



NEWPORT BEACH COUNTRY CLUB

AUTOMATED LICENSE PLATE RECOGNITION (ALPR) USAGE AND PRIVACY POLICY

Effective Date: October 27, 2022

1. Purpose and Scope

Newport Beach Country Club ("NBCC" or the "Club") operates an Automated License Plate Recognition ("ALPR") system to promote the safety, security, and protection of the Club, its members, guests, employees, authorized visitors, vendors, contractors, and property.

NBCC currently utilizes ALPR technology provided by Flock Safety, Inc., or another authorized ALPR technology provider. Regardless of the technology provider, NBCC is the operator of the ALPR system and is responsible for the collection, access, use, maintenance, retention, disclosure, and protection of ALPR Information in accordance with this Policy and applicable law.

ALPR technology uses fixed cameras and computer software to capture images of vehicle license plates and convert the characters displayed on those plates into searchable computer-readable data. Depending on system capabilities, the ALPR system may also collect or generate information including:

- License plate number
- State of issuance
- Date and time of detection
- Camera location
- Vehicle make
- Vehicle model
- Vehicle color
- Vehicle images
- Direction of travel (when available)
- Other system-generated metadata associated with a vehicle detection

Information collected through the ALPR system is referred to in this Policy as "ALPR Information."

The Club's ALPR system is not designed to identify drivers or passengers through facial recognition technology and is not used for facial recognition purposes.

This Policy governs NBCC's collection, access, use, maintenance, sharing, retention, and disclosure of ALPR Information and is intended to ensure those activities are conducted in a manner consistent with applicable law while respecting individual privacy.

2. Authorized Purposes

NBCC collects, accesses, and uses ALPR Information solely for legitimate safety, security, and operational purposes, including:

1. Protecting the safety and security of members, guests, employees, vendors, contractors, and authorized visitors;
2. Protecting Club property;
3. Preventing, investigating, or responding to theft, trespassing, vandalism, fraud, or other criminal or unauthorized activity;
4. Investigating incidents occurring on, entering, leaving, or otherwise affecting Club property;
5. Identifying vehicles reasonably believed to be associated with legitimate safety or security concerns;
6. Assisting law enforcement in connection with lawful requests, emergencies, or criminal investigations when permitted or required by law; and
7. Other legitimate Club safety and security purposes consistent with applicable law.

ALPR Information shall not be used for:

- Marketing or advertising;
- Customer profiling;
- Commercial analytics unrelated to security;
- Personal purposes of any employee, contractor, or authorized user.

3. Authorized Users, Access, and Training

Access to ALPR Information is restricted to specifically authorized personnel whose job responsibilities require such access.

Authorized users may include designated members of:

- Club executive management;
- Club security personnel;
- Information technology personnel responsible for system administration or cybersecurity; and
- Authorized service providers and contractors performing security, ALPR, or information technology services on behalf of NBCC.

Access privileges are granted according to each individual's assigned responsibilities and limited to the minimum level necessary to perform authorized duties.

Before receiving access to ALPR Information, authorized users shall receive training regarding:

- Authorized uses of the ALPR system;
- This Policy;
- Applicable privacy and confidentiality requirements;
- Information security practices;
- Proper system operation; and
- Prohibitions against unauthorized access, use, disclosure, or dissemination of ALPR Information.

Authorized users shall receive periodic refresher training as appropriate.

Authorized contractors and service providers shall use ALPR Information only as necessary to perform authorized services and in accordance with applicable contractual obligations and law.

4. Policy Administration and Oversight

The Assistant Manager of Newport Beach Country Club is responsible for implementing and overseeing this Policy.

Responsibilities include:

- Approving authorized users;

- Maintaining appropriate access controls;
- Coordinating user training;
- Monitoring compliance with this Policy;
- Periodically reviewing user permissions;
- Coordinating responses to suspected unauthorized access or disclosure; and
- Addressing questions regarding the Club's ALPR practices.

5. Monitoring, Access Records, and Auditing

NBCC monitors access to ALPR Information to promote compliance with this Policy and applicable law.

When ALPR Information is accessed, NBCC maintains access records as required by applicable law, including:

- Date and time of access;
- Search criteria or license plate queried;
- Identity of the individual accessing the information;
- Organization, when applicable; and
- Purpose of access.

NBCC reviews user permissions, access records, and system activity at least annually, and more frequently as appropriate, to detect and address unauthorized access or misuse.

