

FEB 13 2015

POLICY TITLE – HMCI Privacy Policy
POLICY SECTION – Governance
POLICY NUMBER –03
DATE OF ORIGIN – 3/2010
APPROVED BY – Board of Directors 2/11/15
REVIEW /REVISION DATE: 2/2015, 2/2018

POLICY STATEMENT - Holiday Manor Cooperative, Inc. (HMCI) fully respects the privacy and security of the personal information on file of all Shareholder's and Non-Shareholder's.

PURPOSE – The purpose of the policy is to allow residents to understand what information about them that is collected, how it is used, who it is shared with and how it is protected. Personal information is treated as confidential.

INFORMATION HMCI MAY COLLECT - Certain nonpublic personal information is collected from residents or applicants. HMCI also may receive such information from consumer reporting agencies. This may include identifying information such as a residents or applicants name, address, telephone number, social security number, your payment or credit history and a criminal background check and information obtained from consumer agencies. The extent of the information received varies based on each individuals history.

HOW HMCI USES YOUR INFORMATION - The information that HMCI receives is used to assist in identifying a resident or applicant, for evaluating an applicant's application for residency and to aid in the management of residents.

INFORMATION HMCI SHARES WITH OTHERS - Disclosure of any nonpublic personal information about HMCI residents, applicants or former residents will not be done except as permitted by law.

A Holiday Manor Directory including Shareholder's name, address, and phone numbers is permitted. However, if an owner does not want to have their phone number included in the directory, they must inform the Office in writing, Florida Laws, Residential 7/12013

PROTECTING CONFIDENTIALITY - HMCI is fully aware of the responsibility of protecting the personal information of all of our current and former resident's and have measures in place to ensure it is secure and protected. Access to any personal nonpublic information is limited to only the Manager, Office Staff and those authorized to view that information on a need to know basis. HMCI is committed to maintaining the physical, electronic and procedural safeguards that are required to guard any nonpublic personal information.

HMCI Privacy Policy

RELEASE OF OFFICIAL RECORDS- The official records of the CO-OP will be managed in accordance with Florida Statutes. All requests for review or copies of official records by a Shareholder must be submitted in writing to the HMCI Office and will be responded to within the timeliness provided in the current statutes.

Reference Florida Statute 719.104, article 13