



COMMUNICATION - TRANSPARENCY - COLLABORATION

Personal Identifying Information Policy and Procedure

PURPOSE: To adopt a policy and procedure for protecting the personal identifying information (“PPI”) of all PineRidge HOA Members.

EFFECTIVE DATE: February 12, 2019

RESOLUTION: The PineRidge Homeowners Association (“Association”) does hereby adopt the following Policy and Procedures:

1. **Background.** The Colorado General Assembly enacted the Protection for Consumer Data Privacy Act on May 29, 2018. This law applies to Colorado businesses and governmental entities as well as third-party vendors who collect and maintain personal identifying information (“PII”). The statute, C.R.S. 6-1-713, defines PII as “a social security number; a personal identification number; a password; a pass code; an official state or government-issued driver’s license or identification card number; a government passport number; biometric data, as defined in section 6-1-716 (1)(a); an employer, student, or military identification number; or a financial transaction device, as defined in section 18-5-701 (3).” This definition includes bank account and debit/credit card information.

Effective September 1, 2018, associations, management companies, and their vendors that collect and maintain PII must adopt policies concerning the protection of that information and procedures for handling breaches and destruction of documents containing PII.

2. **General Policy.** The PineRidge Homeowners Association limits the amount of Member PII to only banking information required for processing ACH transactions for dues assessments. Members requesting this service submit an ACH authorization form that contains their bank routing and account numbers to Board authorized personnel. The information is used to enroll the member with the Association’s Bank for ACH Origination transactions, and then filed collectively with Association Documents

3. **Procedure:** When a member notifies the Association in writing to cancel their ACH transactions, the Board authorized personnel will delete the Member and their banking information from the Association’s Bank Transaction Template. The ACH authorization form is then shredded.

If the Association is notified of a data breach by their Bank, the Association will alert affected Members within 30 days that their data has been compromised.

PRESIDENT'S CERTIFICATION: The undersigned President of the PineRidge Homeowners Association certifies that the foregoing Resolution was approved and adopted by the Board of Directors of the Association at a duly called and held meeting of the Board of Directors of the Association on February 12, 2019.

By: _____

Arlene J. Armata

Date: _____