

OUR COMMITMENT TO PRIVACY

Your privacy is important to us. To better protect your privacy we provide this notice explaining our online information practices and the choices you can make about the way your information is collected and used.

THE INFORMATION WE COLLECT

This notice applies to all information collected on/or submitted to the American Society for Yad Vashem Inc. website. The types of personal information collected are:

- Name
- Address
- Email address
- Phone number
- Credit/Debit Card Information

On some pages, you can submit information about other individuals. For example, if you send a memorial or honorarium, you may include another person's name and address for acknowledgement purposes. In this case the types of personal information collected are:

- Name
- Address

CHILDREN UNDER 13

American Society for Yad Vashem Inc. does not knowingly collect personal information from children under 13 years of age. Children must ask their parents for permission before providing personal information to any website or purchasing any products or services online. American Society for Yad Vashem Inc. urges all parents to participate in their children's exploration of the Internet and to teach them about protecting their personal information while online.

THE WAY WE USE INFORMATION

American Society for Yad Vashem Inc. guarantees that we do not and will not sell or trade our donors' personal or contact information with anyone else, nor will we send mailings on behalf of other organizations.

We use the information you provide when making a donation to complete that donation only. We do not share this information with outside parties.

We use return email addresses to answer the email we receive and to distribute additional information if requested. Such addresses are not shared with outside parties.

We never use or share personally identifiable information provided online in ways unrelated to the ones described above without also providing you with an opportunity to opt-out or otherwise prohibit such unrelated uses.

OUR COMMITMENT TO DATA SECURITY

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

WHISTLEBLOWER POLICY

At American Society for Yad Vashem Inc., we believe that communication is the heart of good employee relations. Employees should share their concerns, seek information, provide input and resolve work-related issues by discussing them with their supervisors until they are fully resolved. It may not be possible to achieve the results an employee wants, but the supervisor needs to attempt to explain in each case why a certain course of action is preferred. If an issue cannot be resolved at that level, the employee is welcome to discuss the issue with the HR Manager. The supervisor should set up a time for both of them to meet with the HR Manager. If the employee's concern cannot be resolved by the HR Manager, the employee may discuss it with an officer of the organization. The manager should schedule that meeting for the employee.

Regardless of the situation, employees should be able to openly discuss any work-related problems and concerns without fear of retaliation. The HR Manager and supervisors are expected to listen to employee concerns, encourage their input and seek resolution to the issues and concerns. Often this will require setting a meeting in the near future. The HR Manager and/or supervisors are to set these meetings as quickly as possible, and employees are expected to understand that issues may not always be addressed at the moment they arise. Discussing these issues and concerns with management will help to find a mutually acceptable solution for nearly every situation.

If an employee has a concern about discrimination and/or harassment, American Society for Yad Vashem Inc. has set up special procedures to report and address those issues. The proper reporting procedures are set forth in the organization's Harassment and Discrimination Policy.

Retaliation against any employee for filing a complaint or participating in an investigation is strictly prohibited.

Occasionally, talking with a supervisor or someone in Human Resources about this conduct is not an option. If an employee/visitor feels that his/her complaint has not been or cannot be properly handled, he/she may forward the complaint to the Chairman of the Society.

DOCUMENT RETENTION AND DESTRUCTION POLICY

I. Purpose

This policy provides for the systematic review, retention, and destruction of documents received or created by the American Society for Yad Vashem Inc. in connection with the transaction of the American Society for Yad Vashem Inc. business. This policy covers all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept and how records should be destroyed. The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records and to facilitate the American Society for Yad Vashem Inc. operations by promoting efficiency and freeing up valuable storage space.

II. Document Retention

American Society for Yad Vashem Inc. follows the document retention procedures outlined below. Documents that are not listed, but are substantially similar to those listed in the schedule, will be retained for the appropriate length of time.

III. Corporate Records

Type of Document	Minimum Requirement
Accident Reports and Workers Compensation records	7 years
Accounts Payable Ledgers and Schedules	7 years
Annual Reports to Secretary of State/Attorney General	Permanently
Appraisals	Permanently
Articles of Incorporation	Permanently
Audit Reports	Permanently
Bank Deposit Slips	7 years
Bank Statements and Reconciliation	7 years
Board Meeting and Board Committee Minutes	Permanently
Board Policies/Resolutions	Permanently
By-laws	Permanently
Cash Receipts	3 years
Checks (for important payments and purchases)	Permanently
Contracts	7 years after expiration
Construction Documents	Permanently
Copyright Registrations	Permanently
Correspondence (general)	3 years
Correspondence (legal and important matters)	Permanently
Correspondence (with customers and vendors)	2 years
Credit Card Receipts	3 years
Deeds and Bills of Sale	Permanently
Depreciation Schedules	Permanently
Donor Records and Acknowledgement Letters	10 years

