



BRIDGING THE DIGITAL DIVIDE · ST. LOUIS, MISSOURI

Donor Privacy Policy

Every gift to Unity Foundation is an act of trust. This policy sets out, in plain language, what information we collect from our donors, how we protect it, how we use it, and the choices every donor holds over it.

ORGANIZATION

Unity Foundation NP
501(c)(3) Private Operating
Foundation

EIN

86-2158056

EFFECTIVE DATE

July 22 2026

VERSION / REVIEW

1.0 · Reviewed annually
by the Board of Directors

OUR CORE COMMITMENT

Unity Foundation does not sell, rent, trade, lease, or otherwise share our donors' names, contact information, or giving history with any other organization, business, or individual — ever, and for any reason other than those required by law and disclosed in this policy.

1 Purpose and Scope

Unity Foundation is a Missouri nonprofit corporation and a 501(c)(3) private operating foundation working to expand access to computer science education, mentorship, and technology opportunity in underserved communities. Charitable contributions make that work possible, and the information donors share with us is held in confidence.

This policy applies to all personal information Unity Foundation collects from donors, prospective donors, grantors, members, event attendees, and website visitors — whether collected online at unityfoundation.io, by mail, by telephone, in person, at events, or through third-party giving platforms acting on our behalf. It binds every director, officer, employee, contractor, and volunteer of Unity Foundation who has access to donor information.

2 Information We Collect

We collect only the information reasonably necessary to process gifts, acknowledge donors, steward relationships, and meet our legal obligations.

- **Identifying information** — name, mailing address, email address, and telephone number.
- **Gift information** — amount, date, payment method, designation or restriction, recurring schedule, matching-gift employer, and gift history.
- **Payment information** — processed exclusively by PCI DSS–compliant third-party payment processors. Unity Foundation does not store complete payment card numbers, card security codes, or bank routing and account numbers.
- **Voluntarily provided information** — recognition name, anonymity preference, employer, program interests, communication preferences, and accessibility or accommodation requests.

- **Website information** — IP address, browser type, pages visited, and referring source, collected through cookies and analytics tools and reviewed only in aggregate.

Unity Foundation does not knowingly collect personal information from children under the age of 13 through our donation channels. Information about minors participating in Unity Foundation education programs is governed by the applicable program agreement and by federal and state student-privacy law, not by this policy.

3 How We Use Donor Information

- To process gifts and issue written acknowledgments and the contemporaneous substantiation required by the Internal Revenue Code.
- To thank donors, report on the impact of their support, and invite them to Unity Foundation programs and events.
- To administer recurring gifts, pledges, matching gifts, and restricted or designated funds according to donor intent.
- To satisfy federal and Missouri reporting, audit, and recordkeeping obligations.
- To conduct internal analysis and planning that strengthens our fundraising and programs.

We do not use donor information for any purpose unrelated to Unity Foundation's charitable mission, and we do not use it for commercial purposes of any kind.

4 Information We Never Share

Unity Foundation **does not sell, rent, trade, lease, swap, or otherwise transfer** donor names, contact information, or giving history to any third party for that party's own use. This applies without exception, including to other charitable organizations. We do not participate in donor list exchanges or cooperative donor databases, and we do not permit any third party to use our donor information for their own solicitation, marketing, or advertising.

5 Limited Disclosures

Donor information is disclosed outside Unity Foundation only in these circumstances:

- Service providers.** Payment processors, donor database and email providers, mail houses, auditors, accountants, and legal counsel engaged by Unity Foundation. Each is bound by a written agreement or professional duty of confidentiality, may use the information only to perform services for us, and may not retain, disclose, or use it independently.
- Legal requirements.** When compelled by subpoena, court order, or a lawful request from a government or regulatory authority, including the Missouri Attorney General under Chapter 407, RSMo.
- Required tax filings.** Contributor information reported to the Internal Revenue Service on Schedule B of Form 990, which is filed confidentially (see Section 9).
- With permission.** When the donor has given express consent, such as for a public recognition listing or a joint announcement with a funding partner.
- Aggregate data.** De-identified or aggregated statistics — total dollars raised, number of donors, average gift — that cannot reasonably be used to identify any individual.

6 Recognition, Anonymity, and Donor Choices

Public recognition

Unity Foundation asks before listing a donor's name in an annual report, on our website, at an event, or in any other public recognition. Donors may specify how their name appears, request that only a gift range be shown, or decline recognition entirely.

Anonymity

Any donor may request anonymity at the time of a gift or at any point afterward. Anonymity is honored across all Unity Foundation channels and is maintained going forward without a further request. Anonymous gifts are still recorded in our internal records as required for tax substantiation and audit.

Communication preferences

Donors may opt out of any or all Unity Foundation communications — fundraising appeals, newsletters, event invitations, or impact reports — and may limit us to a preferred channel such as email only or postal mail only. Email messages include a one-click

unsubscribe, honored promptly and in all cases within the period required by the CAN-SPAM Act. Telephone preferences, including do-not-call requests, are recorded and honored. **Exercising any of these choices never affects the processing, receipting, or designation of a gift.**

7 Access, Correction, and Deletion

On request, Unity Foundation will provide a donor with a copy of the personal information we hold about them, correct information that is inaccurate or out of date, and remove information from our active records. We respond to such requests within thirty (30) days of verifying the requester's identity.

