
**Aviano Owners Association
Association Surveillance Camera Rules**

RECITALS

A. The *Aviano Master Declaration of Restrictions* ("Declaration" or "CC&Rs"), authorizes the Board of Directors ("Board") for Aviano Owners Association ("Association") to adopt rules applicable within the Aviano development ("Development"). Specifically, Sections 1.21 and 5.7.2 of the CC&Rs authorizes the Board to adopt and enforce operating rules concerning the use of the Common Area as it deems proper.

B. These Rules apply to cameras installed by the Association in its discretion in the Development and the images/videos created by these cameras and apply to the Association's use of any type of surveillance camera in the Common Area, including without limitation to standard wired cameras, Wi-Fi enabled cameras, Automated Plate Recognition Systems ("ALPR System") or other similar devices (collectively "Association Surveillance Cameras"). These Rules govern the Association's use of the images/video created by these cameras. "The Automated License Plate Recognition System – End-User Only Usage and Privacy Policy" ("ALPR System Privacy Policy") is **incorporated** into these Rules by reference.

C. The purpose of these Rules is to provide guidelines for the use of Surveillance Cameras by the Association in a way that enhances the Association and aids in governance, while respecting the reasonable privacy of residents.

D. The terms defined in the Declaration have the same meaning when used herein unless the context clearly indicates a contrary intention. The Board adopted these Surveillance Camera Rules ("Rules") in accordance with the relevant provisions of the Declaration, Bylaws, and California law.

RULES

1. **Definition.** The term "Association Surveillance Cameras" refers to any camera system the Association installs under its own authority. It is not limited to surveillance cameras and system the Association owns and includes surveillance cameras and system the Association may lease or otherwise use.

2. **Purpose.** Association Surveillance Cameras are for surveillance purposes only and are not designed to provide security, alert law enforcement in the event of criminal conduct, detect or prevent fires, or otherwise secure or protect any portion of the Development. **Persons should not rely on these cameras for providing security or protection.**

The primary purpose of utilizing Association Surveillance Cameras in the Common Area is to monitor activities and to assist the Association in fulfilling its obligations under the governing documents. The primary use of Association Surveillance Cameras will be to record images and/or video for use by the Association's Directors and management staff who are responsible for investigating alleged violations of the governing documents. These Rules do not imply or guarantee the Association Surveillance Cameras will be in use or monitored, continuously, or otherwise.

3. Unmonitored. Association Surveillance Cameras are not monitored. Rather, the camera system records and stores images and/or video, which can be subsequently accessed and viewed by the Association or persons listed in Section 4 of these Rules. Association retention of information stored in the ALPR System is subject to the retention period stated in the ALPR System Privacy Policy.

4. Authorized Users. To protect the privacy of Owners; residents; and their guests, visitors, and tenants, access to the Association Surveillance Cameras' recorded images and/or video shall be limited to the following persons and entities: (a) Directors, as authorized by the Board, (b) Association's managing agent, (c) Association's legal counsel, and (d) law enforcement agencies.

5. Access by Association. Management and authorized Directors may access recorded images and/or video, for the purpose of investigating alleged violations of the Association's governing documents, or to view images and/or video depicting unlawful activity in the Common Area or in the case emergencies, or otherwise. Management or directors are authorized to assist with basic troubleshooting of the Association Surveillance Cameras, including without limitation adjusting cameras, performing software updates, and rebooting the surveillance system.

6. Access by Owners. Owners and residents are not permitted to view recorded images and/or videos taken by Association Surveillance Cameras unless required by law or permitted by the Board. Notwithstanding the foregoing, an Owner may be given limited access to view recorded images and/or video for either of the following exceptions: (a) the images and/or video are being used as evidence of their alleged violation of the governing documents at a disciplinary hearing, or (b) another purpose, as may be approved by the Board. An Owner may request limited access to view recorded images and/or video by submitting a written request to management.

7. Record Keeping. Access to the recorded images and/or video by authorized persons and entities identified in Section 6 of these Rules shall be documented in any manner the Board deems appropriate. This record shall indicate the date, time, purpose, and authorized person or entity that viewed the recorded images.

8. Retention. The Association shall maintain collected data for a period of 30 days, after which the recordings and associated data may be deleted based upon the settings and retention specifications for the camera data system.

CERTIFICATE OF CONSENT AND ADOPTION

The undersigned declares that they are the Secretary of the Association and that the foregoing Rules were approved by at least a majority of the Directors at which a quorum of the Directors was present at the meeting of the Board held on _____, 2026, and that said rules remain in full force and effect.

