



## Information Use & Privacy Policy

**Policy 500** of the Cape Royal Communications Committee (CC) Date of Issue: 10/24/2012, revised and adopted 8/27/2014; revised and adopted 12/17/2019; revised and adopted 09/21/2021.

The Cape Royal Homeowners Association (HOA) collects and maintains an accurate list of resident information in a secure database—including home address, phone number, email address, vehicle type, color, license plate number, and other select family profile information—for the purposes of communicating with residents through either mail or email within the community. These communications may include meeting notices, financial matters, gate access information and general day-to-day and emergency HOA information, along with distribution of a community directory. Much of this communication is completed through the HOA Block Captain WIX email system.

As an HOA, Cape Royal maintains very strict privacy and usage guidelines related to the use of our residents' personal contact information. The Cape Royal Homeowners Association does not sell any personal names, addresses or email addresses. All communications distributed through the Block Captain email system must be preapproved by the Communication Committee (CC) before distribution.

Further, in compliance with the Cape Royal Community Policy #201, No Solicitation, at no time will communications be distributed by the Block Captains to promote or give the impression of endorsing any one company, individual, or nonprofit cause, regardless of status as a Cape Royal resident. This includes dissemination of information through flyers, signage, leave-behinds, emails, social media, newsletters, and any other form of marketing communication within the community for which the HOA is responsible. Two (2) exceptions are as follows:

- **Cape Royal Golf Course (CRGC)** – The HOA is committed to and benefits from the success of our leasing partner. As owners and landlords, information for CRGC sponsored (seasonal) events, which may be of interest to or benefit Cape Royal residents, may be distributed through our Block Captain email system. Resident contact information, which CRGC may obtain for their own mailings, is generated through voluntary means directly from individual residents.
- **Cape Royal Community Foundation (CRCF)** – The HOA is committed to supporting the Cape Royal Community Foundation, as their mission is to meet the philanthropic goals of the Cape Royal Community. Since their intent is to serve as a channel for the generosity of our residents, and those we partner with throughout the Lee County area, the HOA database and Block Captain email system can be used, with CC preapproval, to assist in marketing large events—such as their Biennial Ball and Golf Outing to residents.

### Family Data Sheets (FDS) & Data Security

The Cape Royal HOA will maintain ~~a~~ the main database of resident information, which is collected and stored within a secure Airtable software service. This database is maintained by the Cape Royal Community Administrative Assistant (CRAA), with assistance from the Block Captains. While the Block Captains can assist residents in managing this process, it is each homeowner's responsibility to ensure that their personal information is current and accurate.



## Information Use & Privacy Policy

Residents can enter new and/or updated information on the community website’s Family Data Sheet (FDS) form at <https://www.caperoyalhoa.com/fds>. The form is encrypted and does not actually access the live database. Rather, the form submission sends a record of the requested changes to the CRAA’s attention. The CRAA will review the information and confirm its validity prior to uploading the changes to the live database.

- Airtable.com security practices (as stated on their website).** *Maintaining the security and privacy of our customers' data is our utmost concern at Airtable -- our success and credibility depend on it. All data you enter into Airtable remains yours, and we are committed to ensuring that your data is not seen by anyone who should not see it. Airtable's data is encrypted both when it is sent to and from our servers, as well as when it is at rest. To protect your content in transit, Airtable uses 256-bit SSL/TLS encryption. At rest, Airtable content is protected using 256-bit AES encryption. Airtable's production data is regularly backed up to a separate, isolated location and all backups are encrypted. You also have the option to manually back up your bases by exporting individual tables as CSV files or by retrieving your data via the Airtable API.*

### Authorization & Access

The CC reserves the right to review any communiqué prior to posting, to ensure that the communications resources are being used in compliance with this policy and other HOA policies. Access to communication resources is at the sole discretion of the CC. Generally, the community is given access to the various forms of communication, while the content will be reviewed and approved by the CC.

Individuals should understand, therefore, that they have no right to privacy with respect to any messages or information created or maintained on the HOA’s media resources, including personal information or messages. Accordingly, if they have sensitive information to post, they should use alternative means to do so. Deletion or removal of information, documents, or messages maintained on the HOA’s media resources is at the sole discretion of the CC.

Access to resident data and other HOA documents will be limited for use by the following HOA Committees, as authorized by the HOA Board for the following functions:

| Committee/<br>Person                | Database/ System                       | Administrator Access & Back Up  | Source/Process   |
|-------------------------------------|--|---|--|
| HOA Administrative Assistant (CRAA) | Airtable – FDS database administration | 2 chairs purchased annually: 1. CRAA and 2. Covenants Lead<br>One additional individual acts as a backup to the CRAA. | Block Captains and Committee Leads are permitted View-Only access of selected sections of data as approved by HOA Board. They do not have access to enter or update data in the live database. |



