

**SUN CITY ROSEVILLE AUTOMATED LICENSE PLATE RECOGNITION SYSTEM – END-USER
ONLY**

USAGE AND PRIVACY POLICY – FLOCK SAFETY

This policy governs the use by Sun City Roseville Community Association, Inc. ("Association") of the Automated License Plate Recognition System ("ALPR System" or "System") operated by Flock Safety, and applies to the Association's Board of Directors, and Association management staff who have access to or use the System. The Association is an "end-user" as that term is defined in Civil Code Section 1798.90.5(a) and is responsible for implementing this policy. The ALPR System is a searchable computerized database resulting from the operation of one or more mobile or fixed cameras combined with computer algorithms to read and convert images of registration plates and the characters they contain into computer-readable data. The information contained in the System ("LPR Data" or "LPR Information") includes images of license plates, images of vehicles, the date, time and location when the images were collected, and the license plate characters numbers, and state associated with images. The images stored in the System are collected from areas visible to the public where there is no reasonable expectation of privacy. The collection and dissemination of the information contained in the System is protected activity under the First Amendment to the US Constitution. Moreover, LPR Data stored in the System does not include any personally identifying information ("PII"), or information which relates the license plate image to the driver or registered owner of a vehicle. PII contained in vehicle registration information is protected by federal law (Driver's Privacy Protection Act, Title 18, US Code, Section 2721 et seq.) and state laws. Law enforcement and other users may have access to vehicle registration information, and other sources of PII, which they may correlate with LPR Data stored in the System to create vehicle hotlists in accordance with the above referenced federal law.

(A) Use and Collection of LPR Data

The Association authorizes collection of LPR Data by Flock Safety for the use of the Association consistent with this policy. The authorized uses of the ALPR System are by the Board of Directors, and Association management staff to identify or ascertain the location of a specific vehicle in order to provide information to Association members and law enforcement with respect to criminal activity. The Association does NOT make the ALPR System, or data it contains, available to individuals for personal, non-commercial or commercial purposes, or any other purpose beyond providing information to Association members and law enforcement with respect to criminal activity.

(B) Users and Training

The members of the Board of Directors, and Association management staff are authorized to use the ALPR System to use the LPR Data for purposes of providing information to Association members and law enforcement with respect to criminal activity.

All authorized members of the Board of Directors, and Association management staff that use LPR Information are required to read and understand any documents, including, but not limited to, training and documentation provided by Flock Safety, necessary to understand the ALPR Information and use the ALPR System. Authorized members of the Board of Directors, and Association management staff that use ALPR Information will receive an individual username and password protecting access to the LPR Information.

(C) Monitoring and Compliance

The Association is not aware of any individual privacy interest applicable to the anonymous ALPR Data contained in the System, however, because the Association considers ALPR Data important to the Association, it maintains usage logs, and periodically audit such logs, to ensure the security of our data assets and compliance with this policy. The usage logs include the following information:

- The date and time ALPR Data is accessed.
- The IP address from which the ALPR Data is accessed.
- The license plate number or other data elements used to query the System.
- The username of the person who accessed the information.
- The purpose for accessing the information.

(D) Sale, Sharing or Transfer of LPR Data

The Association collects data for providing information to Association members and law enforcement with respect to criminal activity. It does not collect data on behalf of law enforcement agencies or commercial purposes. The Association allows law enforcement agencies to query the System directly for law enforcement purposes consistent with this policy, California and Federal law. Except as otherwise stated in this policy, the Association does not share this information with anyone except for members of the Board of Directors, Association management staff, and legal counsel.

(E) Custodian or Owner of the ALPR System

Flock Safety is the custodian and owner of the ALPR Systems. The Association is an "end-user" as that term is defined in Civil Code Section 1798.90.5(a) and is responsible for implementing this policy.

(F) Accuracy of LPR Data

The collection of ALPR Data is automated so that the license plate images, and the details of when they are collected, are included in the System without review, along with the computer translation of the license plate number. Although very infrequent, the license plate translation is sometimes inaccurate or incomplete. To avoid mistaken use of ALPR Data, Flock Safety will confirm the computer translation before taking any action as a result of ALPR Data. Flock Safety also corrects mistaken translation and other database errors when identified. To avoid mistaken use of ALPR Data collected by Flock Safety the Association will confirm the computer translation before taking any action as a result of ALPR Data. The Association also corrects mistaken translation and other database errors when identified.

(G) Retention

Flock Safety stores all ALPR Data in an encrypted format. Flock Safety stores all ALPR Data for thirty (30) days, unless the ALPR Data is in use for an ongoing investigation.

The Association retains ALPR data gathered by Flock Safety for thirty (30) days, and potentially longer if necessary for providing information to Association members if requested before the information is deleted and law enforcement with respect to criminal activity if the Association is aware of such activity and the need for data before the information is deleted. The Association periodically evaluates the use of historical ALPR data to determine if the cost to maintain the data exceeds its value.

(H) Information Breach

In the unlikely event of the ALPR System and information contained therein being exposed to unauthorized persons, Flock Safety or the Association shall notify all persons who are believed to be affected or have had their information compromised pursuant to applicable California and Federal law.

(G) Revisions of Usage and Privacy Policy

The Association reserves the right to revise this policy at any point in the future and such changes will be retroactively applicable to data collected prior to any revision of this policy.