



## HEATHER GLEN COMMUNITY SERVICES DISTRICT

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POLICY TITLE: **Privacy Policy & DPA**

POLICY NUMBER: **2440**

ADOPTED BY BOARD OF DIRECTORS: **03/27/2025**

### 2440.1 - Purpose and Scope

The HEATHER GLEN COMMUNITY SERVICES DISTRICT to be further described in this document as “the District” is committed to ensuring the privacy and protection of personal data in compliance with all applicable laws and regulations, including the California Privacy Rights Act (CPRA) and the California Consumer Privacy Protection Act (CCPSA). This policy outlines the implementation of privacy protections and the establishment of a Data Protection Agreement (DPA) to guarantee that all personal information collected, processed, or stored by the District is handled in accordance with these legal requirements.

### 2440.2 - Privacy Policy

#### 1. Data Collection

The District collects and processes personal data only for lawful, legitimate, and specified purposes to provide you with water, sewer, and road maintenance services (if applicable). The District collects personal information, including:

- o **Contact Information:** Name, mailing address, phone number, and email address.
- o **Account Information:** Service address, account number, payment history, and billing details.
- o **Usage Data:** Water consumption data, sewer usage (for those receiving sewer services), and related service information.
- o **Emergency Contact Information (optional):** Name and contact details of a designated emergency contact person.

The District will:

- o Collect data only for specific administrative and operational purposes.
- o Limit data collection to the minimum necessary to fulfill the stated purposes.
- o Obtain consent from individuals for the collection and use of personal data when required by law.
- o Ensure data is only used for the purpose for which it was collected.

#### 2. Data Use

The District will use your personal information for the following purposes:

- **Service Provision:** To establish and maintain your water, sewer, and road services (if applicable). For those receiving water service only, this will be limited to water service provision.
- **Billing and Payments:** To issue bills, process payments, and manage your account.
- **Customer Support:** To address service inquiries, issues, or requests.
- **Legal Compliance:** To meet local, state, and federal regulations.

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- **Communication:** To inform you about account updates, service disruptions, policy changes, etc.

### 3. Data Rights and Individual Access

In compliance with the CPRA and CCPSA, individuals have the right to:

- Access their personal data.
- Correct any inaccuracies in their data.
- Request the deletion of personal data when it is no longer necessary for the purposes it was collected; subject to legal or contractual obligations.
- Object to or restrict the processing of their data in certain circumstances.
- Withdraw consent for the processing of their personal data at any time where applicable.
- Request information regarding the sharing of personal data to third parties and the ability to opt out.
- Opt-out of non-essential communications (e.g., newsletters or promotional materials).

To exercise any of these rights, contact the District using the details provided at the end of this policy.

### 4. Data Protection and Security

The District will implement appropriate technical and organizational measures to protect personal data against unauthorized access, loss, alteration, and disclosure. These measures include, but are not limited to:

- Data encryption during transmission and storage.
- Access controls limiting the use of data to authorized personnel only.
- Regular audits and reviews of data security practices.
- Training for staff and board members on the protection of personal data and privacy laws.

The District will make every effort and precaution to minimize risks and protect your information, however it sure be known that no system can be 100% secure, and therefore cannot guarantee absolute security.

### 5. Data Sharing and Third-Party Contracts

The District may share personal data with third-party service providers and contractors to support the delivery of services. The District will never sell or rent your personal information. We may share your information in the following ways:

- **Service Providers:** We may share data with trusted third-party service providers, such as those handling billing or technical maintenance, who are required to protect your information.
- **Legal Compliance:** If required by law, we may disclose information to authorities in response to a subpoena, court order, or government request.
- **Emergency Situations:** We may share contact information to ensure your safety in case of emergencies.

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Any third party receiving personal data must sign a Data Protection Agreement (DPA) with the District to ensure compliance with the CPRA, CCPSA, and other applicable laws. The DPA will include provisions for:

- o Data security standards.
- o Prohibition on unauthorized use or disclosure of personal data.
- o Return or deletion of data upon termination of the contract.
- o Regular audits to ensure compliance with the privacy policy.

### 2440.3 - Data Protection Agreement (DPA)

The Data Protection Agreement (DPA) applies to any third-party entity that processes personal data on behalf of the District. This agreement ensures compliance with the CPRA and CCPSA, ensuring personal data is processed securely and in accordance with applicable laws.

#### 1. Third-Party Responsibilities

- o The third party shall process personal data only in accordance with the District's instructions and in compliance with all applicable privacy laws.
- o The third party shall ensure the confidentiality of all personal data and will not disclose, share, or sell personal data to unauthorized entities.
- o The third party will take all necessary measures to ensure data security, including encryption, secure access controls, and incident response procedures.

#### 2. Data Retention and Deletion

- o Personal data shall be retained only for as long as necessary to fulfill the purpose for which it was collected, unless further retention is required by law.
- o Upon termination of the agreement, the third party shall return or securely delete all personal data in its possession.

#### 3. Audit and Compliance

- o The District reserves the right to conduct audits and assessments of third parties to ensure compliance with the terms of the DPA and privacy laws.
- o The third party agrees to cooperate with the District during audits and provide evidence of compliance.

#### 4. Incident Response and Data Breach Notification

- o In the event of a data breach or unauthorized access to personal data, the third party must promptly notify the District and cooperate fully in addressing the breach, including providing assistance with the investigation and any necessary notifications under the CPRA and CCPSA.

### 2440.4 - Compliance and Enforcement

#### 1. Monitoring and Reporting

The District will regularly monitor its compliance with the privacy policy and data

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protection practices. Staff and board members are required to report any incidents or concerns related to data protection immediately.

### 2. **Training**

The District will provide ongoing training to staff, board members, contractors, and third parties to ensure awareness of privacy laws and best practices in data protection.

### 3. **Non-Compliance**

Any failure to comply with the privacy policy or data protection agreements may result in disciplinary action, including the termination of contracts or employment.

### **2440.5 - Review and Updates**

This policy will be reviewed annually or as needed to ensure ongoing compliance with privacy laws and evolving data protection requirements. Updates to this policy will be communicated to all relevant stakeholders, including staff, board members, and third-party contractors.

### **2440.6 - Contact Information**

For questions or concerns regarding the District's privacy policy or data protection practices, please contact the District at [heatherglencsd@gmail.com](mailto:heatherglencsd@gmail.com).