

HILLSDALE SHOPPING CENTER

Automated License Plate Reader (ALPR) Usage and Privacy Policy

Published pursuant to California Civil Code §§ 1798.90.51–1798.90.54

Last Updated: April 25, 2026

This Automated License Plate Reader (“ALPR”) Usage and Privacy Policy is published by HSC Property Owner LLC (“we,” “our,” or “us”), the owner of Hillsdale Shopping Center (the “Center”) located at 60 31st Avenue, San Mateo, California 94403. This Policy is published pursuant to the California Automated License Plate Recognition Information Act, California Civil Code §§ 1798.90.51–1798.90.54 (the “ALPR Law”). It is available as a standalone document at hillsdale.com/alpr-policy and is incorporated by reference into the Center’s general Privacy Policy at hillsdale.com.

1. What Is an ALPR System and What Does It Collect?

The Center uses an Automatic License Plate Recognition system provided by Flock Group, Inc. (“Flock”) and branded as the Flock Safety Platform. The ALPR system consists of fixed camera units installed in and around the Center’s parking areas. When a vehicle passes within the field of view of these cameras, the system automatically captures and records information about that vehicle (“Vehicle Tracking Data”), which may include:

- License plate number and state of registration;
- Vehicle make, model, body style, and color;
- Unique vehicle characteristics (e.g., bumper stickers, roof racks, decals) through Flock’s Vehicle Fingerprint® technology;
- Date, time, and geographic location of the capture; and
- Still images or video frames of the vehicle.

You do not need to enter the Center’s premises or interact with Center personnel for your vehicle’s information to be captured — the cameras also monitor public roadways adjacent to the Center’s property. The ALPR system does not collect information about the identity of vehicle occupants and is not a facial recognition system.

2. Authorized Purposes for ALPR Use

We use ALPR information solely for the following authorized security and safety purposes:

- Detection, deterrence, and investigation of theft, vandalism, and other criminal activity on or near the Center’s property;
- Identification of stolen vehicles and vehicles associated with criminal activity;
- Providing information to law enforcement in connection with active investigations, missing persons cases, or AMBER/Silver Alerts;
- General safety and security management of the Center’s parking facilities and common areas; and
- Responding to specific incidents reported by Center tenants, visitors, or law enforcement.

ALPR information is not used for marketing, advertising, tenant screening, employment decisions, or any commercial purpose unrelated to the safety and security functions described above. ALPR information is not used to monitor lawful First Amendment activities, religious practices, political activities, or medical appointments.

3. Authorized Personnel and Training Requirements

Access to ALPR information is restricted to the following personnel, each of whom must complete the training described below before being granted access.

Authorized Personnel

- Property management and security operations employees of HSC Property Owner LLC, including the Assistant General Manager and designated Security Operations staff;
- Security personnel employed or contracted by HSC Property Owner LLC who are specifically designated by the Assistant General Manager as authorized users; and
- Law enforcement officers presenting lawful legal process or responding to an active incident at the Center.

Training Requirements

Before accessing ALPR information, all authorized personnel must complete:

- A mandatory orientation covering the purposes, legal restrictions, and permitted uses of ALPR information under the ALPR Law and this Policy;
- Training on data security protocols, including password management and prohibition on unauthorized sharing of ALPR data; and
- Annual refresher training confirming familiarity with any updates to this Policy or applicable law.

Training records shall be maintained by HSC Property Owner LLC for a minimum of three (3) years and shall be available for inspection upon request by appropriate regulatory or law enforcement authorities.

4. Security Monitoring and Audit Process

We maintain the following security procedures and practices to protect ALPR information from unauthorized access, destruction, use, modification, or disclosure:

- **Technical Safeguards:** ALPR data is stored on password-protected, access-controlled systems provided by Flock Group, Inc. in accordance with Flock's commercially reasonable security standards. Access credentials are issued only to Authorized Personnel and are not shared.
- **Access Logging:** The ALPR system maintains access logs recording each instance of authorized personnel accessing vehicle data, including the identity of the user, the date and time of access, and the records accessed.
- **Physical Safeguards:** ALPR camera hardware is installed in secure locations and monitored by Center security personnel to prevent tampering.
- **Vendor Security:** Flock Group, Inc. maintains security and disaster recovery policies applicable to its platform.

Periodic Audits

The Assistant General Manager of HSC Property Owner LLC, or their designee, shall conduct an annual review of:

- The list of Authorized Personnel with current access credentials, and revocation of access for any individual no longer authorized;
- Access logs, to identify any anomalous or unauthorized access;
- Compliance with training requirements; and
- This Policy's continued accuracy and conformity with applicable law.

Audit findings shall be documented and retained for a minimum of three (3) years. Any material security incident involving ALPR data shall be reported to the legal counsel of HSC Property Owner LLC and, where required by law, to affected individuals and applicable regulatory authorities.

5. Sharing, Transfer, and Restrictions on Sale of ALPR Information

We do not sell, rent, or lease ALPR information to any third party.

