



# Funders Concerned About AIDS (FCAA)

## Data Security Policy

March 2025

### Background

Funders Concerned About AIDS (FCAA) has tracked the field of HIV-related philanthropy for almost two decades, originally relying on surveys completed by funders, and supplemental review of publicly available data. These efforts result in FCAA's annual resource tracking report, *Philanthropy's Response to HIV and AIDS* (formerly *Philanthropic Support to Address HIV and AIDS*), along with data blogs and infographics.

### Data Collection and Use

Funders are invited to submit their HIV-related grants data for the calendar year by completing FCAA's [Standard or Intermediary Template](#) and uploading their data to FCAA's [Grant Submission Portal](#). These data are supplemented by a review of publicly available data, including from funder and grantee websites, annual reports, grant databases, CANDID, and IRS 990 forms. Directly submitted and publicly identified data will be used to inform FCAA's resource tracking project, which consists of:

- The **annual report**: *Philanthropy's Response to HIV and AIDS*
- **Subsequent analyses** in the form of blogs, reports, infographics, presentations, and articles that provide a deep dive on funding for a specific issue, population, or geography.

### Security Practices

FCAA commits to be responsive to funders' needs and concerns, and to document security issues if and as they arise.

Our work, including this signature resource tracking project, is overseen and guided by FCAA's [Board of Directors](#). The organization will commit to ensuring that data privacy is an ongoing subject for discussion, and to review this policy on an annual or as-needed basis.

### Data Submission and Collection

FCAA's grant submission portal is the most secure way to submit data as it requires funders to log in to their own password protected account to upload their grants data. FCAA recommends against data submissions via e-mail and encourages use of the portal as the most secure option for sharing grants lists. Grant information is also captured from publicly available sources such as CANDID, 990 forms, and funder websites and annual reports.

### Data Handling and Storage

Once a document containing grants data is submitted to the portal, FCAA staff with admin privileges must login to the grant portal to access the file via a download link. The download link will also be securely stored in FCAA's Salesforce account, where it is only available to FCAA staff, and requires multi-factor authentication to login. The data file itself will then be securely stored in FCAA's Dropbox platform, which requires a 2-factor authentication login. Access to these files will be restricted and granted only to FCAA research and executive staff, using their respective login credentials.

After data is fully collected and analyzed, it will be imported into FCAA's Salesforce platform for long-term storage and analysis.

### **Anonymization of Data**

Funders have the option to submit data anonymously or request to remove specific grant information from any of the resource tracking tools. Funders may also note a grantee as anonymous within grant lists if there are concerns about protecting their identity or location, and/or the funder's activity within a particular issue area or geography.

- Requests to anonymize specific grants or grantees should be marked as such when submitting via the online grant portal, or by communicating this need directly to Caterina Gironda ([caterina@fcaids.org](mailto:caterina@fcaids.org)).

### **Data Sharing**

FCAA will use individual grant lists to develop our annual resource tracking report and any subsequent analyses. Grantee names will not be shared in the report or subsequent published infographics.

### **Data Sharing with Third Parties**

Data shared with third parties, including Funders for LGBTQ Issues and the Global Philanthropy Project (GPP), shall be held by strict confidentiality agreements and shall comply with the same security standards upheld by FCAA. These data, encompassing HIV grant information, geographic and population information, and any other relevant data, shall be utilized exclusively for the purposes of conducting research and analysis pertinent to HIV grantmaking initiatives and resource tracking.

A formal data sharing agreement will be signed by all third parties, specifying the terms and conditions of data use, security, and protection.

### **Data Retention Policy**

Data will be retained indefinitely to allow for ongoing trend analysis over time.

### **Feedback and Concerns**

This policy represents a start to our commitment and conversation on data privacy. We encourage funders to share their feedback, concerns, or questions on this process, so we can continue to update this policy to meet the needs of the HIV-related philanthropic sector. If your organization has additional concerns with data sharing that are not adequately addressed by this policy, FCAA would be happy to develop an organization-specific policy that would continue to enable your full participation in resource tracking. FCAA encourages you to share your feedback on this process and policy with Caterina Gironda at [Caterina@fcaids.org](mailto:Caterina@fcaids.org).