



**Children's Hospital Los Angeles**  
**Donor Confidentiality and Privacy Policy**  
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## Donor Confidentiality and Privacy Policy

This Donor Relations Policy aims to clarify Children's Hospital Los Angeles' policies and procedures regarding donor privacy, honoring donor intent, and recognition of gifts. Children's Hospital Los Angeles (CHLA), through this policy, strives to adhere to the principles set forth by the Donor Bill of Rights created by the Association of Fundraising Professionals (AFP), the Association for Healthcare Philanthropy (AHP) and the Giving Institute: Leading Consultants to Non-Profits.

### Donor Bill of Rights

Philanthropy is based on voluntary action for the common good. It is a tradition of giving and sharing that is primary to the quality of life. To ensure that philanthropy merits the respect and trust of the general public, and that donors and prospective donors can have full confidence in the nonprofit organizations and causes they are asked to support, we declare that all donors have these rights:

1. To be informed of the organization's mission, of the way the organization intends to use donated resources, and of its capacity to use donations effectively for their intended purposes.
2. To be informed of the identity of those serving on the organization's governing board, and to expect the board to exercise prudent judgment in its stewardship responsibilities.
3. To have access to the organization's most recent financial statements.
4. To be assured their gifts will be used for the purposes for which they were given.
5. To receive appropriate acknowledgment and recognition.
6. To be assured that information about their donation is handled with respect and with confidentiality to the extent provided by law.
7. To expect that all relationships with individuals representing organizations of interest to the donor will be professional in nature.
8. To be informed whether those seeking donations are volunteers, employees of the organization or hired solicitors.
9. To have the opportunity for their names to be deleted from mailing lists that an organization may intend to share.
10. To feel free to ask questions when making a donation and to receive prompt, truthful, and forthright answers.

### Fiduciary Responsibility of CHLA

Children's Hospital Los Angeles is a California non-profit public benefit corporation and is the largest provider of pediatric medical care in the eight-county area (Los Angeles, Kern, Orange, Riverside, Santa Barbara, San Bernardino, San Luis Obispo, and Ventura) and a referral center for patients throughout California, the nation, and the world. Responsibility for governance of CHLA is vested in its Board of Directors.

Public Disclosure: CHLA will comply with both the letter and spirit of all public disclosure requirements, including the open availability of its Form 990 Tax Return, <https://www.guidestar.org/profile/95-1690977>

### HIPAA and Fundraising

HIPAA (Health Insurance Portability and Accountability Act) governs the use of Protected Health Information (PHI) for fundraising purposes. This policy describes the circumstances and conditions under which PHI may be used for these purposes.



CHLA may use or disclose only the individual's demographic information and health care date of service for fundraising activities. Demographic information is defined as only the individual patient and their guarantor's name, address and other contact information, age, gender, and insurance status. CHLA must obtain the individual's prior authorization to use or disclose any other information (such as the treating or referring physician, the department or practice area, illness or treatment) for fundraising purposes. Since only the individual's demographic information may be used, reports cannot be generated for fundraising purposes from an information system using non-demographic information fields, such as a physician, medical condition, or clinical department.

In conducting fundraising activities, CHLA must ensure that:

- The CHLA Notice of Privacy Practices states that CHLA may contact the individual/guarantor to raise funds for CHLA and may use or disclose certain information (demographic and dates of health care service) to a business associate or institutionally-related foundation, for CHLA's own fundraising purposes;
- When CHLA provides fundraising materials to the individual, CHLA provides the individual with a clear and simple way to opt out of any future fundraising communications;
- CHLA's covered components implement a process for recording, tracking, and honoring all individual "opt outs";
- In conducting fundraising activities, CHLA must ensure that in all cases, it is made very clear that the individual may request that there be no further fundraising communications from the individual provider or CHLA, and that that request will have absolutely no adverse effect on their treatment or care as a result;
- Written solicitations are worded in a way that does not suggest that the sender of the solicitation letter knows the individual's disease diagnosis or treatment unless the recipient has specifically authorized the use of that PHI for fundraising purposes (for example, VIP donors who want their names linked to a specific appeal);
- In conducting fundraising activities, CHLA must ensure that the individual's health care provider or provider team obtains the individual/guarantor's written prior authorization to provide disease or treatment specific information to CHLA. CHLA must maintain the authorization for six years;
- When CHLA staff obtain PHI for fundraising purposes, that PHI should not be stored or recorded unless the individual/guarantor's prior authorization is obtained; and
- For development activities, CHLA may use the Facility Directory to identify individuals who may be receiving care in the covered component and, to personally contact the individual during their hospital stay, unless the individual has restricted disclosure of their information from the Facility Directory.

