

# Data Security & Privacy Policy & Record Retention Policy

San Juan County Board of REALTORS®

## Purpose and Objective:

San Juan County Board of REALTORS® objective, in the development and implementation of a Data Security Policy and Record Retention Policy is to safeguard both the membership, leadership and employees personal information.

## ACCESS

- Only the Executive Officer and MLS Coordinator has access to the keys to the board office building, all the locked file cabinets and desk drawers and passwords for the various programs and software.

## ACCOUNTS PAYABLE

- All Accounts Payable Files: bills and how payment is made are kept in locked file cabinets. These records are kept for 7 years then shredded.

## ACCOUNTS RECEIVABLE

- All Accounts Receivable Files are kept in locked file drawers. No credit card numbers are collected or kept for any purpose. These records are kept for 7 years, then shredded.

## BANK RECORDS

- The Executive Committee which is the President, President-Elect, Immediate Past President, Secretary / Treasurer and the Executive Officer are all signers on all bank check accounts and Certificate of Deposit accounts for the Board. At the beginning of the year, signatures, social security numbers, Dates of Birth and copies of drivers licenses are collected for the signature cards for all accounts. These are sent on to the banks and no copies are kept.
- All blank checks and deposit slips for all checking accounts are kept in a locked file cabinet. The For Deposit Only stamp is also kept in a locked file cabinet.
- All Bank Statements are kept in a locked file cabinet. These are kept for 7 years, then shredded.
- Any payments received by check or cash are placed in a locked file cabinet until the deposit is made at the bank. This is generally within a day or two of receipt.
- Any payments received by check or cash made for Educational classes are kept in a locked file cabinet stapled to the class registration form. After it is determined the class has enough attendees to hold the class, then the funds are deposited into the operating account.
- During Annual Dues Collection, all cash and checks received are deposited as soon as practically possible. These payments will remain in a locked file cabinet until the Deposit can be made. After the deadline date of December 15<sup>th</sup>, only money orders, cashiers checks or with credit card will be accepted for payment of Annual Dues.

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## **COMPUTER SECURITY**

- All 3 Board computers are password protected.
- The Quickbooks program which is used for the Accounts Payable and Accounts Receivable is password protected.
- The RediSAFE and ReaderKEY program is located on the vendor's server and is password protected.
- The website controls for the SanJuanCountyBoardofREALTORS.com is password protected and only modified by the Executive Officer.
- The Flex-MLS program is located on the vendor's server and is password protected.

## **CONFERENCE REGISTRATIONS**

- Any travel arrangements, such as conference registrations, airline tickets, hotel reservations for conferences where the Board's credit card information is used is kept in the Executive Officer's desk drawer which is locked up each evening.
- The President and President-Elect are expected to attend the RANM Leadership conference held in Santa Fe and the RANM Annual Conference and will have an allowance of \$700. for each of the conferences which includes the Registration fee. If travel arrangements have been made by the Board staff for the Board President or President Elect to attend a state conference and is unable to attend after arrangements have been made, the Board President or President Elect agrees to reimburse the board for any charges incurred.

## **CONTINUING EDUCATION RECORDS**

- All Continuing Education Sign In and Sign Out Sheets, class evaluations and duplicate certificates is kept in a locked file cabinet. These records are kept for 3 years, then shredded.

## **CREDIT CARD**

- The Board's Master card credit card is based on the personal information of the Executive Officer. The Executive Officer keeps the credit card in a safe place and it is used for various purposes. From making travel arrangements for Leadership and Staff, making hotel reservations, paying for refreshments for the continuing education classes. For any purchases made for the board office. For auto payment for the Open House Website.
- The Discover credit card is based on the personal information of the Executive Officer . It is used primarily for purchases from Sam's Club of various supplies for the board office.
- The Board of Director's have approved for the use of credit cards and have agreed to pay them off each month.

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## E-COMMERCE

- The e-Commerce on REALTOR.org is password protected and used for payment of MLS fees, Education expenses, Annual REALTOR Dues, Alliance Membership Dues and any other items the Board staff feels is needed. Members may have staff help them make a payment. Credit Card information may be given verbally to staff while staff is completing the online information on their behalf. Credit card information is never written down or kept for any reason.

## MEMBERSHIP FILES:

- Existing membership files /records have been thoroughly researched and any Social Security Number and Drivers License number has been blocked out with permanent black magic marker and is unreadable. The member application and transmittal forms have also been thoroughly researched and the Social Security Numbers have been blocked out or cut off and shredded.
- For all future membership applications received, the Social Security Number will not be collected.
- The New member driver's license will be photocopied but the driver's license number will be marked out.
- All member files will be in locked file drawers, both Active and Inactive.
- The policy of the Board is to keep Inactive Membership Files for 3 years, then shred them.

## PAYROLL

- All completed Time Cards and payroll check stubs are kept in a locked file cabinet with the Accounts Payable Files.
- All employee personal employment information, such as W-2's, I-9 forms, etc. is kept in a locked file cabinet. Former employee records are kept for 7 years, then shredded.

## PETTY CASH

- Petty Cash fund is \$100. And kept in a locked file cabinet. This money is mostly used for making change for our luncheons , or for giving change on an MLS Bill. Or for small purchases when needed.

## READERKEYS & REDISAFES

- ReaderKEY Update Code Lists which have the member's key's pin numbers are kept in locked file cabinets or drawers.
- ReaderKEY & RediSAFE Leases are kept in locked file cabinets.
- All Spare ReaderKEYS are kept in locked file cabinets.