Duplicate Deposit Slips	2 years
Earnings Records	7 years
Electronic Fund Transfer Documents	7 years
Employment Applications	7 years
Environmental Studies	Permanently
Expense Analyses/Expense Distribution Schedules	7 years
Filings with the Registry of Charitable Trusts	10 years
Financial Statements	Permanently
Fixed Asset Records	Permanently
Garnishment Records	7 years
General Ledgers	Permanently
Grant Applications and Contracts	7 years after completion
I-9 Forms	3 years after termination
Insurance Policies, Records, Current Accident Reports, Claims	Permanently
Intellectual Property and Trade Secrets	Life of the Trade Secret
Internal audit reports	5 years
Inventories of products, materials, and supplies	7 years
Invoices (to customers, from vendors)	7 years
IRS Application for Tax-Exempt Status (Form 1023)	Permanently
IRS Determination Letter	Permanently
IRS Annual Return (Form 990 or 990-EZ) and Worksheets	Permanently
IRS 1099s	7 years
Journal Entries	7 years
Leases	7 years after expiration
Legal Files	generally 10 years
Minute Books and Charter	Permanently
Mortgages	7 years after expiration
Notes	7 years after expiration
OSHA Documents	5 years
Payroll Records and Summaries	7 years
Payroll Registers	Permanently
Payroll Tax Returns	7 years
Personnel Files (terminated employees)	7 years
Petty Cash Vouchers	3 years
Press Releases	Permanently
Records Relating to Promotion, Demotion, or Discharge	7 years after termination
Salary Schedules	5 years
Sales Records (box office, concessions, gift shop)	5 years
Solicitations for Contributions	10 years
State Sales Tax Exemption Letter	Permanently
State Tax Returns and Worksheets	Permanently
State Unemployment Tax Records	Permanently
Stock and Bond Records	Permanently
Timesheets	7 years

Trademark Registrations	Permanently
W-2 Statements	7 years
Withholding Tax Statements	7 years

IV. Glossary of Terms

1. *Board and Board Committee Materials.* Meeting minutes should be retained in perpetuity in the American Society's for Yad Vashem minute book.
2. *Commercial Fundraiser.* A commercial fundraiser for charitable purposes must maintain during each solicitation campaign, and for not less than 10 years following the completion of each solicitation campaign, records including any electronic records, containing information regarding:
 - a) The date and amount of each contribution received as a result of the solicitation campaign and, for non-cash contributions, the name and mailing address of each contributor.
 - b) The name and residence address of each employee, agent or other person involved in the solicitation campaign.
 - c) Records of all revenue received and expenses incurred in the course of the solicitation campaign.
 - d) For each account into which the commercial fundraiser deposited revenue from the solicitation campaign, the account number and the name and location of the bank or other financial institution in which the account was maintained.
 - i. If commercial fundraiser sells tickets to events and represents that they will be donated for use by another, then he or she must keep the number of tickets purchased and donated by each contributor, name address of all orgs receiving donated tickets.

American Society for Yad Vashem Inc. must maintain a copy of its contract with the commercial fundraiser and records of solicitations and donations according to the table above.

3. *Contracts.* Final, executed copies of all contracts entered into by the American Society for Yad Vashem Inc. should be retained. American Society for Yad Vashem Inc. should retain copies of the final contracts for at least seven years beyond the life of the agreement, and longer in the case of publicly filed contracts.
4. *Development/Intellectual Property and Trade Secrets.* Development documents are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development process are often also of value to the American Society for Yad Vashem Inc. and are protected as a trade secret where the American Society for Yad Vashem Inc.:
 - a) derives independent economic value from the secrecy of the information; and

- b) American Society for Yad Vashem Inc. has taken affirmative steps to keep the information confidential.
 - c) American Society for Yad Vashem Inc. should keep all documents designated as containing trade secret information for at least the life of the trade secret.
5. Legal Files. Legal counsel should be consulted to determine the retention period of particular documents, but legal documents should generally be maintained for a period of ten years.
 6. Personnel Records. State and federal statutes require the Company to keep certain recruitment, employment and personnel information. American Society for Yad Vashem Inc. should also keep personnel files that reflect performance reviews and any complaints brought against the American Society for Yad Vashem Inc. or individual employees under applicable state and federal statutes. American Society for Yad Vashem Inc. should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file. Personnel records should be retained for seven years.
 7. Press Releases/Public Filings. American Society for Yad Vashem Inc. should retain permanent copies of all press releases and publicly filed documents under the theory that the American Society for Yad Vashem Inc. should have its own copy to test the accuracy of any document a member of the public can theoretically produce against the American Society for Yad Vashem Inc.
 8. Tax Records. Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the American Society for Yad Vashem Inc. revenues. Tax records should be retained permanently. Payroll tax returns can be retained for only seven years.

