

Mediterrania Homeowners Association

Automated License Plate Recognition System Usage and Privacy Policy

1. Definitions:

- a. "Flock" is the Automated License Plate Recognition ("ALPR") system vendor, operator of the cameras and related equipment and custodian of the database.
- b. "Automated license plate recognition system" or "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.
- c. "Automated license plate recognition information," or "ALPR information" means information or data collected through the use of an ALPR system. This information includes, but is not limited to:
 - License plate image
 - Vehicle image
 - Vehicle characteristics (e.g. color, make, racks, body type, stickers)
 - License plate number
 - License plate state
 - Date
 - Time
 - Camera location

2. **Authorized Purposes:** This Policy is established pursuant to California Civil Code § 1798.90.5 et seq. (SB 34). The purpose of the ALPR system is to enhance public safety and deter and solve crime. The Mediterrania Homeowners Association ("MHOA") is a voluntary homeowners association that utilizes a Flock ALPR system in connection with the City of Rancho Palos Verdes ALPR program to support law enforcement and enhance community security. The system is paid for jointly by the City and through voluntary contributions by City residents who are members of the MHOA. The two cameras are located on City property or right-of-way at the intersection of Palos Verdes Drive East and Ganado Drive. The ALPR system is NOT used for: monitoring residents' routine travel patterns, general surveillance, targeting of any individual or group based on race, color, religion, national origin, ancestry, sex, gender, gender identity, sexual orientation, disability, or any other protected classification, surveillance of activities protected by the First Amendment to the United States Constitution, Article I of the California Constitution and any commercial or personal use.
3. **Authorized Users and Access:** The Mediterrania HOA Board may designate any current HOA member/volunteer as the ALPR end-user. This person will have access to the admin console via

the Flock portal. This person will receive training from Flock and receive unique login credentials known only to herself/himself and to Flock. This user may request any other MHOA homeowner member to temporarily assist her/him and request Flock Safety to provide/deactivate temporary login credentials. The following law enforcement agencies additionally have access to the system pursuant to authorization by the City of Rancho Palos Verdes: the Los Angeles County Sheriff's Department (LASD) and the Los Angeles Police Department (LAPD). No other person has standing access to the ALPR system. Any individual granted temporary access under this provision is subject to the same use restrictions as the end-user.

4. **Training:** All users of the ALPR system are provided training and information on the use of the system through Flock resources.
5. **Security and Monitoring:** Flock uses industry-leading safeguards to protect ALPR information from unauthorized access, use, destruction, modification, or disclosure. Flock's information security policy and safeguards align with the security requirements established by NIST Cybersecurity and CISA Secure By Design. Examples of safeguards include:
 - a. Operational:
 - Audit logging.
 - Continuous security scanning and remediation of vulnerabilities on public facing infrastructure.
 - Role-based access controls to limit access based on functional need.
 - b. Administrative:
 - Processes to report vulnerabilities for responsible and public disclosure.
 - Third party attestations to requirements for SOC 2 Type II and ISO 27001.
 - Personnel screening for engineers with access to cloud infrastructure.
 - c. Technical:
 - Strong multi-factor (TOTP) authentication for customer accounts.
 - NIST data security standards including encryption in transit and data at rest using FIPS approved algorithms.
 - d. Physical:
 - Storage and processing of ALPR information in AWS US based cloud infrastructure.
 - Safeguards to mitigate device tampering and vulnerabilities in firmware.
 - Visitor controls, security personnel, and escort procedures for warehouses and sensitive areas.
 - e. Monitoring: Information about each query of the ALPR system is recorded in audit logs maintained by Flock for auditing purposes, including:
 - Username

- Date
- Time
- Purpose of query
- License plate and other elements used to query the system

6. Restrictions on the Sale, Sharing, or Transfer of ALPR Information:

- ALPR information gathered by the ALPR cameras is contractually owned by the MHOA and mutually shared with the City of Rancho Palos Verdes.
- The MHOA permits Flock to share the MHOA ALPR information only with the Los Angeles County Sheriff's Department (the primary responding agency, via the Lomita Station) and the City of Los Angeles Police Department, pursuant to authorization by the City of Rancho Palos Verdes in connection with the City-sponsored Flock program, and only for criminal-investigative purposes. Retention and deletion of all MHOA ALPR information is governed by the Data Retention policy.
- Neither the MHOA nor Flock sells, publishes, exchanges, or discloses the ALPR information for commercial purposes.
- Flock does not disclose or publish ALPR information without authorization in writing from the MHOA, except as necessary to provide the ALPR system services under MHOA's agreement with Flock, or as required by law, or to address an imminent risk of harm to any person.
- The Flock System is configured so that ALPR information is made available only to specifically authorized users (as referenced above).
- Member Opt-Out Program:** Each dues-paying member of the MHOA may request that vehicles registered to the member be excluded from recorded capture by the ALPR system. A member may opt out by submitting the license plate number(s) of the owned vehicle(s) to be excluded, in writing, to the ALPR end-user. Requests are processed within a reasonable time after receipt. Members may add or remove plates from the opt-out list at any time by written request. The opt-out list is maintained by the ALPR end-user, is treated as confidential, and is retained only as long as necessary to give effect to member opt-out requests.

7. Accuracy: ALPR technology is considered accurate but not infallible. Flock cameras self-monitor to ensure connectivity and functionality, and low-confidence plate reads are not sent to the user. To promote accuracy and correct errors, MHOA relies only on plate reads that include an associated photographic image, and an authorized user visually verifies each plate read against that image before any operational use or alerting of law enforcement. Any individual who reasonably believes that ALPR information about a vehicle registered to them, or a vehicle

they were operating, is inaccurate may submit a written correction request to the ALPR end-user, together with sufficient information to locate the record. The end-user will review the underlying image within 30 days and either correct the record, annotate the record as disputed, or explain in writing explaining why no correction is being made.

8. **Data Retention:** The ALPR information is hard deleted on a rolling 30-day basis, by Flock consistent with Flock Safety's standard tenant configuration. Retention beyond the 30-day period is authorized only where (i) based on a specific documented request from a law enforcement agency, that the information is necessary for an active investigation, or (ii) counsel of record has communicated a litigation hold applicable to the information to Flock. Extended retention is reviewed no less than annually, and any information no longer needed is destroyed.
9. **Other:**
 - a. **Signage:** Signs stating the presence of Flock cameras and 24-hour recording are posted at each camera location.
 - b. **Public Availability:** This Policy is available to the public in writing on request and is posted conspicuously on the MHOA website at www.mediterraniahoa.com for as long as the HOA uses an ALPR system.
 - c. **Complaints and Inquiries:** Any person may submit a complaint concerning the operation of the ALPR system directly to Flock Safety. Any inquiry concerning this Policy should be made to the MHOA Board of Directors. If a request under the Accuracy section is made, it should be in writing with sufficient detail to locate the record in question and be made to the attention of the end-user. All inquiries addressed to the MHOA should be made to mediterraniahoa@cox.net.
 - d. **No Waiver; No Third-Party Beneficiaries:** Nothing in this Policy waives any defense, privilege, immunity, or other right available to the Mediterranean Homeowners Association or its directors, officers, committee members, members or agents. This Policy does not create any private right of action or third-party-beneficiary right and is adopted solely to describe MHOA's internal governance of its ALPR system and to satisfy California Civil Code § 1798.90.51(b).

July 26, 2026