

**POLICY
OF
HIGH COUNTRY ESTATES HOMEOWNERS WATER AND SEWER ASSOCIATION, INC.
DBA MOUNTAIN MEADOWS GOLF CLUB
REGARDING SECURITY AND DESTRUCTION OF ASSOCIATION RECORDS
CONTAINING PERSONAL IDENTIFYING INFORMATION**

SUBJECT: Adoption of a Policy addressing security and destruction of Association records containing personal identifying information.

PURPOSE: To provide notice of the Association's adoption of a uniform process concerning security and destruction of Association records containing personal identifying information

AUTHORITY: The Declaration, Articles and Bylaws of the Association and Colorado law.

**EFFECTIVE
DATE:** _____

RESOLUTION:

This Personal Identifying Information Policy ("Policy") is created in accordance with C.R.S. §6-1-713 and C.R.S. §6-1-713.5 to establish a process to be used by the Association for the security and destruction/disposal of paper and electronic documents, within its custody or control, containing personal identifying information. The Policy adopted is as follows:

Personal Identifying Information

Personal identifying information ("PII") is defined as including any of the following:

- 1) Social security numbers,
- 2) Personal identification numbers,
- 3) Passwords,
- 4) Pass codes,
- 5) Official state/government-issued driver's license numbers or identification card numbers,
- 6) Government passport numbers,
- 7) Biometric data (including but not limited to fingerprints and retina scans),
- 8) Employer, student, or military identification numbers,
- 9) Financial transaction devices, and
- 10) Any other information identified as PII under any applicable state or federal privacy laws, including but not limited to the federal Corporate Transparency Act.

Protection of PII

While in the Association's possession or control, any PII (whether physical or electronic) will be protected from unauthorized access, use, modification, disclosure, and destruction through the

following security measures:

- 1) Use of secure data systems with encrypted hard-drives;
- 2) Use of secured physical storage facilities;
- 3) Use of confidential waste bins and shredders;
- 4) Proper and secure packaging of physical documents for storage; and
- 5) Lockable document storage cabinets.

To the extent any PII (whether physical or electronic) is stored in or controlled by a third party, such as a management company or storage facility, Association shall ensure such third party also utilizes adequate security measures and practices for the protection of PII.

Destruction/Disposal

The Board of Directors shall determine, in its sole discretion, when PII is no longer required by the Association. Once such determination is made, the Association shall destroy physical documentation by shredding the documents or physically redacting the PII in the pertinent documents to the point that it is not visible and cannot be deciphered.

When PII is saved in an electronic format is no longer required by the Association, it shall be permanently deleted from any and all data storage locations, including back-ups, so as not to be retrievable by any means.

Supplement to Law

The provisions of this Policy shall be in addition to and in supplement of the terms and provisions of the Declaration and the law of the State of Colorado governing the Association.

Amendment

This Policy may be amended from time to time by the Board of Directors.

PRESIDENT'S

CERTIFICATION: The undersigned, being the President of High Country Estates Homeowners Water and Sewer Association, Inc. dba Mountain Meadows Golf Club certifies that the foregoing Policy was adopted by the Board of Directors of the Association, at a duly called and held meeting of the Board on _____ and in witness thereof, the undersigned has subscribed their name.

**High Country Estates Homeowners Water and Sewer Association, Inc.
dba Mountain Meadows Golf Club,
a Colorado nonprofit corporation**

By: _____
Its: President