HIDDEN CANYON COMMUNITY ASSOCIATION

AUTOMATED LICENSE PLATE RECOGNITION SYSTEM USAGE AND PRIVACY POLICY
(Civil Code Section 1798.90.5, et seq.)
ADOPTED 10/29/2026

Hidden Canyon Community Association ("Association") has installed at the main entrance and exit gates an Automated License Plate Recognition System ("ALPR System"). An 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 vehicle license plates and the characters they contain into computer-readable data.

If the Association maintains a website, this Policy shall be posted on such website.

A. Purpose

The purpose of this Automated License Plate Recognition System Usage and Privacy Policy ("Policy") is to provide requirements for the use, operation, storage of and access to the ALPR System.

The Association will use the ALPR System to capture and store digital license plate data and images while recognizing the privacy rights of members and residents. The primary purposes and benefits of the ALPR System are to deter criminal activity, assist law enforcement officials should a crime occur in the community, and to assist the Association in the investigation and enforcement of violations of its governing documents, including but not limited to traffic safety violations.

The Association makes no representations or guarantees that the ALPR System will be monitored and/or operational at all times. Members and residents should not rely on the ALPR System or the Association for their own personal protection or safety, or that of their family members, tenants and guests, or for the protection or safety of their property. The Association makes no guarantees of safety and no representations that the community is safe or that the ALPR System will successfully deter criminal acts committed by third parties. Each member and/or resident should take measures they believe appropriate to protect themselves, their family members, tenants and guests, and their property.

B. Access

All data and images gathered by the ALPR System are for Association and law enforcement use only.

The Association will only disclose and provide access to the ALPR System to Board members, Association management, Association gate and patrol vendors and their respective employees in carrying out services for the Association, and law enforcement and other governmental agencies in connection with alleged trespass, criminal activity or other misconduct or liability, pursuant to subpoena or when disclosure is otherwise required by law.

For privacy reasons, the Association will not release ALPR System data to Association members or any other persons or entities, unless legally required to do so or by court order.

The operator of the ALPR System, as designated by the Board of Directors, shall have access to the ALPR System and data.

The Association or its operator shall maintain a record of access to the ALPR System. The record shall include all of the following:

a. The date and time the data is accessed;
b. The license plate number or other data elements used to query the ALPR System;
c. The username of the person who accesses the data, and, as applicable, the organization or entity with whom the person is affiliated; and
d. The purpose for accessing the data.

C. Training

Each person having access to the ALPR System and data shall complete training before using or accessing the ALPR System and data, except that law enforcement and other governmental agencies may have their own training. Completion of such training shall be noted in the Association's records. Association may rely on retained third-party vendors to provide required training to their employees.

D. Administration

The installation and maintenance of the ALPR System and equipment, as well as ALPR System data retention and access, shall be managed either by the Association or an operator as designated by the Board of Directors.

E. Monitoring

The Association, together with any operator, shall be responsible to monitor the ALPR System to ensure the security of the data accessed and used and to ensure compliance with all applicable privacy laws.

On a regular basis, the Board of Directors, or its operator, if any, shall perform an audit to determine the persons and entities who have been provided with access to and have used the ALPR System to confirm the security of the data accessed and to confirm compliance with all applicable privacy laws.

The Association and/or its operator, if any, shall not use or allow others to use the ALPR System and data for any purpose not authorized under this Policy.

F. Sale, Sharing or Transfer of ALPR Data

ALPR System data shall not be sold. ALPR System data shall not be shared or transferred except as may be provided herein.

G. Responsible Party

The Association is responsible for implementing this Policy. The policy may be amended as necessary or appropriate to comply with laws and changing circumstances.

H. Accuracy of ALPR Data

The Association shall take reasonable measures to ensure the accuracy of ALPR data and correct data errors. Upon discovering or being informed of any inaccuracy or data error of the ALPR System, Association and/or its operator shall promptly correct same if reasonably able to do so.

I. Retention of ALPR Data

The Association shall retain ALPR data for no more than ninety (90) days, except as noted herein. Thereafter, the ALPR data may be purged and in accordance with any retention schedule maintained by the Association. ALPR data shall not be purged as described herein if it is retained for auditing purposes, relevant to an investigation in connection with an Association violation, enforcement or legal matter, subject to a law enforcement investigation, subject to a demand for preservation of evidence or subject to a subpoena request or as otherwise required by law. The Association's third-party vendor managing the ALPR system will implement the retention of ALPR data in accordance with this Policy.