## Information Use & Privacy Policy

| <b>Committee/<br/>Person</b>     | <b>Database/System</b>  | <b>Administrator Access &amp; Back Up</b>  | <b>Source/Process</b>  |
|----------------------------------|---|--|--|
| HOA Archives                     | Google Drive & Docs   | The CRAA is responsible for archive maintenance, with 'invitation only' access granted to current HOA board members & select committee members approved by the HOA President and our Webmaster.      | There are 2 different HOA Archives: General Information and Sensitive Information for confidential HOA files and documents.  |
| Architectural Review Board (ARB) | Airtable & Paper Format   | The CRAA is responsible for maintaining the submitted ARB data with View-Only access granted to the ARB chair and committee members.   | The database contains summary results of the requests and deliberations along with communication and/or photos where necessary. Does not include specific builder, i.e. Policy 600, constructions agreements, etc., which are maintained separately in paper format by the ARB Chair and CRAA. |
| Covenants Committee              | Airtable  | The CRAA and Covenants Lead are responsible for approving and maintaining the data, with Form input and View-Only access granted to Covenant Committee members.                                      | Covenant violations, photos, and correspondence with individual residents is recorded and stored here for follow up and resolution.  |
| Finance Committee                | QuickBooks for HOA financial matters  | The HOA accountant is responsible for maintenance and input.   | Certain resident updates related to property ownership are available from Airtable.  |
| Gate Access Committee            | Door King System for community access   | The CAC committee chair and one assistant are responsible for updating changes related to gate access.   | Relevant resident updates are available from Airtable.   |
| Communications Committee         | HOA & Community Website & Block Captain Emails – hosted by Wix.com            | The Webmaster and Block Captain Email Committee are responsible for updating and maintaining the website and Block Captain emails. This includes database content, the contact list & functionality. | Relevant email addresses are available from the Block Captains and should match those in the Airtable database. CC approves communication before distribution.   |
| Communications Committee         | Nextdoor.com – a social media platform  | Next Door Coordinator and Webmaster.   | Encouraged as the community social media platform, however, voluntary for residents. The community's Nextdoor Coordinator monitors compliance with community standards.  |
| Communications Committee         | Directory   | Updated and assembled by Directory Coordinator.  | Data is available from Airtable with corrections provided by Block Captains.   |
| Communications Committee         | HOA Email addresses and the Cape Royal phone number on the community website. | The Webmaster and one assistant are responsible for updating HOA emails and phone and for monitoring incoming communication from the public and residents.   | Monitors incoming communication via main HOA phone and email. Responds directly or distributes to HOA Board President—or appropriate Committee Chair—for response and follow up.   |



## **Information Use & Privacy Policy**

Further information on individual committee usage of FDS data is as follows:

### **Architectural Review Board (ARB)**

The ARB is responsible for reviewing, approving and enforcing architectural plans and specifications for new construction and major improvements. ARB information in Airtable is a summary results of the requests and deliberations along with some communications and/or photos where it deems necessary. It does not contain the complete document history (ex. no Policy 600, Construction Agreements, etc.). The ARB Chair maintains the builder floor plans and CRAA maintains paper files for all the other documents related to any project. The only access to Airtable information is via View-Only access for the Chair and members.

### **Covenants Committee**

The Covenants Committee is responsible for identifying property violations and for seeking corrections with individual homeowners. Throughout the process they are responsible for maintaining documentation, as outlined in the Florida statutes. These historical records are stored in the Airtable database. Each committee member has View Only access to identify resident contact information. They also have access to a Covenant Input Form for recording observations and photographs. As with other input forms for Airtable, the form is encrypted and submitted to the CRAA and Covenant Chair for review. Upon review and validation, the CRAA uploads the data into the Airtable database.

### **Finance Committee**

The Finance Committee manages HOA finances, develops annual budgets, and ensures conformance with legal responsibilities. Additionally, they are responsible for collection of the HOA's annual assessment and the directed assessment for golf course purchase debt retirement, as well as other HOA-related fees attributed to individual residents in Cape Royal. FDS information related to property ownership is provided by the CRAA for upload into a QuickBooks program to facilitate completion of these tasks.

### **Community Access Committee (CAC)**

The CAC is responsible for managing the processes that control access to our Community through our North and West gates. They are also responsible for maintaining entry security equipment and communicating with local law enforcement agencies. Updated vehicle data, provided by the resident via the FDS and reviewed by the appropriate Block Captain, is paired with the resident's individual household access code. This FDS information is then provided by the CRAA for upload into a Door King program to allow automated access to the community.

### **Website**

In accordance with FL statute 718.111, the CC provides and maintains an independent website and email system hosted by an independent third-party provider (Wix.com). The website is dedicated to the structure, responsibilities, and



## Information Use & Privacy Policy

activities of the HOA and provides a platform for viewing activities, required notices, records, and documents that may be posted by the association. The Communication Committee (CC) of the HOA Board is responsible for maintaining **all** the website's content. The website contains a password-protected section to display required meeting minutes and other confidential HOA documents that must be accessible to the HOA members.

