

# Professional Parking Management Corp.'s Privacy Policy

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### Usage and Privacy Policy

This policy governs the Automated License Plate Recognition System (“ALPR System” or “System”) operated by Professional Parking Management Corp. (“PPM” or “Company”) and applies to our employees, customers, and camera affiliates who have access to or use our System. Our ALPR System is 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. The information contained in the System (“LPR Data”) includes images of license plates, plus the date, time, and location when the images were collected, and the license plate characters and numbers associated with the image. The images stored in the System are collected from areas visible to the public where there is no reasonable expectation of privacy. Moreover, LPR Data stored in our System does not include any personally identifying information (“PII”), or information which relates the license plate image to the driver or registered owner of a vehicle. Law enforcement and other users may have access to vehicle registration information, and other sources of PII, which they may correlate with LPR Data stored in the System to create vehicle hot lists in accordance with the above referenced federal law. All hot list fields other than the license plate number itself are encrypted to protect any PII that may exist in these hot lists.

#### a) Use and Collection of LPR Data

The Company does NOT make the ALPR System or data it contains available to individuals for personal, non-commercial purposes. However, the Company will share the collected data for the limited purposes set forth below:

- With government authorities and third parties involved in court action, including external agencies and organizations (including the police and the relevant local authority) for the purpose of complying with applicable legal and regulatory obligations.
- When we believe that disclosure is (1) reasonably necessary to comply with any applicable law, regulation, subpoena, legal process or enforceable governmental request; (2) necessary to enforce the provisions of the Policy; (3) required to enforce our terms, including investigation of potential violations; or (4) necessary to investigate or protect against actual or threatened harm to the rights, property, or safety of Professional Parking Management, our Users, or the public as required or permitted by law.

You acknowledge and agree that we cannot be held liable for the actions or omissions of any party with whom we share your information, and such information will be governed by such parties' policies, procedures, and practices.

#### **b) Users and Training**

All employees of the Company are authorized to use the ALPR System to demonstrate the System to customers, or potential customers, provide customer support, or collect data for purposes authorized by this policy.

All independent contractors of the Company are authorized to use the ALPR System for purposes consistent with their underlying contract with the Company and this policy. All authorized employees and independent contractors that collect LPR Data are required to read and understand any documents (e.g., the operational manual for the specific camera type) necessary to successfully operate a camera. Additionally, all authorized employees and independent contractors that collect LPR Data are required to read and understand "Know Your Rights: Photographers" published by the American Civil Liberties Union (ACLU) located at: <https://www.aclu.org/know-your-rights-photographers> (July 2014).

#### **c) Monitoring and Compliance**

The Company utilizes reasonable information security measures to safeguard the LPR Data against unauthorized access, modification, or destruction. For example, we utilize Secure Socket Layer (SSL), Transport Layer Security (TLS), or similar encryption technology when sensitive data is transmitted over the Internet, and use firewalls to help prevent external access into our network. However, no data transmission over the Internet and no method of data storage can be guaranteed to be 100% secure. Therefore, while we strive to use commercially acceptable means to protect the LPR Data, we cannot guarantee its security.

#### **d) Disclosure of LPR Data**

The Company licenses our commercially collected LPR Data to customers for the authorized uses set forth in Section A of this policy. The Company shares the results of specific queries for use by its customers consistent with this policy and pursuant to the customer's license agreement. Through an affiliate subsidiary of our parent Company, the Company collects data for commercial purposes and does not collect data on behalf of law enforcement agencies.

#### **e) Custodian or Owner of the ALPR System**

The Company is the custodian and owner of the ALPR System and is responsible for implementing this policy.

#### **f) Accuracy of LPR Data**

The collection of LPR Data is automated so that the license plate images, and the details of when they are collected, are included in the System without review, along with the computer translation of the license plate number. Although very infrequent, the license plate translation is sometimes inaccurate or incomplete. To avoid mistaken use of LPR Data the Company employs staff to verify the computer translation before taking any action as a result of LPR Data. The Company corrects mistaken translation and other database errors when identified.

#### **g) Retention**

The Company retains LPR Data to the extent necessary to comply with the Company's legal obligations (for example, if the Company is required to retain LPR Data to comply with applicable laws), resolve disputes, and enforce the Company's legal agreements and policies.

## **h) Revisions of Usage and Privacy Policy**

The Company reserves the right to revise this policy at any point in the future and such changes will be retroactively applicable to data collected prior to any revision of this policy.

## **i) Security**

We take precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline. Wherever we collect sensitive information (such as credit card data), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the bottom of your web browser or looking for "https" at the beginning of the address of the web page. While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment.

Professional Parking Management believes strongly in an individual's right to privacy. This policy summarizes what personally identifiable information we may collect on this website, and how we may use this information. This commitment reflects the value we place on earning and keeping the trust of our employees, customers, business partners and others who share their personal information with us.

## **FAQ's**

### **What information do we collect?**

We collect information from you when you register on our site, subscribe to our newsletter, respond to a survey, fill out a form or send us an email.

### **What do we use your information for?**

Any of the information we collect from you may be used in one of the following ways:

#### **To respond to your inquiries and requests**

Your information helps us to better respond to your individual needs.

#### **To improve our website**

We continually strive to improve our website offerings based on the information and feedback we receive from you.

#### **To improve customer service**

Your information helps us to more effectively respond to your customer service requests and support needs.

#### **To administer a promotion, survey, or other site feature To send periodic emails**

The email address you provide for order processing may be used to send you information and updates pertaining to your order, in addition to receiving occasional Company news, updates, related product or service information, etc. Note: If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

### **Do we use cookies?**

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain non-personal information (i.e. your web browser, pages visited, duration of visit, etc).

We use cookies to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies via your browser settings. Like most websites, if you turn your cookies off, some of our Services may not function properly. However, you may still contact us by phone or mail.

### **Do we disclose any information to outside parties?**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

### **Third party links**

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

### **Online Privacy Policy Only**

This online privacy policy applies only to information collected through our website and not to information collected offline.

### **Your Consent**

By using our site, you consent to our web site privacy policy.

### **Changes to our Privacy Policy**

If we decide to change our privacy policy, we will post those changes on this page.