# AVA PRIVACY POLICY PROCEDURES

These policy procedures apply to any American Volkssport Association ("AVA") personnel or authorized representatives, including local, statewide or regional AVA club personnel with access to AVA personally identifiable member information. The AVA Executive Director has overall responsibility for ensuring that proper safeguards are in place and that these procedures are followed. It is the responsibility of any of these individuals to learn, understand and comply with these procedures. Failure to do so could result in a club or individual's expulsion from AVA membership or employment.

Personally identifiable member information (PIMI) must be collected in the method described in the AVA Privacy Policy and safeguarded in accordance with these procedures. PIMI may only be used for the purpose for which it was collected and intended and may not be shared without proper authorization from the member. (Member has not opted out.) PIMI is a combination of certain types of individual information from which the identity of a person can be determined. These types of information include a combination of two or more of any of the following:

- First and last name or first initial and last name;
- Physical Description;
- Ethnicity;
- Social Security Number;
- Driver's License Number or State Issued ID Card Number;
- Credit or Debit Card Number, regardless of whether any of the following are included with that number:
    - Expiration Date;
    - CSV Code;
    - PIN;
    - Password; or
    - Access Code;
- Financial Account Number, in combination with any access code or password that would permit access to an individual's financial account;
- Mother's Maiden Name;
- Date of Birth;
- Medical Information; or
- Passport Number.

PIMI should not be shared with any person or organization outside of AVA and should only be shared internally within AVA and its local, statewide or regional AVA club personnel as provided for and allowed by AVA's Privacy Policy. When such information is shared, it should be done so via encrypted or otherwise protected email or on paper documents that are shredded or stored in a locked file cabinet or area with restricted access. Any authorized individual accessing the PIMI housed in paper or electronic fashion will be responsible for securing that information by key or password prior to leaving that work area.

Any information maintained electronically must be maintained in a computer storage system that has current anti-virus and firewall or security software in place and is accessible only to individuals who need access in order to conduct the business of AVA. Security passwords should be in place on such computer system with each individual responsible for his or her own password. Passwords should not be shared.

Any information maintained in paper copies must be stored in a locked file cabinet or locked area with restricted access. When such information is no longer needed in paper form, the paper should be properly shredded and disposed of.

No PIMI should be copied to portable media devices, including USB fobs or external data saving devices, without prior written approval of the AVA Executive Director. No PIMI should ever be placed on an individual cell phone or other portable media device. Printing of PIMI should be done on a designated printer or a printer with password printing capability.

Local, statewide or regional AVA clubs and club personnel with access to PIMI because of information shared in accordance with the AVA Privacy Policy must not use any such information for any reason outside of the AVA Privacy Policy.

Any AVA personnel or authorize representative who is or becomes aware of a violation of these procedures is required to report such violation immediately to the AVA Executive Director.