



PERSONAL IDENTIFYING INFORMATION (“PII”) POLICY

The Corporate Transparency Act (“CTA”) requires board members to register as beneficial owners with the Financial Crimes Enforcement Network. The registration process requires beneficial owners to provide their associations with copies of certain personal identifying information, such as copies of passports, driver’s licenses, and/or state issued id’s.

A PII policy is necessary for associations to establish a process for the security and destruction of documents containing personal identifying information in its possession, whether in paper or electronic format.

This policy would establish the following:

1. List of documents and information constituting personal identifying information;
2. Processes to be used for protecting personal identifying information in the association’s possession; and
3. Process and timing for destruction and/or disposal of personal identifying information.

Please contact us at 303.432.9999 or hoalaw@altitude.law if you have any questions on the above or any other policy or other legal needs for your association.