

City of San José

Privacy Impact Assessment (PIA) – Monterey Rd and Curtner Ave Traffic Safety Monitoring

Date of initial publication: December 17, 2021

Date of last update: March 16, 2022

Contact – digitalprivacy@sanjoseca.gov

Privacy Impact Assessment (PIA) for Monterey Rd and Curtner Ave Traffic Safety Monitoring project

Update (March 16, 2022) - Since release of this assessment, there has been concern voiced by the public, including the Northern California branch of the American Civil Liberties Union (ACLU) and the National Association of the Advancement of Colored People (NAACP). This has been reflected in the assessment. Additionally, clarified that current ALPR usage protocol is dictated by Police Duty Manual L4207, but may be updated for this project and general ALPR in future council meetings. Updated ALPR protocol will be made available at sanjoseca.gov/digitalprivacy prior to approval.

Purpose of the Privacy Impact Assessment (PIA): The PIA is an analysis of how personally identifiable information (PII) is collected, stored, protected, shared, and managed to enable a project, system, tool, or other service (collectively “Projects”). The PIA identifies and assesses privacy implications in proposed Projects, and provides recommendations to reduce privacy concerns and increase the civic value of the Project.

Project context: In 2021 the intersection of Monterey Rd and Curtner Ave had 3 hit & run fatal accidents with no suspect. To reduce accidents, the City is exploring traffic barriers, intersection design, and traffic light timing. To increase accountability, the City plans to record video around the intersection.

Executive Summary

Our Privacy Policy has 7 standards. Based on this Privacy Impact Assessment, the Project:

- Presents no significant concerns for 4 of 7 standards: Notice, Retention, Accountability, Sharing
- Presents addressable concerns for 3 of 7 standards: Accuracy, Equity, Minimization
- Presents prohibitive concerns for 0 of 7 standards

Based on the defined data usage and generally positive response from the Public, the Project is approved. Since release of this assessment, there has been concern voiced by the public, including the Northern California branch of the American Civil Liberties Union (ACLU) and the National Association of the Advancement of Colored People (NAACP). Additional recommendations to reduce privacy concerns and increase civic value are detailed below.

Recommendations: The Police Department and Department of Transportation should consider following recommendations during the pilot:

1. Require a person to visually verify any “hit” from the Automated License Plate Reader (ALPR) before acting on an alert.
2. Monitor the number of cases charged and eventual convictions that use evidence from this pilot project, including video footage and license plates read.
3. Continue to allow online public feedback throughout the pilot period to log any new concerns arising from the project.
4. While the assessment below approves 24/7 video recording, further conversations with the Police department indicate that video recording may not be necessary. We recommend removing the video recording feature if deemed non-essential for law enforcement.

Details of Recommendations:

The following standards in our Privacy Policy raise concerns for the Project, which are likely addressable:

- Accuracy
 - Concern 1: Cameras and systems using Automated License Plate Reader (ALPR) software can mis-identify a vehicle or license plate through inaccurate reads or an inaccurate “hot list”. A camera may misread a license plate number, or the camera may accurately read the plate but have an outdated hotlist that, for example, reports a car is stolen when it was already returned.
 - *Recommendation 1:* To reduce inaccurate reads, require a person to verify any “hit” from the Automated License Plate Reader (ALPR) before acting on an alert. This can be a simple visual confirmation, such as a person confirming that the identified plate number is the same as the plate in the video/picture. To reduce inaccurate “hot lists”, ensure live updates to vehicle “hot lists”. If not possible, then practice nightly updates on police systems.
 - Concern 2: The City may lose track of the camera’s effectiveness and impact without tracking key metrics.
 - *Recommendation 2:* Monitor the number of cases charged and eventual convictions that use evidence from this pilot project, including video footage and license plates read. This should include the following information:
 1. # of Cases *opened* in part due to footage or other data captured from the cameras such as license plates (collectively “project data”), by case type (vehicle, robbery/auto theft, etc.) and level (violent felony, felony, misdemeanor)
 2. # of Cases *solved* in part due to project data, by case type and level
 3. # of Convictions which used project data as evidence, by case type and level
 4. # of Unsolved reported crimes at intersection before and after project data collection began, by case type and level
- Equity

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- Concern: Currently the public perception of this project is generally positive, but it's possible concerns not yet identified may arise as the pilot is put into action. Update (as of March 16, 2022): Since release of this assessment, there has been concern voiced by the public, including the Northern California branch of the American Civil Liberties Union (ACLU) and the National Association of the Advancement of Colored People (NAACP).
- *Recommendation*: Keep online public comment open for citizens to report thoughts on the project throughout the pilot
- Data minimization
 - Concern 1: 24/7 video, while supported in the public comments, Council meetings, and being approved by the Digital Privacy Office, may not be needed for investigation purposes.
 - *Recommendation 1*: Video recording should be removed if not essential for law enforcement. To be resolved in future discussions.

