

Oakmore Community LPR Program (OLCP) Privacy and Usage Policy (Revised 8.2.2026)

This Privacy and Usage Policy (PUP) governs the use of the Flock Safety Automated License Plate Recognition (ALPR) system operated by the Oakmore Homes Association (OHA) on behalf of its members and the residents of the Oakmore neighborhood, in the program known as the Oakmore Community LPR Program (OCLP).

1. DEFINITIONS

The terms used in this document have the following meanings. (See the [Flock Safety Terms and Conditions](#) for additional definitions.):

- 1.1 “ALPR” or “LPR” shall mean Automated License Plate Recognition. Cameras with ALPR capability have the ability to capture and store digital images of automobiles and use automatic-character-recognition software to identify and store license plate numbers and other identifying vehicle characteristics. They are also referred to as License Plate Readers (LPRs) or License Plate Recognition (LPR) cameras.
- 1.2 “Flock Safety” is the vendor supplying the hardware, software and associated services as contracted by the OHA.
- 1.3 “Flock Safety system”-shall mean deployment of mono-directional LPRs by Flock Safety on behalf of the OHA: to capture still images of license plates and attributes of vehicles entering Oakmore. The system automatically interprets, manages and stores the data obtained by the cameras in a secure, searchable database operated by Flock Safety.
- 1.4 “Law enforcement agencies” shall mean the designated law enforcement agencies as selected by the OHA Board and may be added or deleted at the OHA Board’s discretion.
- 1.5 “OHA” shall mean the Oakmore Homes Association, a non-profit legal entity that maintains and enforces a [Declaration of Restrictions \(CC&Rs\)](#) that applies to real property which is deed restricted to follow the CC&Rs.
- 1.6 “OCLP” shall mean the Oakmore Community LPR Program, comprised of the Flock Safety System and managed by the OHA’s Officers, Directors and appointed committees to enhance public safety and assist law enforcement investigations.
- 1.7 “SCC” shall mean the OHA Security Camera Committee which consists of at least one member of the OHA Board of Directors, OHA members and non-members who provide the OHA’s Officers and Directors with operational, technical and administrative assistance in running the OCLP.

2. ADMINISTRATIVE ROLES

- 2.1 The OHA Board of Directors and Officers oversee the OCLP. They engage with Flock Safety on all contractual matters including lease payments for the system and oversee the activities of the SCC.
- 2.2 Members of the SCC shall perform the following duties in the operation of the Flock LPR system:
 - a. The “SCC Administrator” serves as the official manager of the Flock LPR system and data, receives anonymized usage reports from Flock on a regular basis, and is the first point of contact for Flock Safety and law enforcement agencies regarding access to the system.
 - b. The “SCC Director” assists the OHA Board of Directors with raising funds for the program, informing all

residents of the area of how to sign up for the safe/opt-out lists, and maintaining a public-facing website containing usage statistics, a Frequently Asked Questions (FAQ) page about the OCLP, and the OCLP Privacy and Usage Policy (PUP).

c. The “SCC Auditor” regularly monitors the system’s network access to verify that only authorized law enforcement agencies access our LPR data and only for legitimate law enforcement purposes as allowed by state and local statutes and contractual obligations. The SCC Auditor also verifies that no federal or out-of-state authorities have accessed or attempted to access our data for any reason. The SCC Auditor is granted “Audit” authority, but cannot access the LPR images or data.

d. Other members of the SCC shall serve as Back-up Administrators or assist the Director in performing the above duties as requested.

3. ACKNOWLEDGEMENTS AND RESPONSIBILITIES

3.1 Flock Safety acknowledges that it shall:

- a. install and maintain the equipment, and remove the same at the end of the contract
- b. obtain all required permissions before installing the cameras
- c. securely store and maintain LPR data for the OHA in compliance with applicable law
- d. encrypt data in transit from the camera to cloud storage and encrypting data at rest in the cloud
- e. ensure accuracy of the LPRs and correct license plate translation errors when identified– *** see footnote below
- f. purge all data collected after 30 days from their storage devices
- g. generate anonymized reports on system usage including:
 - ☐ Number of times each law enforcement agency accessed our cameras
 - ☐ Number of vehicles imaged on our cameras that are on their hot lists of stolen vehicles or vehicles being sought in connection with criminal activity.
- h. train the system administrators on the use of the Flock system overall, and specifically how to use the web interface to perform administrative duties

3.2 OHA, either through its Board of Directors or its Security Camera Committee acknowledges that it shall:

- a. negotiate and engage in contracts with Flock Safety
- b. be the owner of the data captured by the Flock Safety system
- c. provide access to the data to authorized law enforcement agencies
- d. control use and access of the system and its data in compliance with applicable local and state law
- c. solicit and collect funds for the OCLP and pay invoices for associated services
- d. obtain permission from private property owners to have a camera installed on their property
- e. notify Flock Safety of any camera damage or need to repair their equipment
- f. notify Flock Safety three months prior to the expiration of the contract of their intent to cancel, renew, or expand the contract

**** Flock reports that their LPRs have 93% license plate reading accuracy, 95% vehicle color accuracy, 92% vehicle make accuracy, and 98% vehicle type accuracy. Because of Flock’s machine learning technology, these rates continue to improve. Some of the other procedures to ensure the accuracy of the data include:*

Flock Safety automatically confirms both the Optical Character Recognition (OCR) plate number and the State of the plate are a match before sending a Hot List notification -- this is an extra step that many other LPR systems do not perform. In the event that an LPR camera picks up a low-confidence plate read, Flock proactively sends an alert to caution the user. Flock also advises law enforcement agencies using the data to visually confirm that the scanned plate matches the alert with regard to plate letters, numbers, and issuing state prior to conducting a traffic stop. In addition, The National Crime Information Center (NCIC) database is updated every 12 hours and to ensure the most accurate and up-to-date data. Finally, Flock updates its own system every 6 hours, which helps to ensure that the information reported by Flock's ALPR system is as current and accurate as possible.

