

Automated License Plate Recognition (ALPR) Policy and Notice at Collection

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Welcome to the Automated License Plate Recognition (“ALPR”) Policy and Notice at Collection of Caruso Management Company, LLC and its affiliates (collectively, “Caruso”, “we,” “us,” or “our”). This policy addresses the following topics:

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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”)—and cell phone information that you may input into kiosks when parking at certain Caruso facilities. 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, The Americana at Brand, The Commons at Calabasas 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 Database"), where it is stored temporarily and may be accessed and used as provided below.

We use two forms of ALPR that are independent of each other. One facilitates parking functionalities ("Parking ALPR System"), and the other is used for security purposes ("Flock ALPR System", and together, the "Caruso ALPR Systems"). Data is not shared between the Parking ALPR System and the Flock ALPR System. The Commons at Calabasas uses the Flock ALPR System, but not the Parking ALPR System.

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

For purposes of the Parking ALPR System, the following parties are authorized to collect ALPR Information and associated cell phone numbers on the Properties, or to access and use the ALPR Information and cell phone numbers from the Parking ALPR System:

- Caruso, owner of the Properties and of the Caruso ALPR Systems and ALPR Information;
- LAZ Parking Management, which operates the Properties and the ALPR System on behalf of Caruso. Employees with the following job titles have access to the Parking ALPR System: LAZ Supervisor, LAZ Auditor, LAZ Assistant Manager, and LAZ Manager;
- Technology vendors to Caruso that provide support and maintenance for the Parking ALPR System, and job titles of employees authorized to access or use the ALPR Information or Parking ALPR System:
 - Sentry Control Systems – Technician
 - Inex Technologies, LLC – Technician
 - Zamir Recognition Systems, Ltd. – Technician
 - Tech Solutions LLC – Technical Engineer
 - Hitachi Solutions, Ltd. – Architect; Consultant
 - FlashParking, Inc. – Technicians
 - Salesforce – Contractors
 - Globant – Contractors
- Employees and providers for each of the above ("Authorized Personnel").

For purposes of the Flock ALPR System, the following parties are authorized to collect ALPR Information on the Properties, or to access and use the ALPR Information from the Flock ALPR System:

- Caruso, owner of the Properties and of the Caruso ALPR Systems and ALPR Information;

- Local law enforcement agencies:
 - Los Angeles Police Department
 - Beverly Hills Police Department
 - Glendale Police Department
 - Los Angeles County Sheriffs' Department
 - Ventura County Sheriffs' Department
 - California Highway Patrol
- Flock Group, Inc., which provides support and maintenance for the Flock ALPR System.
- Authorized employees and providers for each of the above ("Authorized Personnel").

Caruso's General Manager, Assistant General Manager, Concierge Manager, Assistant Concierge Manager, and Concierge are authorized to collect ALPR Information or access or use the Caruso ALPR Systems.

What Are the Authorized Purposes for Collecting and Using ALPR Information?

Caruso and its providers may collect and use ALPR Information and associated cell phone numbers 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;
- Communicate with parkers regarding parking fees and with guests regarding goods, services, and offers relevant to the Caruso facility that guests are visiting;
- Communicate with service providers and other third parties that help us fulfill any of these purposes;
- Provide security for the Properties, or protect our rights;
- Identify and track abandoned vehicles;
- Count and check vehicles parked overnight;
- Identify stolen vehicles and trespassers and report them to law enforcement; 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 Are People Trained On How To Use The ALPR System?

Authorized Personnel who access or use the ALPR System are trained on appropriate use of the Caruso ALPR Systems and ALPR Information. Specifically, Authorized Personnel will be trained on the proper use and handling of ALPR data prior to being granted access. Such training includes system access safeguards, system use, collecting system data, privacy, and restrictions on the sharing of data. This ALPR policy shall be reviewed by all Authorized Personnel with access to the system on an annual basis. No Authorized Personnel shall be given a username or password to access ALPR data without being trained and having read the ALPR policy.

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 info@caruso.com or 1-855-490-5500. Authorized Personnel visually verify ALPR Information when a ticket is issued or if there is a mismatch when a car leaves a parking facility, and correct data errors. 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 Caruso ALPR Systems 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 Sell or Share ALPR Information With Third Parties?

Caruso and its providers do not sell ALPR Information or associated cell phone data and do not share that information or data with "third parties," as that phrase is defined in the California Consumer Privacy Act, for the purpose of cross-context behavioral advertising. Caruso may disclose that information and data to Authorized Personnel, service providers, 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 Caruso ALPR Systems is Caruso.

How Long Do We Keep ALPR Information?

Data from the Parking ALPR System and associated cell phone numbers will be retained for 90 days for those who are not active Caruso Signature Members or contract parkers, and for those who are—for as long as reasonably necessary to provide parking services; to maintain, service, or close the Members' or contract parkers' accounts; or to comply with any legal or contractual requirements Caruso may have. ALPR Information that concerns lost or outstanding tickets will be retained in the ALPR System for 90 days. After 90 days, the ALPR Information 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 info@caruso.com or 1-855-490-5500.