

**FOX LAKE HOMEOWNERS ASSOCIATION, INC.
POLICY REGARDING THE USE AND PROTECTION OF MEMBER DATA**

EFFECTIVE DATE: July 30, 2025
ADOPTED BY BOARD RESOLUTION ON: July 30, 2025

1. PURPOSE

The purpose of this policy is to establish guidelines for how Fox Lake Homeowners Association, Inc. (“Association”) collects, uses, protects, and shares personal information of its members. The policy is intended to ensure responsible use of personally identifiable information (PII) and to promote transparency and trust among Association members.

2. DEFINITION OF PERSONALLY IDENTIFIABLE INFORMATION

For purposes of this policy, “Personally Identifiable Information” (PII) includes, but is not limited to:

- Name
- Physical address
- Phone number(s)
- Email address(es)
- Emergency contact information
- Any other information maintained by the Association that can reasonably identify a homeowner or resident

3. COLLECTION AND USE OF MEMBER DATA

The Association collects member data solely for lawful purposes in support of its operations, including:

- Maintaining accurate ownership and contact records
- Distributing meeting notices and Association updates
- Facilitating communications regarding dues, assessments, and maintenance
- Verifying residency or ownership when required

The Association does not collect social security numbers, banking information, or other sensitive data unless required for specific transactions and with appropriate safeguards.

4. MEMBER DIRECTORY AND OPT-OUT

The Association may maintain a voluntary member directory, viewable on the Association website, which may include name, address, phone number, and/or email address.

Members may opt out of having any or all of their personal information displayed in the directory by selecting privacy settings on the website or by submitting a written request to the Board or website administrator.

5. DISCLOSURE OF MEMBER DATA

The Association will not disclose PII to third parties except under the following circumstances:

- To vendors or contractors engaged to perform Association business, under confidentiality obligations
- As required by law, subpoena, or court order
- With express written consent of the affected member
- Where disclosure is necessary to verify residency for participation in Association communications or platforms (e.g., email distribution lists or verification of Facebook group requests), and only to the extent necessary for that verification

Facebook or Social Media Groups:

Administrators of unofficial or private Facebook groups are not entitled to full member lists. Residency verification may be handled by forwarding requests to the Board for review.

6. ACCESS AND CORRECTION

Members may request to review or correct their own contact information by submitting a written request to the Board or the designated administrator.

7. DATA PROTECTION

The Association will take reasonable steps to protect stored member data from unauthorized access, disclosure, or misuse. This includes use of password-protected files, limited access to administrative accounts, and secure data handling by Board members and vendors.

8. VIOLATIONS

Improper use or disclosure of member information by any Board member, officer, volunteer, or vendor may result in disciplinary action, removal from position, or termination of contract, as applicable.

9. AMENDMENT

This policy may be amended by a majority vote of the Board at a duly noticed meeting.

CERTIFICATION

This Policy Regarding the Use and Protection of Member Data was adopted by the Board of Directors of the Fox Lake Homeowners Association, Inc. on July 30, 2025, and is effective as of that date.