

License Plate Readers – Usage and Privacy Policy Brookfield Properties - Retail —shopping centers in California

What is the Purpose?

The mall utilizes License Plate Reader (LPR) technology for the purposes of enforcing our *Parking Program* and for *Crime Prevention and Law Enforcement Investigations*. LPR data is NOT used by the mall or third parties for marketing solicitations or target marketing.

Parking Program

LPR technology is used to help identify employee vehicles that are not parked in designated employee parking areas. This helps us maintain prime parking areas for customer use.

- LPR technology is used to help identify non-customer vehicles, examples include commuters, nearby office building workers, students at nearby schools, etc. Parking on our private property while going to other places not associated with the business of the mall is prohibited.
- Repeated non-compliance with our employee parking program and/or abuse of our private property parking lots may result in enforcement actions allowable by lease or local laws. This may include fining a tenant, towing, or temporarily disabling the individual's vehicle in a non-damaging manner with a commercial device intended for such purpose. Towing or the use of a temporary disabling device may require that a fee be paid to release the vehicle.
- We may use the technology to respond to a person who has requested assistance locating their car.

Crime Prevention and Investigation

LPR data may be shared in real time with local law enforcement for the purposes of detecting stolen vehicles, stolen license plates, and/or potentially "wanted" persons.

- LPR may be used to detect vehicles known to be associated with persons that have been banned from the property.
- LPR may be used to assist in detecting vehicles that are suspected of being associated with a recent crime or investigation.
- LPR data may be used to assist law enforcement with criminal investigations.

Collection and Use of LPR Data:

LPR data is collected automatically when a security vehicle equipped with an LPR system drives by a vehicle and reads the license plate.

- The LPR system must be turned on at the time.
- LPR reads are not 100% accurate and may require a visual verification between the LPR data that was read and the actual license plate. This can be accomplished by comparing the photograph of the vehicle taken by the LPR system at the time of the read, or by looking at the actual vehicle.
- We can never expect the LPR system to provide 100% inventory of all vehicles in the parking lot at any specific time.
- Data reads include the license plate number, a photograph of the license plate (which may include parts of vehicle surrounding the license plate), the GPS location of the vehicle, and the time of date of the read (collectively, "LPR Data"). This same information can be observed by any person walking through the parking lot. Additional personally identifiable information is not paired with license plate reads in the LPR system.
- The LPR system is programmed to automatically delete LPR Data from the system after 30 days if the vehicle is not associated with a parking violation or action item concerning mall security or crime prevention, if a vehicle is associated with a parking violation or action item it will generally remain in the system for 180 days after an incident is logged and if in the case a banned vehicle or criminal activity, it may be retained longer. Additionally,

we may keep LPR Data in a separate file if it relates to a specific security or parking matter, we do this for the purpose of managing or investigating that specific matter, claim, or issue.

- Real-time detection of wanted vehicles is facilitated through the LPR system and our third party automated LPR provider (“Service Provider”).
- We will share LPR data if required by a Court Order. For certain mall security investigations, we may share LPR Data with law enforcement or a service provider engaged to assist us with investigations. Additionally, The LPR system allows us to give Service Provider permission to share LPR Data with local law enforcement agencies and typically we grant such permission to the police department that serves the mall. In such instances, the local law enforcement agency has direct access to the LPR system for their lawful purposes and their privacy policy governs their use of the data.
- Our contractors and personnel with access to the LPR system include the on-site security staff that operate the system at the mall and their managers, the mall management staff, and the Brookfield Properties Retail Corporate Security team and these people are trained to use the system and comply with the policies that govern the program and each have a unique user name and password and a record of access is maintained by the LPR system.
- Brookfield Properties Retail Inc. engaged the Service Provider and the Service Provider uses tools to monitor the system and conducts periodic audits of its system.
- Our on-site security staff are trained by their managers and are tasked with correcting known inaccuracies.
- Our Service Provider takes reasonable measures to monitor and maintain the security of the LPR System and we have calendared system reviews.

Our VP of Security is the official custodian of the LPR Data and is responsible for how LPR Data and system is used by our company and our paid contractors.

Who can I contact if I have a question?

- If you have questions regarding the LPR program, please contact the mall manager.

This policy pertains to data collected automatically from the LPR system. We reserve the right to update this policy.

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