Mass Communication Policy

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<th>Policy Title:</th>
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<td>Responsible Department:</td>
<td>Data Governance Council</td>
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<td>Responsible Staff:</td>
<td>DGC, CAA</td>
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<td>Policy Owner:</td>
<td>Sr. Dir. of Marketing &amp; Events, Development and Alumni Relations</td>
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1. **Purpose**: To provide the best possible service to our constituents through strategic communications while at the same time maintaining the confidentiality of the information entrusted to us by our constituents.

2. **Definitions**: 
   
   **Fundraising Database** means 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 Blackbaud CRM, also known as CADENCE.

3. **Policy**:

   a. **Information Requests**:
      
      Clemson University maintains information containing biographical, academic, demographic and gift information on alumni, donors, friends and students. This information exists exclusively to support the work of Clemson University and to assist the University community in transacting business related to Clemson University programs. Much of this information is protected under various state and federal laws and may not be used in violation of those laws. Clemson University abides by the Family Educational Rights and Privacy Act (FERPA) regulations. All requests for information from members of the media or government relations must be referred to the Clemson University Office of University Relations. Information from the fundraising database (CADENCE) is not available for release for commercial or political purposes at any time. No information will be released to vendors or third-party partners unless approved and a confidentiality form has been signed. By agreeing to the user acknowledgement statement, you are required to abide by the policies as outlined below:

      i. Constituent information provided may only be used for the purpose intended and the purpose must be legitimate and lawful in nature.
      
      ii. The sale or transfer of the information to another party is strictly prohibited.
      
      iii. Information is provided for a one-time communication purpose only and is approved for university-related activities only. University-related activities include: Alumni relations, public relations, research, continuing education programs, giving requests, and recruitment.
iv. Approved requestors must have authority and/or responsibility for the business, organization, or group for which they are requesting information.

v. An alumnus may request information from the database on behalf of a group or club they represent or have oversight authority as long as the alumni group is recognized by the Clemson Alumni Association. Information provided to volunteer alumni constituent groups will be limited to those alumni who are affiliated with the requesting group.

vi. A copy of the material to be distributed must be shared before the requested information is released.

vii. A request for demographic data may be provided but would include no personal details.

viii. Absolute confidentiality of the information provided is expected and is the responsibility of the requestor.

b. Communication Requests to Constituents:
   All requests for alumni information must be submitted through the alumni information online request forms at https://alumni.clemson.edu/new-information-request-forms/ and linked from the Alumni homepage www.clemson.edu/alumni. Groups with a legitimate business need may request information from the fundraising database (CADENCE). Approved requests for information may be used for demographics analysis or for communications purposes.
   
   i. Upon review and approval of an alumni communication, mailing list files may be provided.
   
   ii. Email addresses will not be provided to requestors. All email communications will be sent through the Alumni Association’s centralized email utility and will be scheduled and distributed to approved audience.
   
   iii. Phone numbers may be provided upon approval and receipt of signed nondisclosure agreement.
   
   iv. Individual information on alumni classmates will not be released. The alumni team will either reach out to the classmate on your behalf or you may look up if that classmate has made their contact information available to the public in the Alumni Directory.

c. Estimated Timing:
   All requests for information release or communication to alumni should be submitted at least ten business days prior to the requested date. Delivery timeline will be provided to the requestor once the communication has been approved.

d. Copyright and Trademarks:
   Clemson University and Alumni Association logos, names, trademarks and service marks are property of the Clemson Alumni Association or Clemson University. Display or use of these marks requires prior written permission by these entities. The Alumni Association respects the intellectual property of others and ask that our users to do the same. Please review the University's full copyright policy at https://www.clemson.edu/administration/ogc/selected-policies/copyright.html.

e. Specific Constituency Groups:
   EU Residents
   
   i. Clemson University and the Clemson Alumni Association are committed to abiding by the standards in the General Data Protection Regulation (GDPR). As an organization, we request the consent of residents residing in the European Union
(EU) to receive emails, postal mail or phone calls from Clemson University. To learn more about Clemson University's GDPR policy, please visit: https://ccit.clemson.edu/gdpr/. For those living within the EU who would like to receive communications from Clemson University, they must complete the form located at https://cualumni.clemson.edu/eu-consent to provide consent to receive communications.

Athletic and Academic Donors
   ii. Constituents who are IPTAY-only donors may not be communicated with by Development and Alumni Relations except for joint IPTAY and Alumni events or with approval by the IPTAY Marketing and Communications team. Constituents who are academic donors may not be communicated with by IPTAY unless they are IPTAY members or with approval by the Alumni Association.

Children
   iii. Constituents under the age of 18 with identified birthdates in the database will be tagged with appropriate solicit code to not contact with the exception of IPTAY Tiger Cub Communications.

Students
   iv. Enrolled students may not be communicated with or solicited with the exception of student-focused development events (Give Day, Legacy Day, and Week of Gratitude), scholarship recipients through the approval of the Financial Aid Office, University college communications and IPTAY Collegiate Club member communications or with approval by the Alumni Association. Communications regarding Ring Purchases, Ring Ceremony, Senior Week, Clemson Club Summer Send Offs, Senior Class Gift, and $2 Bill Distribution at Graduation will go through the Office of Institutional Research to verify student credit hours and acceptance.

University Leaders and Groups
   v. Committees in the fundraising database (CADENCE) which include high-priority groups and university leadership may not be communicated with unless approved by the Alumni Association.

f. Appended Lists:
   Appended lists can be submitted in the effort to expand the email communication reach if the lists abide by the following guidelines:
   i. All appended lists submitted through the information request form for email distribution will be reviewed and approved by the Alumni Association and University Relations. The justification on the request form must include the purpose of the communication, the reason these individuals must be included in this distribution and follow the remaining guidelines listed in the bullets below.
   ii. The list must not include clemson.edu email addresses as those audiences are already included in the fundraising database (CADENCE) and should be identified with their constituent ID. Please work with the Clemson Alumni Association to identify those individuals who are affiliated with the university for these communications.
   iii. The party submitting the list has consent from each individual on the list to receive email from Clemson University and its approved colleges, departments, units, clubs, groups and affiliates.

g. Receiving Communications:
   All individuals who have attended and graduated from Clemson University and those who update their contact information within the fundraising database (CADENCE) through email, a phone call or through the Contact Update Form are providing consent to receive
communications from Clemson University and its approved affiliates. If an individual does not wish to receive email communications from these entities, they must contact the university through email or a phone call to a development or alumni staff member or select “Opt Out of Email” in any email communication they receive in their email inbox. Opting Out of University Email does not opt an individual out of IPTAY communications. If an individual wishes to receive no communication from the university including direct mail, solicitations, Clemson World magazine and email communications, they must send an email to cualumni@clemson.edu, call 864-656-2347, or contact a development or alumni staff member to formally request the change and their record will be marked appropriately.

h. **Policy Violation:**
   Users that violate this policy will have their access to constituent information and communication with constituents suspended either temporarily or permanently and the matter will be turned over to the University.

Approval Date: March 2020 - Approved by Executive Leadership of the Data Governance Council