

# ST. ANDREW'S SOCIETY OF BALTIMORE



**First Revised Privacy Policy of The St. Andrew's Society of Baltimore, Inc.  
*and*  
The St. Andrew's Society Foundation, Inc.**

**Adopted by the Board of Managers & Foundation Trustees - 02 March 2010**

## **Background Statement**

The St. Andrew's Society of Baltimore, Inc. (the "Society") and its affiliated foundation, the St. Andrew's Society Foundation, Inc. (the "Foundation") (hereinafter, severally, the "Society" or the "Foundation"; and jointly as "we" or "us" as per context) are committed to maintaining the confidentiality of Member information collected or otherwise obtained and/or generated, from time to time, in the conduct of the business of the Society, in its membership applications and renewals, and as retained in its membership databases and general books and records. We are also committed to undertaking and assuring the confidentiality of sundry confidential information obtained by the Society and/or the Foundation from non-Member third parties in connection with certain activities and undertakings of the Society and/or the Foundation.

The Society routinely gathers Confidential Information (the "Information") from Members, friends, guests, and others who have a relationship to, or do or seek to do business with us. Additionally, the Society routinely generates information from the conduct of its business and programs, including without limitation budgets, operating statements, records of disbursements and collections, and banking and tax records and filings, pertaining to Society business in general and Society programs in particular, as well as sundry governmental and other filings, reports, etc. This Information may contain confidential, proprietary, and/or legally privileged or protected content. The Board of Managers ("BOM"), Officers, Committees of the Society, and the Trustees of the Foundation are committed to high ethical standards in the gathering, generation, and protection of the confidential content of this Information as set forth in greater detail in this Privacy Policy (the "Policy").

### **Information We Collect**

The Society, in the routine conduct of its business and the discharge of its charter and stated mission, from time to time collects, receives, and maintains Confidential Information about Members, their families, friends, guests, and others, who have or seek a relationship to or undertake business with us. This Information includes names, dates of birth, elements of Scottish heritage, occupations, family status, home and business addresses, telephone numbers, e-mail addresses, and other data which may be necessary in the conduct of, or otherwise assist in, the furtherance of the purposes and business of the Society. Additionally, the Benevolence Committee of the Society may collect and maintain financial, medical, academic, tax, and other Confidential Information to further its work in recommending the approval and distribution of benevolence grants, and the award and/or renewal of annual and one-time scholarship and heritage activities' grants from the Society or the Foundation.

### **Information We Generate**

The ordinary conduct of its business requires the Society to generate and maintain certain Information that we regard as Confidential. Such Information typically relates to the financial records created in the conduct of the Society's business at a general level, and specifically in the conduct of its various programs. Such activities are as disparate as fund raising initiatives, proposed and approved capital and operating budgets, and disbursements records routinely distributed at Board of Managers' meetings, etc. The Society has a vested interest in seeing that its Members and Officers each recognize the proprietary and confidential nature and content of such generated and collected Information, and to require that such Information be treated and maintained with due regard to the Society's rightful and legally protected interests therein, and the rightful and legally protected interests of applicable third parties therein.

### **Uses of Confidential Information**

We fully recognize and appreciate that persons and parties who provide Confidential Information to the Society or Foundation expect such generated and entrusted Information to be handled with high standards of care, sensitivity, respect, and diligence. Generally, we use this Information within the confines of the work of various Committees, as applicable, and we do not share such information with the Society membership at-large, or with non-Society or non-Foundation members. Only on a "need to know" basis do we share this Information with the Board of Managers and Officers of the Society, and the Trustees of the Foundation, et al.