- **Wix.com Security (as stated by the company).** *Wix has implemented security measures designed to protect the Personal Information you share with us, including physical, electronic and procedural measures. Among other things, we offer HTTPS secure access to most areas on our Services; the transmission of sensitive payment information (such as a credit card number) through our designated purchase forms is protected by an industry standard SSL/TLS encrypted connection; and we regularly maintain a PCI DSS (Payment Card Industry Data Security Standards) certification. We also regularly monitor our systems for possible vulnerabilities and attacks, and regularly seek new ways and Third Party Services for further enhancing the security of our Services and protection of our Visitors' and Users' privacy.*

**Nextdoor.com** (The Cape Royal Community's Electronic Bulletin Board or Social Media Platform)

The Cape Royal Community's Nextdoor network was initiated when residents requested an "electronic bulletin board" that could be used to share information within the community. It proved to be an invaluable resource during the 2017 hurricane season. Nextdoor supplements our traditional Board of Directors and Block Captain communications by providing an environment for neighbor-to-neighbor communication. Participation is completely voluntary, with many Cape Royal residents electing to take part. While Nextdoor is neither directly supported nor managed by the HOA, the HOA acknowledges its place as an important communication tool and encourages its use by the membership.

- **Nextdoor.com Security & Privacy Protocol (as outlined on their website).** *Nextdoor is securely encrypted using the HTTPS Internet protocol. Violations of privacy or threats to someone's physical safety are not tolerated. Members can opt to adjust their privacy settings and, when appropriate, report a member's offending content. Nextdoor will take steps to remove reported offensive content and, in the extreme, a member can be barred from participation. In order to participate:*
  - *Every neighbor must verify their address in the neighborhood and use their real name.*
  - *Personal information shared on Nextdoor will never show up in Google or other search engines.*
  - *Nextdoor never shares your personal information with third-party advertisers.*

### Community Directory

The Communication Committee provides and maintains an annual community directory. The directory is available only in print format and consists of names, addresses, and telephone numbers of residents and community resources (e.g., clubhouse, fire, police, etc.). Updates for contact information are available from **Airtable**. **Block Captain Emails**

Cape Royal Block Captains are residents who volunteer their time and effort to the community. They are the conduit between the residents, the Board of Directors, and the various committees within our homeowners' association. They are responsible for encouraging and assisting residents in maintaining current and accurate FDS information, which



## Information Use & Privacy Policy

enables successful resident gate access, provides accurate directory information, and helps ensure successful delivery of email notifications through the Wix email system. Resident email addresses obtained by other Cape Royal Clubs, Groups or Clubs, are only generated through voluntary means directly from individual residents.

### HOA Email and Phone Numbers

The HOA maintains 5 email addresses and a general phone number to facilitate the flow of questions and information about the community for the public and residents. All are listed on the community website, [caperoyalhoa.com](http://caperoyalhoa.com). They include:

- General Info: [info@caperoyalhoa.com](mailto:info@caperoyalhoa.com) / 941-681-0139
- Architectural Review Board: [arb@caperoyalhoa.com](mailto:arb@caperoyalhoa.com) / 239-896-4804
- Community Access Committee: [caperoyalcac@caperoyalhoa.com](mailto:caperoyalcac@caperoyalhoa.com) / 941-257-3437
- Covenants Committee: [covenants@caperoyalhoa.com](mailto:covenants@caperoyalhoa.com)
- Roads & Lighting: [rdl@caperoyalhoa.com](mailto:rdl@caperoyalhoa.com)

The General Info email and phone number are monitored by the Webmaster and their committee. They will either respond directly or channel the communication to the HOA Board President or appropriate Committee Chair for response and follow up. The remaining email addresses forward messages to the respective committee chair's email of choice.

### Prohibited communications

Activities that appear to sponsor direct selling are not allowed. For example, a resident may decide to host a community event in which the guest speaker provides a general educational session about their field of expertise. That session, however, should not be used to promote the speaker's products. The speaker can give out business cards at the end of the session.

This prohibition also extends to include promotion of a company owned by a Cape Royal resident or at which a Cape Royal resident may be employed. For example, when a resident offers to write a newsletter article about a service or upcoming event that may be of interest to the community, the resident's field of expertise or title may be mentioned, however the company name will not be mentioned.

Communications media cannot be used for knowingly transmitting, retrieving, or storing any communication that is:

- Used for personal reasons
- Discriminatory or harassing in nature
- Derogatory to any individual or group
- Obscure, defamatory or threatening
- In violation of any law (civil, copyright, etc.)



## Information Use & Privacy Policy

### Professional Considerations

To ensure that a proper spirit and tone to the community is maintained, the following guidelines are recommended:

- Communications should be positive, constructive, complete, and factual
- Email Subject lines should describe an email message topic in a clear, short and concise format and include a call to action (CTA) when possible, to increase open rate
- Use correct grammar and spelling
- Review, spell check, and edit before submitting
- Use humor with caution – the reader cannot see your wink and emojis should be avoided
- Avoid sarcastic humor
- Avoid using all capital letters – the electronic equivalent of shouting

Questions should be directed to the chairperson of the CC at [info@caperoyalhoa.com](mailto:info@caperoyalhoa.com).