

# PORT OF EVERETT

## ALPR POLICY

### Purpose

The purpose of this policy is to establish guidelines for the use, management, and operation of an automated license plate reader system ("ALPR") by the Port of Everett directly or through its contracted parking management provider(s) ("contractor"). The Port of Everett and any contractor is committed to utilizing this system in compliance with state law, to promote efficient administration of its parking program and support the overall mission of the Port.

### Scope

The Port of Everett utilizes an ALPR to enable the rapid identification of vehicles for parking access and enforcement. ALPR units are deployed on parking enforcement vehicles, as well as certain parking lots within the Port's real estate holdings where they collect license plate information from vehicles parked on Port property or accessing designated parking lots.

The Port's ALPR captures license plate images but does not identify any individual or access any person's personal information through its analysis of license plate characters. The data captured by the units themselves is entirely anonymous. Port of Everett personnel and its contractor can only identify the registered owner of a vehicle, on an as needed basis, by querying a separate, secure government database of vehicle license plate records, which is restricted, controlled, and audited.

The Port of Everett and its contractor shall ensure that it uses the most recent and updated version of the database made available by the ALPR provider.

### Definitions

**Automated license plate reader system (ALPR):** A system, software, or computer algorithm, whether used independently or in combination with one or more mobile or fixed automated cameras, that is used to convert images of license plates into computer-readable data as defined in RCW.

**ALPR Administrators:** The ALPR Administrators are responsible for the management of the ALPR system/equipment, and are responsible for working with any 3<sup>rd</sup> party providers, system training, deployments, audits, etc.

**ALPR Users:** Users who are expressly authorized to utilize the ALPR system/equipment. Prior to using an ALPR system, ALPR Users must complete authorized training.

**ALPR Data:** All data collected by ALPR systems including, but not limited to, global positioning system coordinates, location, date and time, photograph, license plate number, automobile characteristics, or other identifying information.

**Audit Trail Data:** All forms of data collected or generated by an ALPR system that identify how the system is accessed or used. "Audit trail data" includes information about who accesses or uses the system, and how and when the system is accessed or used. "Audit trail data" does not include automated license plate reader data.

# Authorized Purposes, Collection and Use of ALPR Data

## Collection/Detection

The ALPR system identifies and captures images of vehicle license plates as they pass through the camera's field of view or are scanned with handheld ALPR devices. This process includes the automated recognition and recording of license plate numbers, vehicle characteristics, and the associated date, time, and location data. Detection enables the system to document and store information about vehicles for any parking enforcement measures.

ALPR Users may access, operate, or use an ALPR and its data only for the following purposes:

- a. Managing and enforcing restrictions on the use of parking spaces; and
- b. Identifying vehicles in a database for impoundment or immobilization under a local ordinance enacted under RCW 46.55.240, provided the database includes only license plates of vehicles subject to that ordinance

## Restrictions on Collection of ALPR Data and Use of ALPR Systems

Authorized Users shall abide by the policies and procedures related to the ALPR system, as set forth in RCW, this policy, and related procedures. Authorized Users are expressly prohibited from using ALPR technology for any other purposes than those contained in this policy.

## Accountability and Safeguards

All saved license plate data collected by the ALPR systems will be safeguarded, accessible by ALPR Users only, and protected by clear policies and procedures that dictate when and how the data can be used. When accessing data, ALPR Users should use the ALPR User's unique login and password in alignment with RCW. The ALPR system retains all Audit Trail Data.

ALPR data is not subject to disclosure under the public records act, chapter 42.56 RCW, except such data may be used for bona fide research as defined in RCW 42.48.010 and does not include individually identifiable information.

## Auditing, Reporting and Retention

### Audit Trail Data

All Audit Trail Data will be stored for two years. Audit Trail Data may be used solely for auditing purposes and may not be searched, analyzed, compiled, or indexed for investigative purposes.

### Internal Audit

The Port of Everett will conduct a comprehensive internal audit of its ALPR practices at least annually.

### Data Collection and Retention

ALPR data collected by or on behalf of the Port of Everett shall not be used or shared for any other purpose and shall not be retained longer than 21 days for short-term parking, except when retained for the purpose of investigating a parking enforcement violation, provided the data is deleted no later than 12 hours after final disposition of a parking violation, including exhaustion of any applicable appeals process.

### System Misuse

Any person who willfully and intentionally queries, accesses, or uses an automated license plate reader system for a purpose not specifically authorized under this policy, or who willfully and intentionally retains, sells, shares, permits

access, or disseminates automated license plate reader system data or audit trail data in violation of this policy, may be guilty of a gross misdemeanor and/or discipline.

## State Reporting Guidelines and Policy Updates

This policy will be reviewed annually and updated to remain consistent with state law, Attorney General guidance, and legal requirements and will be posted on the Port of Everett's website.

The ALPR Administrator will draft and submit an annual report of its ALPR system practices and usage to the appropriate committees of the legislature. The report must also be conspicuously posted on the Port of Everett's public website.

Whenever this policy is modified or there are any changes to any policy pertaining to the use of the ALPR system, the Port of Everett will submit notice of such action with copies of any relevant policies to the Attorney General within 60 days.