

Automated License Plate Recognition (ALPR) Usage and Privacy Policy

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Welcome to the Automated License Plate Recognition (“ALPR”) Usage and Privacy Policy of Caruso Management Company, Ltd. and its affiliates (collectively, “Caruso”, “we,” “us,” or “our”). This ALPR Usage and Privacy Policy satisfies all applicable privacy laws, including the requirements of California Civil Code § 1798.90.5, *et seq.*

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Purpose

We have developed this ALPR Usage and Privacy Policy to tell you how and why we collect and use information about your license plate, including a photograph of your license plate, your license plate number and the location/date/time that such information is collected (“ALPR Information”). Caruso is committed to limiting the access and use of your ALPR Information in a manner that is consistent with respect for privacy rights and civil liberties.

Additional Privacy Rights

For more information about how Caruso uses, stores and shares information, including ALPR Information, see our [Privacy Policy](#).

Acceptance

Please read this ALPR Usage and Privacy Policy carefully. By accessing our parking structures at The Grove, The Americana at Brand and Palisades Village (“Properties”), you are accepting the terms of this ALPR Usage and Privacy Policy, which may be updated and amended from time to time.

What Is ALPR?

ALPR is a camera system that takes a photograph of a license plate and uses a computer algorithm to convert the image of the license plate, and the characters it contains, into computer-readable data. This data, together with the location/date/time that make up the ALPR Information, is encrypted and transmitted to a searchable database (“ALPR System”), where it is stored temporarily and may be accessed and used as provided below.

Who Is Authorized To Collect, Use, And Access ALPR Information?

The following parties are authorized to collect ALPR Information on the Properties, and to access and use the ALPR Information and ALPR System:

- Caruso, owner of the Properties and of the ALPR System and ALPR Information;
- LAZ Parking Management, which operates the Properties and the ALPR System on behalf of Caruso;
- Technology vendors to Caruso that provide support and maintenance for the ALPR System:
 - SKIDATA
 - Inex Technologies, LLC
 - Zamir Recognition Systems, Ltd.
 - Tech Solutions LLC
 - Hitachi Solutions, Ltd.
- Employees and providers for each of the above (“Authorized Personnel”).

The job titles of the Authorized Personnel who are authorized to collect ALPR Information, or access or use the ALPR System, are: General Manager, Assistant General Manager, Concierge Manager, Assistant Concierge Manager, Concierge.

Why Do We Collect And Use ALPR Information?

Caruso and its providers collect and use ALPR Information to:

- Implement Caruso’s parking policies and practices;
- Determine correct parking fees;
- Recognize vehicles of loyalty program members, contract parkers and others with a special relationship to Caruso;
- Provide security for the Properties, or protect our rights;
- Identify and track abandoned vehicles;
- Count and check vehicles parked overnight;
- Identify stolen vehicles and report them to law enforcement; and
- Otherwise cooperate with law enforcement agencies, government requests, subpoenas, court orders, or legal process.

We also may use ALPR Information in connection with the sale or transfer of business assets, to enforce our rights or as needed support for external auditing, compliance, and corporate governance functions.

How Are People Trained On How To Use The ALPR System?

Authorized Personnel who access or use the ALPR System are trained on appropriate use of the ALPR System and ALPR Information.

How Do We Make Sure The ALPR Information Is Accurate?

The printed receipt for entry/exit from the parking facility will show part of the driver's license plate number, giving the driver the opportunity to verify accuracy. If the driver sees a discrepancy, please contact Caruso at thegrovela@caruso.com or at 323.900.8080. Authorized Personnel visually verify ALPR Information when a ticket is issued or if there is a mismatch when a car leaves a parking facility, and correct data errors. Caruso and its providers also employ reasonable technical measures, including regular testing, to check the accuracy of ALPR Information.

How Will We Monitor And Secure The ALPR Information?

Caruso and its providers use physical access controls, computer application permission controls, and other operational, administrative, technical, and physical safeguards and procedural and personnel security measures to monitor and secure ALPR Information, and to protect ALPR Information from unauthorized access, use, modification, disclosure, or destruction. We also identify and record who has accessed ALPR Information based on individual access credentials, the date and time of access, the search query, and purpose for access. Caruso also conducts periodic audits of the ALPR System to check the security of the ALPR Information, and that the ALPR Information is used only for the authorized purposes described in this Policy.

Do We Share ALPR Information With Third Parties?

Caruso and its providers do not sell ALPR Information. Caruso and its providers also do not share or transfer ALPR Information except to provide access to Authorized Personnel and others for the purposes stated above, or as otherwise required by law. Caruso also may share or transfer ALPR Information with a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Caruso assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding.

Who Is The Official Custodian and Owner Of The ALPR Information And ALPR System?

The official custodian and owner of the ALPR Information and ALPR System is Caruso.

How Long Do We Keep ALPR Information?

Most ALPR Information will be retained in the ALPR System for 10 days. ALPR Information that concerns lost or outstanding tickets will be retained in the ALPR System for 30 days. After 30 days, the ALPR Information is automatically purged from the ALPR System.

How Will You Know If This Policy Has Changed?

Changes to this ALPR Usage and Privacy Policy may be made from time to time by Caruso. Any changes to the Policy will take effect upon posting, and will apply to all ALPR Systems and ALPR Information, regardless of when it was collected, in accordance with applicable law. We will display the "Last Updated" date above so you can check this Policy for any recent update.

For more information, see our [Privacy Policy](#) or contact Caruso at thegrovela@caruso.com or at 323.900.8080.