



F.I.S.H. OF SANIBEL-CAPTIVA, INC. (“F.I.S.H.”) is committed to protecting our Donor’s privacy. Our Donors expect that we will use their support wisely. They also place their faith and trust in us concerning the personal information that they may share with their gifts. We value our Donor’s trust and we recognize that maintaining this trust requires us to be transparent and accountable to our supporters and the public at all times. An organization that deals with individuals and information about individuals in its daily operations and fundraising activities must secure that information. This policy will help ensure that all personal information is properly collected, used only for the purposes for which it is collected, and is irretrievably disposed of in a secure and timely manner when it is no longer needed.

In this Policy, “personal information” means information that is recorded in any form, both fact and opinion and that can be used to distinguish, identify or contact a specific individual. It does not include publicly obtainable information such as names. “Donor” refers to any individual or organization that contributes funds, securities or property to F.I.S.H.

It is vital for F.I.S.H. to have knowledge about its supporters and those people who provide the necessary funding. In order to be successful during a campaign, strong Donor relationships must be established and cultivated. Information is the key to any relationship. Due to the sensitive nature of personal information disclosed by a Donor or obtained by F.I.S.H., F.I.S.H., and its employees and volunteers who have access to personal information of Donors, will at all times abide by this Policy.

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## Accountability

F.I.S.H. and its employees are responsible for all Donor personal information in our possession and it will establish, maintain, and revise practices and procedures to ensure compliance with this Policy. Every reasonable precaution will be taken to protect and preserve the confidentiality of our Donor’s personal information. All employees and volunteers of F.I.S.H. are individually required to safeguard each individual Donor’s personal information. Volunteers who are provided access to personal information of Donors will be required to agree to protect such personal information, use it for only the



purposes for which it was provided and to not keep the personal information on file.

Donors may notify F.I.S.H. of a privacy-related issue or grievance by contacting the President. We will provide information about our privacy procedures and investigate the complaint. If a problem is discovered during the review, we will take all appropriate steps to revamp our policies and procedures if necessary.

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## Use and Disclosure of Personal Information

F.I.S.H. collects, uses and discloses personal information only for certain purposes that are identified to the Donor. We may use it to establish and manage our relationship with a Donor, as well as providing information requested by the Donor related to their donation. Personal information can also help us understand a Donor and identify preferences and expectations. The main uses will involve raising money to reach our operational goals and to process gifts and return appropriate receipts. To publicly recognize and thank them for their generosity, we occasionally release a list of our Donors. In such cases, other organizations and third parties will have access to our Donor names and in some cases donation amounts or range of amounts, unless the Donor has stated that they wish to remain anonymous.

F.I.S.H. holds special events to create publicity for our programs, thank supporters, and raise funds. At these events selected Employees may obtain personal information. If so, Donors will be advised of this fact and the information related to the event will be disposed of properly when it is no longer needed.

We collect Donor information for internal use only, and just to the extent required for our purposes. We obtain relevant personal information about Donors lawfully and fairly.



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## Sharing or Selling of Personal Information

F.I.S.H. will not sell, trade or give the information or contents of Donor files to others. F.I.S.H. will also not share Donor addresses, telephone numbers, or e-mail address to third parties.

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## Donor's Consent

F.I.S.H. only uses and discloses personal information with Donor permission. Donor permission can be in writing or implied, either verbally or electronically. A Donor may withdraw permission to collect, use, and disclose Donor information at any time by giving F.I.S.H. reasonable notice. A Donor may opt out of sharing of any information, including their name, by e-mail or other written notice and submitting it to F.I.S.H. or by calling the President. When a Donor has communicated to F.I.S.H. a desire to opt out of the disclosure of all of his or her information, F.I.S.H. will not publish the Donor's data on the F.I.S.H. Donor roll on its website or otherwise.

Donors who wish to avoid any public recognition may inform F.I.S.H. when making a pledge or gift. The option to remain anonymous will be made available to Donors by F.I.S.H. This request for anonymity will be honored by F.I.S.H. until the Donor informs us otherwise.

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## Custody and Care of Personal Information

The personal information in our possession will be kept accurate and up-to-date. Donors may always correct their personal information if they believe that our records are not correct. If a Donor feels that any of our information about them is inaccurate or incomplete, the Donor has the right to ask us to change it or delete it. If a Donor's personal information is wrong in any way, F.I.S.H. will make the required changes.

F.I.S.H. OF SANCAP  
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F.I.S.H. operates under the assumption that any Donor or Donor prospect has the right to review his or her record maintained by our organization. Donors may request in writing to see personal information about them that is in the possession of F.I.S.H.

Donors also have the right to know how the information is obtained and used. We will respond to Donor requests within a reasonable time (within 30 days or less) by either providing copies of the documents or access to the information.

F.I.S.H. will keep Donor's personal information only as long as it is necessary to satisfy the purposes for which it was obtained, or as legally required. Access to Donor file materials containing personal information is restricted to Employees who need it to do their jobs.

F.I.S.H. has established appropriate technical, physical and organizational security procedures to protect Donor's personal information against loss, theft, unauthorized use, disclosure, or modification. These procedures will be monitored and reviewed at least annually and when needed to ensure their continued effectiveness. The safeguards employed by F.I.S.H. include, but may not be limited to, the use of limited access storage areas, locked files, and the use of encryption, secure servers, and computer workstation passwords. Appropriate measures will be undertaken when personal information is destroyed in order to prevent access or inadvertent disclosure to any unauthorized parties.

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