

Annual Reports and Honor Walls: Can donors be listed securely?

The short answer: it depends. In printed and circulated reports it is no, on honor rolls displayed on your premises, it can be yes.

Scenario: Your annual report always includes a list of donors above a certain dollar amount for that year. They may even be divided into giving tiers or circles.

Common approach: Include names of all donors, in the format in which they want to be recognized, except anyone who has asked to remain anonymous.

Why this fails under GDPR

Names are personally identifiable information and an annual report constitutes sharing of this information publicly. If you do not have specific consent of donors their names must not be included in the list. Furthermore, if a couple gives and wishes to be recognized together, consent must be obtained from both people before their names can be included.

This fails under GDPR because even with consent in place, what happens in the unlikely event that a donor later rescinds their consent? It would be impossible to redact a name already sent out on a printed list.

The safest approach for annual reports

List the total amounts received under each giving tier, or total number of donors overall for the year. Do not include names of individual donors.

Honor walls are a different matter

Literally setting a donor list in stone (or wood, glass, steel...) is usually something done on the premises of your organization, so management of the list falls under your protection. As noted above, consent must be obtained from every donor you wish to include and from both parties in any couple being listed together. You would need a procedure in place to handle unlikely requests to be removed. As the wall would be within the protection of your organization, removing a name while not very practical, is not impossible.