

**COPPERLEAF HOMEOWNERS ASSOCIATION, INC.
PERSONAL IDENTIFYING INFORMATION POLICY**

Effective Date: January 23, 2019

1. Definitions: For purposes of this policy, personal identifying information (PII) is:

- A. Social security number
- B. Personal identification number
- C. Password
- D. Pass code
- E. Official state or government-issued driver's license or identification card number
- F. Government passport number
- G. Biometric data (defined as unique biometric data generated from measurements or analysis of human body characteristics for the purpose of authenticating the individual when he accesses an online account)
- H. Employer, student, or military identification number
- I. Financial transaction device (defined by statute as a credit, banking card, debit card, electronic fund transfer card, guaranteed check card or account number representing a financial account or affecting the account holder's financial interest, standing or obligation, that can be used to make financial payment or to obtain cash, property or services.)

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, such PII is not available for inspection and/or copying by members and will be maintained separately from other Association records.

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 the Association has determined that it no longer needs records containing PII, they will be disposed of or destroyed in a manner reasonably designed to make the PII unreadable or indecipherable. Possible methods of disposal or destruction include shredding of any physical files containing PII and using a wipe utility program to securely erase electronic files or otherwise erasing electronic files so that information cannot be read or reconstructed.

5. If the Association becomes aware that PII has been breached, it will promptly investigate the likelihood that PII has been or will be misused. Unless the Association determines that the PII has not been misused and is not reasonably likely to be misused, the Association will provide notice to any affected individuals 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 is made.

This Personal Identifying Information Policy was adopted by the Board of Directors this 23 day of January, 2019

COPPERLEAF HOMEOWNERS ASSOCIATION, INC.,
a Colorado nonprofit corporation,

By: Elizabeth Hubbard
Its: President