**ST. ANDREW'S SOCIETY OF BALTIMORE, INC. & ST. ANDREW'S SOCIETY FOUNDATION, INC.  
FIRST REVISED PRIVACY POLICY OF 2010**

Neither the Society nor the Foundation discloses restricted Information to non-affiliated third parties except when required by applicable law. All applicable non-disclosure, confidentiality, statutory, and regulatory requirements are incorporated in the "Best Practices" of the Society and Foundation when collecting, maintaining, utilizing, disseminating, and disposing of such Confidential Information. Whether required by applicable law or otherwise, we seek to apply the foregoing Best Practices to: (a) keep Confidential Information strictly confidential; (b) maintain such Information in a safe and secure environment; (c) use such Information in an ethical manner solely for the purposes for which it was collected, obtained, and intended; and (d) dispose of such Information, whether stored in paper or electronic form, once no longer required by the Society or Foundation, in a safe and secure manner.

**Past Presidents' Scholarship Program & Other Benevolence Grants**

Similarly, we collect Confidential Information from non-Member third-parties in connection with the Past Presidents' Heritage Scholarship Program as administered by the Society's Benevolence Committee. The Benevolence Committee also receives sundry Confidential Information from both Members and non-Members in connection with non-scholarship benevolence requests. Generally, we do not identify the name, circumstances, or details of a request received from a person, family, or organization that seeks, or is awarded, benevolence funds from the Society or Foundation, except in the following situations when limited Information is disclosed by the Benevolence Committee to the Board of Managers and/or the Foundation's Trustees, such as: (a) the name, college plans, and brief background Information about the new winner(s) of our annual Past Presidents' Heritage Scholarship award; (b) the name and college of attendance of current recipients of previous Heritage Scholarship awards; and (c) the name and specific dollar amount of our financial grant(s) directed toward various publicly-recognized Scottish organizations, pipe bands, or individual musicians or performers, including awards from competition, when appropriate. Requests for benevolent assistance grants made to the Society or the Foundation are considered highly Confidential, and are not disclosed to any third party beyond the members of the Benevolence Committee who review the case and determine the outcome; the Foundation Trustees, if required to be involved to approve the disbursement; the Foundation Treasurer who writes the check for the grant; and the Foundation Secretary who records the activity in the Foundation Minutes.

**Publications & Society Website**

Periodically, the Society publishes a Membership Directory for the exclusive use of its Members. The contents of the Membership Directory may not be reproduced, sold, leased, or used by Society members for any business or commercial purpose or by any non-members of the Society for any purpose, without the express prior written approval of the Board of Managers of the Society. Any Member may, upon adequate advance written or electronic notice to the Membership Secretary of the Board of Managers, opt out of having his Confidential Information listed, in whole or in part, in such Membership Directory and/or Society Website.

The personal Information of former Members, families, friends, and others who have or have previously had a relationship to the Society is treated in the same manner as the personal Information of current Members, families, friends, and others who have a current relationship to the Society, except that such information is not generally included in the Society's Membership Directory unless Honorary Membership status or other circumstances warrant.

Periodic announcements concerning the general interest activities of the Society or the Foundation are made via *The Pibroch* (the Society's bi-monthly newsletter), other Society publications, and media releases to the general public, including without limitation any such Information appearing, in whole or in part, from time to time or at any time, in the Society's Website. Such publications are understood and intended to include identification of Society Members, and there may be certain details disclosed of past and present Society activities which are generally known to the public, and which are used for general interest purposes in the promotion and reporting of Society activities and events. These announcements, publications, and Website, and the Information appearing therein from time to time, are neither deemed to be violations of this Policy, nor deemed to be an unauthorized use of Confidential Information, when made or done in accordance with this Policy, and all Members participating therein are deemed to have consented to inclusion in such publications. Charitable Donors to the Society or the Foundation may be acknowledged by name only, but the fiscal amount of their donation(s) will not be disclosed beyond the Officers, Board of Managers and/or Foundation Trustees. Any request by a donor to remain anonymous will be honored by the Society or the Foundation and may be so noted in Society documents, publications or other media releases.

Express and unconditional consent by each Member and his guests as to all references and/or appearances in any Society publication or website, including without limitation

**ST. ANDREW'S SOCIETY OF BALTIMORE, INC. & ST. ANDREW'S SOCIETY FOUNDATION, INC.  
FIRST REVISED PRIVACY POLICY OF 2010**

photographs and electronic and artists images, recordings, and renderings, are deemed a started and irrevocable condition of attendance and admission to all Society events and functions, and not a waived right.

