

## **California Polytechnic State University**

### **Automated License Plate Recognition Usage and Privacy Policy**

California Polytechnic State University, San Luis Obispo (“Cal Poly”) uses Automated License Plate Recognition (“ALPR”) technology, also known as License Plate Recognition technology, for parking enforcement purposes. ALPR allows for the automated detection of vehicle license plates. ALPR captures and stores digital data and images of license plates.

Cal Poly’s Transportation and Parking Services (“TAPS”) Department is responsible for enforcement of Cal Poly’s parking policy, rules, and restrictions. All data and images gathered by Cal Poly’s ALPR are for the official use of TAPS in enforcing Cal Poly’s parking policy, rules, and restrictions.

“ALPR system” means 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. “ALPR information” means information or data collected through the use of an ALPR system.

This Usage and Privacy Policy ensures that the access, use, sharing, and dissemination of ALPR information is consistent with respect for individuals’ privacy and civil liberties as required by Civil Code § 1798.90.51 and §1798.90.53.

This Usage and Privacy Policy is available to the public in writing. Copies may be obtained at the following location(s): 1 Grand Ave, Building 36, San Luis Obispo, CA, 93407 or a request can be made by calling 805-756-6654. Additionally, this Policy is posted on the website of Cal Poly Transportation and Parking Services at [www.parking.calpoly.edu/lpr](http://www.parking.calpoly.edu/lpr)

- (A) The authorized purpose for using the ALPR system and collecting ALPR information is for the official use of TAPS for purpose of parking enforcement and management. The ALPR system may also be used to identify stolen or wanted vehicles as allowed by law.
  
- (B) Access to and use of ALPR information are not available to the public. Access and use are authorized for the following individuals:
  - a. Technical support personnel of Cal Poly’s authorized service provider of ALPR technology;
  - b. TAPS Parking & Events Manager or designee;
  - c. TAPS Parking Enforcement staff
  - d. Software Systems Analyst
  - e. Assistant Vice President of Public Safety
  
- (C) Training for those with authorized access to and use of ALPR information shall consist of the following:
  - a. Data storage and protection;
  - b. Reporting of data theft, loss, or breach;
  - c. Patroller equipment and system design
  - d. Equipment and System General Terminology
  - e. Review of System Design and Data Flow

- f. Patroller's Start-Up Process and General Checklist
  - g. Screen Navigation
  - h. Patroller's Standard Patrol Process
  - i. Permit Hit Process
  - j. General Patroller Functions
  - k. Patroller's Standard End of Patrol Process
- (D) 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:
- a. All ALPR data processed by 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.
  - b. Users approved to access ALPR data under these guidelines are permitted to access the data for legitimate parking management purposes only.
  - c. All data transmission and storage will follow Cal Poly Security guidelines based on the applicable data level.
  - d. Security or data breaches shall be handled pursuant to Cal Poly's Information Security Program.

The ALPR system is monitored to ensure the security of the information and compliance with applicable privacy laws. Security monitoring consists of the following access controls: ALPR users/operators who access or provide access to ALPR information shall maintain a record of that access and require that ALPR information only be used for the authorized purposes described herein. Records of access shall include (1) The date and time the information is accessed; (2) The license plate number or other data elements used to query the ALPR system; (3) The username of the person who accesses the information, and, as applicable, the organization or entity with whom the person is affiliated; (4) The purpose for accessing the information. The ALPR system shall be audited every twelve 12 months to determine whether any protected information has been subject to unauthorized disclosure. The system shall be subject to Cal Poly's Information Security Standards, Information Security Program, and Responsible Use Policy.

- (E) ALPR information shall not be sold to any person or entity. ALPR information may be shared or transferred to persons or entities other than those specifically authorized by this Policy as required by law. Any request for such sharing or transfer of ALPR information must be submitted and approved before any information is transferred. Such requests shall be submitted to the Director of TAPS or designee and must be approved in writing with proper consultation from legal counsel and/or the campus Public Records Act (PRA) office.
- (F) The official custodian of ALPR information who is responsible for implementing this Usage and Privacy Policy is the Director of TAPS.

(G) Cal Poly will use the following measures to ensure the accuracy of ALPR information and to correct data errors:

- a. Authorized system operators will monitor accuracy on a daily basis
- b. System errors will be addressed by the TAPS Parking & Events Manager or designee
- c. Software system technical support will be consulted when issues require an elevated level of support

(H) ALPR information will be retained for a period of one (1) year. The process Cal Poly will employ to determine if and when to destroy retained ALPR information is complete through an automated system task.