

# PUBLIC CHARITY DONOR PRIVACY POLICY

*(Not-for-Profit Corporations)*

Last Updated: May 27, 2026

## Plain-Language Summary

**NorthEast Education Initiatives, Inc. (“NEEI,” “NEED Initiatives,” “we,” “us,” or “our”) respects the privacy of donors and prospective donors.** We use donor information to process gifts, issue acknowledgments and receipts, communicate about our mission, honor donor preferences, maintain required records, and comply with law. We do not sell, rent, or trade donor names or contact information.

Topic	NEEI commitment
<b>Donor lists</b>	We do not sell, rent, or trade donor lists or donor contact information.
<b>Use of information</b>	We use donor information only for legitimate NEEI purposes, including gift processing, receipts, stewardship, communications, reporting, and compliance.
<b>Recognition</b>	Donors may request anonymity or ask not to be publicly recognized.
<b>Service providers</b>	We may use payment processors, CRM tools, email platforms, accountants, auditors, and similar providers, but only for NEEI-related purposes.
<b>Opt-outs</b>	Donors may opt out of fundraising or marketing communications while still receiving required transactional notices.

## 1. Purpose

This Public Charity Donor Privacy Policy (“Policy”) explains how NEEI collects, uses, shares, retains, and protects donor information in connection with charitable contributions, sponsorships, fundraising communications, donor stewardship, events, online donations, and related public charity activities.

This Policy is intended to supplement, not replace, NEEI’s general website Privacy Policy and its internal Board-adopted policies governing donor privacy, gift acceptance, financial controls, document retention, cybersecurity, safeguarding, and charitable solicitation compliance.

## 2. Scope

This Policy applies to donor information received or maintained by NEEI through any donation, pledge, sponsorship, event registration, crowdfunding page, online donation form, mailed contribution, in-kind gift, donor-advised fund distribution, matching-gift process, fundraising communication, or related donor interaction.

This Policy applies to donors, prospective donors, sponsors, grantors, donor advisors, and other individuals or entities that provide or may provide charitable support to NEEI. It also applies to NEEI representatives who handle donor information, including directors, officers, employees, volunteers, contractors, and service providers acting on NEEI’s behalf.

### 3. Key Terms

**Donor Information.** Information that identifies, relates to, describes, or can reasonably be linked to a donor or prospective donor, including contact information, gift history, donor preferences, communication history, and donor-related notes.

**Personal Information.** Information that identifies or can reasonably be linked to an individual, such as name, address, email address, phone number, payment-related information, or similar identifying details.

**Confidential Donor Information.** Non-public Donor Information, including anonymous donor identity, internal donor notes, restricted-gift information, non-public donor preferences, and any other donor information that should be accessed only by people with a legitimate NEEI need to know.

**Anonymous Donor or Anonymous Gift.** A donor or gift for which the donor has requested that the donor's name not be publicly disclosed, or for which NEEI elects not to publicly identify the donor.

**Service Provider.** A third-party vendor, platform, professional advisor, contractor, or other outside provider that supports NEEI's operations, such as payment processing, donor management, email communications, accounting, auditing, legal services, website hosting, or event registration.

### 4. Donor Information We Collect

Depending on the nature of the donor relationship and the way a gift or communication is made, NEEI may collect the following categories of Donor Information:

- Contact and identifying information, such as name, mailing address, email address, phone number, organization or business name, and preferred contact method.
- Gift and transaction information, such as gift amount, date, method, campaign, fund, restriction, dedication, sponsorship level, event participation, or in-kind gift description.
- Payment-related information needed to process a gift, such as payment method, transaction identifiers, billing information, or limited payment confirmation details. NEEI does not intend to store full credit card or bank-account numbers outside approved payment-processing systems.
- Donor communications and preferences, such as opt-in or opt-out choices, recognition preferences, anonymity requests, mailing-list choices, event registrations, and stewardship notes.
- Matching-gift, donor-advised fund, foundation, grant, or institutional information when a gift is made through or connected to an employer, donor-advised fund sponsor, foundation, corporate partner, or other institution.
- Information voluntarily provided by a donor, such as personal connection to NEEI's mission, comments, questions, or story-related information, subject to NEEI's consent and safeguarding practices when information is sensitive or involves minors.

NEEI seeks to limit the Donor Information it collects to what is reasonably necessary for donation processing, donor stewardship, legal compliance, recordkeeping, fundraising, mission-related communications, and organizational operations.

### 5. How We Use Donor Information

NEEI may use Donor Information for the following purposes:

- To process, record, verify, and acknowledge donations, pledges, sponsorships, grants, in-kind gifts, and other charitable support.
- To issue receipts, thank-you letters, tax acknowledgments, quid pro quo disclosures, sponsorship confirmations, corrected acknowledgments, and related gift documentation.
- To respect donor intent, including gift designations, restrictions, campaign choices, dedications, anonymity requests, and recognition preferences.
- To communicate with donors about NEEI's mission, programs, fundraising campaigns, impact, events, volunteer opportunities, governance updates, and ways to support the organization.
- To maintain donor records, fundraising records, accounting records, audit support, grant or sponsorship files, and charitable-solicitation records.
- To conduct internal analysis, planning, donor stewardship, campaign evaluation, financial reporting, fraud prevention, compliance review, and mission-related fundraising strategy.
- To respond to donor questions, requests, corrections, complaints, opt-outs, refund questions, or concerns.
- To comply with applicable federal, state, and local law, including tax, accounting, charitable solicitation, audit, subpoena, court order, regulatory, fraud-prevention, and public charity reporting obligations.
- To protect NEEI, donors, students, families, volunteers, staff, the public, and charitable assets from fraud, misuse, unauthorized access, unsafe conduct, or other improper activity.

