



# PCI MUNICIPAL SERVICES LLC

## STANDARD OPERATING PROCEDURE

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### Automated License Plate Recognition (ALPR) Data Use, Access, Security & Retention

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|---------------------|--------------------------------------------|-----------------------|--------------------|
| <b>SOP Number</b>   | PCIMS-ALPR-001                             | <b>Effective Date</b> | _____              |
| <b>Department</b>   | Municipal Operations                       | <b>Revision</b>       | 1.0                |
| <b>Policy Owner</b> | PCI Municipal Services LLC                 | <b>Approved By</b>    | _____              |
| <b>Applies To</b>   | PCIMS managed municipal parking operations | <b>Review Cycle</b>   | Annual / As Needed |

### 1. Purpose

This Standard Operating Procedure establishes PCI Municipal Services LLC (PCIMS) requirements for the responsible operation of Automated License Plate Recognition (ALPR) technology and the handling of information generated by those systems. The procedure is intended to support municipal parking operations while protecting data from unauthorized access, use, disclosure, alteration, or retention and while complying with applicable federal, state, and local requirements. Specifically this policy is to limit the use of LPR data by company employees to define business purposes, while adhering to specific client directives.

### 2. Scope

This SOP applies to PCIMS employees, managers, authorized contractors, and approved service providers who operate, administer, access, review, or otherwise handle ALPR systems or ALPR data at municipal parking locations managed by PCIMS. Data that is accessed and in the possession or control of a client, technology provider, law-enforcement agency, or other third party shall be governed by that party's requirements.

### 3. Definition of ALPR

Automated License Plate Recognition uses fixed or mobile cameras and optical character-recognition technology to capture vehicle license plate information and associate that information with operational details such as the date, time, and location of the capture. The resulting records may be searchable within an authorized parking or enforcement platform.



## 4. Operational Objectives

PCIMS may deploy ALPR technology when it supports an authorized municipal parking function. Approved operational purposes may include:

- Parking enforcement and identification of vehicles associated with parking violations or citation activity.
- Vehicle entry and exit processing at parking facilities, including frictionless or permit-based access.
- Verification of active permits, subscriptions, validations, or other parking credentials.
- Calculation or verification of parking charges, including situations involving a lost or unavailable entry ticket.
- Identification and management of abandoned or long-term parked vehicles.
- Occupancy, utilization, vehicle-count, and parking-space availability analysis.
- Operational reporting, performance measurement, auditing, research, and statistical analysis for legitimate business or client purposes.
- To support a request from an authorized governmental, law-enforcement, legal, or collection-related requests.

## 5. Prohibited and Restricted Uses

ALPR systems and data are business tools and shall not be used for personal purposes or for activity unrelated to an employee's assigned responsibilities. PCIMS personnel shall not:

- Sell ALPR data or use it for commercial marketing or promotional purposes.
- Search ALPR data of vehicles out of curiosity, for personal reasons, or personal gain.
- Use ALPR information to harass, intimidate, discriminate against, or improperly target an individual or protected group.
- Publish, exchange, store, copy, download, or distribute ALPR information to an unauthorized person or entity.
- Use ALPR technology to collect information outside the lawful and authorized scope of PCIMS municipal parking operations.

## 6. Roles and Responsibilities

### 6.1 Site / Program Management

The manager responsible for a PCIMS location shall serve as the local operational custodian of the ALPR program or designate an appropriate administrator. Management is responsible for ensuring that access is limited to personnel with a documented business need, required training is completed, and local procedures are consistent with this SOP and client requirements.

### 6.2 Authorized Users

Access shall be limited to personnel whose assigned duties require use of ALPR information. Depending on the operation, authorized roles may include:

- General, facility, program, or operations managers and approved designees.
- Parking enforcement supervisors and other designated enforcement personnel.
- Auditors and compliance personnel.
- Information technology personnel.
- Accounting or administrative personnel when access is required for a legitimate parking transaction, reconciliation, citation, or collection function.
- Approved contractors or service-provider personnel with a defined operational responsibility.



### 6.3 Third-Party Technology Providers

PCIMS may rely on qualified third-party providers to host, operate, maintain, or support ALPR systems. Providers are expected to maintain appropriate safeguards for information under their control and to comply with contractual requirements, applicable law, and their approved data-security and retention practices.

## 7. Access Control and User Accountability

1. ALPR access shall be granted only after management determines that access is necessary for the employee's or contractor's assigned duties.
2. Users shall use individually assigned credentials when the system supports individual accounts. Credentials shall not be shared.
3. System access shall be removed or modified when an employee changes responsibilities, separates from employment, or no longer has a legitimate need for access.
4. PCIMS management or its designee shall periodically review authorized-user lists and system activity.
5. Where supported by the system, user logins and searches may be recorded and reviewed for compliance and audit purposes.
6. Each location manager shall keep an active list of authorized ALPR data users.

