

**CONFLUENCE AT TWO RIVERS COMMUNITY ASSOCIATION, INC.  
PERSONAL IDENTIFYING INFORMATION, DATA SECURITY AND BREACH  
NOTIFICATION POLICY**

Effective Date: November 11, 2025

1. Association Safeguarding Personal Identifying Information of Owners and/or Residents.

A. In the normal course of the Association's business, the Association may have an individual's PII (as defined below) in its records.

B. The Association recognizes the need to maintain the confidentiality of PII and has and will continue to implement reasonable security procedures to seek to protect any PII from unauthorized access, use, modification, disclosure or destruction. Those measures are based on the nature of the PII and the volunteer nature of the Association's board, officers and owners in the community. The Association is not a guarantor, but rather, will seek to protect PII as set forth in this policy.

C. Pursuant to the Association's records inspection policy and Colorado law, PII is not available for inspection and/or copying by members and will be maintained separately from other Association records.

D. The Association's records, including PII, if any, may be maintained by the Association's management company.

E. The management company is expected to implement reasonable security measures to protect any Association member's PII, whether stored electronically or in hard copy, from unauthorized access, use, modification, disclosure or destruction.

F. Reasonable security measures may include, without limitation, non-disclosure, use of appropriate technology, security practices, computer access security, data access security, data storage encryption, data transmission encryption, security inspections, and audits.

2. Disposal of Personal Identifying Information by the Association.

When the Association has determined that it no longer needs records containing PII, those records 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.

3. Protection of Personal Information / Notification and Investigation of Suspected Security Breach.

A. If the Association becomes aware that a Security Breach may have occurred, it will promptly investigate the likelihood that PI (as defined below) has been or will be misused.

B. Unless the Association determines that the PI 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. § 6-1-716.

C. If the Association becomes aware that any PI 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. § 6-1-716.

D. This notice will be sent as soon as is reasonably possible, but no later than 30 days after the determination is made.

4. Definitions:

A. **“Personal Identifying Information” or “PII”** means any:

- i. social security number;
- ii. personal identification number;
- iii. password or pass code;
- iv. government or state-issued driver's license or identification card number;
- v. passport number;
- vi. 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);
- vii. employer, student, or military identification number; or
- viii. 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, goods, property or services).

B. **“Personal Information” or “PI” means:**

i. The first name or first initial and last name of any Colorado resident, plus one of the following: social security number; employer, student, or military ID numbers; passport number; driver’s license or government/state-issued ID number; medical information; biometric data; health insurance ID number; or

ii. The username or email, in combination with a password or security questions (with answers) that would permit access to an online account; or

iii. The account number or credit or debit card number in combination with any required security code, access code, or password that would permit access to that account.

C. **“Security Breach”** means the unauthorized acquisition of unencrypted computerized data that comprises the security, confidentiality, or integrity of Personal Information maintained by the Association. Good faith acquisition of personal information by an employee or agent of the Association for the Association’s business purposes is not a security breach if the personal information is not used for a purpose unrelated to the lawful operation of the business or is not subject to further unauthorized disclosure.

This Policy was adopted by the Board of Directors this 11 day of November, 2025.

CONFLUENCE AT TWO RIVERS COMMUNITY  
ASSOCIATION, INC., a Colorado nonprofit corporation

By:   
Its: President