

## License Plate Reader Usage and Privacy Policy

Effective Date: 6.29.2017

**Stonestown Shopping Center, LP** ("**Mall LLC**") and its security contractors ("**Security Contractors**," and together with Mall LLC, "**Operators**") use and operate automated license plate readers ("**LPRs**") in 's provision of parking services and parking lot access at the **Stonestown** ("**Mall**") (collectively, "**Parking Services**"), including to employees of tenants in Mall and to Mall guests visiting the property with the intention to shop, dine, attend a theater, or visit an office for business purposes (collectively, "**Shoppers**"). This License Plate Reader Usage and Privacy Policy ("**LPR Policy**") describes how Operators will collect, use and disclose information collected in connection with the LPRs. By utilizing the Parking Services, you agree to, and agree to comply with, the terms of this LPR Policy.

### DATA COLLECTED

The LPRs capture photographs ("**Photos**") and license plate numbers ("**LP Data**") of vehicles parked on Mall property or otherwise utilizing the Parking Services, as well as the location, date, and time that the data was collected (collectively, "**LPR Data**"). The LPR Data is input into a software program ("**LPR Mobile System**") operated by **Operators**. The LPR Mobile System is hosted by NuPark Inc. ("NuPark") and Mall LLC has licensed the LPR Mobile System from NuPark.

### PURPOSES/SHARING LPR DATA/CITATIONS/CONTACT US

Mall LLC collects, uses and shares LPR Data for the following purposes:

- **Security; Law Enforcement.** Operators use LPRs and LPR Data to manage Mall security, including without limitation, to identify vehicles known to be associated with persons banned from the Mall or of interest to Mall security. In addition, Operators may use and share LPR Data with law enforcement to enable law enforcement to assist us in managing security at the Mall and to assist law enforcement in other valid law enforcement purposes, such as locating stolen cars or suspected criminals. Operators may also use and share LPR Data with other third parties as necessary to assist us in managing security.
- **Parking Management.** Operators use LPRs and LPR Data, in conjunction with other information, to monitor and prevent and remedy unauthorized use of our Parking Services, including to enforce Mall parking restrictions with the goal of reserving preferred parking spaces for Shoppers. Operators may use and share LPR Data with law enforcement or other third parties to assist us in managing parking.

Separate from LPRs and LPR Data, Operators collect certain information, including without limitation, license plate information, pertaining to people employed by tenants of the Mall ("**Employee Data**") in a database ("**Data File**") pursuant to a separate privacy policy and terms of use which communicates how the Mall uses Employee Data ("**Parking Portal Agreement**"). This LPR Policy forms a part of the Parking Portal Agreement and is incorporated therein by reference. **The Parking Portal Agreement is available at the Mall Security Office. If you are an employee of a tenant in the Mall, please review the Parking Portal Agreement carefully as it contains important information including how disputes must be resolved through arbitration or small claims court. The Data File may also include data related to security matters (e.g., vehicle information and reference numbers concerning past security incidents).**

The LPR Mobile System automatically cross-checks the Photos and LP Data against the Data File, and certain LPR Mobile System users are notified when the LPR Mobile System identifies a vehicle in the parking lot bearing a license plate that matches a license plate number in the Data File.

The applicable user of the LPR Mobile System may then issue a parking citation if the vehicle is improperly parked (e.g., the vehicle is a non-Shopper vehicle, or the vehicle registered as belonging to a tenant employee in the Data File, and is not parked in the designated tenant employee parking areas as required). Any citation notice on a vehicle should be read carefully, as Operators may arrange for such vehicles to be towed off the property as stated on the citation and at the owner's expense. Questions concerning towing or citations may be directed to the Mall manager. Questions concerning designated employee parking may be directed to the Mall manager, or an employee may consult with their employer and reference the tenant handbook maintained by their employer.

Employee Data will be shared with third parties as articulated in the Parking Portal Agreement. To the extent this LPR Policy conflicts with the Parking Portal Agreement: i) this LPR Policy will govern LP Data and Photos; and ii) the Parking Portal Agreement will govern Employee Data.

- **Compliance with Laws.** Operators may use and share LPR Data, including with law enforcement and other government entities, to cooperate with law enforcement agencies and to comply with laws, regulations, court orders and subpoenas, and other similar requests for information by authorities.
- **Other Legitimate Uses.** Operators may use LPR Data as necessary to maintain the LPR Mobile System and other Mall LLC systems. Operators may use and share LPR Data if we believe such use or disclosure is necessary to

enforce Mall LLC's rights, to protect the safety of Shoppers and other Mall guests or others when they access the property, and to assist us in fraud prevention or investigation.

#### **AUTHORIZED USERS OF THE LPR MOBILE SYSTEM**

Authorized users of the LPR Mobile System may include the following people working for, or supporting, Mall management and/or employed by a subsidiary of GGP Inc., which has an ownership interest in the Mall: General Manager, Operations Manager, and the VP of Security ("**Mall Employees**"). In addition, authorized users of the LPR Mobile System may include the following people employed by Security Contractors: Security Director, Assistant Security Director, Security Supervisor, Security Dispatcher, Regional Managers, and Security Officers ("**Contractor Employees**"). NuPark, as the developer of the LPR Mobile System, may also access the LPR Mobile System. The Vice President of Security is responsible for providing or limiting access to the above named parties. The Vice President of Security is the official custodian of the LPR Data and is responsible for how it is used.

Mall Employees and Contractor Employees, who have a legitimate business need, are authorized to use and access the LPR Mobile System and LPR Data after they have been made aware of the policies that govern the LPR Mobile System. Mall LLC trains Mall Employees who have access to the LPR Mobile System on how to best capture images and use the LPR Mobile System, and on the policies that govern the program. Security Contractors train Contractor Employees who have access to the LPR Mobile System on how best to capture images and use the LPR Mobile System, and on the policies that govern the program.

#### **MONITORING OF THE LPR MOBILE SYSTEM AND THE LPR DATA**

NuPark maintains usage logs concerning the LPR Mobile System, which track information such as when the information in the LPR Mobile System is accessed, the IP address and username accessing the LPR Mobile System, and queries made when using the LPR Mobile System, among other things. Mall LLC may audit such records from time to time. Operators and NuPark have implemented reasonable security procedures and practices designed to protect the LPR Data as required by applicable law.

#### **ACCURACY OF LPR DATA**

NuPark takes reasonable measures to ensure the accuracy of LPR Data, to correct for data errors, and to use tools to monitor and improve performance of the LPR Mobile System.

#### **RETENTION AND DESTRUCTION OF DATA CAPTURED BY THE LICENSE PLATE READERS**

NuPark automatically deletes LP Data, including a time/date stamp, from the LPR Mobile System after 6 months. NuPark automatically deletes photos from the LPR Mobile System after 60 days. Should any LPR Data be needed to assist with a security or law enforcement matter, it may be retained indefinitely, in paper and electronic forms, as part of the security file until Operators determine it is no longer needed; in addition, it may be shared with law enforcement, which may retain it in accordance with its own retention policy. LPR Data may also be retained for a longer period if required by law or other legal process. Any LPR Data shared with a law enforcement agency is subject to that agency's applicable policies.

#### **UPDATES/EXCLUSIONS**

Mall LLC reserves the right to update this LPR Policy from time to time. Any changes to the LPR Policy will be posted to this page, and we will note near the top of this page the date when such changes become effective. Therefore, please check this LPR Policy periodically. The updated LPR Policy will apply to any LPR Data collected from the effective date of such update. This LPR Policy only applies to LPR Data collected by LPRs utilized at the Mall. It does not pertain to information collected by Mall LLC in any other manner.