

# PRIVACY NOTICE

Last updated October 08, 2023

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This privacy notice for Holiday Beach Property Owners Association Inc. (doing business as HBPOA) ("we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("process") your information when you use our services ("Services"), such as when you:

- Visit our website, or any website of ours that links to this privacy notice
- Engage with us in other related ways, including any sales, marketing, ~~or~~ events, or Request Forms of various types.

**Questions or concerns?** Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [hbpoa@holidaybeachtx.org](mailto:hbpoa@holidaybeachtx.org).

## SUMMARY OF KEY POINTS

*This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.*

**What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about [personal information you disclose to us](#).

**Do we process any sensitive personal information?** We do not process sensitive personal information.

**Do we receive any information from third parties?** We do not receive any information from third parties.

**How do we process your information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about [how we process your information](#).

**In what situations and with which parties do we share personal information?** We may share information in specific situations and with specific third parties. Learn more about [when and with whom we share your personal information](#).

**How do we keep your information safe?** We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about [how we keep your information safe](#).

**What are your rights?** Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about [your privacy rights](#).

**How do you exercise your rights?** The easiest way to exercise your rights is by submitting a [data subject access request](#), or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? [Review the privacy notice in full](#).

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### 1. WHAT INFORMATION DO WE COLLECT?

#### Personal information you disclose to us

*In Short:* We collect personal information that **you provide to us**.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us **via the website**.

**Personal Information Provided by You.** The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- contact preferences
- mailing addresses
- holiday beach street address

**Sensitive Information.** We do not process sensitive information.

**Payment Data. Our credit card vendor** We may collect data necessary to process your payment if you make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is stored by Total System Services, Inc.®. You may find their privacy notice link(s) here: All rights reserved worldwide. TSYs® and TSYs Business Solutions are federally-registered U.S. service marks of Total System Services, Inc. TSYs Business Solutions is a registered ISO/MSP of: Wells Fargo Bank, N.A., Walnut Creek, CA; Synovus Bank, Columbus, GA; and Deutsche Bank, New York, NY; for Visa® and MasterCard® transactions only. TSYs Merchant Solutions is a registered ISO/MSP of Wells Fargo Bank, N.A., Walnut Creek, CA and Synovus Bank, Columbus, GA .

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

#### **Information automatically collected**

***In Short:** Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

The information we collect includes:

- *Google Analytics.* Device data is information about the user's computer, phone, tablet or other device used to access your website or app. Examples include device and application

identification numbers, location, and hardware model Internet service provider or mobile carrier.

- *Website usage.* Page visit counts are aggregated by month

## 2. HOW DO WE PROCESS YOUR INFORMATION?

*In Short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

**We process your personal information for a variety of reasons, depending on how you interact with our Services, including:**

- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- **To fulfill and manage user requests .** Requests for Community Center reservations or newsletter sign up, etc.

## 3. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

*In Short: We may share information in specific situations described in this section and/or with the following third parties.*

**We may need to share your personal information in the following situations:**

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

## 4. HOW LONG DO WE KEEP YOUR INFORMATION?

*In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 5. HOW DO WE KEEP YOUR INFORMATION SAFE?

*In Short: We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## 6. DO WE COLLECT INFORMATION FROM MINORS?

*In Short: We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at [hbpoa@holidaybeachtx.org](mailto:hbpoa@holidaybeachtx.org).

## 7. WHAT ARE YOUR PRIVACY RIGHTS?

*In Short: You may review, change, or terminate your account at any time.*

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**Withdrawing your consent:** If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "[HOW CAN YOU CONTACT US ABOUT THIS NOTICE?](#)" below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you have questions or comments about your privacy rights, you may email us at [hbpoa@holidaybeachtx.org](mailto:hbpoa@holidaybeachtx.org).

## 8. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 9. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

*In Short: If you are a resident of, you are granted specific rights regarding access to your personal information.*

### What categories of personal information do we collect?

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	NO
B. Protected classification characteristics under state or federal law	Gender and date of birth	NO
C. Commercial information	Transaction information, purchase history, financial details, and payment information	NO
D. Biometric information	Fingerprints and voiceprints	NO
E. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements	NO
F. Geolocation data	Device location	NO
G. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities. (Zoom recordings of POA board meetings)	YES
H. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	NO
I. Education Information	Student records and directory information	

		NO
J. Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO
K. Sensitive personal Information	Sensitive personal information, sometimes called SPI, is data that is subject to strict protection guidelines under laws like the GDPR and the CPRA and includes very intimate details about your users, like their: Political affiliations, Religious beliefs, Philosophical beliefs, Race or ethnicity, Sexual orientation, Health data, Biometric data, Criminal history, Credit or financial data, Trade union and membership information, Personal identification (ID) numbers (license, social security, state ID cards, passports)  *Source – <a href="#">Privacy Policy Generator</a> .	NO

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

**How do we use and share your personal information?**

Learn about how we use your personal information in the section, "[HOW DO WE PROCESS YOUR INFORMATION?](#)"

**Will your information be shared with anyone else?**

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Learn more about how we disclose personal information to in the section, "[WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?](#)"

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal information.

We have not disclosed, sold, or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. We **will not** sell or share personal information in the future belonging to website visitors, users, and other consumers.

## 10. DO WE MAKE UPDATES TO THIS NOTICE?

*In Short:* Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## 11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at [hbpoa@holidaybeachtx.org](mailto:hbpoa@holidaybeachtx.org) or contact us by post at:

Holiday Beach Property Owners Association Inc.  
104 St. Charles Loop  
Rockport, TX 78382  
United States

## 12. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

You have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please fill out and submit a [data subject access request](#).  
This privacy policy was created using Termly's [Privacy Policy Generator](#).

**Commented [t3]:** Not sure how we can manage this. I know Jason and I discussed members being able to review and update their information