Inventory of Personally Identifiable Information (PII)

The following form details the types of Personally Identifiable Information that is collected, shared, processed, or otherwise used for this Project. Personally Identifiable Information includes information that could directly or indirectly identify an individual. Some examples include one’s full name, home address, or credit card information.

Mark and detail any data collected, stored, shared, or used by the project, system, or tool (collectively “Projects”) that falls into the following categories. You can mark a box () by highlighting it in red () or replacing the box with a red X. Provide additional detail in red for this section only. For a more detailed list of PII, refer to the PII reference list at the end of this document.

Category of PII	Sub-categories
<input checked="" type="checkbox"/> Personal Data	<p>General: <input type="checkbox"/> Full name; <input type="checkbox"/> Home address; <input type="checkbox"/> Date of birth; <input type="checkbox"/> Place of birth</p> <p>Technology: <input type="checkbox"/> Email address; <input type="checkbox"/> Phone, laptop, or other device IP¹ address; <input checked="" type="checkbox"/> Vehicle make, model and year</p> <p>Government-issued ID: <input type="checkbox"/> Driver’s License; <input type="checkbox"/> Passport; <input type="checkbox"/> Social Security Number; <input type="checkbox"/> Federal Employer ID or Tax ID; <input type="checkbox"/> Employee ID number; <input checked="" type="checkbox"/> License Plate</p> <p>Financial data: <input type="checkbox"/> Credit or debit card information; <input type="checkbox"/> Bank account, brokerage account or other financial information</p> <p><input type="checkbox"/> Other written or scanned information that can directly tie to an individual or household – detail below:</p>
<input checked="" type="checkbox"/> Sensitive PII or demographic-related PII	<p>Health data: <input type="checkbox"/> Biometric data; <input type="checkbox"/> Genetic data; <input checked="" type="checkbox"/> Physical identifiable characteristics; <input type="checkbox"/> Other health records</p> <p>Race/Ethnicity: <input type="checkbox"/> Race or ethnic origin; <input type="checkbox"/> Nationality; <input type="checkbox"/> Immigration status</p> <p>Religion/Politics: <input type="checkbox"/> Religious affiliation; <input type="checkbox"/> Political affiliation; <input type="checkbox"/> Voter status</p> <p>Sensitive personal records: <input type="checkbox"/> Education records; <input type="checkbox"/> Criminal records</p> <p><input type="checkbox"/> Other sensitive written or scanned information traditionally kept confidential – detail below:</p> <p>NOTE: Do not mark if data is only shared/collected/used in aggregate of a population larger than 1,000² (e.g., # of registered voters in San José)</p>

¹ Internet Protocol - An IP address is a unique address that identifies a device on the internet or a local network

² Based on reporting requirements used for anonymity by the US Department of Health and Human Services [AFCARS Foster Care Dataset](#); refer to the [2021 codebook, element #6](#)

Category of PII	Sub-categories
<input type="checkbox"/> Image data	<input type="checkbox"/> Picture that can identify an individual by their face or other physical and contextual information ³ - detail below:
<input checked="" type="checkbox"/> Recording data	<input checked="" type="checkbox"/> Video that can identify an individual by their face or other physical and contextual information – detail below: Video will record in high definition (1080 or 720) around the intersection of Monterey Rd and Curtner Ave/Tully Rd. This video will record faces, physical characteristics, cars, license plates (automatically identified via Automated License Plate Reader technology) and any other information that passes around the intersection. <input type="checkbox"/> Audio that can identify an individual by their voice or other contextual information – detail below:
<input checked="" type="checkbox"/> Geolocation data	<input checked="" type="checkbox"/> Data affiliated with a vehicle, computer, or other device that can be used to identify an individual’s physical location – detail below: Since the camera’s location is known, anyone recorded by these cameras will have their location identified at that point in time (i.e., the City will know they were at the intersection of Monterey and Curtner at 9:03am).
<input type="checkbox"/> Other private or personal information	<i>Detail other data that could directly or indirectly identify an individual:</i>

