Automated License Plate Recognition (ALPR) 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 Chapman 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 Chapman University Parking lots and structures will improve access control, enforcement of Chapman University's Parking Policy, electronic surveillance and enhance security and safety of Chapman 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: ALPR operators will receive initial training from the vendor on the procedure and proper use of the system prior to being granted access to the ALPR system; each user will also receive annual refresher training from the assistant director or designee.

Access: The Assistant Director of Parking and Transportation 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 Director of Parking and Transportation Services
- Parking and Transportation Supervisor(s)
- Parking and Transportation Enforcement Officers
- Chief of Public Safety
- Chief of Public Safety's designee as needed or required for official investigations.

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 Director of Parking and Transportation. License plates will only be referenced against the campus vehicle database.

The assistant director 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 Chapman University Parking and Transportation Services is as follows:

For ALPR:

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

For Chapman Vehicle Registration:

- Name
- Email address
- Phone number and address (for vehicle related notifications only)
- Permit type (commuter, resident, staff, faculty or adjunct faculty)
- License Plate

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 ALPR system. Monitoring and auditing usage of database.
- Operational: Training and proper use and secure practices when using ALPR and its database.
- Physical: Secure storage of computers with access to database, and secure on-premises storage of data on servers in our data center.
- Technical: All information is encrypted to protect any personally identifiable information. Chapman University uses 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 Chapman University.

For more information on what personal information is collected and how it is used, please see the Automated License Plate Recognition Privacy Policy.

Quality Assurance: The collection of license plates is automated so that 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 Director of Parking and Transportation Services 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.

The 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 60 days of storage.

Releasing ALPR Data: Information gathered or collected and records retained by Chapman 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.
- Chapman 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.

We will only share information with:

- Law enforcement without a subpoena during an exigent circumstance-type of investigation.
- Title IX University investigators
- Other university official investigations requested by senior staff or Human Resources.

Any other request will require a subpoena through the office of legal affairs.

Data Retention: License plates will be stored for no longer than 60 days, unless they are 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 Chapman 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 image and affiliated data will be

purged after a 60-day period. For more information on Chapman University's privacy policy please visit: http://www.chapman.edu/campus-services/information-systems/policies-and-procedures/privacy-policy.aspx

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