

BEVERLYWOOD HOMES ASSOCIATION

Video Camera and Automated License Plate Recognition (ALPR) Policy Adopted October 13, 2026

PURPOSE

Beverlywood Homes Association (the “Association”) is a planned development as defined by the Davis Stirling Common Interest Development Act (California Civil Code section 4100 et seq.). The Association is the legal entity that manages and is responsible for the common areas within the development (the “Development”). For this reason, the Association and its Board of Directors (the “Board”) have an interest in protecting the Common Area, regulating the installation and use of surveillance equipment, and balancing residents’ reasonable expectations of privacy.

The Association utilizes cameras equipped with automated license plate recognition technology (“ALPR”), and may in the future utilize video cameras for limited and legitimate Association purposes.

This Video Camera and Automated License Plate Recognition (ALPR) Policy (“Policy”) is intended to govern (i) the installation and use of video cameras and other surveillance equipment within the Development, (ii) the Association’s own production and release of video footage captured by its cameras, if any, to the police or local authorities, and (iii) address the collection, use, retention, and disclosure of ALPR information in compliance with California Civil Code sections 1798.90.50–1798.90.55.

DEFINITIONS

For purposes of this Policy, the following definitions apply. Statutory definitions from California Civil Code sections 1798.90.50 et seq. are incorporated by reference and summarized below for ease of understanding.

1. **Surveillance Equipment** means any equipment used to monitor, record, or deter activity in audio or visual form, whether or not actively monitored or recorded, including but not limited to fixed or mobile video cameras, closedcircuit television (CCTV), and cameras capable of capturing vehicle images.
2. **Automated License Plate Recognition System** or **ALPR System** means a computerized system that captures an image of a vehicle license plate and converts that image into computer-readable data, including any associated searchable database generated by the system.

3. **ALPR Information** means information or data collected through the use of an ALPR system, including license plate numbers, images, dates, times, and locations.
4. **ALPR Operator** means a person or entity that operates an ALPR system. For purposes of this Policy, the Association is the ALPR operator.
5. **ALPR End-User** means a person who accesses or uses ALPR information. Authorized Association representatives and vendors acting on behalf of the Association may be ALPR endusers.
6. **Common Area** means all real property owned or controlled by the Association within the Development, excluding separate interests.

INSTALLATION AND USE OF CAMERAS

A. Association Cameras

The Association may install and operate video cameras, including cameras equipped with ALPR technology, in selected common area locations. Association cameras are intended for limited purposes, which may include: protection of Association property; deterrence and investigation of vandalism, theft, or other unlawful activity; traffic and access management; and assisting law enforcement when legally requested. Cameras may also assist the Association in investigating alleged violations of the Governing Documents.

Association cameras are not continuously or contemporaneously monitored, and the Association makes no representation or guarantee that cameras will prevent incidents or capture any event. Residents should not rely on Association cameras for personal security, and the existence or use of such cameras should not be relied upon to prevent harm, damage, or other issues that may impact a resident.

Nothing in this Policy obligates the Association to monitor its cameras, review recordings, investigate every reported incident, or preserve recordings except as expressly provided herein. Decisions regarding the review or preservation of recordings shall remain within the Association's reasonable discretion, subject to applicable law.

B. Visual Inspection of Identification

For purposes of access control, the Association and its patrol officers may request to visually inspect a government-issued photo identification card to confirm a visitor's

identity. Such visual inspection is limited to confirming identity only. The Association and its agents shall not photograph, scan, copy, record, retain, or otherwise collect any driver's license or other identification information, and no such information shall be stored in any Association system or record.

C. Owner-Installed Surveillance Equipment

No Owner may install or use surveillance equipment in the common area or on common area structures without prior written approval from the Board, consistent with the Association's architectural standards.

Any approved Ownerinstalled camera must be positioned so that it does not unreasonably capture images of common areas, roadways, neighboring residences, or vehicles beyond the immediate vicinity of the owner's entry area and must comply with all applicable privacy laws. The Association reserves the right to require evidence of the scope or capture area of any camera to ensure compliance with the foregoing.

Upon reasonable written request by the Association, an Owner shall provide a sample image or brief recording sufficient to demonstrate that the camera's field of view complies with this Policy. Such request shall be solely for the purpose of confirming compliance and shall not require ongoing access to an Owner's surveillance system.

Unauthorized, improper, or unreasonable installation or use of surveillance equipment shall constitute a nuisance, as well as an architectural violation, and is strictly prohibited.

