



## **License Plate Recognition System Data Collection and Privacy**

**Date: July 1, 2019**

### **Rules and Regulations**

The Office of Parking Services utilizes license plate recognition hardware and software (“LPR”) for vehicle parking and parking access control.

### **Locations**

LPR data is collected on University managed parking lots, garages and structures. The Office of Parking Services utilizes a mobile vehicle-mounted system and handheld devices which are driven or operated by trained personnel in parking locations throughout the university. There are fixed camera locations that are active 24 hours a day 7 days a week.

### **Data Collection**

The LPR system captures two photos of the vehicles: (1) a context photo of the vehicle and its immediate surroundings and (2) a photo of the license plate. These photos are taken from the rear of the vehicle, and/or the front of a vehicle backed into a space or standing in a driving aisle. The photos are not of a resolution that allows identification of the vehicle occupants if they are present. 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. While no owner or driver information is stored directly with the LPR record, vehicle LPR data is linked to individual patron accounts within the parking management system.

### **Use of Data**

The intended use of data collected by the LPR system is for parking access control, parking enforcement and law enforcement investigations. LPR data is used to determine a vehicle’s access permissions in a given parking area or controlled access area of campus and support the issuance of a parking citation if needed. The data is also used by the Department of Public Safety (“DPS”) in conducting ongoing criminal investigations and investigations of complaints. DPS may utilize LPR data with active connections to state and federal sponsored lists containing stolen vehicle, wanted person and missing person information. Any use of the data for purposes outside of these stated purposes must be detailed and approved in writing through administrative channels by the Director of Public Safety, Vice President for University Operations, and the President of University of San Diego.

### **Data Retention**

Data collected by the LPR system not resulting in parking enforcement action or not part of an ongoing law enforcement investigation is retained for 180 days. Data resulting in parking enforcement action is

retained with the citation record according to established University data retention policies (<https://www.sandiego.edu/legal/policies/community/institutional/recordretention.pdf>). Data associated with an ongoing law enforcement investigation is retained until the investigation is completed or as directed by investigators or courts.

### **Access to Records**

Access to records created and maintained by the LPR system is restricted to trained Office of Parking Services and Department of Public Safety personnel performing their duties. All personnel with access to the system use unique identifiers and passwords to access records and all login activity, record additions, and other activity is logged. Access to the system by others is prohibited.

### **Determining what LPR data we have about your vehicle**

USD faculty/staff, administrator or student may request a report detailing what, if any, LPR data we have on vehicles registered or identified to them. Any registered user of the University parking management system may view this information by logging into their account found at <https://usd.nupark.com/portal>

### **Public Notification**

Office of Parking Services will notify the public of its LPR data collection activities and rules and regulations via:

- a. Posting of a privacy procedure on the Parking Services website
- b. Publishing of this LPR procedure on the departments Rules and Regulations document
- c. Posted signage at each entrance to campus.
- d. An e-mail to each user of a registered vehicle will be sent to the registered e-mail address containing rules and regulations and general information pertaining to the use of LPR and its parking management system. It is important for each registered use to maintain and update their contact information with our parking management system to receive important notices.