

Data Privacy & Cybersecurity Policy

DreamSpire Creatives, Inc.

(Adopted by the Board on: December 26, 2025)

1. Purpose

This policy explains how DreamSpire Creatives, Inc. (“DreamSpire,” “we,” or “our”) protects personal information and uses reasonable security practices appropriate for a small nonprofit organization.

This policy applies to all board members, officers, employees, contractors, teaching artists, and volunteers who handle DreamSpire information.

2. Responsibility

- **Board of Directors:** Approves this policy and reviews it annually.
- **President / Executive Director:** Oversees compliance and handles serious incidents.
- **Designated Privacy Contact:** Maintains basic records, vendor information, and coordinates any data concerns.
- **All Personnel:** Follow this policy and report concerns promptly.

3. Information We Collect

We collect **only the minimum information needed** to operate our programs and fundraising.

This may include:

- Names and email addresses
- Donation history (amount and date)
- Program registration information (child’s name, age, and parent/guardian email)

We do not collect or store:

- Social Security numbers

- Government-issued ID numbers
- Credit card numbers
- Medical records

Payment information is handled entirely by third-party platforms.

4. Children's Information

We collect information about children **only with parent or guardian involvement** and only for program participation.

Children's information is never sold or shared for marketing purposes.

5. How Information Is Used

We use information only to:

- Communicate about programs, events, or registrations
- Send donation confirmations or receipts
- Meet basic legal and reporting requirements

We do **not sell, rent, or trade personal information**.

6. Third-Party Platforms

DreamSpire uses trusted third-party services to operate efficiently, including but not limited to:

- **Zeffy** (donations and events)
- **Give Lively** (donations and fundraising tools)

These platforms are responsible for protecting payment and account information under their own privacy and security policies.

7. Data Access & Protection

- Access to DreamSpire data is limited to people who need it.

- Organization email and shared cloud storage must be used for DreamSpire work.
- Passwords must be strong and not shared.
- Multi-factor authentication (when available) should be enabled.
- Lost or stolen devices used for DreamSpire work must be reported promptly.

8. Devices & Files

- Computers and phones used for DreamSpire work should be protected with a password, PIN, or biometric lock.
- Automatic updates should be enabled when possible.
- Sensitive information should not be stored on personal devices or personal email accounts.

9. Email & Communications

- Use DreamSpire email accounts when available.
- Be cautious of suspicious emails or links.
- Never share passwords or sensitive information by email.

10. Payments & Donations

- DreamSpire does **not store credit card information**.
- All donations are processed through PCI-compliant third-party platforms.
- DreamSpire only receives confirmation details needed for records and receipts.

11. Record Retention

We keep information only as long as needed for:

- Program operations
- Financial and legal records

Paper records are shredded when no longer needed.

Electronic files are deleted securely when possible.

12. Incidents & Breaches

Any suspected data loss, unauthorized access, phishing attempt, or lost device must be reported immediately to the President or designated privacy contact.

If required under Kentucky law, affected individuals will be notified as soon as reasonably possible.

13. Training

- New personnel receive basic privacy and security guidance.
- Annual reminders cover safe passwords, email awareness, and reporting concerns.

14. Enforcement

Failure to follow this policy may result in loss of access, corrective action, or removal from DreamSpire activities.

15. Policy Review

This policy is reviewed annually by the Board and updated as needed.