Automated License Plate Recognition (ALPR) Usage and Privacy Policy

Last Updated: April 15, 2020

Welcome to the Automated License Plate Recognition ("ALPR") Usage and Privacy Policy of Caruso Management Company, Ltd. and its affiliates (collectively, "Caruso", "we," "us," or "our"). This ALPR Usage and Privacy Policy satisfies all applicable privacy laws, including the requirements of California Civil Code § 1798.90.5, *et seq.*

Purpose

Additional Privacy Rights

Acceptance

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Purpose

We have developed this ALPR Usage and Privacy Policy to tell you how and why we collect and use information about your license plate, including a photograph of your license plate, your license plate number and the location/date/time that such information is collected ("ALPR Information"). Caruso is committed to limiting the access and use of your ALPR Information in a manner that is consistent with respect for privacy rights and civil liberties.

Additional Privacy Rights

For more information about how Caruso uses, stores and shares information, including ALPR Information, see our Privacy Policy.

Acceptance

Please read this ALPR Usage and Privacy Policy carefully. By accessing our parking structures at The Grove and Palisades Village ("Properties"), you are accepting the terms of this ALPR Usage and Privacy Policy, which may be updated and amended from time to time.

What Is ALPR?

ALPR is a camera system that takes a photograph of a license plate and uses a computer algorithm to convert the image of the license plate, and the characters it contains, into computer-readable data. This data, together with the location/date/time that make up the ALPR Information, is encrypted and transmitted to a searchable database ("ALPR System"), where it is stored temporarily and may be accessed and used as provided below.

Who Is Authorized To Collect, Use, And Access ALPR Information?

The following job titles at Caruso, owner of the Properties and of the ALPR System and ALPR Information, are authorized to collect ALPR Information on the Properties, and to access and use the ALPR Information and ALPR System:

- General Manager (Caruso's property manager);
- Assistant General Manager (Caruso's assistant property manager);
- Concierge Managers (Caruso's ambassadors who manage and improve guest experience); and
- Employees with access to Caruso's Customer Relationship Management (CRM) system *only if* Rewards Members have elected to link their license plates with their personal accounts

These employees are responsible for the daily operation of the ALPR System. Caruso employees must undergo a legal and operational training seminar before accessing ALPR information.

Caruso contracts with the following entities for the purpose of maintenance and implementation of the ALPR System:

- LAZ Parking Management (manages parking facilities); employees with the following titles have access to Caruso's system:
    - LAZ Supervisor
    - LAZ Auditor
    - LAZ Assistant Manager
    - LAZ Manager
- Skidata (service provider for ALPR technology); employees with the following titles have access to Caruso's system:

        - Skidata Technician

- Tech Solutions LLC (runs API connection ALPR system); employees with the following titles have access to Caruso's system:

        - Technical Engineer

- Hitachi Solutions, Ltd. (CRM system service provider); employees with the following titles have access to Caruso's system:

        - Architect
        - Consultant

Employees of these contractors are authorized to access or use ALPR Information for the sole purpose of maintenance and implementation of the ALPR System and receive operational training on the ALPR system. These contractors must comply with Caruso's ALPR Policy.

Authorized Personnel (employees and contractors as stated above) with access to ALPR Information must review a training manual and sign a "User Agreement" to maintain Caruso's security procedures and practices and safeguard ALPR information from unauthorized access, destruction, use, modification, or disclosure.

Why Do We Collect And Use ALPR Information?

Caruso and its providers collect and use ALPR Information to:

- Implement Caruso's parking policies and practices;
- Determine correct parking fees;
- Recognize vehicles of loyalty program members, contract parkers and others with a special relationship to Caruso;
- Provide security for the Properties, or protect our rights; and
- Otherwise cooperate with law enforcement agencies, government requests, subpoenas, court orders, or legal process.

We also may use ALPR Information in connection with the sale or transfer of business assets, to enforce our rights or as needed support for external auditing, compliance, and corporate governance functions.

How Do We Make Sure The ALPR Information Is Accurate?

The printed receipt for entry/exit from the parking facility will show part of the driver's license plate number, giving the driver the opportunity to verify accuracy. If the driver sees a discrepancy, please contact Caruso at alpr@caruso.com or at 323.900.8080.

Additionally, Authorized Personnel are trained to visually verify ALPR Information when a ticket is issued and verify ALPR Information when a car leaves a parking facility if license plate data is

not properly recorded. Any mismatch or data errors identified will be corrected. Caruso and its providers also employ reasonable technical measures, including regular testing, to check the accuracy of ALPR Information.

How Will We Monitor And Secure The ALPR Information?

Caruso and its providers use physical access controls, computer application permission controls, and other operational, administrative, technical, and physical safeguards and procedural and personnel security measures to monitor and secure ALPR Information, and to protect ALPR Information from unauthorized access, use, modification, disclosure, or destruction. We also identify and record who has accessed ALPR Information based on individual access credentials, the date and time of access, the search query, and purpose for access. Caruso also conducts periodic audits of the ALPR System to check the security of the ALPR Information, and that the ALPR Information is used only for the authorized purposes described in this Policy.

Do We Share ALPR Information With Third Parties?

Caruso and its providers do not sell ALPR Information. Caruso and its providers also do not share or transfer ALPR Information except to provide access to Authorized Personnel and others for the purposes stated above, or as otherwise required by law. Caruso also may share or transfer ALPR Information with a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Caruso assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding.

Who Is The Official Custodian and Owner Of The ALPR Information And ALPR System?

The official custodian and owner of the ALPR Information and ALPR System is Caruso. Caruso's General Manager, Assistant General Manager, and Legal Department have responsibilities for implementing the ALPR System in accordance with Caruso's legal obligations.

How Long Do We Keep ALPR Information?

Most ALPR Information will be retained in the ALPR System for only 10 days. ALPR Information that concerns lost or outstanding tickets will be retained in the ALPR System for 30 days. After 30 days, license plate data is automatically purged from the ALPR System.

How Will You Know If This Policy Has Changed?

Changes to this ALPR Usage and Privacy Policy may be made from time to time by Caruso. Any changes to the Policy will take effect upon posting, and will apply to all ALPR Systems and ALPR Information, regardless of when it was collected, in accordance with applicable law. We will display the "Last Updated" date above so you can check this Policy for any recent update.

For more information, see our Privacy Policy or contact Caruso at alpr@caruso.com or at 323.900.8080.