Describe how and why the project/program uses the personally identifiable information (PII) that is collected:

Category of PII	Detail use of PII and purpose for using this PII (detail all that apply)
Personal Data	General: Technology: Captured via video recording and license plate reading. See “recording data” below Government-issued ID: Captured via video recording and license plate reading. See “recording data” below Financial data: Other:

³ An example of “contextual information” being used to identify someone could include a picture of a license plate, car make model and year, or a picture of someone’s backside next to a house with a visible address.

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Category of PII	Detail use of PII and purpose for using this PII (detail all that apply)
Sensitive PII or demographic-related PII	Health data: Captured via video recording. See “recording data” below Race/Ethnicity: Religion/Politics: Sensitive personal records: Other:
Image data	
Recording data	Video: Provides the Police department with video evidence of felonies such as hit & runs that can be used in an investigation and prosecution. If video is collected, the video can also be used to better understand traffic patterns and ultimately improve the safety of the intersection. The automated license plate reading provides Police with ongoing monitoring to identify vehicle owners of vehicles identified in a felony. Audio:
Geolocation data	Data is tracked since the camera’s location is known, but quickly becomes outdated once an individual leaves the camera’s field of view. Identifying what license plates passed through an intersection at a given time may provide investigators valuable information in felony cases.
Other private or personal information	

Privacy Impact Assessment across Policy factors

Context: The PIA is an analysis of how personally identifiable information is collected, stored, protected, shared, and managed to enable a project, system, tool, or other service (collectively “Projects”). It identifies and assesses privacy implications in proposed Projects. The **system owner** conducts the Privacy Impact Assessment below using the PII Reference List and the Instructions Page.

The system owner responds to privacy-related questions regarding the following areas related to the [City’s Digital Privacy Policy](#):

- Notice
- Retention
- Minimization
- Accountability
- Accuracy
- Sharing
- Equity

NOTE on the term “data subject”: The term “data subject” is used frequently below and refers to the individual(s) which data is being collected on. For example, if someone is filling out their information on a government application, the person filling out the application would be considered the “data subject”. If someone is recorded on a camera, the person recorded would be considered the “data subject”.

I. Notice: Public User Consent, Control & Access

Questions – Notice Impact	Yes	No	N/A	Details / Notes
Are data subjects (see definition above) explicitly informed why their personal data is collected and how it may be used? If not, why not?	X			Notice provided at intersection with link to more details online
Is a data subject notified prior to their data being collected? If not, why not?	X			Notice is visible within 150 feet of approach

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Does the Project require <i>express consent</i> - consent to the project by a clear and recorded action (e.g., checking a box, signing a document, affirming into a microphone)? If yes, explain how in notes.		X		
Are data subjects able to request the service / use the tool without providing personal information?		X		
If data subjects refuse to provide some or all information, are they deprived of any assistance that the tool or organization might otherwise provide? If so, why?	X			Opting-out would mean not passing through or around this intersection.
If personal data is to be used for a purpose other than that originally specified, will data subjects be notified and allowed to opt-out?		X		Data subjects would be notified by an adjustment to the publicly available data usage policy. Technically data subjects could “opt-out” by not passing through the intersection, but this option likely infeasible for most.
Are data subjects explicitly informed how personal data may be shared with other organizations?	X			Via data usage information available online
Are details on the project’s data usage and privacy practices available to the public (e.g., online)?	X			
Was the public consulted prior to project implementation, or will they be consulted prior to implementation? If yes, detail methods of contact (e.g., online comments, in-person outreach with X groups, letters). If not, explain why it is not necessary	X			Community contacted through public hearings in Council meetings, hearings with 100+ community partners through the Mayor’s Gang Prevention Task Force, and public information and opportunity for comment available on San Jose’s digital privacy webpage. Public response for this pilot has been mostly positive across all venues. Written comment was limited (only 11 responses as of publication), but 8 out of 11 respondents reported they are “very comfortable” with the Project and 1 reported they are “uncomfortable” with the Project.
Is there a public communications plan to explain to the public how personal information will be	X			Impact assessment has been made available sanjoseca.gov/digitalprivacy , and notice will be provided at the intersection.

