

# California Automated License Plate Reader (ALPR) Usage and Privacy Policy

At some of our Shopping Centers, you may have noticed cameras in our parking lots with signs indicating that we may use automated license plate readers (ALPR). This Usage and Privacy Policy provides additional information about our ALPR system and our practices regarding the collection, use, maintenance, sharing, and retention of ALPR information.

## 1. Authorized Purposes

The authorized purposes of our ALPR system are to promote safety, and investigate crime and other incidents on the properties we manage, including by supporting investigations and responding to lawful requests from law enforcement.

## 2. Collection and Use of ALPR Information

The ALPR camera captures an image of license plates that are visible when vehicles enter and exit the Shopping Center. The license plate image may be scanned so that the characters on the plate can be translated into machine-readable text to make the information searchable. In addition to the license plate number, the system may capture the date, time, and location of the image in the Shopping Center, and a limited image of the area surrounding the license plate.

The ALPR information we collect is intended to identify vehicles, not individuals. The information collected by our system does not include names, driver's license numbers, or vehicle registration addresses nor are we able to access this information

## 3. Sharing, Transfer, and Sale of ALPR Information (Purposes, Process, and Restrictions)

ALPR information may be shared with law enforcement in connection with an investigation; in response to a lawful subpoena, court order, or other legal process; or in response to other legitimate third-party requests, such as an insurance claims adjustor. Requests for ALPR information are reviewed and approved by authorized personnel before any disclosure is made, and disclosures are limited to the information reasonably necessary to respond to the request.

When we disclose ALPR information, it is generally limited to the information captured by our system, which may include the location of the image, vehicle make/model/color, the license plate number, and the date and time of the image.

We do not sell ALPR information. We do not provide ALPR information to any business or individual for commercial purposes, and we do not release ALPR information to any business or individual solely upon request. ALPR information collected by us will not be used to harass, intimidate, or discriminate against any individual or constitutionally protected group.

## 4. Authorized Users and Training

Access to ALPR information is restricted to a limited number of employees within the Property Management Department for the properties we manage. If any independent contractors or service providers are permitted to access the ALPR system or ALPR data (for example, the ALPR vendor for

system maintenance and technical support and security vendors), they will be authorized by contract and limited to the minimum access necessary to perform their services.

Before being granted access to the ALPR system or ALPR information, authorized employees (and any authorized independent contractors) are required to complete training that includes: (a) the procedures for proper use of the ALPR system; (b) applicable laws and policies, including privacy and civil liberties requirements; (c) operation of the equipment; and (d) safeguarding access to ALPR information.

## 5. Security, Monitoring, and Compliance

We take reasonable measures to protect ALPR information from unauthorized access, use, or disclosure. These measures include restricting access to authorized users, using account-based access controls, and monitoring access where feasible. Suspected misuse or unauthorized access may be investigated and may result in revocation of access or any other appropriate action.

## 6. Accuracy and Correction of ALPR Information

ALPR technology can produce errors (for example, due to lighting, weather, image quality, or plate condition). We take reasonable measures to support accuracy, which may include reliance on the associated image to confirm the license plate characters before taking action based on ALPR information, and addressing identified data errors when discovered.

## 7. Retention and Destruction

Our system is designed to automatically delete ALPR information after 30 days. ALPR information may be retained longer when reasonably necessary for a specific, documented purpose, such as when requested by law enforcement in connection with an investigation, in response to a lawful subpoena or court order, or as otherwise required or permitted by law. When ALPR information is retained beyond the standard retention period, access remains restricted and the information is retained only for the applicable purpose. Once the purpose for extended retention no longer applies, the information will be securely deleted or destroyed.

## 8. Applicability of This Policy

This Policy applies to our access to and use of the ALPR system and ALPR information. To the extent other parties possess or control ALPR information (including through their own systems or practices), their collection and use of that information is governed by their respective policies, not this Policy.

## 9. Official Custodian

The official custodian responsible for implementing this Policy and overseeing our ALPR practices is the Privacy Compliance Officer.

## 10. Contact Us

A written copy of this Policy is available upon request, you may request a copy by email at [privacy@petrovichdevelopment.com](mailto:privacy@petrovichdevelopment.com)