

Pioneer Village II

Protecting Owner Personal Identifying Information

Policy and Procedure Pursuant to C.R.S. §6-1-713

PURPOSE: To adopt a policy and procedure for protecting the personal identifying information (“PPI”) of all Pioneer Village II HOA Members. The Colorado General Assembly enacted the Protection for Consumer Data Privacy Act on May 29, 2018. 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.

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

1. **Definitions:** For purposes of this policy. 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 C.R.S. 18-5-701 (3).” This definition includes bank account and debit/credit card information.
2. In the normal course of the Association’s business, it may have an individual’s PII in its records. The Association recognizes the need to maintain the confidentiality of any PII it may have in its possession and will take reasonable security steps, based on the nature of the PII and the volunteer nature of the Association’s operations, to protect any PII from unauthorized access, use, modification, disclosure or destruction. Pursuant to the Association’s records inspection policy and Colorado law, PII is not available for inspection or copying by members.
3. The Association’s records, including PII, if any, are maintained by the management company. The management company is expected to follow reasonable security steps to protect any Association member’s PII, whether stored electronically or in hard copy from unauthorized access, use, modification, disclosure or destruction.
4. When a member notifies the Association or Management Company, in writing, to cancel their ACH transactions, or when the Association or Management Company determines that it no longer needs records containing PII, they will be disposed of or destroyed in a manner designed to make the PII unreadable or indecipherable. Possible methods include shredding of physical files and securely erasing electronic files so information cannot be read or reconstructed.
5. 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 in accordance with the requirements set forth in C.R.S. Section 6-1-716. If the Association becomes aware that any PII in the management company’s possession or control has been breached, it will require the management company to follow any notice requirements set forth in C.R.S. Section 6-1-716. This notice will be sent as soon as is reasonably possible but no later than 30 days after the determination has been made.

President's Certification: The undersigned, being the President of the Association, certifies that the Board of Directors of the Association adopted the foregoing resolution and in witness thereof, the undersigned has subscribed his/her name.

Pioneer Village II Homeowners' Association

A handwritten signature in black ink, consisting of stylized initials followed by a long horizontal line extending to the right.

President

Effective Date: 1-19-2024