Flock Automated License Plate Reader Usage and Privacy Policy

This Automated License Plate Reader ("ALPR") Usage and Privacy Policy ("Policy") is adopted by the Association pursuant to **California Civil Code section 1798.90.51** to ensure that the collection, use, maintenance, sharing, and dissemination of ALPR information is consistent with respect for individuals' privacy and civil liberties.

The Association uses a Flock Safety ALPR system at the entrance(s) to the community for limited and authorized purposes described below.

The Association and its Board do not guarantee the security of any person or property. Residents and guests remain responsible for taking reasonable personal safety precautions.

Definitions:
ALPR System: a system of one or more automated high-speed cameras used in combination with data processing to convert images of vehicles and license plates into computer-readable data.

ALPR Data: Information collected by or stored in the ALPR System, which includes the following:

- License plate image
- Vehicle image
- Vehicle characteristics (e.g. color, make)
- License plate number
- License plate state
- Date
- Time
- Camera location

Authorized Purposes: The primary purposes of the ALPR System are as follows:

1. Investigation of Property Damage or Vandalism
2. Investigation of Theft or Other Property Crimes
3. Enforcement of Governing Documents and Applicable Law Vandalism, and
4. Cooperation with Law Enforcement.

ALPR Data shall not be used for generalized surveillance, tracking individuals without a legitimate purpose, or any discriminatory or unlawful purpose.

Authorized Users and Access:
The following individuals and CCHOA representatives and agents have been authorized to access the ALPR System and ALPR Data, this list may be amended at any time with General Manager or Board approval:

- Henry Angelino, General Manager, CCHOA
- Michael Gaylord, Assistant General Manager, CCHOA
- Gene Rowell, Safety Site Supervisor, Allied Universal
- Sergio Gonzalez, Facilities Manager, CCHOA

Access Control Requirements:

- Access shall be role-based and limited to necessary functions

- Unique login credentials are required
- Access logs shall be maintained to document all use of ALPR Data
- Unauthorized access or use is strictly prohibited

Training: The CCHOA authorized users must complete Flock Safety provided training on the proper use of the system. Periodic refresher training may be required. This training is provided online to identified users via the Flock Safety Academy.

Security and Monitoring: The ALPR System is not generally monitored in real time or on a regular basis and is not intended to be effective in preventing or stopping a crime while it is occurring. The ALPR System and Data will primarily be used to attempt to identify the persons responsible for a crime after it occurs.

Restrictions on the Sale, Sharing, or Transfer of ALPR Data: CCHOA will not sell, publish, exchange, or disclose ALPR Data for commercial purposes. ALPR Data gathered by the Flock Safety system on behalf of CCHOA will only be shared with law enforcement in response to a valid request or where legally required, when necessary to investigate authorized incidents, or as required by law, subpoena, or court order. All sharing must be consistent with privacy protections and limited to the minimum necessary information.

CCHOA may access, use, preserve and/or disclose the ALPR Data to law enforcement authorities, government officials, and/or third parties, if legally required to do so or if CCHOA has a good faith belief that such access, use, preservation or disclosure is reasonably necessary to comply with a legal process, or detect, prevent or otherwise address the primary purposes listed above, security, privacy, fraud or technical issues.

Official Custodian: Michael Gaylord, Assistant General Manager, CCHOA.

Accuracy: Flock ALPRs have a high rate of accuracy; because of Flock's machine learning technology, these rates continue to improve over time. Additionally, the cameras self-monitor to ensure connectivity and functionality, and low-confidence plate reads are not sent to CCHOA. Although infrequent, license plate translation may be incomplete or inaccurate. False positives are flagged to continuously improve the system. An authorized user of the ALPR System will confirm the computer translation of ALPR Data prior to taking any action.

Data Retention: ALPR Data is hard deleted on a rolling 30-day basis by default; this may be increased or decreased on a case-by-case basis if a different schedule is required by a CCHOA, law or policy.

Privacy: This policy governs the ALPR System provided to CCHOA by Flock Safety. The images stored in the system are collected from areas visible to the public where there is no reasonable expectation of privacy.

Policy Enforcement and Violations: Misuse of ALPR Data may result in disciplinary action, including termination of access and potential legal consequences. Any suspected misuse must be reported to the General Manager or Board.

Policy Availability: This Policy is posted on the CCHOA website and shall be made available to Association members upon request, as required by law.