

Policy and Procedures for handling sensitive and private information

In the course of administering the required business operations of the Grandview Peaks Property Owners Association, the POA must collect and manage certain sensitive and private information including, but not limited to: property status; payment and tracking of assessments; banking-related information; private contact information such as personal e-mail addresses and phone numbers; and other data, such as that collected by the gate access and surveillance camera systems.

To the extent that federal and state laws mandate procedures to control, maintain and safeguard certain of this information, the POA will diligently adhere to these mandates.

Additionally, the POA will commit to minimize the amount of confidential information required for its operations, and maintain a reasonable policy to ensure this information is secured and made available only on a “need-to-know” basis in support of necessary business operations and administration of the Association.

Procedures:

The Board Secretary will serve as the Chief Privacy Officer of the Association, providing oversight for data and information privacy and protection protocols in support of the goals of this policy. The Chief Privacy Officer will review these procedures annually and make recommendations, as warranted. These procedures include:

- Any form of private or confidential information—including Personal Identifiable Information (PII) and Sensitive Personal Identifiable Information (SPII) -- will held confidential by the Board or authorized appointees acting under its direct control (such as the POA property manager) and stored in a manner that provides reasonable physical and digital security for that information. For purposes of this policy, PII and SPII means information which if lost, compromised or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience or unfairness to an individual.
- Contact information is for official POA use only, excepting for a roster of POA member names and POA Board member names and mailing addresses, which under the North Carolina Non-Profit Corporation Act [North Carolina General Statutes Chapter 55F] may be requested by and must be provided to any member of the Association. Any release of personal contact information outside of necessary business operations under the direct control of the Board (including mailing addresses, e-mail addresses or phone

numbers), is prohibited unless accompanied by the affirmative knowledge and written permission of the individual members whose information is being shared. This written permission record will be retained by the Board or property manager.

- Financial hardship information (e.g. unable to pay dues, but working on a payment plan) is confidential within the Board or its appointees on a need-to-know basis until such time as the POA is required to take legal action and release that information in a filing that becomes public information through a filed public record.
- Confidential information may be shared as legally required, and to conform to the lawful demands of government and regulatory authorities. Such release requires approval of at least two Board Officers, who in a timely manner will inform the full Board.
- Gate entry log information and security video is accessed and released only at the direction of the full Board of Directors (which may be represented and authorized in a time-critical situation by any two Board Officers who must then in a timely manner inform the entire Board) and primarily to assess operations and/or facilitate public safety. License plates recorded by cameras should only be released upon appropriate request from law enforcement or court order.
- The requirement to keep information secured and confidential is binding even after Board and/or POA service concludes.