Dated: _____, 2026

By: _____
_____, Secretary

AVIANO OWNERS ASSOCIATION
AUTOMATED LICENSE PLATE RECOGNITION SYSTEM – END-USER ONLY

USAGE AND PRIVACY POLICY

This policy governs the use by Aviano Owners Association ("Association") of the Automated License Plate Recognition System ("ALPR System" or "System") operated by Flock Safety, and applies to the Association's Board of Directors who have access to or use the System. The Association is an "end-user" as that term is defined in Civil Code Section 1798.90.5(a) and is responsible for implementing this policy. The ALPR System is a searchable computerized database resulting from the operation of one or more mobile or fixed cameras combined with computer algorithms to read and convert images of registration plates and the characters they contain into computer-readable data. The information contained in the System ("LPR Data" or "LPR Information") includes images of license plates, images of vehicles, the date, time and location when the images were collected, and the license plate characters numbers, and state associated with images. The images stored in the System are collected from areas visible to the public where there is no reasonable expectation of privacy. The collection and dissemination of the information contained in the System is protected activity under the First Amendment to the US Constitution. Moreover, LPR Data stored in the System does not include any personally identifying information ("PII"), or information which relates the license plate image to the driver or registered owner of a vehicle. PII contained in vehicle registration information is protected by federal law (Driver's Privacy Protection Act, Title 18, US Code, Section 2721 et seq.) and state laws. Law enforcement and other users may have access to vehicle registration information, and other sources of PII, which they may correlate with LPR Data stored in the System to create vehicle hotlists in accordance with the above referenced federal law.

(A) Use and Collection of LPR Data

The Association authorizes collection of LPR Data by Flock Safety for the use of the Association consistent with this policy. The authorized uses of the ALPR System are by the Board of Directors to identify or ascertain the location of a specific vehicle in order to provide information to law enforcement with respect to criminal activity. The Association does NOT make the ALPR System, or data it contains, available to individuals for personal, non-commercial or commercial purposes, or any other purpose beyond providing information to law enforcement with respect to criminal activity.

(B) Users and Training

The members of the Board of Directors are authorized to use the ALPR System to use the LPR Data for purposes of providing information to law enforcement with respect to criminal activity.

All authorized members of the Board of Directors that use LPR Information are required to read and understand any documents, including, but not limited to, training and documentation provided by Flock Safety, necessary to understand the ALPR Information and use the ALPR System. Authorized members of the Board of Directors that use LPR Information will receive an individual username and password protecting access to the LPR Information.

(C) Monitoring and Compliance

The Association is not aware of any individual privacy interest applicable to the anonymous LPR Data contained in the System, however, because the Association considers LPR Data important to the Association, it maintains usage logs, and periodically audits such logs, to ensure the security of our data assets and compliance with this policy. The usage logs include the following information:

- The date and time LPR Data is accessed.
- The IP address from which the LPR Data is accessed.
- The license plate number or other data elements used to query the System.
- The username of the person who accessed the information.
- The purpose for accessing the information.

(D) Sale, Sharing or Transfer of LPR Data

The Association collects data for providing information to law enforcement with respect to criminal activity. It does not collect data on behalf of law enforcement agencies or commercial purposes. The Association allows law enforcement agencies to query the System directly for law enforcement purposes consistent with this policy, California and Federal law. Except as otherwise stated in this policy, the Association does not share this information with anyone except for members of the Board of Directors, Association's Management and legal counsel.

(E) Custodian or Owner of the ALPR System

Flock Safety is the custodian and owner of the ALPR Systems. The Association is an "end-user" as that term is defined in Civil Code Section 1798.90.5(a) and is responsible for implementing this policy.

(F) Accuracy of LPR Data

The collection of LPR Data is automated so that the license plate images, and the details of when they are collected, are included in the System without review, along with the computer translation of the license plate number. Although very infrequent, the license plate translation is sometimes inaccurate or incomplete. To avoid mistaken use of LPR Data, Flock Safety will confirm the computer translation before taking any action as a result of LPR Data. Flock Safety also corrects mistaken translation and other database errors when identified. To avoid mistaken use of LPR Data collected by Flock Safety the Association will confirm the computer translation before taking any action as a result of LPR Data. The Association also corrects mistaken translation and other database errors when identified.

(G) Retention

Flock Safety stores all LPR Data in an encrypted format. Flock Safety stores all LPR Data for thirty (30) days, unless the LPR Data is in use for an ongoing investigation.

The Association retains LPR Data gathered by Flock Safety for thirty (30) days, and potentially longer if necessary for providing information to law enforcement with respect to criminal activity if the Association is aware of such activity and the need for data before the information is deleted. The Association periodically evaluates the use of historical LPR data to determine if the cost to maintain the data exceeds its value.

(H) Information Breach

In the unlikely event of the ALPR System and information contained therein being exposed to unauthorized persons, Flock Safety or the Association shall notify all persons who are believed to be affected or have had their information compromised pursuant to applicable California and Federal law.

(G) Revisions of Usage and Privacy Policy

The Association reserves the right to revise this policy at any point in the future and such changes will be retroactively applicable to data collected prior to any revision of this policy.