

California Polytechnic State University

License Plate Recognition System Data Collection and Privacy

PURPOSE AND SCOPE

The purpose of this policy is to provide guidance for the capture, storage and use of digital data obtained through the use of Automated License Plate Recognition (ALPR) technology.

ADMINISTRATION

The ALPR technology, also known as License Plate Recognition (LPR), allows for the automated detection of license plates. It is used by California Polytechnic State University San Luis Obispo Transportation and Parking Services (TAPS) Department for vehicle parking, access control, and parking program management.

All installation and maintenance of ALPR equipment, as well as ALPR data retention and access, shall be managed by the Director of TAPS or designee. The TAPS Director will assign members under his/her supervision to administer the day-to-day operation of the ALPR equipment and data.

ALPR ADMINISTRATOR

The ALPR Administrator shall be responsible for developing guidelines and procedures to comply with the requirements of Civil Code §1798.90.5, et seq. This includes, but is not limited to, (Civil Code §1798.90.51; Civil Code §1798.90.53):

- a) A description of the job title or other designation of the members and independent contractors who are authorized to use or access the ALPR system or to collect ALPR information.
- b) Training requirements for authorized users.
- c) A description of how the ALPR system will be monitored to ensure the security of the information and compliance with applicable privacy laws.
- d) Procedures for system operators to maintain records of access in compliance with Civil Code §1798.90.52.
- e) The title and name of the current designee in overseeing the ALPR operation.
- f) Working with the Custodian of Records on the retention and destruction of ALPR data.
- g) Ensuring this policy and related procedures are conspicuously posted on the department's website.

OPERATIONS

Use of ALPR is restricted to the purposes outlined below. TAPS Department members shall not use, or allow others to use the equipment or database records for any unauthorized purpose (Civil Code §1798.90.51; Civil Code §1798.90.53).

- a) ALPR shall only be used for official parking management and enforcement operations.
- b) No member of the department shall operate ALPR equipment or access ALPR data without first completing department-approved training.
- c) No ALPR operator may access ALPR data unless otherwise authorized to do so.

DATA COLLECTION AND RETENTION

The Director of TAPS or designee is responsible for ensuring systems and processes are in place for the proper collection and retention of ALPR data.

ALPR captures an image of the vehicles license plate and generates an alphanumeric version of the license plate number which is also stored with the record and used to determine the vehicle's parking permission. While no owner or driver information is stored or collected directly by the LPR system, vehicle LPR data is linked to individual patron parking accounts within the parking management system.

All ALPR data downloaded to the server should be stored for a minimum of one year (Government Code §34090.6) and in accordance with the established records retention schedule. Thereafter, ALPR data should be purged unless it has become, or it is reasonable to believe it will be needed in support of the issuance of a parking citation or enforcement action.

ACCOUNTABILITY

All data will be closely safeguarded and protected by both procedural and technological means. The TAPS Department will observe the following safeguards regarding access to and use of stored data. (Civil Code §1798.90.51; Civil Code §1798.90.53):

- a) All ALPR data downloaded to the mobile workstation and in storage shall be accessible only through a login/password-protected system capable of documenting all access of information by name, date and time (Civil Code §1798.90.52).
- b) Members approved to access ALPR data under these guidelines are permitted to access the data for legitimate parking management purposes only.
- c) ALPR system audits will be conducted on a regular basis.

POLICY

The policy of the TAPS Department is to utilize ALPR technology to capture and store digital license plate data and images while recognizing the established privacy rights of the public. All data and images gathered by the ALPR are for the official use of this department.

RELEASING ALPR DATA

Requests for ALPR data by non-law enforcement or non-prosecutorial agencies will be processed as provided in the Public Records Act (PRA) and Release Policy. (Civil Code §1798.90.55)

Requests for ALPR data by a law enforcement agency may only be shared as permitted by law.

TRAINING

The Training Coordinator will ensure that members receive department-approved training for those authorized to use or access the ALPR system. (Civil Code §1798.90.51; Civil Code §1798.90.53).