managed and protected following project implementation?				
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II. Retention

Questions – Retention Impact	Yes	No	N/A	Details / Notes
Is there a data retention schedule for personally identifiable information collected by the system? Reference relevant policies, statutes, or other guidance that informs retention policy.	X			Video and ALPR data will be retained for 1 year per CA Civil Code 1798.90.51. If information is used in a claim or pending litigation, it would be kept until litigation is resolved + an additional period that varies by the crime or type of litigation.
Is this data governed by any statutory retention policies from outside the City, i.e. from other agencies or levels of government? If so, list relevant statutes.	X			<ol style="list-style-type: none"> Video would be stored for 1 year in accordance with CA GC 34090.6 ALPR retained for 1 year per CA Civil Code 1798.90.51
Is there a process in place for carrying out the data retention schedule, such as technical rules for deleting or deidentifying data after the retention period expires, or a position responsible for executing on retention policy? If so, explain or attach document detailing retention process.	X			Guided by CA Civil Code 1798.90.51 and the San José Police Duty Manual section L4207

III. Minimization

Questions – Minimization Impact	Yes	No	N/A	Details / Notes
Is all the personal information collected necessary to deliver this service or to the specified activity?	X			
Could disclosure of any PII put any persons in danger (e.g. relating to ethnicity, religion, sexual	X			

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orientation, political views, trade union membership, location etc.)?				
Is there a risk of information or persons being subject to surveillance?	X			
Does the project have a Data Usage Policy, defining how data can and cannot be used? If so, attach to this document.	X			General ALPR usage is defined in the Police Department Duty Manual Section L4207, but likely to be updated by a general ALPR data usage policy in 2022.
Are personal identifiers used for the purposes of linking across multiple data sources or databases? If so, list other databases and purpose.		X		The License plate reader system (ALPR) is stand alone.
Is personal and sensitive data collected but anonymized before being used (e.g., when conducting a survey)? If so, detail the anonymization process. Note if a copy of the personal data stored anywhere, and where it will be stored.		X		
Is information anonymized when used for predictions, forecasts and/or evaluations?		X		
Will information be stored in a centralized location? Detail where the information will be stored. Also detail if data is briefly stored on a device, but then moved to a central location (e.g., camera stores 1-day of recording on device but then sends data to central location).	X			Information will be stored by the ALPR vendor in a centralized secure cloud. Data may be stored on camera for ~24 hours.
Will additional copies of the information be stored or shared to other locations? If so, detail where. Include email clients (e.g., Outlook, Gmail) if information will be shared via email as an attachment.		X		ALPR leads will be stored in a CJIS compliant Government cloud. If the ALPR read becomes of evidentiary value, the office then has the ability to export the ALPR data and upload to SJPD's evidence management system

IV. Accountability

Questions – Accountability Impact	Yes	No	N/A	Details / Notes
Is there an activity or audit log that records access to and uses of information in the tool or system?	X			As required by CCC 1798.90.51
Is the system designed so that access and changes to personal information can be audited by date and user identification?			X	
Are individuals informed in the event of an “incident” (i.e., their personal data is lost, stolen, or otherwise compromised)?	X			
Is the general public notified in the event of a confirmed data breach?	X			
If a vendor manages any personal information during this project, does the vendor have an incident/data breach response plan? If so, attach their plan to this document.	X			All ALPR data will be housed on the vendor’s servers. Vendor cybersecurity response plan will be provided upon contract execution.
Will the City department follow the City’s Information Security Office (CISO) in the event of a breach? If not, are there separate contingency plans and documented procedures in place to identify and respond to security breaches or disclosures of PII?		X		All ALPR data will be housed on the vendor’s servers. Vendor cybersecurity response plan will be provided upon contract execution.
Are program staff trained in the requirements for protecting personal information and are they aware of the relevant policies regarding breaches of security or confidentiality?	X			Follows standard SJPD security protocols. At a minimum all SJPD members take 2 hours of cybersecurity training every 2 years.
Is there a plan for quality assurance and audit programs to assess the ongoing state of the safeguards applicable to the system?	X			Follows standard SJPD security protocols. Further outlined in CA Civil Code 1798.90.51 and San José Police Duty Manual section L4207.

