

# Records Management Policy

## Montezuma Valley Volunteer Community Service Organization (MVVCSO)

*Effective Date: June 28, 2025*

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### 1. Purpose

This policy ensures MVVCSO maintains accurate, secure, and accessible records in strict compliance with **Article VII, Section 1** of the 2025 bylaws, California corporate codes for nonprofit public benefit corporations, the Nonprofit Integrity Act (NIA), IRS 501(c)(3) requirements, the Unruh Civil Rights Act, and the California Consumer Privacy Act (CCPA). It aligns with MVVCSO's North Stars of community focus, transparency, inclusivity, and serving all members by promoting equitable access and accountability for the Ranchita community.

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### 2. Scope

This policy applies to all records created, received, or maintained by MVVCSO, including:

- Meeting minutes and resolutions
  - Financial statements, budgets, and audit reports
  - Membership lists and applications
  - Grant applications and reports
  - Volunteer and contractor agreements
  - Correspondence related to organizational activities
  - Personal information of members, volunteers, and program participants
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### 3. Record Maintenance

### 3.1 Types of Records

MVVCSO maintains the following records to ensure transparency and compliance:

- **Corporate Records:** Bylaws, articles of incorporation, Board minutes, and resolutions.
- **Financial Records:** Annual budgets, financial statements, tax filings (e.g., IRS Form 990), and audit reports.
- **Membership Records:** Voting Member lists, applications, and good standing status.
- **Program Records:** Grant applications, reports, and program evaluations.
- **Personal Information:** Data collected from members, volunteers, or participants (e.g., contact details, accessibility needs).

### 3.2 Storage and Security

- **Physical Records:** Stored in a locked cabinet at the principal office (37370 Montezuma Valley Rd, Ranchita, CA 92066), accessible only to authorized personnel (e.g., Secretary, Treasurer).
- **Digital Records:** Stored in a secure, encrypted cloud service (e.g., Google Drive) with two-factor authentication and restricted access.
- **Backup:** Digital records are backed up monthly to an external drive stored off-site.
- **Confidentiality:** Records containing personal information are protected per CCPA and shared only with explicit consent or as legally required.

### 3.3 Retention Periods

- **Corporate and Financial Records:** Retained for seven years or as required by law.
- **Membership Records:** Retained for three years after membership ends.
- **Program Records:** Retained for five years or as specified by grant agreements.
- **Personal Information:** Retained only as long as necessary, then securely destroyed.

### 3.4 Destruction of Records

- Records are destroyed securely after retention periods expire (e.g., shredding for paper, secure deletion for digital files).
  - Destruction logs are maintained by the Secretary.
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## **4. Access to Records**

### **4.1 Member Access**

- Voting Members may inspect corporate records (e.g., bylaws, minutes, financial statements) with 7 days' written notice to the Secretary, per **Article VII, Section 2** of the bylaws and California Corporations Code § 6330.
- Requests must specify the records sought and the purpose of inspection.
- Access is provided during regular business hours or via mail for non-digital members.

### **4.2 Public Access**

- Certain records (e.g., IRS Form 990, annual reports) are publicly available at the principal office and online (if feasible), supporting transparency.
- The public may request copies with 7 days' notice; reasonable copying fees may apply.

### **4.3 Accessibility**

- Records are provided in accessible formats (e.g., large print, screen-reader compatible, Spanish translations) upon request, per the Unruh Civil Rights Act and ADA.
- Non-digital or disabled members are ensured equitable access.

### **4.4 Restrictions**

- Confidential records (e.g., personal information, sensitive financial data) are not publicly accessible, per CCPA and privacy laws.
  - The Board may restrict access if disclosure would harm MVVCSO or violate legal obligations.
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## **5. CCPA Compliance**

### **5.1 Data Collection and Use**

- MVVCSO collects only necessary personal information (e.g., name, address, accessibility needs) for membership, programs, or volunteer coordination.

- Data is used solely for operational purposes and not shared without consent, except as required by law.

## 5.2 Data Subject Rights

- Members and participants may:
  - Request access to their personal data.
  - Request correction or deletion of inaccurate data.
  - Opt out of non-essential communications.
- Requests are submitted to the Secretary and processed within 45 days, per CCPA.

## 5.3 Data Security

- Personal information is stored securely, with access limited to authorized personnel.
  - In case of a data breach, MVVCSO will notify affected individuals within 72 hours, per CCPA.
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## 6. Non-Discrimination in Record Access

- Record access is provided without discrimination based on race, color, religion, gender, sexual orientation, national origin, age, disability, or any protected characteristic, per the Unruh Civil Rights Act.
  - MVVCSO ensures inclusivity by offering accommodations (e.g., translation, transportation assistance).
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## 7. Responsibilities

- **Secretary:** Oversees record maintenance, access requests, and CCPA compliance.
  - **Treasurer:** Maintains financial records and ensures audit readiness.
  - **Board of Directors:** Reviews record management annually and approves policy updates.
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## 8. Public Availability and Transparency

- This policy and key records (e.g., bylaws, annual reports) are posted at the food bank lot, community bulletin boards, and online (if available), per the Nonprofit Integrity Act and transparency North Star.
  - Records are available in accessible formats for all community members.
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## 9. Review and Amendments

- The Board reviews this policy annually by January 31 to ensure compliance with evolving laws and community needs.
  - Amendments require a majority vote and 30 days' notice to Voting Members, per **Article VIII** of the bylaws.
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## Compliance with Legal Standards

- **2025 Bylaws:** Complies with **Article VII, Section 1** for record maintenance and access.
  - **California Corporations Code:** Meets § 6330 (member inspection rights) and § 6320 (record-keeping requirements).
  - **Nonprofit Integrity Act (NIA):** Ensures public access to financial records and audit reports.
  - **IRS 501(c)(3):** Maintains records showing mission alignment and no private benefit.
  - **Unruh Civil Rights Act:** Guarantees non-discriminatory access.
  - **CCPA:** Protects personal data and ensures data subject rights.
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## Alignment with MVVCSO North Stars

- **Community Focus:** Prioritizes community access to records.
- **Transparency:** Makes key records publicly available.
- **Inclusivity:** Provides accommodations for diverse members.

- **Serving All Members:** Ensures equitable access for all, including non-digital or disabled residents.
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