



Little Elk Creek Village
Home Owners' Association
Post Office Box 420
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POLICY ON USE OF COMMUNICATIONS WITH MEMBERS AND RESIDENTS
Adopted by the Board of Trustees June 15, 2022

The Little Elk Creek Village Home Owners' Association has many needs to engage in communication with its Members and the other residents who live in the LECV subdivision. This policy is adopted to provide guidance to the Board of Trustees, management agents, and Members and residents about the appropriate use of communications venues that may be utilized for LECVHOA's purposes.

1. Principles. The LECVHOA affirms that it respects the privacy interests of its Members and residents and will strive to ensure that confidential information of Members and residents is maintained with such respect. At minimum, the LECVHOA will comply with applicable law in the management of information, including without limitation the Colorado Common Interest Ownership Act ("CCIOA"), and the Colorado Privacy Act. This policy is intended to be consistent with the confidentiality policies required by the CCIOA provisions on Responsible Governance.
2. Ownership and Use of Personal Data.
Personal Data, as defined in the Colorado Privacy Act (e.g. credit card information, social security numbers) will be used solely for the management and operations of the LECVHOA, as allowed under applicable law. No member of LECVHOA's management team, governing board, or the Members or residents to whom access to any Personal Data has been granted may use such information for any purpose other than reasonable management, operational and LECVHOA social activities. All Personal Data collected by the LECVHOA is the intellectual property of, and owned solely by, LECVHOA, and the use of such data by any agent or Trustee is derivative of such LECVHOA ownership.
3. Use of Member and Resident Contact Information.
Effective activities necessary for the management and operations of the LECVHOA, as well as applicable law, requires that the LECVHOA maintain and use a subset of Personal Data, e.g. records of the names, addresses, telephone numbers, and email address of LECVHOA Members and LECV residents ("Contact Records"). The Contact Records gathered for these purposes may only be used as follows:
 - A. For management, operational, and legal notices: The contracted LECVHOA manager and Board of Trustees may have access to the Contact Records to provide notices as required by law, as well as notices of corporate meetings, regular neighborhood news, emergency event information and guidance, water system management and operations, health and safety information, and for other reasonable purposes. In general, such notices will be disseminated by the LECVHOA manager or the President of the LECVHOA Board of Trustees.

In the case of time-sensitive or emergency notices where the LECVHOA manager or Board President are not readily available, however, any member of the Board of Trustees may use Contact Records to provide reasonable notices. If the LECVHOA manager and President are reluctant to provide notices as described in this section, any three members of the Board of Trustees may provide such notices to Members and residents after providing at least 48 hours' advance notice of the information to be disseminated to the manager and the President.

- B. For LECVHOA social event notices. The LECVHOA manager and Board of Trustees may have access to and utilize the Contact Records to provide social event notices that are available for all LECVHOA Members or social events for the Capitol Creek valley. Any Member or resident may request in writing that their Contact Information be removed from the contact list for all social event notices, but due to limited management and trustee time resources, Members and residents may not request to participate in receipt of some social event notices but not others.

- C. Contact Records Available to Members and Residents. To facilitate intra-neighborhood communications, selected Contact Record elements, such as email, telephone and address contact information, may be posted in a members-only section of the LECVHOA website. **This information may only be posted in the members-only section of the LECVHOA website with the specific written authorization of the Member or resident whose information is posted.** Members and residents may request that their prior-authorized Contact Records be removed from the website by a written request to the LECVHOA manager, and such information will be removed within ten business days. Only LECVHOA Members and residents are authorized to retrieve such information from the LECVHOA website, and the Contact Record information may used solely for neighborhood engagement. No LECVHOA Member, Resident, or agent may utilize such information for any other purpose, including without limitation commercial, political, or social media purposes.