V. Accuracy

Questions – Accuracy Impact	Yes	No	N/A	Details / Notes
Are data subjects provided with the possibility to access and correct their personal information?		X		
Are there processes in place for ensuring information quality? Detail processes in notes, and attach any relevant documentation if available.		X		Information collected is a video stream and is not anticipated to hold inaccurate or false information unless the camera is breached by a malicious actor.
Does this tool use automated decision-making? If so, describe the human role in vetting these decisions, if any.	X			Any information automatically identified, such as a license plate # from the automatic license plate reader (ALPR), will be confirmed by a person before an Officer may use this as justification to press charges, it is recommended confirmation occurs before Police make any actions based on information from the ALPR system. This can be a simple visual verification that the target license plate is read correctly by the ALPR system. This can be a simple visual verification that the target license plate is read correctly by the ALPR system.
Does this technology make predictions/automated identifications (such as license plate reading or voice recognition)? If so, what is the estimated accuracy rate of this technology?	X			Publicly available research on the accuracy of Automated License Plate Reader (ALPR) technologies is limited, but one randomized control trial with the Police Department of Vallejo, CA found a false positive rate of 35-37%. This means that out of 100 times that the ALPR system alerted an officer of a suspicious license plate, the system had misread the plate 35-37 times. However, the system allowed the City of Vallejo to detect 140% more stolen vehicles than they would without the system. Given this significant value in additional detection, the usage of ALPR is approved but it is required that a person verifies the plate read by the ALPR system before it may be used as justification to press charges. It is recommended visual confirmation occurs before Police make any actions based on ALPR information from the ALPR system.

				See study: Jason Potts, “Research in Brief: Assessing the Effectiveness of Automatic License Plate Readers,” <i>Police Chief</i> March 2018, 14. https://www.theiacp.org/sites/default/files/2018-08/March%202018%20RIB.pdf
If the tool does make predictions, do the outcomes and/or accuracy rates of this tool change based on use of personal or sensitive data categories?		X		Algorithms are only used for license plate recognition, which is standardized across all vehicles
Is there auditable documentation that explains any predictive algorithms used? If so, attach documentation, including which datasets and data elements are used to train the algorithms.		X		
Does the system or tool create new information such as a composite score, analysis, or report based on personally identifiable information?		X		
Are there controls in place for any process to grant authorization to modify (add, change, or delete) personal information from records? If so, detail who is responsible for process (vendor, city job title, etc.)	X			Access to video and data requires login and password access, and is only granted to authorized team members. Vendor does not have access to change metadata
Is there a policy or procedure in place to correct data that has already been shared with partners, or to notify partners about updates?			X	
Has a procedure been established to log and periodically review the nature, frequency and resolution of user accuracy complaints?		X		

VI. Sharing

Questions – Sharing Impact	Yes	No	N/A	Details / Notes
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Will personal information be shared with or disclosed to other governments outside of the City, vendors, and/or organizations? If so, who and for what purpose?	X			City departments and select partners may have access to the data to meet the data usage outlined above. Partners can only use the data as directed by the City (e.g., to identify a license plate) and cannot sell, share, or use the data beyond what is required for the City’s purposes. The public may be able to access anonymized portions of the data through a CA Public Records Act Request
If information will be disclosed or shared with other organizations, is a data sharing agreement in place that specifies appropriate uses? If so, attach agreement.		X		Agreements to be established prior to sharing
If information will be disclosed to other organizations, have they provided written assurances that they will safeguard the information and not share it further? Note: This assurance is provided in our City procurement privacy and disclosure policy.			X	Assurances to be included in vendor agreements via privacy and disclosure policy
Have access controls been implemented and are there processes or controls in place to notify system owners of unauthorized access to data?	X			Yes. SJPD maintains a trail of all accesses to identify any unauthorized access, as required under CCC 1798.90.51
Are access rights only provided to users on a "need to know basis" consistent with the stated purposes for which the personal information was collected?	X			Yes. SJPD mandates need to know, right to know and covered under CCC 1798.90.51
Have security procedures for the collection, transmission, storage and disposal of personal information, and access to it, been documented?	X			Follows standard SJPD security protocols, including San José Police Duty Manual section L4207.