Deletion is subject to records Unity Foundation is legally required to retain for tax substantiation, audit, and reporting purposes. Where information must be retained, we will tell the donor what is being kept and why, and we will suppress the record from all solicitation and mailing use.

8 Safeguarding Donor Information

Unity Foundation maintains administrative, technical, and physical safeguards appropriate to the sensitivity of the information we hold. Access to donor records is role-based and limited to directors, employees, contractors, and volunteers with a legitimate need. Information submitted through unityfoundation.io is transmitted over an encrypted connection. Paper records containing donor information are stored securely and destroyed by shredding when no longer needed.

9 Confidentiality of Our IRS Filings

Unity Foundation makes its Form 990 available for public inspection as federal law requires. The names and addresses of contributors reported on Schedule B, Schedule of Contributors, are not part of the copy made available for public inspection and are redacted before public disclosure, consistent with Section 6104(d)(3)(A) of the Internal Revenue Code. Our directors, officers, and staff maintain that confidentiality.

10 Data Breach Notification — Missouri

Unity Foundation complies with the Missouri data breach notification statute, Section 407.1500, RSMo. In the event of a breach of the security of a system involving unencrypted personal information of Missouri residents, we will notify affected individuals without unreasonable delay following discovery, consistent with the legitimate needs of law enforcement and with any measures necessary to determine the scope of the breach and restore system integrity.

Notice will describe the incident in general terms, identify the categories of personal information involved, provide a telephone number and contact information for further inquiry, describe the steps taken to protect against further unauthorized access, and advise recipients to remain vigilant by reviewing account statements and monitoring free credit reports. Where a single notification event involves more than one thousand Missouri consumers, we will also notify the Missouri Attorney General's office and the nationwide consumer reporting agencies without unreasonable delay. Where we determine, after appropriate investigation or consultation with law enforcement, that a risk of identity theft or other fraud is not reasonably likely to occur, that determination will be documented in writing and retained for five years.

11 Website, Cookies, and Third-Party Giving Platforms

Our website uses cookies and analytics tools to keep the site functioning and to understand site usage in aggregate. Unity Foundation does not sell website visitor data and does not use donor or visitor data to target third-party advertising.

Gifts made through an external giving platform, employer matching portal, donor-advised fund sponsor, or crowdfunding site are also subject to that provider's own privacy policy and terms, which Unity Foundation does not control. We encourage donors to review them. Once donor information is transferred to Unity Foundation, this policy governs how we handle it.

12 Record Retention

Donor records are retained for as long as needed for stewardship and as required by law — generally no fewer than seven years following the close of the calendar year in which a gift was made. Gift agreements and documentation for restricted, endowed, or planned gifts are retained permanently. Records are securely destroyed at the end of their retention period.

13 Solicitation and Third-Party Fundraisers

Unity Foundation does not authorize any individual or organization to solicit contributions on its behalf except under a written agreement requiring compliance with this policy and with the Missouri Charitable Organizations and Solicitations Law, Sections 407.450 to 407.478, RSMo. Unity Foundation does not compensate any solicitor or fundraising professional on a commission or percentage-of-contributions basis.

14 Governance, Review, and Accountability

This policy is adopted by the Unity Foundation Board of Directors, published on unityfoundation.io, and made available to any donor on request. The Board reviews it at least annually and following any material change in law or in our fundraising operations. Directors, employees, contractors, and volunteers with access to donor information acknowledge this policy and are responsible for following it; a failure to do so may result in disciplinary action, up to and including termination of employment or of the volunteer or contractual relationship.

Unity Foundation will post any material revision to this policy on our website with an updated effective date. Revisions apply prospectively and will not reduce the protections that applied to information already collected without the donor's consent.

15 Questions, Requests, and Concerns

Any donor may ask what we hold, correct it, request anonymity, change communication preferences, or raise a concern about this policy by contacting us. We will respond promptly and without cost to the donor.

Unity Foundation

Mail 12140 Woodcrest Executive Drive, Suite 300, St. Louis, Missouri 63141

Phone (314) 579-0066

Email info@unityfoundation.io

Web unityfoundation.io

Donors may also contact the Missouri Attorney General's Office, Consumer Protection Division, which registers and oversees charitable organizations soliciting in Missouri, at ago.mo.gov or (800) 392-8222.

16 Adoption

This Donor Privacy Policy was adopted by the Board of Directors of Unity Foundation NP at a duly held meeting on **July 22, 2026** and is effective as of that date.

Ebrahim Moshiri

CHAIR, BOARD OF DIRECTORS

Aaron Berkenwald

SECRETARY, BOARD OF DIRECTORS

FRAMEWORK AND AUTHORITY

This policy is designed to conform with the Missouri Charitable Organizations and Solicitations Law (§§ 407.450–407.478, RSMo), the Missouri Merchandising Practices Act (§ 407.020, RSMo), the Missouri data breach notification statute (§ 407.1500, RSMo), the Missouri Nonprofit Corporation Act (Chapter 355, RSMo), Sections 170 and 6104 of the Internal Revenue Code, the CAN-SPAM Act, the Telephone Consumer Protection Act, the Children's Online Privacy Protection Act, and the Donor Bill of Rights. It also satisfies the donor privacy criteria applied by Charity Navigator and comparable charity evaluators.