4. KEY ELEMENTS OF THE OAKMORE COMMUNITY LPR PROGRAM (OCLP)

- 4.1 Purpose: Identification of vehicles entering or leaving the neighborhood that might be associated with criminal activity to enhance the security and safety of residents by enabling local law enforcement to apprehend the perpetrator(s) of those crimes.
- 4.2 Privacy: The images stored in the system are of motor vehicles, not of the occupants in the vehicle. Images are collected from areas visible to the public where there is no reasonable expectation of privacy. Per the Flock Safety legal department: "Flock's License Plate Reader technology is specifically designed to capture objective vehicle data, such as license plate numbers, vehicle make, model, color, and other identifying characteristics relevant to public safety. Our technology does not use facial recognition, nor is it equipped with any hardware or software capable of biometric identification. Protecting privacy and ensuring the responsible use of technology are central to our mission, and our systems are designed with these principles in mind."
- 4.3 Prohibited uses: Sharing of information across state lines, immigration enforcement, traffic enforcement, harassment or intimidation, usage based solely on a protected class (i.e., race, sex, religion), personal use.
- 4.4 Security: Administrative, operational, technical, and physical safeguards shall be used to protect OCLP data from unauthorized access, use, destruction, modification, or disclosure as follows:
 - a. Administrative: No officers, employees, members, or agents of OHA shall have direct access to the vehicle data. Only trained and authorized SCC Administrators and Auditors will have access to the system and only then in order to perform administrative and/or audit duties. All administrative access will be password protected and logged by the Flock system. The SCC Administrator, at the Administrator's discretion, may do searches upon request. The request must come from a verified resident within the circumference of our Flock system and be accompanied by a Police Incident number. LPR data will only be released to law enforcement upon their request. Residents will not be provided with any data. Furthermore, those requesting a search should amend their police report to indicate that we may have relevant LPR data related to their incident.
 - b. Operational: Only specifically identified local law enforcement agencies authorized by OHA will have access to the data. The Flock system will log all access by law enforcement. Only designated law enforcement agencies are allowed to monitor the data. Such authorization can be rescinded at any time. The list of authorized agencies can be viewed on the OCLP [transparency portal](#).
 - c. Technical: All information shall be encrypted by Flock Safety in transit from the camera to the cloud storage and at rest in the cloud.
 - d. Physical: Flock Safety shall secure all computers and storage devices containing LPR information, as well as ensure through Memoranda of Use (MOUs) that all law enforcement agencies using their system will also

secure all computers and storage devices containing LPR information provided by their cameras.

4.5 Vehicle Information captured by the Flock Safety system contains:

- a. Vehicle image
- b. License plate number
- c. License plate state
- d. Date
- e. Time
- f. Location
- g. Body type
- h. Make
- i. Color
- j. Other vehicle identifying characteristics such as bumper stickers, roof rack, or bicycle rack.
- k. Frequency observed in the last 30 days
- l. Residency (if owned by a registered resident)

(Not captured – images of people in or near the vehicle, video footage or sound. Also see 4.2 above)

4.6 Restrictions on Customer use of Flock Safety system data: Information gathered or collected, and records retained by Flock Safety and OHA, will not be sold, accessed or used for any purpose other than described herein.

4.7 Data Retention Policy: Vehicle data from the Flock Safety system will be available for a rolling period of 30 days. In the event of illegal activity, vehicle information and images may be downloaded by law enforcement for extended storage.

4.8 A Vehicle Safe List designation is available to all residents at OCLP addresses. Vehicles on the Safe List will appear in the Flock database marked as “Resident”. (Note: this designation only appears on images captured within the OCLP system.)

4.9 A Vehicle Opt-Out designation is available to all residents at OCLP addresses. Vehicles on the Opt-Out List will not be captured or stored on the OCLP database. (Note that this exemption only applies to images captured within the OCLP system. This exemption does not apply to any LPRs located outside the OCLP system.

4.10 Notifications:

- a. The existence of Flock Safety Cameras and/or the OCLP should NOT be relied upon by any individual for safety or security. Individuals are encouraged to take additional precautions to ensure the safety of their property.
- b. OHA and Flock Safety are NOT law enforcement agencies and cannot undertake law enforcement activities. Any illegal or suspicious activity should be directly reported to law enforcement for investigation.
- c. The OHA may update or modify this Privacy and Usage Policy (PUP) from time to time. Updated versions will be posted on the OHA website.
- d. If you have any questions about this PUP please contact us at oakmorehomes@yahoo.com.