## 6. Our Donor Privacy Commitments

NEEI is committed to the following donor privacy practices:

- NEEI will not sell, rent, trade, or exchange donor names, donor contact information, or donor lists with other organizations.
- NEEI will not send fundraising mailings, emails, texts, or similar solicitations on behalf of unrelated third-party organizations.
- NEEI will not share Donor Information with unrelated third parties for their independent marketing, fundraising, or commercial purposes.
- NEEI will limit access to Donor Information to individuals and Service Providers who need the information for legitimate NEEI purposes.
- NEEI will make reasonable efforts to honor donor requests regarding anonymity, public recognition, communication preferences, and opt-outs.
- NEEI will use donor stories, testimonials, photos, videos, or identifying details only with appropriate consent and in accordance with NEEI's safeguarding, privacy, and photo/video consent practices.
- NEEI will handle donor complaints, restricted-gift concerns, donor anonymity requests, and donor-related records with appropriate confidentiality and care.

## 7. Sharing Donor Information

NEEI may share Donor Information only in limited circumstances, including:

- With authorized NEEI directors, officers, employees, volunteers, contractors, or representatives who need access for gift processing, donor stewardship, fundraising, accounting, compliance, governance, reporting, or other legitimate NEEI purposes.

- With Service Providers that help NEEI process donations, manage donor records, send communications, host the website, operate event or fundraising platforms, provide accounting or audit services, provide legal or insurance services, or support other organizational functions.
- With financial institutions, payment processors, donor-advised fund sponsors, corporate matching-gift programs, crowdfunding platforms, event platforms, or similar parties as needed to process or verify a donation or donor request.
- With professional advisors, auditors, accountants, insurers, legal counsel, consultants, or authorized reviewers when needed for governance, audit, legal, tax, insurance, risk-management, or compliance purposes.
- With government authorities, regulators, courts, law enforcement, or other parties when NEEI believes disclosure is required by law, subpoena, court order, audit, regulatory inquiry, charitable-solicitation requirement, tax reporting obligation, or other legal process.
- With a donor's consent or at the donor's direction.

When NEEI uses Service Providers, NEEI expects those providers to use Donor Information only for the services they provide to or on behalf of NEEI and to maintain appropriate privacy, confidentiality, and security safeguards.

## 8. Donations, Payment Processing, and Tax Acknowledgments

### 8.01 Payment Processing

Online donations and other electronic payments may be processed by third-party payment processors or donation platforms. Those platforms may collect and process payment information under their own privacy policies, security practices, and terms of service. NEEI receives only the donor and transaction information made available to NEEI by those platforms and does not intend to store full credit card or bank-account numbers outside approved payment-processing systems.

### 8.02 Gift Acknowledgments and Receipts

NEEI will make reasonable efforts to provide timely and accurate gift acknowledgments, receipts, and tax-related donor communications consistent with applicable law and NEEI's internal gift-acceptance, financial-control, donor-privacy, and recordkeeping policies.

Where required or appropriate, NEEI may include statements about whether goods or services were provided in exchange for a contribution, a good-faith estimate of the value of any goods or services provided, gift restrictions or designations, and other information needed for donor records and legal compliance.

NEEI does not provide tax, legal, financial, or accounting advice to donors. Donors should consult their own advisors regarding the deductibility or tax treatment of any gift.

### 8.03 Government and Regulatory Reporting

NEEI may be required to report certain contribution, donor, grant, or fundraising information to the Internal Revenue Service, Pennsylvania authorities, other state charitable-registration authorities, auditors, funders, or other oversight bodies. NEEI will not publicly disclose donor names, addresses, or identifying details except as required by law, authorized by the donor, or consistent with a donor's recognition preferences.

## 9. Public Recognition and Anonymous Gifts

NEEI may recognize donors, sponsors, grantors, or supporters in public materials such as annual reports, websites, event programs, sponsor listings, campaign materials, press releases, donor walls, or social media. Public recognition may include a donor's name, organization name, logo, giving level, sponsor level, or general description of support.

Donors may request to remain anonymous or to opt out of public recognition. NEEI will make reasonable efforts to honor recorded anonymity and recognition preferences in future public materials. Because some materials may already have been printed, published, distributed, archived, cached, or shared by third parties, NEEI may not be able to retract every prior public reference after a preference change.

Anonymous donor identity may still be maintained in NEEI's internal records for accounting, audit, tax, legal, restricted-gift, anti-fraud, governance, and compliance purposes and may be disclosed where required by law or authorized governmental process.

