Outlets at Tejon

Automated License Plate Recognition Policy

**What is it:** Automated License Plate Recognition (ALPR or LPR) captures and stores digital images of license plates, and uses character recognition algorithms to identify and store plate characters. The system creates a searchable computerized database resulting from the mobile and fixed cameras at the Outlets at Tejon. The ALPR system data includes license plate number as well the date, time and location when the image was collected.

**Purpose:** The purpose of this policy is to ensure that the collection, use, maintenance, sharing and dissemination of ALPR information complies with the provisions of California Civil Code Section 1798.90.51 et seq. This policy is available to members of the public, in writing upon request to the Outlets at Tejon. Identification of vehicles entering the Outlets at Tejon parking lots and structures will improve access control, enforcement of parking policies, electronic surveillance, assist law enforcement, and enhance security and safety of the Outlets at Tejon and its employees and patrons. Information on vehicles coming to the Outlets at Tejon may also be anonymized and aggregated to analyze various metrics including parking patterns and compliance.

**Training:** LPR operators will receive initial training from the Outlets at Tejon’s LPR vendor on the procedure and proper use of the system prior to being granted access to the LPR system; each user will also receive refresher training as necessary from the LPR vendor.

**Access:** The General Manager of the Outlets at Tejon will be the custodian and head administrator of the ALPR systems and its operation. The only individuals who have access and ability to query data in the system are:

* General Manager of the Outlets at Tejon, or designees
* Chief Operating Officer, Tejon Ranch Co., or designees
* The Outlets at Tejon’ LPR vendor
* Outlets at Tejon security and parking personnel
* Law enforcement personnel

All logins and queries will be stored and monitored including:

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

These data points will be stored and monitored by the LPR vendor working in conjunction with the General Manager of the Outlets at Tejon.

**Information Collected:** Information collected by the ALPR system is as follows:

* License plate image captured
* License plate number
* License plate state
* Date
* Time
* Location
* Year, make, model, license plate number, license plate state, VIN and color of your vehicle(s)

**Security:** We use administrative, operational, technical and physical safeguards to protect ALPR information from unauthorized access, use, destruction, modification or disclosure.

* Administrative: Username and password protected access to the LPR system. Monitoring and auditing usage of database.
* Operational: Training and proper use and secure practices when using LPR and its database.
* Physical: Secure storage of computers with access to database, and secure off- site database.
* Technical: All information is encrypted to protect any personally identifiable information using Secure Sockets Layer (SSL) to secure internet traffic. SSL is the industry standard security protocol.

In the very unlikely event of an information breach, all individuals who are believed to be affected or have their information compromised will be notified by the Outlets at Tejon.

**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. The General Manager of the Outlets at Tejon or their designee will ensure accuracy and correct license plate translation errors when identified. Users will also confirm the computer translation prior to taking any action based on ALPR results.

Outlets at Tejon’s ALPR vendor will store the data (data hosting) and ensure proper maintenance and security of data stored in their data towers. The vendor will also be in charge of purging data at the end of the 120-day retention period.

**Releasing ALPR Data:** Information gathered or collected, and records retained by the Outlets at Tejon 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.

We will only share information with:

* Law enforcement
* Other investigations requested by Tejon Ranch’s General Counsel.
* Those serving a subpoena through the office of the Tejon Ranch Co. General Counsel.

**Data Retention:** License plates will be stored for no longer than 120 days, unless it is involved in a citation, open appeal case, or law enforcement ongoing investigation or to be used as evidence by a law enforcement agency. Data stored for longer will be anonymized, aggregated and used for various analytics.

**Privacy:** This policy governs the Automated License Plate Recognition System (ALPR System or ALPR) operated by the Outlets at Tejon, and applies to our employees, customers, vendor, contractors and camera and data hosting affiliates.

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

Changes to this Privacy Policy will be posted on the website. Parking on Outlets at Tejon property constitutes acceptance and consent of the Privacy Policy.