### Fundraising Permit

In compliance with the Charitable Solicitation Ordinance in the City of Los Angeles (L.A. Municipal Code Article 4, Section 44), CHLA's permit is on file with the City of Los Angeles. CHLA registers fundraising permits in all 50 states in the United States; to review a specific permit email CHLA Foundation at [foundation@chla.usc.edu](mailto:foundation@chla.usc.edu) or call (323) 361-2308.

### Privacy Notice

The 1977 California Information Practices Act requires CHLA to inform individuals asked to supply information about themselves of the following: CHLA is requesting this information to update the general resource files of its Foundation Department. Furnishing the information is strictly voluntary and will be maintained confidentially. The information may be used by other hospital departments in the regular course of business, but will not be disseminated to others except if required by law. You have the right to review your own data file. Inquiries should



be forwarded to [foundation@chla.usc.edu](mailto:foundation@chla.usc.edu) or via mail at CHLA Foundation, 4560 Sunset Blvd, #29, Los Angeles, CA 90027.

### Confidentiality of Personal Information of Donors

CHLA is responsible for maintaining records of all personal information of donors, prospects, event guests, and friends of CHLA. Reasonable precautions shall be taken to protect and preserve the confidentiality of such personal information. CHLA employees and volunteers, as well as agents and authorized service providers of the CHLA, are required to safeguard donors' personal information. CHLA values and respects its donors' right to privacy, and is committed to ensuring that donors' personal information is used only for the purposes for which is it collected, and in accordance with donors' intent.

Donors' personal information is collected to establish and manage the CHLA's relationship with donors, and to identify donors' preferences and expectations. The information is also used by CHLA to analyze giving patterns, process gifts, and provide donors with documentation of their charitable contributions. In addition, personal information is used to publicly recognize and thank donors for their generosity.

Donors who wish to avoid any disclosure of their contributions may inform CHLA when making a pledge or gift or at any time after the initial gift. This request for anonymity shall be honored by CHLA unless and until a donor informs CHLA otherwise. In the absence of a donor's request for anonymity, CHLA may, at its discretion, recognize and publicize a donor's contribution.

### Donor's Consent for Public Acknowledgment and Recognition

CHLA recognizes donors' philanthropic contributions by various means, in a tasteful and appropriate manner, respecting the desire of those donors who wish would remain anonymous. Gifts accepted by CHLA, regardless of value or form, shall be acknowledged in writing to the donor, and in accordance with the Internal Revenue Code and US Income Tax Regulations.

One of the ways we express our thanks is by listing the names of donors in Web-based and/or print honor rolls. Should you wish that your name not appear as a donor, please notify us at [foundation@chla.usc.edu](mailto:foundation@chla.usc.edu).

Leadership gifts of a certain magnitude donated for particular projects or campaigns may receive recognition subject to any required consents and/or approvals from CHLA, applicable boards, and other consents and/or approvals as may be required by law. Determination of the required gift level for donor recognition, if any, shall be made on a case-by-case basis by CHLA, considering such factors as the financial needs of CHLA and the philanthropic climate at the time of the contribution.

CHLA may relocate or remove donor recognition at the end of an agreed-upon term, or when the renovation of the surrounding area warrants such a change. In addition, in the event that circumstances change substantially such that continued donor recognition could compromise the CHLA, may relocate or remove such donor recognition. Donors who wish to avoid any public recognition of their contributions may inform CHLA when making a pledge or gift.

### Giving Site Disclaimer

Every effort is made to provide complete and accurate data and information on the CHLA Giving site, <https://www.chla.org/ways-help>. However, errors may occur in processing data or in seeking to provide non-



technical explanations of fund uses and goals. Materials contained within this site should not be intended nor construed as a contract. Formal disclosure information for donors is available in our privacy policy below.

### Information Collected by CHLA

Our Sites are made available to you to provide information about our services offered. You can browse our Sites without providing any personal information such as your name, mailing address, email address, phone number or social security number.