**Confidentiality, Security, and Disposal**

The Society and Foundation restrict access to and distribution of non-public Confidential Information to currently serving and/or duly elected Society Officers, the Board of Managers, Committee Chairmen and Committee members, and Foundation Trustees who have a current and specific need to know, official use for, or otherwise have official access to such Information. Society Members not currently serving as Officers, on the Board of Managers, as Committee Chairmen or Committee members, or in Honorary or Advisory Positions, or as Foundation Trustees, may not obtain or otherwise be granted access to any Confidential Information without the express prior approval of the Board of Managers upon written request from such Member seeking such Information, which requests may be denied or granted in accordance with prevailing law or the Charter, Constitution, Bylaws or Standing Rules of the Society or Foundation as applicable. Any Confidential Information placed into the Minutes, or other books or records of the Society or Foundation shall be and remain confidential; shall be coded when, where, and as necessary; and shall be similarly protected from unauthorized and un-permitted access and use, except as provided herein.

Physical, electronic, and procedural safeguards shall be established by the Society and Foundation to comply with the Society's current or revised "Best Practices" standards intended to safeguard such non-public Information. Such safeguards shall be reviewed and revised periodically by the Board of Managers of the Society, not less often than annually by the Library & Archives and Risk Management Committees of the Society. The aforementioned Best Practices shall be reviewed periodically and upgraded when and as necessary.

The periodic destruction and disposal of any and all such Confidential Information as herein referenced shall be done according to the within-referenced Best Practices of the Society and Foundation. With regard to the sundry financial and tax records generated and/or received by the Society, or Foundation, plus any applicable medical or other such Confidential Information, if any, generated or obtained by the Society or Foundation, the Society and Foundation shall establish and enforce mutually agreed upon strict retention, destruction, and disposal protocols, including where applicable the requirement of mechanical shredding, and the creation and maintenance of a Destruction and Disposal Log in the Minutes of the Benevolence Committee or as otherwise directed by the Board of Managers and Foundation Trustees.

**ST. ANDREW'S SOCIETY OF BALTIMORE, INC. & ST. ANDREW'S SOCIETY FOUNDATION, INC.  
FIRST REVISED PRIVACY POLICY OF 2010**

**Annual Review and Confirmation**

This Policy shall be reviewed and confirmed annually by the Board of Managers of the Society and the Trustees of the Foundation, and record of such confirmation shall be included in the Minutes of the Society and Foundation, not later than the first regular meeting of the Board of Managers of the Society and the first regular meeting of the Trustees of the Foundation, when new Officers, Managers, Committee Chairmen, and Trustees are installed in accordance with Standing Rule 12.5.

This *First Revised Privacy Policy* was adopted by the Officers and Board of Managers of the St. Andrew's Society of Baltimore, Inc. at their 02 March 2010 regular meeting;

This *First Revised Privacy Policy* was adopted by the Trustees of the St. Andrew's Society Foundation, Inc. at its 02 March 2010 meeting of the Foundation Board.

The effective dates are the respective dates of adoption or confirmation as aforesaid.

A copy of this Privacy Policy is available to any Member of the Society, and to any person or party with a legitimate business relationship to the Society or the Foundation upon written request to the Secretary of the Society.

**Attest:**

/s/ Greg William Scott, President  
St. Andrew's Society of Baltimore, Inc.

**Attest and Seal:**

/s/ Robert I. Catlin, II  
Secretary & Parliamentarian  
St. Andrew's Society of Baltimore, Inc.

**Attest:**

/s/ Donald C. Kerr, Jr, President  
St. Andrew's Society Foundation, Inc.

**Attest and Seal:**

/s/ Richard B. Isaac, Esq.  
Secretary  
St. Andrew's Society Foundation, Inc.

[This Privacy Policy is composed of a total of six pages including this page.]