

**BENEDICT HILLS HOMEOWNERS ASSOCIATION
DISCLOSURE REGARDING USE
OF AUTOMATED LICENSE PLATE RECOGNITION (ALPR) SYSTEM**

This Notice is provided to Benedict Hills Homeowners Association (BHHOA) in compliance with Civil Code Sections 1798.90.5, 1798.29 and 1798.82, as amended by Senate Bill 84 (effective January 1, 2016). Any California entity that deploys automated license plate readers (ALPR) or accesses ALPR data must post a privacy and usage policy online.

WHAT IS ALPR: Automated License Plate Recognition (ALPR) uses high-speed cameras to photograph license plates and character recognition algorithms to identify and store plate characters. The information is tagged with time and location and stored in a database for retrieval.

BHHOA, together with Benedict Hills Estates Association (BHEA), has contracted with Flock Safety (“Flock”) to capture the ALPR data, and securely store and maintain it for access pursuant to the contract and in compliance with applicable law.

PURPOSE OF ALPR: The BHHOA Bylaws authorize the Board to provide for guard service or security patrol, as necessary. The BHHOA and BHEA Boards of Directors have determined that monitoring vehicles coming into and leaving the community will enhance the security and safety of the Benedict Hills community. In the event of criminal activity, authorized users of the system will be able to review the data to identify vehicles that may have been involved and provide the information to law enforcement.

TRAINING: ALPR users will receive initial training from Flock Safety, on the procedure and proper use of the system prior to being granted access to the ALPR system. Each authorized user will also receive annual refresher training.

ACCESS: The Association’s Managing Agent will be the custodian of and administrator of the ALPR system. The Managing Agent will be authorized to access the ALPR system data when a security breach is reported. Additional individuals who have access to the ALPR system, as agreed by a vote of the Board of Directors are:

- BHHOA Vice President Joy Denton
- BHOA Security Committee Members: Susan Davidson and Susan Welsh.

Additional individuals may be authorized to access ALPR system data by the vote of the BHHOA Board of Directors and disclosure by amendment to this online Notice. Comparable authorized users are identified by the BHEA Board of Directors.

All logins and queries will be stored and monitored including:

- Username
- Date
- Time
- Purpose of inquiry
- License plate and other elements used to query the system

These data points will be stored and monitored by the Managing Agent who will run periodic audits to ensure access was made by authorized persons for legitimate purposes.

INFORMATION COLLECTED: Information collected by BHHOA on the ALPR system includes:

- License plate image captured
- License plate number
- License plate state
- Date
- Time
- Location

SECURITY: BHHOA uses administrative, operational, technical, and physical safeguards to protect ALPR information from unauthorized access, use, destruction, modification, or disclosure as follows:

- **Administrative:** Username and password protected access to the ALPR system along with periodic monitoring and auditing usage of database.
- **Operational:** Users will receive training in proper use and secure handling of the ALPR data system and secure handling practices when using ALPR and its database.
- **Physical:** Secure storage of computers with access to ALPR database, and secure off-site “cloud” stored database.
- **Technical:** All information is encrypted in cloud storage to protect any personally identifiable information. In the unlikely event of an information breach, all individuals who are believed to be affected or have their information compromised will be notified by BHHOA.

QUALITY ASSURANCE: Collection of ALPR is automated so the license plate images and details of collection are included in the system without review. Although infrequent, license plate translation may be incomplete or inaccurate. System users will make every reasonable effort to correct license plate translation errors when identified.

RELEASING ALPR DATA: Information gathered or collected and records retained by Flock Safety’s system for BHHOA will not be:

- Sold, published, exchanged, or disclosed for commercial purposes.
- Disclosed or published without authorization.
- Disseminated to persons not authorized to access or use the information.
- BHHOA shall not confirm the existence or nonexistence of information to any person or agency that would not be eligible to receive the information unless otherwise required by law.

BHHOA will only release information to law enforcement during a criminal investigation, or upon receipt of subpoena or court order.

DATA RETENTION: License plate image and associated data will be purged by Flock after a 30-day storage period.

PRIVACY: The images stored in the system are collected only from areas visible to the public where there is no reasonable expectation of privacy.

Changes to this Policy will be posted on the BHHOA website.

RESIDENTS' VEHICLES. Residents will be provided a link to an online portal in order to enter the make, model and license plate numbers of their vehicles so that those vehicles will be marked as belonging to a resident when sorting through footage in the event of a crime. Homeowners who lease their residence should forward the portal link to their tenants so that their vehicles can be registered as a resident's vehicle.

Changes to this Policy will be posted on the BHHOA website.