### Non-Personal Information

When you access and use our Sites, some information is automatically collected. For example, we may collect information about your computer's operating system, Internet Protocol (IP) address, access times, browser type and language, and the website that referred you to us. We also collect information about your usage and activity on our Sites.

### Cookies

When you visit our Sites, you may be issued a "cookie," which helps track your session while online. Cookies are small data files stored on your hard drive. Among other things, cookies help to make your site visit more relevant and personalized for you. We use cookies to see which areas and features are popular and to count visits to our Sites. Most browsers are initially set to accept cookies. If you would prefer, you may set your browser to refuse cookies or alert you when cookies are being sent; however, it is possible that some parts of our Sites will not function properly if you do so.

### Web Beacons

The Sites and any communications sent by CHLA may contain electronic images (generally, single pixel ".gif" images) called "web beacons." These web beacons allow CHLA and CHLA authorized third parties to monitor and collect certain information about the viewer of a web page, email message or other communication, such as the type of browser requesting the web beacon, the device identifier of the device the web beacon is sent to and the time the web beacon was viewed. Web beacons may be used count unique users, visits, and page views; monitor traffic and conversion patterns; personalize your experience when you visit the Sites, including advertising and content you see; and determine whether messages were opened, links were clicked and/or notifications/offers were acted upon.

### Personal Information

We also collect personal information that you voluntarily provide to us, such as when you apply for admissions, register for an account, participate in a promotion or sweepstakes, request a brochure or other materials, locate, or make inquiries to specific departments, request information or otherwise contact CHLA. Such information may include contact information (name, address, telephone number, social media username/handle, mobile phone, and/or email address); academic area or interest (biology, anthropology, human studies, medicine, etc.); financial information (financial aid application history, payment history, current and estimated loan payments, etc.); demographic information (age, marital status, size of household, income); and marketing profile information. We may also collect the names and email addresses of your friends and family, if you choose to provide CHLA with this information. Finally, we may obtain information from other sources and combine that with the information we collect directly from you.



## How We Use Your Information

Non-personal information is used to generate statistics and to measure site activity to improve the usefulness of the site for our visitors.

Personal information allows us to provide you with products, services and information and enables us to offer a customized experience on our Sites. We use personal information for the purposes described in this privacy policy or otherwise disclosed to you on our Sites. CHLA may store and process personal information in the United States and other countries. For example, personal information may be used to:

- Operate and improve our Sites;
- Provide information about our institution and send you related information, including confirmations, brochures, updates, security alerts and support and administrative messages;
- Notify you of the closest medical office;
- Process and deliver contest entries and rewards;
- Respond to comments, questions, or requests for information and provide customer service;
- Communicate with you about our achievements, new contests, promotions, rewards, special offers, upcoming events and other news;
- Generate site analytics to improve our website and the user experience; and
- Link or combine with personal information we get from third parties to help understand your needs and provide you with better service and information.

## Cooperative Databases

To facilitate our fundraising activities, we participate in certain “cooperative databases” as do many other reputable charitable organizations. This means that we occasionally contribute certain donor names and postal addresses to a shared database that may be accessed by other participating organizations who also contribute certain information to the database. Note that the cooperative database does not allow participating organizations to identify donors to CHLA or access donation amounts but may identify a donor as being interested in a particular type of charitable organization (e.g. child health). Our partner organizations will not have continued access to your name and address unless you choose to respond to their mailings. They may also be required to comply with certain laws or guidelines concerning your information, such as the Direct Marketing Association’s guidelines for ethical business practice. We do not sell your information or share your email address with cooperative databases. If you do not wish to have your information shared with a cooperative database, please contact us at [foundation@chla.usc.edu](mailto:foundation@chla.usc.edu). We strive to promptly honor all requests concerning your preferences on how we share or use your personal information.

## Third-Party Vendors and Personal Information

When you donate on our website, the transaction will be processed by third-party vendors who are not affiliated with CHLA. When you provide your name, contact information, and credit card billing or bank account information, all such information is encrypted using "SSL," an industry standard secure technology. This encryption is designed to prevent the theft or interception of the information you provide. SSL encryption is indicated on your web browser by the display of a lock or key on the browser status bar. Our online giving form and events registration are supported through our primary third-party processor, Blackbaud, which provides CHLA basic transaction data but not sensitive information such as credit card numbers or passwords. In addition to using SSL encryption for all transactions and conforming to the Payment Card Industry Data Security Standards (PCI Compliance) for all online payment transactions, Blackbaud stores encrypted credit card numbers and passwords, as well as other donor information, on servers that are kept in a physically secure environment with strict policies that minimize staff access to the information contained therein. Blackbaud is responsible for its



own data security and privacy measures, and we cannot and will not be liable for any loss in connection with Blackbaud's handling of your information. Blackbaud has its own privacy policy, which you may review at <https://www.blackbaud.com/privacy-policy.aspx>.

