

VPM MEDIA CORPORATION
DONOR LIST POLICY

I. PURPOSE AND POLICY STATEMENT

A. Purpose and Mission of VPM. VPM Media Corporation (“VPM”) as Virginia’s home for public media, connects nearly 2 million people across Central Virginia and the Shenandoah Valley to insightful programming in arts and culture, history, science, news, and education. In addition to acclaimed series and documentaries, VPM produces compelling original content across platforms for local audiences and national distribution. VPM’s mission is to use the power of media to educate, entertain and inspire. VPM solicits and relies upon the generosity of individuals, corporations, foundations and government agencies to ensure its future growth, success and mission.

B. Purpose of Donor List Policy. This Donor List Policy (the “Policy”) governs the collection and use of names and contact information (“Donor List”) for donors and contributors to VPM to ensure that the donor list is not shared, traded or leased to unaffiliated third-parties. This Policy is intended to (1) provide guidance for the Board of Directors, officers, staff, and other constituencies with respect to their responsibilities concerning the safekeeping and use of VPM’s Donor List and (2) provide guidance to prospective donors and their professional advisors when making gifts to the VPM.

C. Application; Modification of Policy. The provisions of this Policy shall apply to all contact information received by VPM from donors and contributors. Notwithstanding the foregoing, VPM reserves the right to revise or revoke this Policy at any time, and to make exceptions to the Policy.

II. COLLECTION AND SAFEKEEPING OF DONOR LIST.

A. Communications Act of 1934.

Section 396 (k)(12) of the Communications Act of 1934, as amended, provides that: “Funds may not be distributed under this subsection to any public broadcasting entity that directly or indirectly—

(A) rents contributor or donor names (or other personally identifiable information) to or from, or

exchanges such names or information with, any Federal, State, or local candidate, political party, or political committee; or

(B) discloses contributor or donor names, or other personally identifiable information, to any

nonaffiliated third party unless—

(i) such entity clearly and conspicuously discloses to the contributor or donor that such information may be disclosed to such third party;

(ii) the contributor or donor is given the opportunity, before the time that such information is

initially disclosed, to direct that such information not be disclosed to such third party; and
(iii) the contributor or donor is given an explanation of how the contributor or donor may exercise that nondisclosure option.”

B. VPM Donor List Policy. VPM does not sell, exchange, or lend to unaffiliated third parties any name, address, e-mail or telephone information donors or contributors provide when making a pledge, donation or contribution. VPM does not share postal mailing information provided when donors or contributors pledge online, over the phone or through the mail with other non-profit organizations. In no event will VPM sell, rent, lease, lend, trade, give, donate, transfer or otherwise exchange, the station’s membership lists with, or acquire such lists from, any candidate for public office, committees or organizations supporting a candidate, political parties, or organizations that solicit funds for use in political campaigns.

C. Effective Date of Policy Adoption; Amendment. This Policy was revised, reviewed and adopted by VPM on February 23, 2022. This Policy may only be amended as needed to comply with rules and regulations promulgated by the Corporation for Public Broadcasting or other organizations.