V. Electronic Documents and Records

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files, including records of donations made online, that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an email message, the message should be printed in hard copy and kept in the appropriate file or moved to an “archive” computer file folder. Backup and recovery methods will be tested on a regular basis.

VI. Emergency Planning

American Society's for Yad Vashem Inc. records will be stored in a safe, secure and accessible manner. Documents and financial files that are essential to keeping the American Society for Yad Vashem Inc. operating in an emergency will be duplicated or backed up at least every week and maintained off site.

VII. Document Destruction

American Society's for Yad Vashem Inc. chief financial officer is responsible for the ongoing process of identifying its records, which have met the required retention period and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

VIII. Compliance

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the American Society for Yad Vashem Inc. and its employees and possible disciplinary action against responsible individuals. The chief financial officer and finance committee chair will periodically review these procedures with legal counsel or the American Society's for Yad Vashem Inc. certified public accountant to ensure that they are in compliance with new or revised regulations.

CONFLICT OF INTEREST POLICY

All decisions of the Board of Trustees and officers of administration of the American Society for Yad Vashem Inc. are to be made solely on the basis of a desire to promote the best interests of the Society. It is therefore the policy of the Board and the Society:

1. That all activities or behavior, which conflict with the best interests of the Society, are prohibited. Clear examples would include:

- a) Use of the Societies Resources: For a Society trustee or officer to make unauthorized use of any Society resources, including the services of Society employees, for his or her own personal benefit.
- b) Compliance with Rules: For a Society trustee or officer to fail to strictly comply with any rules, regulations or standards of personal behavior applicable to the Society.
- c) Disclosure of Confidential Information: For a Society trustee or officer, without proper authority, to give or release to anyone not authorized to receive such information, any data of a

confidential nature secured through his or her relationship to the Society.

d) Acceptance of Gifts: For a Society trustee or officer, or any dependent member of his or her immediate family to accept from any organization or person doing or seeking to do business with the Society, a loan or a favor of more than nominal value. This paragraph shall not be deemed to prohibit normal loans made in the course of business from banks or financial institutions that may have or expect to have relations with the Society.

e) Competition with the Society: For a Society trustee or officer, directly or through a corporation in which he or she has a substantial interest, to engage in for remuneration any other enterprise when the activity is in direct competition with the Society.

2. That, in the event that the Board or a Society officer shall be called upon to consider a transaction involving the Society and (i) a member of the Board or any officer of the Society (or a member of his or her immediate family), or (ii) an organization with which a member of the Board or any officer of the Society is “affiliated,” such trustee or officer, as soon as he or she has knowledge of the transaction, shall:

a) Disclose fully the precise nature of his or her interest or involvement in such transaction and/or such organization; and

b) Refrain from participation in the Society’s consideration of the proposed transaction.

For the purposes of Section 2 of this conflict-of-interest policy, a trustee or an officer is “affiliated” with any organization of which he or she (or a member of his or her immediate family residing in his or her household) is a principal executive officer, general partner or controlling stockholder.

3. That the following persons also disclose to the Society on a continuing basis all their relationships and business affiliations that reasonably could give rise to a conflict of interest, or the appearance of a conflict of interest, involving the Society: The Trustees (including the Chairman); the Vice Chairman; the Treasurer; and other officers shall designate as being officers from whom, because of their respective duties and responsibilities, the Society should receive continuing disclosure of such outside relationships and business affiliations.

Each of these Trustees and officers shall identify any company, organization or other entity, whether or not for profit, of which he or she is a principal executive officer, director, trustee, general partner or controlling stockholder.

All disclosures required to be made hereunder must be directed in writing to the Chairman who, together with the Executive Committee of the Society shall have responsibility for administration of this conflict-of-interest policy. All known violations, disputes and other issues arising out of the application of this policy to officers of the Society shall be referred to the Chairman for appropriate action. Matters under this policy concerning trustees shall be reported to the Chairman of the Board of Trustees for appropriate action.