

Policy F0-31.2: License Plate Recognition System Data Collection and Privacy

DATE: March 27, 2015

PURPOSE: This Operating Policy and Procedure provides guidelines for the collection, retention and privacy of license plate recognition data at Sam Houston State University "University".

REVIEW: This policy will be reviewed in November of even-numbered years by the Assistant Director of Parking and Transportation with substantive revisions forwarded to the Director of Public Safety Services and Vice President for Finance and Operations.

POLICY/PROCEDURE

The Department of Public Safety Services ("DPSS") utilizes license plate recognition hardware and software ("LPR") for vehicle parking and access control.

1. Locations

LPR data is collected on University managed or owned streets, parking lots and structures. The Department of Public Safety Services utilizes a number of mobile vehicle-mounted systems or handheld devices which are driven or operated by trained personnel in parking locations throughout the university.

2. Data Collected

The LPR system captures two photos of observed vehicles: (1) a context photo of the vehicle and its immediate surroundings and (2) a photo of the license plate. Typically, these photos are taken from the rear of the vehicle, although there are occasions where a photo is taken from the front of a vehicle backed into a space or standing in a driving aisle. The photos are not of a resolution that allows identification of the vehicle occupants if they are present. Along with the photographic data, the system also records the global positioning system coordinates and date/time information of the observation. Further software processing of the license plate image generates an alphanumeric version of the license plate number which is also stored with the record. While no owner or driver information is stored directly with the LPR record, vehicle LPR data is linked to individual patron accounts within the parking management system.

3. Use of Data

The intended use of data collected by the LPR system is for parking access control, parking enforcement and law enforcement investigations. LPR data is used to determine a vehicle's access permissions in a given parking area or controlled access area of campus and support the issuance of a parking citation if needed. The data is also used by the Sam Houston State University Police Department ("UPD") in conducting ongoing criminal investigations and investigations of complaints. UPD may utilize LPR data with active connections to state and federal sponsored hot lists containing stolen vehicle, wanted person and missing person information. Any use of the data for purposes outside of these stated purposes must be detailed

and approved in writing through administrative channels by the Director of Public Safety, Vice President for Administration & Finance, and the President of Sam Houston State University.

4. Data Retention

Data collected by the LPR system not resulting in parking enforcement action or not part of an ongoing law enforcement investigation is retained for 90 days. Data resulting in parking enforcement action is retained with the citation record according to established University data retention policies. Data associated with an ongoing law enforcement investigation is retained until the investigation is completed or as directed by investigators or courts.

5. Access to Records

Access to records created and maintained by the LPR system is restricted to trained Department of Public Safety Services personnel performing their duties. All personnel with access to the system use unique identifiers and passwords to access records and all login activity, record additions, and other activity is logged. Access to the system by others is prohibited. Texas Government Code 552.130 exempts license plate data compiled by a governmental entity from the public information access provisions contained in Section 552.021 of the Texas Government Code.

6. Determining what LPR data we have about your vehicle

Individuals may request a report detailing what, if any, LPR data we have on vehicles registered or identified to them. The report may be requested in person; or in writing by email, U.S. Mail or fax. Alternatively, any registered user of the University parking management system may view this information by logging into their account found at <https://shsu.nupark.com/portal>. Contact information for DPSS can be found on our website at www.shsu.edu/police and www.shsu.edu/parking. Individuals requesting a report in person must provide sufficient identification to establish their identity as owner of the vehicle or family relationship to the registered owner as a driver of the vehicle. For all other requests, a copy of the report will be mailed to the registered owner of the vehicle by U.S. mail at the address on file with the proper state Department of Motor Vehicles.

7. Public Notification

DPSS will notify the public of its LPR data collection activities and policies via:

- a. Posting of a privacy policy on the DPSS website
- b. Publishing of this LPR privacy policy in the Sam Houston State University Policy and Procedures web page.
- c. Posted signage at each entrance to campus.
- d. An e-mail to each user of a registered vehicle will be sent to the registered e-mail address containing policy, procedure and general information pertaining to the use of LPR and its parking management system. It is important for each registered user to maintain and update their contact information with our parking management system to receive important notices.