

| COUNCIL POLICY | | | |
|---|---------------|----------------|-----------------|
| Subject: | Policy Number | Effective Date | Number of Pages |
| AUTOMATED LICENSE PLATE RECOGNITION USER RULES AND PRIVACY AGREEMENT POLICY | 400-04 | 12/13/2016 | Page 1 of 4 |

1. PURPOSE

- 1.1. The purpose of the Automated License Plate Recognition (ALPR) system is to serve as a tool to assist Parking Enforcement in enforcing the posted time limits in parking zones downtown as well as residential neighborhoods participating in the City's residential parking program.
- 1.2. This policy will specify rules of conduct and outline acceptable uses of this system. This policy applies to all City of Santa Rosa employees who have permission to utilize the ALPR system (System) within the scope of their job specific duties. All employees that have permission to utilize the System will be required to read this policy and sign a form acknowledging their receipt and understanding of the policy.

2. DATA COLLECTED

- 2.1. The System utilizes two cameras mounted on a mobile vehicle which captures (1) a context photo of the vehicle and its immediate surroundings and (2) a photo of the license plate. The images of a vehicle are captured with cameras mounted in an optimal configuration to achieve clear photographic evidence of the vehicle location. Along with the photographic data, the System also records the global positioning system coordinates and date/time information of the observation. Further software processing of the license plate image generates an alphanumeric version of the license plate number which is also stored with the record. When viewing photos from the System, the end user will verify license plate, color and make of vehicle to ensure accuracy of the system and avoid data errors.
 - 2.1.1. The System is not intended to serve as a mechanism for the casual observation of citizens in public places conducting lawful activities in a public setting or situation.
- 2.2. The System may not be used for:

| COUNCIL POLICY | | | |
|---|---------------|----------------|-----------------|
| Subject: | Policy Number | Effective Date | Number of Pages |
| AUTOMATED LICENSE PLATE RECOGNITION USER RULES AND PRIVACY AGREEMENT POLICY | 400-04 | 12/13/2016 | Page 2 of 4 |

- 2.2.1. Arbitrary viewing of citizens;
- 2.2.2. Viewing activities where a reasonable expectation of privacy may exist, even though conducted in a public place; or
- 2.2.3. Traffic enforcement.

3. SECURITY OF IMAGES

- 3.1. Data collected by the System will be housed on the City's Information Technology (IT) storage network which is firewalled and password protected through standard City authentication and access controls. Video images captured from City vehicles using the System will be stored temporarily on domain enabled secured devices consistent with the Parking Division's security requirements. This involves domain level user authentication over a secured network.
- 3.2. Data collected by the System not resulting in a parking enforcement action or not part of an ongoing law enforcement investigation will be retained for up to 48 hours. Data resulting in a parking enforcement action will be transferred to a database housed in the City's IT storage network and retained with the citation records per established City of Santa Rosa data retention policies. The data will be purged for closed, paid or cancelled citations with an automatic feature which queries the operator for confirmation. Data associated with an ongoing law enforcement investigation will be retained until the investigation is completed or as directed by investigators or a court having jurisdiction over the matter.

4. USER ACCESS

- 4.1. Only employees with a valid reason for System usage shall be granted access. All persons designated by their Department Head as System users shall receive training and a unique user identification to access the System. Employees who fail to comply with rules regulating the operation of the System shall be subject to disciplinary action up to and including termination. All users of the

| COUNCIL POLICY | | | |
|---|---------------|----------------|-----------------|
| Subject: | Policy Number | Effective Date | Number of Pages |
| AUTOMATED LICENSE PLATE RECOGNITION USER RULES AND PRIVACY AGREEMENT POLICY | 400-04 | 12/13/2016 | Page 3 of 4 |

System will be required to sign this privacy agreement and uphold the City's Information Technology and Use Policy.

- 4.2. Requests for a review of any stored images shall be dependent upon the level of permissions given to the user. The person reviewing stored images within the System understands that authorization is granted for the purpose of citation review or administrative investigations only.
 - 4.3. The Department Director overseeing the Parking Division is the official custodian of the ALPR system and is responsible for ensuring this policy is implemented and monitored.
5. SHARING OF IMAGES
- 5.1. Other than for evidentiary purposes as described above, video data collected by the System shall not be reproduced, nor shall it be distributed, provided, or shown to other persons, without the approval of the Department Director overseeing the Parking Division or pursuant to a court order.
 - 5.2. Private litigants, journalists, and others may utilize the Freedom of Information Act, or California Public Records Act, to request surveillance records.

| COUNCIL POLICY | | | |
|---|---------------|----------------|-----------------|
| Subject: | Policy Number | Effective Date | Number of Pages |
| AUTOMATED LICENSE PLATE RECOGNITION USER RULES AND PRIVACY AGREEMENT POLICY | 400-04 | 12/13/2016 | Page 4 of 4 |

REQUEST FORM FOR ACCESS TO ALPR SYSTEM

ACCESS CAN BE GRANTED IF YOU SPECIFICALLY AGREE TO THE FOLLOWING:

1. You will access The ALPR System data only during normal working hours.
2. You have read and understand the ALPR User Rules and Privacy Agreement Policy

ACCESS LEVEL REQUESTED (CHOOSE ONLY ONE):

- Parking Enforcement Officer
- Support Staff
- Manager

I hereby agree to the above and request that a copy of this request be placed in my personnel file.

Date

Signature

Print Name: _____

APPROVED:

Date

Supervisor

Date

Department Director