Unauthorized access to or misuse of ALPR Information may result in disciplinary action, termination of access privileges, termination of contractual relationships, or other appropriate action.

6. Sharing and Disclosure of ALPR Information

NBCC does not sell, lease, license, or otherwise commercially monetize ALPR Information.

ALPR Information may be shared or disclosed, as appropriate and consistent with applicable law:

For the authorized safety, security, investigative, and operational purposes described in this Policy; To authorized service providers performing services on behalf of NBCC; To local law enforcement agencies and other public agencies for legitimate law enforcement, public safety, investigative, emergency response, or other lawful governmental purposes; To other

law enforcement agencies pursuant to lawful requests or as otherwise permitted or required by law; To comply with subpoenas, court orders, warrants, or other valid legal process; In connection with investigations of criminal activity, suspicious activity, threats to public or Club safety, or incidents occurring on or affecting Club property; When NBCC reasonably determines that sharing information with a law enforcement or public agency is appropriate to protect the safety or security of Club members, guests, employees, visitors, or property; or When reasonably necessary to respond to an immediate threat to health, safety, or security.

Where permitted by applicable law and consistent with the authorized purposes of this Policy, NBCC may provide local law enforcement or other public agencies with access to or information derived from the ALPR system. Such sharing may include ALPR Information relevant to criminal investigations, public safety matters, missing or wanted persons or vehicles, stolen vehicles, emergencies, or other legitimate governmental or law enforcement activities.

Service providers receiving ALPR Information shall maintain reasonable administrative, technical, and physical safeguards designed to protect the information from unauthorized access, destruction, use, modification, or disclosure.

7. Accuracy and Integrity

ALPR technology is an investigative and security tool and may not always accurately identify a vehicle or license plate.

Whenever reasonably practicable, authorized personnel shall verify ALPR Information using available supporting information before taking material action based solely upon ALPR Information.

Verification may include review of:

- Original ALPR images;
- Security camera footage;
- Visual observation;
- Vehicle descriptions; or
- Other available records.

ALPR Information should not ordinarily serve as the sole basis for denying access to Club property or taking disciplinary or legal action without reasonable verification when practicable.

If NBCC becomes aware that ALPR Information is materially inaccurate, reasonable steps will be taken to avoid reliance on inaccurate information and to correct or annotate records when appropriate.

8. Information Security

NBCC maintains reasonable administrative, technical, operational, and physical safeguards designed to protect ALPR Information from unauthorized access, use, disclosure, modification, or destruction.

Security measures include, as appropriate:

- Role-based access controls;
- Individual user authentication;
- Access logging;
- Periodic review of user permissions;
- User training;
- Prohibition on credential sharing;
- Prompt termination of access when no longer required; and
- Security controls provided by NBCC and its ALPR technology provider.

If NBCC becomes aware of unauthorized access to ALPR Information, the Club will promptly investigate the incident, implement appropriate corrective measures, and provide any notifications required by applicable law.

9. Data Retention

NBCC's standard retention period for ALPR Information is sixty (60) days, unless a different retention period is configured within the ALPR system.

ALPR Information may be retained longer when reasonably necessary for:

- Active investigations;
- Specific incidents;
- Law enforcement preservation requests;

- Pending or anticipated litigation;
- Legal or regulatory obligations; or
- Other lawful purposes consistent with this Policy.

Upon expiration of the applicable retention period, ALPR Information will be securely deleted or destroyed in accordance with the capabilities of the ALPR system and the Club's records management practices.

10. Public Notice

NBCC posts signage at or near vehicle entrances notifying visitors that Automated License Plate Recognition technology is in use for safety and security purposes.

This Policy is publicly available on the Club's website.

11. Privacy Rights

Nothing in this Policy is intended to limit any rights available under applicable California privacy laws.

To the extent required by law, individuals may submit inquiries regarding NBCC's collection and use of ALPR Information using the contact information below. Certain ALPR Information may be exempt from consumer access, deletion, or disclosure rights where such exemptions are authorized by law, including where the information is maintained solely for security, investigative, or legal compliance purposes.

12. Policy Review

NBCC reviews this Policy at least annually and may revise it from time to time to reflect changes in applicable law, technology, or Club operations.

The current version of this Policy will remain publicly available on the Club's website.

13. Contact Information

Questions regarding this Policy or the Club's use of Automated License Plate Recognition technology may be directed to:

Newport Beach Country Club

One Clubhouse Drive

Newport Beach, California 92660

Attn: Assistant Manager

Email: mstacklie@newportbeachcc.com