

**NORTHTOWN HOMEOWNERS' ASSOCIATION, INC.  
POLICY & PROCEDURE**

**PRIVACY & NON DISCLOSURE**

June 2013

- 1) This policy shall apply to the Board of Directors, committee members, managers, employees, contractors and consultants of the Association.
- 2) Information which may be deemed sensitive, private, or confidential shall include, but not be limited to, the following:
  - A) personal details such as Social Security numbers, phone numbers, date of birth, maiden or family member names, employment, or medical history
  - B) financial details such as credit, payment, tax or banking information
  - C) corporate details including pending or current legal action, computer codes or passwords, and any other non-public Association business
  - D) any document marked "private" or confidential"; all records contained in the individual lot files of the Association unless such information is part of the public record.
- 3) All persons listed above are cautioned against communicating sensitive information to anyone other than the Association's legal council or a currently sitting Board member. Disclosure if such information is prohibited by any means including electronic (E mail or social media), written, and oral. The use of sensitive information should be restricted to the proper conduct of the business of the Association.
- 4) Violation of this Policy may result in censure, removal from office, termination of contract, or further legal action.