VII. Equity

Questions – Equity Impact	Yes	No	N/A	Details / Notes
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Have predictive capabilities or algorithms used been analyzed to check for bias how they are trained and applied? If so, attach any analyses done on the bias in the algorithms.		X		
Is there any aspect of the project/program that might cause concern by giving the appearance to the public of privacy intrusion or misuse of personal information?	X			24/7 recording cameras are a new feature for the City to install. While the City is taking precautions and has vetted this Project with the public, a citizen seeing a camera may naturally feel concerned.
Have City Council or community stakeholders been provided with an opportunity to comment on the privacy protection implications of the proposal?	X			
Is this program intended to reduce discrimination or advance equity for vulnerable or at-risk populations?			X	

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PII Reference List

This PII Reference List includes 7 categories and types of PII and subsets of PII that are included when the City refers to "personal" or "sensitive" data or information throughout the Privacy Impact Assessment.

Personally Identifiable Information (PII)

First Name

Last Name

Alias Name

Maiden Name

Full Home Street Address

Zip Code

Date of Birth

Date of Death

Email Address

Photograph

Internet Protocol (IP) Address

Marital Status

Beneficiary Name

Beneficiary Contact Phone Number

Beneficiary Contact Address

Employee ID

Identifying Marks (e.g. tattoos, birth marks, etc.)

Identifying information of children, youth, minors under 18 years old

Sensitive PII Subset

SSN (full 9 digits)

Username/ID

User Hint Question and Answer

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Driver's License Number

Vehicle Information (license plate #, vehicle ID# (VIN))

Passport Number

Biometric ID Data (fingerprint, iris scan, faceprint, etc.)

Voter ID Number

FEIN (Federal Employer Identification Number)

State or City ID Number

Criminal Justice Number (arrestee or prisoner numbers)

Alien Registration Number

Demographics Subset

Citizenship Status

Nationality

Sexual Orientation

Gender Identity

Background Check/Investigation Details or Results

Drug and Alcohol Abuse Information

Criminal Offenses/Convictions

Physical Characteristics

Political Party Affiliation

Political Party Affiliation

Military / Veteran Status

Race / Ethnic Origin

Religious / Philosophical Beliefs

Other Sensor Information

Audio Recordings

Phone Call Recordings

Video Recordings

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Social Network Profile, Family Network Research and/or Friends/Contacts/Followers
Computer Use or Website Tracking/ Monitoring (cookies, web beacons, web widgets)
Location Tracking (individual or vehicle, geo-location, RFID Tracking, cell tower data)
Behavioral Pattern Mapping (e.g. physical, psychological, online, etc.)
Item or Identifier Scanning (contraband recognition, license plate reader, RFID reader)
Other Electronic Signatures or Monitoring (other cell phone signal, device sensors monitoring usage not previously stated)
Other Sensory Data (visual, audio, olfactory, or biometric not previously stated)
Other uncategorized surveillance information or data

Health Information Subset

Relative / Emergency Contact Name
Relative / Emergency Contact Phone Number
Relative / Emergency Contact Email
Relative / Emergency Contact Address
Disability Description
Health Diagnosis or Condition for Physical / Mental Health (non-substance use)
Health Diagnosis (substance use)
Health Services Provided
Medical Record Number
Health Plan / Insurance ID Number or Policy (inc. Medicaid & Medicare)
Medical Payments or Health Insurance Payments (incl. Medicaid & Medicare)
Health Policy Group Number
Patient ID Number
Medical Records
Prescriptions / Medications

Financial Information Subset

Bank or Financial Account Number

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Credit Card / Debit Card Number

Other Credit / Debit Card Data (e.g., Expiration date, security code)

Personal Identification Number (PIN)

Personal Check Data or Scanned Images

Income/Salary/Wage Data

Socio-Economic Status

Credit Score, Credit Grade, or Credit History

Other Sensitive Information (organizational, children, unstructured)

Intellectual Property or Proprietary Information

Budgets, Financial Statements / Forecasts

Organizational Strategy, Business Decision, or Design Info

Legal Documents, Contracts, Vendor Agreements

Other Children's Information not previously stated

Other Confidential Information not previously covered

Any Unstructured Data that might include any of the above types of information