Automated License Plate Recognition Procedure

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 San Jose State University. The ALPR system data includes license plate number as well the date, time and location when the image was collected.

Purpose: Identification of vehicles entering San Jose State University parking garages and lots will improve access control, enforcement of San Jose State University Parking Policy, electronic surveillance plus enhance security and the safety of San Jose State University. Information on vehicles coming to campus will be anonymized and aggregated to analyze various metrics including parking patterns, permit-type usage and compliance.

Training: LPR operators will receive initial training from the companies (Ventek Intl & PCS Mobile) on the procedure and proper use of the system prior to being granted access to the LPR system; each user will also receive annual refresher training from the assistant director or designee.

Access: The Assistant Parking Manager of Parking Services 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:

- Assistant Parking Manager of Parking Services
- Parking Supervisor(s)
- Parking Enforcement Officers
- Parking Administration
- Police Officers

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 Assistant Manager of Parking Services. License plates will only be referenced against the campus vehicle database.

The assistant parking manager or their designee will also run periodic audits to ensure access was made by authorized persons for legitimate business purposes.
**Information Collected:** Information collected by the ALPR system and San Jose State University Parking Services is as follows:

For ALPR:

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

For San Jose State University Vehicle Registration:

- Name
- ID number
- Student/Faculty/Staff email address
- Student/Faculty/Staff username
- Permit type (commuter, housing, staff, faculty, visitor, contractor)
- 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, 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. San Jose State University blocks all inbound port to secure internet traffic. Inbound traffic is regulated on a per need basis.

In the very unlikely event of an information breach, all individuals who are believed to have been affected or believed to have had their information compromised will be notified by San Jose State University.

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

Genetec, the ALPR vendor will store the data (data hosting) and ensure proper maintenance and security of data stored in their data towers. Genetec will also be in charge of purging license plate image data at the end of the 60 days of storage.
**Releasing ALPR Data:** Information gathered or collected and records retained by San Jose State University 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.
- San Jose State University 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.

Contingent on permission given by Chief of Police, we may share information with:

- Outside law enforcement without a subpoena during an exigent circumstance-type of investigation (i.e., in an emergency)
- The head of University Personnel or Vice President overseeing the unit, Title IX Coordinator, or Vice President of Student Affairs, upon written request, for use in investigations
- The campus attorney

Any other request will require a subpoena.

**Data Retention:** License plate images will be stored for no longer than 60 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. License plate numbers will be stored for no longer than 180 days to be used for adjudication and investigation purposes 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 San Jose State University, and applies to our employees, customers, 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. License plate images will be purged after a 60 day period.

Changes to this Privacy Policy will be posted on the website. Parking on San Jose State University property constitutes acceptance and consent of the Privacy Policy Notice.

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