Third-Party Online Platform Vendors include:

- Blackbaud Luminate Online - <https://www.blackbaud.com/company/privacy-policy/north-america>
- OneCause - <https://www.onecause.com/general/security-privacy-policy/>
- Crowdrise by gofundme - <https://www.crowdrise.com/about/privacy>

## Sharing Your Information

We do not share your personal information with third parties except as described in this privacy policy or as otherwise disclosed to you on our Sites. For example, we may share personal information as follows:

- when you give us your consent to do so, including if we notify you on the Sites that the information you provide will be shared in a particular manner and you provide such information;
- with vendors, contractors, consultants, and other service providers who are working on our behalf and need access to your information to carry out their work for us;
- with specialized vendors that work on behalf of CHLA's cooperative database;
- to (i) comply with laws or to respond to lawful requests and legal process, (ii) to protect our rights and property and those of our agents, customers, and others, including to enforce our agreements, policies, and Terms of Use; or (iii) in an emergency to protect CHLA and the safety of our faculty and staff or any third party; and we may also share aggregated or anonymized information that does not directly identify you.

## California Privacy Rights

Under California's Shine the Light law, Cal. Civ. Code § 1798.83, California residents have the right to request and obtain, once per year, information regarding CHLA's disclosure of personal information to third parties for their own direct marketing purposes. To request a list of the categories of information CHLA has shared, and the names and addresses of such third parties, please send your request to: CHLA Foundation, 4650 Sunset Blvd, #29, Los Angeles, CA 90027.

## Information Security

We take reasonable measures to protect personal information to prevent loss, misuse and unauthorized access, disclosure, alteration, and destruction.

## Third-Party Advertising

We may also allow third parties to use cookies or other tracking technologies to collect non-personal information about your use of our Sites, including your IP address, pages viewed and conversion information. This information may be used, among other things, to deliver advertising targeted to your interests and to better understand the usage and visitation of our Sites and other sites tracked by these third parties. This privacy policy does not apply to, and we are not responsible for, third party cookies or other tracking technologies. We encourage you to check the privacy policies of advertisers and/or ad services to learn more about their privacy practices. If you would like more information about third-party advertising or to opt-out of having your information used in this way, please visit [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).

## Third-Party Links

Our Sites may contain links to third party websites. This privacy policy does not apply to the linked sites, and we





do not control, nor are we responsible for, the content or privacy and security practices of those sites. Any personal information you provide to a linked site is provided directly to a third party and is subject to such third party's privacy policy. We encourage you to learn more about such third party's privacy and security practices and policies before providing any of your personal information.

### Opt-Out Option and Correcting Your Information

You may update your contact information, the frequency of contact, and/or opt-out of receiving promotional emails and SMS messages from CHLA at any time.

You may also request changes to your contact preferences and personal information by contacting CHLA via one of the following methods:

CHLA Foundation  
4650 Sunset Blvd, #29  
Los Angeles, CA 90027

Email: [foundation@chla.usc.edu](mailto:foundation@chla.usc.edu)

Telephone: (323) 361-2308

SMS messages: text [CHLASTOP](#) from the cell phone that you have registered with CHLA

### Updates and Changes to this Privacy Policy

We reserve the right to change this privacy policy for any reason and may make changes to it with or without notice. Each time this policy is changed, we will revise the "Effective Date" at the top of this page. If substantial changes are made to our policies on collection or disclosure of your personal information, we will notify you by posting such changes on our website and/or through other appropriate communications we deem necessary. If you are concerned about how your information is collected or used, you should check our privacy policy periodically to make sure it is acceptable to you. Your use of our website constitutes your agreement to this privacy policy and any revisions or updates to it.

### Contact Us

If you have any questions or concerns about this privacy policy, please contact CHLA Foundation at (323) 361-2308 or by email at [foundation@chla.usc.edu](mailto:foundation@chla.usc.edu).