

Privacy Policy
Adopted May 18, 2015

PURPOSE: The purpose of this policy is to delineate the level of protection of personally identifiable membership information that the Glastonbury Landowners Association, Inc. (GLA) collects, maintains, uses, disseminates or discloses to third parties. Membership information is available per the Bylaws and Montana law. However, certain private information of members that the GLA may have is kept private per federal and Montana law and because the members have expressed that they have a right to privacy with regard to that information which outweighs the members' right to know the information.

Corporate records that are available to GLA members may still be considered private information to persons who are not GLA members, and such records may be protected by privacy laws.

No part of this Privacy Policy supersedes the GLA Bylaws. This policy will be updated as appropriate in response to changing business circumstances and/or legal developments.

Private Information

We share members' private information only as needed with our employees and other parties who require such information to assist us with fulfilling GLA obligations to its members. Further, a member's private information may be disclosed:

- As permitted or required by applicable law or regulatory requirements;
- To protect the rights and property of the GLA;
- During emergency situations or where necessary to protect the safety of a person or group of persons; or
- With a member's consent.

Private information that the GLA may have is defined as:

- Social Security numbers, taxpayer identification numbers or driver license numbers;
- Email addresses, unless it is the official address on the membership list;
- A member's financial account transactions (does not include account balances);
- Bank account, credit card or debit card account numbers or information;
- Phone numbers;
- Date of birth or family information (such as number of, names of, or ages of children);
- Employment records;
- Minutes of closed Board meetings that deal with confidential matters such as litigation or employee-related issues;
- Income tax filings and any personal financial information provided to negotiate payment plans, and
- Other information that may be required to be kept confidential under Montana law.

Protection of Free Speech

Members attending any GLA meetings do not have an expectation of privacy within the community, but they have a reasonable expectation that their conversations and likenesses are not going to be posted on the internet thereby making it open to the general public.

In order to make sure members' free speech rights are not suppressed,

- The GLA prohibits the publishing of members' images taken while at a meeting, or audio or video recordings of the meetings to the general public, including the internet, without the express written permission of all of the parties who are recorded.
- Membership votes at Annual and Special Membership meetings are held as private information.