

Fisher Island Community Association, Inc. Privacy Policy

Privacy Policy Scope

This Privacy Policy identifies and describes the way Fisher Island Community Association, Inc. (FICA) uses and protects the information we collect about Customers and Users. All use of FICA services, as well as visits to www.ourfica.com, are subject to this Privacy Policy.

The Information We Collect, How We Collect It, And How We Use It

We collect different types of personal and other information based on your use of our services. Some examples include:

- **Contact Information** that allows us to communicate with you -- including your name, address, telephone number, and e-mail address;
- **Billing information** related to your financial relationship with us -- including your payment data, credit history, credit card number, Social Security numbers, security codes, and service history;

We collect information in three primary ways:

- You give it to us when you purchase a unit;
- We collect it automatically when you visit www.ourfica.com;
- We obtain it from other sources, such as from the Public Safety office or Membership office.

We use the information we collect in a variety of ways, including to:

- Provide you with the best customer experience possible;
- Provide you services, and to respond to your questions;
- Communicate with you regarding news, billing, and announcements;
- Address network integrity and security issues;

Information Sharing

FICA may share your Personal Information with other Fisher Island entities, such as the Fisher Island Club and Fisher Island Holdings to make sure your experience is as seamless as possible, and to make sure you have the full benefit of what FICA has to offer.

With Non-FICA Companies: We share your Personal Information only with non-FICA companies that perform services on our behalf, and only as necessary for them to provide those services to you.

- We require those non-FICA companies to protect any Personal Information they may receive in a manner consistent with this policy.
- We do not provide Personal Information to non-FICA companies for the marketing of their own products and services without your consent.

In Other Circumstances: We may provide Personal Information to non-FICA companies or other third parties for purposes such as:

- Complying with court orders and other legal process;
- Enforcing our agreements and property rights; and
- Obtaining payment for our products and services, including the transfer or sale of delinquent accounts to third parties for collection

Safeguarding Your Information: Our Policy on Data Protection and Security

- We do not sell your Personal Information to anyone for any purpose.
- We maintain information about you in our business records while you are a customer, or until it is no longer needed for business, tax, or legal purposes.
- We have implemented encryption or other appropriate security controls to protect Personal Information when stored or transmitted by FICA.
- We require non-FICA companies acting on our behalf to protect any Personal Information they may receive in a manner consistent with this Policy. We do not allow them to use such information for any other purpose.

Customer Privacy Controls and Choices,

- You can review and correct your Personal Information collected by us.
- We will provide you with notice of changes to this policy.

Fisher Island Community Association Privacy Policy FAQ

QUESTIONS ABOUT DEFINITIONS

1. Do the terms used in your Privacy Policy have any special meanings I need to know about?

We recognize that many privacy policies are long, complicated and difficult to understand. That's why we've focused on using words and sentences that are easy to follow and mean just what they say. There are a few important definitions you should know about.

As used in this Policy, the terms listed below have the following meanings:

- Customer
 - A "Customer" is anyone who owns a unit and pays a FICA assessment.
- User
 - A "User" is anyone who visits our Web site.
- Personal Information

"Personal Information" is information that directly identifies or reasonably can be used to identify an individual Customer or User. Examples include name, address, telephone number, email address, and financial account number. Personal Information does not include Published Listing Information as discussed in more detail below.

- o Web Site

"Web Site" means any page or location on the Internet, no matter what device (cell phone, lap top, PC, etc.) or protocol (http, WAP, ftp or other) is used to access the page or location. In this Policy, we use the term Web site other similar terms such as "Internet site," "site" and "Web page."

QUESTIONS ABOUT THE SCOPE OF THIS POLICY

1. What FICA companies are subject to this Privacy Policy?

All direct and indirect subsidiaries of FICA that collect, use or have access to information about our Customers or Users are subject to this Privacy Policy.

2. What does this Policy cover?

This Privacy Policy covers our practices regarding the information we collect about our Customers and Users. All use of FICA services, and all visits to www.ourfica.com are subject to this Privacy Policy.

3. Does this Policy apply to my family members or other users under my account with FICA?

Yes. This Policy applies to all Customers and Users. The Customer who holds the account with FICA is responsible for making sure all family members or other Users under the same account understand and agree to this Policy.

QUESTIONS ABOUT THE INFORMATION WE COLLECT

1. What information do we collect?

We collect different types of personal and non-personal information. Some examples include:

- o **Account Information:** Information we obtain as a result of your business relationship with us, such as:
 - **Contact Information** that allows us to communicate with you, including your name, address, telephone number, fax number and e-mail address.
 - **Billing Information** related to your financial relationship with us, such as the payments you make, your credit history, your credit card numbers, security codes, and your service history.

2. How do we collect information?

We collect information in three primary ways:

- **You Give Us Information:** We collect information from you when you purchase a unit or when you interact with us about a service we offer or provide. For example, you provide us with Contact Information, and Billing Information (such as credit information and Social Security number) when you wish to setup payment for unit.
- **We Collect Information Automatically:** We automatically collect certain types of information when you visit our Web site. For example, we automatically collect various types of Technical Information when you log on to our Web site and register your user name and password.
- **We Collect Information from Other Sources:** We may obtain information about you from outside sources. For example, we may request information from the Public Safety office or the Membership office.

