



Safeguarding Personal Information Policy

WHEREAS, Eldorado Neighborhood Second Homeowners Association (the "Association") is a Nevada nonprofit corporation governed by the laws of the State of Nevada, including Nevada Revised Statutes ("NRS") Chapter 116, which governs common Interest communities.

WHEREAS, NRS 116.3102(1) (a) provides that an association may "adopt and amend rules and regulations".

WHEREAS, Article 4 Section 4.2 of the Declaration of Covenants, Conditions and Restrictions and Reservation of Easements for Eldorado Neighborhood Second Homeowners Association (the "Declaration") empowers the Board, acting on behalf of the Association, to conduct, manage and control the affairs and business of the Association and to make such rules and regulations therefor not inconsistent with law, the Articles and the Bylaws.

WHEREAS, NRS 603A.210 requires data collectors that collect, handle, or disseminate nonpublic personal information to enact reasonable security measures to protect such information from unauthorized access, acquisition, destruction, use, modification or disclosure.

WHEREAS, the Association and/or its managing agent is a "data collector" as defined by NRS 603A.030 being a Nevada business entity or association that for any purpose, whether by automated collection or otherwise, handles, collects, disseminates, or otherwise deals with nonpublic personal information.

WHEREAS, NRS 603A.040 defines "personal information" as follows:

1. "Personal information" means a natural person's first name or first initial and last name in combination with any one or more of the following data elements, when the name and data elements are not encrypted:
 - a. Social security number.
 - b. Driver's license number, driver authorization card number or identification card number.
 - c. Account number, credit card number or debit card number, in combination with any required security code, access code or password that would permit access to the person's financial account.

3. The managing agent shall ensure that each person working on the Association's account understands the definition of nonpublic personal information and can identify the most common sources by which the Association receives this information and the steps which must be taken to secure it. On an annual basis, the Community Manager shall provide the Board with a written acknowledgement that this information has been reviewed with the managing agent's employees.
4. Unless the person's duties involve routine review or processing of nonpublic personal information, any person encountering nonpublic personal information in any document in the Association's possession or control shall immediately bring it to the attention of the Community Manager so that it may be properly secured.
5. The Board shall establish reasonable safeguards for storing its nonpublic personal information. Such safeguards may include, but are not limited to:
 - a. Use of encryption to ensure the security of electronic transmission of data meeting the standards set forth in NRS 603A.215. Pursuant to NRS 603A.215(2), a data collector shall not transfer any personal information through an electronic, non-voice transmission other than a facsimile to a person outside of the data collector's secure system unless it uses encryption to ensure the security of the electronic transmission.
 - b. Segregation of nonpublic personal information from other generally accessible data. This may include ensuring that personal information is maintained in locked files separate from the general homeowner files; a separate password protected "filing cabinet" exists within an electronic record storage system for personal information, or access to screens, reports or programs within the management/accounting or access software where such personal information is stored is restricted.
 - c. Limitations on the number and types of persons (e.g., Community Manager, Accounting Manager, Board Treasurer) who are authorized to access or process nonpublic personal information in the Association's or its managing agent's possession.
 - d. Requirements for the proper disposal of nonpublic personal information.
 - e. If the Association or its managing agent accepts credit cards, debit cards or any other cards meeting the definition of "payment card" pursuant to NRS 205.602, compliance with the current version of the Payment Card Industry (PCI) Data Security Standard as set forth in

Association shall redact the information by using commercially available redaction software for scanned or electronic records, securely deleting the un-redacted document, or by manually redacting information retained in hardcopy.

11. Pursuant to NRS 116.31175(7), at the end of 10-year record retention period, the Association shall destroy any outdated nonpublic personal information by:
- Shredding any hard copies.
 - Securely deleting personal information from electronically maintained records.

12. Before selling, donating, exchanging, or decommissioning any data storage device, including but not limited to, computers, cell phones, electronic computer drives, optical computer drives, digital copiers and multi-function printers, the Association shall ensure that all data has been securely deleted from the device. Lost or stolen data storage devices shall be promptly reported to the Community Manager.

On an annual basis, the Board shall cause a review of Association operations to (1) identify what processes, procedures, activities, or services may result in the collection of nonpublic personal information, (2) test that privacy protection procedures are functioning as intended, and (3) revise this policy or its procedures. As new services or technologies are added, the Board shall consider whether such services or technologies will result in the Association collecting nonpublic personal information and how such information will be secured.

If any provision of the Policy is determined to be null and void, all other provisions of the Policy shall remain in full force and effect. This resolution of the Board of Directors has been duly adopted at the January 11, 2024 Executive Board of Directors meeting.

By: <u>W. E. McKenzie</u> Date _____ President	By: _____ Date _____ Vice President
By: <u>Robert Harner</u> Date <u>2/8/2024</u> Treasurer	By: <u>Jimmie McKinney</u> Date <u>1/28/2024</u> Secretary
By: <u>Oréal McDaniel</u> Date <u>2-8-2024</u> Director	By: _____ Date _____ Director
By: <u>Mr. R. G. f</u> Date <u>2-8-2024</u> Director	