## 10. Donor Communications and Opt-Outs

NEEI may communicate with donors and prospective donors by email, mail, phone, text message, social media, event platform, or other appropriate channels, subject to applicable law and donor preferences. Communications may include receipts, tax acknowledgments, thank-you messages, program updates, impact reports, event invitations, fundraising appeals, campaign updates, newsletters, sponsorship information, and other mission-related communications.

Donors may request to opt out of fundraising or marketing communications, reduce the frequency of communications, change communication channels, or update contact information. Email communications that contain marketing or fundraising content should include an unsubscribe mechanism where required by law or platform practice.

Even after an opt-out, NEEI may still send transactional or legally necessary communications, such as gift receipts, tax acknowledgments, notices about a donor's gift, records-related communications, security notices, legal notices, or responses to donor requests.

## 11. Donor Access, Corrections, and Requests

Donors may contact NEEI to request updates or corrections to their contact information, communication preferences, recognition preferences, anonymity preferences, or donor record details. NEEI will make reasonable efforts to respond to donor requests in a timely manner, subject to identity verification, legal requirements, record-retention obligations, and organizational capacity.

A donor may request that NEEI limit, suppress, archive, anonymize, or delete certain Donor Information. NEEI may not be able to delete information that must be retained for tax, accounting, audit, legal, restricted-gift, fraud-prevention, charitable-solicitation, grant, governance, or recordkeeping purposes.

Requests may be sent to [info@NEEDInitiatives.org](mailto:info@NEEDInitiatives.org).

## 12. Retention and Security

### 12.01 Retention

NEEI retains Donor Information for as long as reasonably necessary to process and document gifts, maintain donor and fundraising records, comply with legal and audit requirements, respect donor intent and restrictions, maintain organizational records, resolve disputes, prevent fraud, and support mission-related communications and stewardship.

Donor records will be retained and destroyed in accordance with NEEI's Document Retention & Destruction Policy and applicable law, subject to any legal hold, audit, investigation, subpoena, grant requirement, regulatory inquiry, or other preservation obligation.

### 12.02 Security

NEEI uses reasonable administrative, technical, and physical safeguards designed to protect Donor Information against unauthorized access, loss, misuse, alteration, or disclosure. These safeguards may include access controls, password protection, approved systems, secure payment processing, limited access based on need to know, confidentiality expectations, and vendor safeguards.

No method of electronic transmission, internet communication, payment processing, or storage is completely secure. NEEI cannot guarantee absolute security, but will take reasonable steps to protect Donor Information and respond to suspected security incidents in accordance with applicable law and NEEI's internal policies.

## 13. Third-Party Websites and Platforms

NEEI's website, donation pages, event pages, social media pages, email messages, or fundraising materials may link to or use third-party websites or platforms. Those third parties may collect, use, store, or disclose information under their own privacy policies and terms. NEEI is not responsible for the privacy or data-handling practices of third-party websites or platforms that it does not control.

Donors are encouraged to review the privacy policies and terms of any third-party donation platform, payment processor, crowdfunding platform, event platform, social media platform, or other service used to interact with NEEI.

## 14. Children and Donors

NEEI's donor-facing pages and fundraising communications are not directed to children under the age of 13. NEEI does not knowingly solicit donations directly from children under 13. If NEEI becomes aware that it has collected donor information directly from a child under 13 without appropriate parent or guardian involvement, NEEI may delete or limit the information and request that a parent or legal guardian contact NEEI.

Because NEEI's mission involves students and families, donor stories or gift dedications may sometimes reference minors. NEEI will handle any public use of names, images, direct quotes, stories, or identifying details involving minors in accordance with applicable consent, safeguarding, privacy, and photo/video practices.

## 15. Changes to This Policy

NEEI may update this Policy from time to time to reflect changes in law, technology, fundraising practices, donation platforms, internal policies, or organizational operations. Updated versions will be effective when posted or otherwise made available, unless a different effective date is stated.

The “Last Updated” date should be revised whenever this Policy is materially updated.

## 16. Contact Information

Questions, donor privacy requests, opt-out requests, correction requests, anonymity requests, or concerns about this Policy may be directed to:

**NorthEast Education Initiatives, Inc. / NEED Initiatives**

Email: [info@NEEDInitiatives.org](mailto:info@NEEDInitiatives.org)

Website: <https://www.needinitiatives.org>

## 17. Relationship to Other NEEI Policies

This public-facing Policy should be read together with NEEI’s general website Privacy Policy and applicable internal Board-adopted policies, including the Donor Privacy & Communications Policy, Gift Acceptance Policy, Financial Controls Policy, Document Retention & Destruction Policy, Cyber/Privacy & Safeguarding Policy, Charitable Solicitations Registration & Financial Reporting Policy, Child Protection & Mandatory Reporting Policy, Photo/Video Consent Policy, and Crisis Communications & Media Policy.

If there is a conflict between this Policy and applicable law, applicable law controls. If there is a conflict between this public-facing Policy and a more protective NEEI internal policy, NEEI should apply the more protective standard to the extent legally and operationally appropriate.