3. How do we use the information we collect?

We use information we collect in a variety of ways. For example, we may use some or all of the information we collect as appropriate for the following purposes:

- To initiate, provide and manage the services you receive (Transportation, Landscaping Public Safety, Mail Room, etc.), and to respond to your questions or problems;
- To develop, bill and collect for assessments;
- To communicate with you regarding updates and announcements;
- To conduct research and analysis directed toward maintaining, protecting and improving our Association and the services we provide;

QUESTIONS RELATED TO INFORMATION SHARING

1. Do the Fisher Island companies share your Personal Information with each other?
- Yes. FICA and other Fisher Island entities share member information to better serve you.

The Fisher Island entities share your Personal Information with each other as necessary to ensure your experience is as seamless and consistent as possible, and that you have the full benefit of what the island has to offer.

2. Do we share your Personal Information with non-FICA companies?

We share your Personal Information only with non-FICA companies that perform services on our behalf, and only as necessary for the provision of those services. We use non-FICA companies to perform many of the services outlined in the FAQ "How do we use the information we collect?" For example, we may use external vendors to process and print your billing statement, or with the Web site hosting company.

We require non-FICA companies acting on our behalf to protect any Personal Information they may receive in a manner consistent with this Policy, and do not allow them to use that information for any other purpose. Most importantly, we do not sell, give or rent your Personal Information to non-FICA companies for the marketing of their own products and services without your consent.

3. Are there any other circumstances in which your Personal Information may be provided to non-FICA entities?

We may provide Personal Information to non-FICA companies or other third parties (for example, to government agencies, credit bureaus and collection agencies) without your consent for certain purposes, such as:

- To comply with court orders, subpoenas, lawful discovery requests and other legal or regulatory requirements, and to enforce our legal rights or defend against legal claims;
- To obtain payment for FICA assessments and services, including delinquent accounts to third parties for collection;
- To enforce our agreements, and protect our rights or property.

QUESTIONS ABOUT DATA PROTECTION AND SECURITY

1. Do we sell your Personal Information?

No. We do not sell your Personal Information to anyone, for any purpose.

2. How long do we keep your Personal Information?

We keep your Personal Information only as long as needed for business, tax or legal purposes, after which we destroy it by making it unreadable or undecipherable.

3. What safeguards does FICA have in place?

We have established electronic and administrative safeguards designed to secure the information we collect, to prevent unauthorized access to or disclosure of that information and to ensure it is used appropriately. Some examples of those safeguards include:

- All FICA employees are subject to the Fisher Island Community Association Code of Business Conduct and certain state-mandated codes of conduct. The Fisher Island Community Association Code requires all employees to follow the laws, rules, regulations, court and/or commission orders that apply to our business — including, specifically, the legal requirements and company policies related to the privacy of communications and the security and privacy of Customer records. Employees who fail to meet the standards embodied in the Code of Business Conduct are subject to disciplinary action, up to and including termination.
- We have implemented technology and security features and strict policy guidelines to safeguard the privacy of your Personal Information. For example:

- We maintain and protect the security of computer storage and network equipment, and our security procedures require user names and passwords to access sensitive data;
 - We have implemented encryption or other appropriate security controls to protect Personal Information when stored or transmitted by FICA;
 - We limit access to Personal Information to those employees, contractors, and agents who need access to such information to operate, develop, or improve our services and products;
 - We require caller/online authentication before providing Account Information so that only you or someone who knows your Account Information will be able to access or change the information.
4. Will you notify me in case of a security breach?

Although we strive to keep your Personal Information secure, no security measures are absolute, and we cannot guarantee that your Personal Information will never be disclosed in a manner inconsistent with this Policy (for example, as the result of unauthorized acts by third parties that violate the law or this Policy). We will make reasonable attempts to notify you if we determine that FICA has experienced a security breach and there is a reasonably likely risk of identity theft, or where otherwise required by law.

QUESTIONS ABOUT CUSTOMER CONTROL

1. Can I review and correct my Personal Information?

Yes. FICA honors requests from Customers to review their Personal Information maintained in reasonably retrievable form, and we are happy to correct information found to be inaccurate. Customers may verify that appropriate corrections have been made.

2. What can I do to protect my passwords and Account Information?

When selecting User names and passwords for www.ourfica.com, you should choose words or characters that are not obvious. Likewise, you should always keep Personal Information such as account numbers, Usernames, passwords or similar information in a secure place and not share the information with others.

QUESTIONS ABOUT CHANGES...

1. ...To Corporate Control?

Information about our Customers and Users, including Personal Information, may be transferred as part of any merger, acquisition, or sale of company assets, as well as in the unlikely event of an insolvency, bankruptcy, or receivership in which Customer and User records would be transferred to another entity as a result of such a proceeding.

2. ...To This Policy?

We reserve the right to update this Privacy Policy as necessary to reflect any changes we make and to satisfy legal requirements. If we make a material change to this Policy, we will post a prominent notice of the change on our Web sites, and provide you with other appropriate notice and choice regarding the use of your information, at least 30 days before the effective date.

Please check our Web site periodically for changes to this Privacy Policy.

HOW TO CONTACT US ABOUT THIS POLICY

We are happy to address any questions or concerns you may have about our privacy practices and policies. You may write to us at FICA, One Fisher Island Drive Fisher Island, FL 33109, or e-mail airizarry@ourfica.com. If you believe you have been aggrieved by any act of ours in violation of the law, we encourage you to contact us directly to resolve your question or issue.