



## **PAR ALPR Policy**

### **1. PURPOSE**

The purpose of this policy to ensure that PAR's collection, use, maintenance, sharing and dissemination of ALPR information is consistent with respect for individuals' privacy and to comply with applicable law, including the provisions of California Civil Code Section 1798.90.53.

### **2. SCOPE**

This Policy applies to all ALPR information received by PAR from any entity which operates an ALPR System.

### **3. DEFINITIONS**

- 3.1. **"ALPR"** means Automated License Plate Recognition.
- 3.2. **"ALPR System"** means a searchable computerized database resulting from the operation of one or more mobile or fixed cameras combined with computer algorithms to read and convert images of registration plates and the characters they contain into computer-readable data.
- 3.3. **"ALPR Custodian"** means the individual identified in Section 4.5 of this policy.
- 3.4. **"PAR"** means PAR, Inc.

### **4. PROCEDURE**

#### **4.1. ALPR System Information.**

PAR shall not operate an ALPR System but may from time to time receive ALPR Information from a contracted ALPR System operator. All PAR employees and authorized users shall comply with this policy regarding all ALPR Information received and stored by PAR. All ALPR Information shall be PAR confidential information. PAR shall maintain reasonable security procedures and practices, including operational, administrative, technical, and physical safeguards, to protect ALPR information from unauthorized access, destruction, use, modification, or disclosure.

#### **4.2. ALPR Information Usage**

- (A) The authorized purpose for accessing and using ALPR information are to identify the historical and potential current location of vehicles assigned to PAR for recovery solely in furtherance of management of the recovery of such vehicles.
- (B) The only individuals working or contracted with PAR who are authorized to use ALPR Information accessed by PAR are:
  - i. Skip tracing coordinators and managers; and
  - ii. Contracted recovery vendors



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- (C) The individuals identified in section 4.2 (B) as authorized users of ALPR information shall complete all training as specified in the PAR Employee Training Procedure PAR-PRO-06 prior to accessing any ALPR information.

### **4.3. Monitoring of ALPR Information**

- (A) [A description of how the ALPR system will be monitored to ensure the security of the information accessed or used, and compliance with all applicable privacy laws]
- (B) User access to ALPR data is audited using the VIPR Access Role Review Procedure PAR-PRO-15.

### **4.4. Sale, Sharing or Transfer of ALPR Information**

ALPR Information may only be shared with contracted recovery vendors and only in order to permit such vendors to perform their obligations under such contracts. The sale and unauthorized dissemination of ALPR information is strictly prohibited. Violations will include disciplinary action up to and including termination of employment.

### **4.5. ALPR Information Custodian**

PAR's Vice Presidents shall be the custodian of the ALPR information and responsible for implementing this policy.

### **4.6. Accuracy of ALPR Information**

PAR's technology team is responsible for monitoring the integration between any ALPR system and PAR's recovery management system, VIPR. PAR's technology team uses alerts if the data integration between ALPR System and VIPR fails. Upon receiving an alert, the team will address and correct the integration and inform PAR management of any ALPR inaccuracies remaining.

### **4.7. Retention of ALPR Information**

PAR shall retain ALPR information in accordance with OPENLANE Record Access and Management Policy.