Audit records may include the username, date and time of access, search purpose, license plate searched, and other search criteria.

## 8. Training Requirements

Personnel shall receive appropriate ALPR privacy, security, acceptable-use, and system training before receiving access. Refresher or supplemental training may be required when systems, laws, client requirements, or this SOP change. PCIMS and/or the applicable service provider shall maintain records of completed training.

- Each employee will be required to acknowledge and understand this policy annually. This will be sent out via Paycom
- PCIMS University Training portal will store this policy and will require completion by each employee of PCIMS.

## 9. Data Elements

Depending on the equipment and platform in use, an ALPR system may capture or process:

- License plate image.
- License plate characters / plate number.
- Issuing state or jurisdiction.
- Date and time of capture.
- Capture or parking location.
- Associated parking, payment, permit, citation, or device information when applicable.

Not every data element captured by a technology provider will necessarily be accessed, used, or retained by PCIMS.



## 10. Data Storage and Retention

ALPR information will generally be stored within approved PCIMS systems or within systems operated by authorized third-party technology providers. PCIMS shall retain ALPR information only for the period reasonably necessary to support the parking transaction, enforcement activity, client requirement, legal obligation, operational need, or approved business purpose.

Unless a shorter period is required by law, contract, client direction, or system configuration, ALPR data under PCIMS possession or control shall not be retained beyond six (6) years. Records may be retained longer when preservation is legally required, including for litigation holds, court orders, lawful governmental requests, or other documented legal obligations.

## 11. Security Safeguards

PCIMS and its authorized providers shall use reasonable administrative, technical, operational, and physical safeguards appropriate to the system and data. Safeguards should include, as applicable:

- Controlled user authentication and role-based access.
- Regular software, operating-system, and security updates.
- Malware and endpoint protection for applicable workstations and servers.
- System logging and periodic review of access or query activity.
- Routine backup and recovery practices appropriate to the system.
- Confidentiality and data-protection requirements in applicable vendor or contractor agreements.

Suspected unauthorized access, disclosure, loss, or compromise of ALPR information shall be reported immediately to a PCIMS Director and established incident-response channels. Required notifications will be made in accordance with applicable law and contractual obligations.

## 12. Data Accuracy and Verification

When ALPR information is used to support a citation, parking transaction, collection activity, or other consequential operational decision, personnel should use reasonable verification procedures available within the applicable system. When an accuracy concern is properly raised, PCIMS will take commercially reasonable steps to review the information and correct confirmed errors within systems under its control.

## 13. Disclosure and Third-Party Requests

ALPR data shall not be released outside PCIMS or an authorized client/service-provider relationship unless the release is necessary for legitimate parking operations or is otherwise permitted or required by law.

Requests from law enforcement, governmental agencies, litigants, private parties, or other third parties shall be routed to the appropriate PCIMS management, Client(s) or designated review authority before data is released. A valid warrant, subpoena, court order, statutory requirement, or other lawful basis may be required depending on the nature of the request.

ALPR records shall not be disclosed to the general public or for a civil matter unless disclosure is authorized or legally required. Approved recipients may be required to confirm that the information will be handled in accordance with applicable law and appropriate confidentiality requirements.



## 14. Citation and Collection Records

When ALPR information is associated with a parking citation, violation, or unpaid parking obligation, the information may be maintained as part of the transaction and enforcement record for as long as reasonably necessary to administer the citation and related collection process, subject to the retention limits and legal exceptions in this SOP. Authorized collection partners may receive information necessary to perform contracted collection services.

## 15. Compliance Audits

PCIMS shall conduct annual reviews of ALPR access, user permissions, search activity, training records, and retention controls. Site management shall cooperate with compliance reviews and promptly address identified deficiencies.

## 16. Violations

Improper access, misuse, unauthorized disclosure, or other violations of this SOP may result in immediate suspension and or termination of employment.

## 17. SOP Administration and Revision

PCIMS may revise this SOP when necessary to address changes in law, technology, municipal client requirements, vendor platforms, or company procedures. Site management is responsible for implementing the current approved version and communicating material changes to affected personnel.

## 18. Records to Maintain

- Current list of authorized ALPR users, where administratively available.
- Training completion records.
- Applicable vendor agreements and data-security/retention documentation.
- Access or audit reports when required by management, contract, or law.
- Documentation of approved third-party data releases when applicable.
- Incident documentation for suspected or confirmed data-security events.
- Client specific policies.

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|--------------|--|
| Approved By: |  |
| Title:       |  |
| Date:        |  |

Employee Acknowledgement: Print name\_\_\_\_\_

Signature\_\_\_\_\_

Date: \_\_\_\_\_