



GENERAL ORDERS §10102

Automated License Plate Recognition Systems:

Use of Data

Revision Date: November 2, 2016

Effective January 1, 2016, Patrick K. Willis Company Inc. (PKW) employees who receive, access, retrieve, or otherwise view or handle any information distributed to the company by its license plate recognition (LPR) partners consent to this policy by virtue of employment at the order of the Chief Compliance Officer.

POLICY

PKW employees may not access LPR information for any purpose other than the permissible uses afforded by our LPR partners and in accordance with PKW policies. Permissible uses fall generally under the categories of verifying addresses, updating account information, or entering the information into PKW's system of record. At no time is an employee authorized to access this information without a manager's knowledge and written approval.

LPR data is submitted to PKW's system of record in the form of the image of the vehicle, the image of the vehicle's license plate, and the GPS coordinates of that vehicle. **No consumer data is transmitted or received via these submissions.** An email notification is generated and sent to a single dedicated email address with controlled access. LPR email notifications **do not** contain any personally identifiable information or non-public personal information. All LPR information stored in PKW's system of record is encrypted and access is controlled. Only authorized LPR dispatchers, customer service representatives, and investigators may view the notification emails distributed to and by the LPR dispatchers.

PKW has no control over, and assumes no responsibility for, the accuracy of the LPR information received. PKW will make all reasonable efforts to notify our LPR partners when we become aware of any inaccuracies or errors within the LPR information. LPR information will be retained for a minimum of seven (7) years or as otherwise required by our clients.

Notifications will be held indefinitely for periodic system audits as required by California law. All information sent by our LPR partners is monitored by PKW's LPR manager and all LPR personnel must report any confirmed or suspected breach of security to the IT Department.

Consumers with concerns relating to this policy may contact PKW at 1-800-398-6480 or via ComplianceOffice@pkwillis.com.