Software Acquisition

_all software acquisition requests_ must be submitted to the IT department for a determination of whether the software could have any effect on the fundraising database or donor data. If the result is in the affirmative, the IT department will review the software for security clearance and compatibility. If the result is in the negative, security and compatibility approval is not required but will be optional as determined between the user and their supervisor.

The IT department will not unnecessarily or unreasonably withhold or delay approval of outside software systems and will perform security checks on such systems in a manner that will not unreasonably delay implementation of said outside software if said software is approved for purchase. It is acknowledged within this policy that the IT security approval is only one such approval for staff to secure a software tool.

IT Services

The IT department will provide services to the users to the fundraising database to include but not be limited to functional use, reporting, and training. Services may include query and export training, and developing and providing tools through the fundraising database for constituent cultivation and stewardship.

Adherence to Policy

Issues and concerns with regard to the implementation of this policy may be submitted to the Executive Leadership Team of the DGC for review and resolution.