Permitted Disclosures

We may share ALPR information only in the following limited circumstances:

- **Law Enforcement:** We will share ALPR information with law enforcement agencies in response to a valid subpoena, court order, warrant, or other lawful legal process, or in response to an emergency involving imminent danger to a person.
- **Flock Safety Network:** As part of our agreement with Flock Group, Inc., our ALPR cameras are connected to the Flock Safety Network, a national database of ALPR data collected from Flock customers (including law enforcement agencies, businesses, and residential communities) across the United States. By operating our cameras, we contribute Vehicle Tracking Data captured at the Center to this shared network. In turn, authorized HSC Property Owner LLC security personnel may access the network's data to assist in identifying vehicles of interest in connection with the authorized security purposes described in Section 2. Our agreement with Flock contractually restricts Flock's use of Center data to the security and operational purposes described in this Policy and to the provision of Flock Services; Flock does not sell Customer Data. Additionally, pursuant to our agreement with Flock, Flock retains the right to anonymize and de-identify data derived from Center captures and to use such anonymized, non-identifiable data on a perpetual basis for platform improvement, diagnostics, and machine learning purposes. Such anonymized data is permanently stripped of identifying details and cannot be used to identify any individual or vehicle.
- **Emergency Situations:** We may disclose ALPR information to emergency responders, medical personnel, or other parties where we have a good-faith belief that disclosure is necessary to prevent imminent harm to a person.
- **Legal Proceedings:** We may use or disclose ALPR information in connection with litigation, arbitration, or other legal proceedings to which we are a party, to the extent permitted or required by law.

Restrictions

ALPR information shall not be shared with any private entity (other than as described above), shall not be used for civil immigration enforcement, and shall not be accessed for any purpose other than those listed in Section 2 above.

6. Official Data Custodian

The official custodian of ALPR information collected at the Center, and the individual responsible for implementing and ensuring compliance with this Policy, is:

Name: Jen Ticzon
Title: Assistant General Manager
Entity: HSC Property Owner LLC (Owner of Hillsdale Shopping Center)
Address: 358 Hillsdale Mall, San Mateo, CA 94403
Email: info@northwoodretail.com
Phone: (650) 586-7750

The Data Custodian is responsible for: (i) maintaining this Policy and ensuring it is publicly accessible on this website; (ii) managing the list of Authorized Personnel; (iii) overseeing annual audits; (iv) responding to requests or complaints regarding ALPR data; and (v) ensuring that all access to and use of ALPR information complies with applicable law.

7. Accuracy of ALPR Information and Error Correction

We rely on Flock’s Vehicle Fingerprint® technology, which is designed to accurately capture vehicle characteristics and license plate information. We recognize, however, that ALPR systems are not infallible. We implement the following measures to promote accuracy:

- Authorized Personnel are trained to verify ALPR hits through secondary confirmation before taking any action based solely on ALPR data;
- ALPR data is not used as the sole basis for any adverse action against a vehicle owner or occupant; and
- In the event of a suspected ALPR system malfunction or pattern of inaccurate reads, we will promptly report the issue to Flock Group, Inc. for diagnosis and correction.

Error Correction Requests

If you believe that ALPR information associated with your vehicle has been inaccurately captured or is being retained in error, you may request a review by contacting our Data Custodian:

- Email: info@northwoodretail.com with the subject line “ALPR Data Correction Request”
- Phone: (650) 586-7750

Please provide your name, a description of the vehicle at issue (including license plate number and state), the approximate date and location of the capture you believe was erroneous, and an explanation of the inaccuracy. We will review your request and respond within thirty (30) days. We will correct or delete inaccurate information to the extent technically feasible and consistent with applicable law.

8. ALPR Data Retention and Deletion

ALPR information captured by the Center’s cameras is retained in the Flock Safety Platform cloud storage for a maximum of thirty (30) days from the date of capture, after which it is automatically

and permanently deleted from the Flock platform in accordance with our agreement with Flock Group, Inc.

The thirty (30)-day retention period applies unless:

- The data has been flagged as relevant to an ongoing law enforcement investigation, in which case we may retain or preserve it pursuant to a lawful legal hold or as required by court order or law enforcement request;
- The data is the subject of a pending litigation hold issued by legal counsel for HSC Property Owner LLC; or
- Applicable law otherwise requires a longer retention period.

We do not maintain separate offline copies of ALPR data beyond the Flock platform except where required for the purposes described above. When a legal hold is lifted or a legal obligation expires, retained data will be deleted as promptly as practicable.

Deletion Process

Deletion from the Flock platform occurs automatically at the end of the 30-day retention period via Flock's system architecture. For any ALPR data separately preserved by HSC Property Owner LLC (e.g., pursuant to a legal hold), deletion shall be authorized by the Assistant General Manager of HSC Property Owner LLC or legal counsel upon confirmation that the applicable retention obligation has expired.

9. Your Rights Regarding ALPR Information

California residents have certain rights with respect to ALPR information under the ALPR Law. You may submit a request to:

- Obtain information about the ALPR information collected about your vehicle;
- Request correction of inaccurate ALPR information (see Section 7); or
- Inquire about how your ALPR information has been used or shared.

To submit a request, contact our Data Custodian using the information in Section 6. We will respond to verifiable requests within thirty (30) days. Please note that due to the 30-day automatic deletion cycle, ALPR information older than 30 days will no longer be available in our systems absent a legal hold.

We do not discriminate against individuals who exercise rights under this Policy or the ALPR Law.

10. Updates to This Policy

We will review and update this Policy at least annually and whenever there is a material change in our ALPR practices or applicable law. The "Last Updated" date at the top of this document reflects the most recent revision. We encourage you to review this Policy periodically.

This standalone ALPR Policy is also incorporated by reference into the Hillsdale Shopping Center general Privacy Policy, available at hillsdale.com. Questions or requests may be directed to our Data Custodian at info@northwoodretail.com or (650) 586-7750.

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