In the event of any violations of this Policy relating to Owner-installed cameras, the Association reserves the right to: (1) take disciplinary action against the violating Owner, after providing that person with a duly noticed hearing before the Board; (2) require the removal of any surveillance equipment; and (3) take any other actions not prohibited by law in order to enforce violations of this Policy and the Association's other Governing Documents. This may include the removal of an Owner's surveillance equipment, at the Owner's cost and expense, if the Owner fails to take such action upon demand by the Association. ***Even though this Policy reserves the right to remove surveillance equipment, the Association will consult with legal counsel before removing or taking possession of any Owner's personal property.*** All remedies taken by the Association shall be cumulative and no single remedy shall be deemed to preclude the Association from such other remedy or remedies that are legally available.

ASSOCIATION RECORDING POLICY

The Association will only release recordings or images captured by the Association's video cameras to the police or applicable local authority, and only upon receiving a verified request for those recordings and/or images from the police department or local authority.

The Association does not store video recordings or images indefinitely, and no guarantee is made that the Association will have any video recordings or images on file for longer than 30 days. However, if a resident notifies the Association in writing of an incident that may have been recorded by the Association's cameras, the Association will make reasonable efforts to preserve recordings from the applicable date and time for up to thirty (30) days so that law enforcement has sufficient time to request the recordings.

The Association may also preserve recordings for insurance claims, pending litigation, anticipated litigation, or other legitimate Association business purposes.

In addition to the foregoing, the Association will cooperate, as necessary, with any court orders or subpoenas requiring the production or release of video recordings or images captured by the Association's cameras.

ALPR USAGE AND PRIVACY POLICY

In accordance with California Civil Code section 1798.90.51, the Association adopts the following usage and privacy policy for its ALPR system.

A. Authorized Purposes

The Association's ALPR system and ALPR information may be used solely for the following authorized purposes: investigating suspected violations of law; investigating and enforcing the Governing Documents where reasonably related to vehicular access or vehicle-related violations; providing information to law enforcement upon lawful request; and other legitimate Association operational, administrative, and risk-management purposes.

ALPR information shall not be used for profiling, tracking individuals unrelated to Association purposes, or any purpose inconsistent with this Policy.

B. Authorized Users and Training

Access to the ALPR system and ALPR information is limited to designated Association personnel, Board members, committee members, managing agents, and authorized vendors whose job duties reasonably require such access. Authorized users must receive training regarding privacy obligations, confidentiality, data security, proper use of ALPR information, and applicable California law.

C. Safeguarding and Monitoring

The Association shall maintain reasonable operational, administrative, technical, and physical safeguards designed to protect ALPR information from unauthorized access, use, modification, or disclosure. Such safeguards may include, where commercially reasonable and available: password protection; multi-factor authentication; encryption of stored and transmitted data; routine software updates; vendor security reviews; and secure deletion of expired records.

D. Sharing and Disclosure

ALPR information shall not be sold. ALPR information may be shared or disclosed only: to law enforcement or other governmental agencies pursuant to a lawful request, subpoena, or court order; or as otherwise required by law. Any disclosure shall be limited to the minimum information reasonably necessary for the authorized purpose. Vendors receiving ALPR information shall be contractually required to maintain reasonable confidentiality and data security measures consistent with applicable law.

E. Custodian of ALPR System

The Association's Board of Directors, acting through its designated managing agent or officer, is the official custodian responsible for oversight and implementation of this Policy.

F. Accuracy and Corrections

The Association shall use reasonable measures to ensure the accuracy of ALPR information and will correct data errors when identified.

G. Retention and Destruction

ALPR information shall be retained only for as long as reasonably necessary to fulfill the authorized purposes described in this Policy, unless longer retention is required by law or for an active investigation. Except as required for an active investigation, insurance claim, litigation hold, or other legal requirement, the Association intends to retain ALPR information for no longer than 30 days. The Association will periodically review retained ALPR information to determine whether continued retention is necessary for authorized purposes. Retained ALPR information shall be securely destroyed when no longer needed.

H. ACCESS LOGGING

Consistent with California Civil Code section 1798.90.52, the Association shall maintain records of access to ALPR information, including: date and time of access; license plate

number or data queried; identity of the person accessing the information; and purpose of access.

All ALPR end-users accessing ALPR information on behalf of the Association shall comply with the access, use, and recordkeeping requirements of California Civil Code sections 1798.90.52 and 1798.90.53. ALPR information may only be accessed and used for authorized purposes.

Access logs shall be retained for a minimum of one (1) year.

I. SECURITY INCIDENTS

Any known or suspected unauthorized access to, or disclosure of, ALPR information shall be promptly investigated. Where required by applicable law, affected persons shall be notified in accordance with California data breach notification laws. The Association shall document any corrective measures implemented following such incident.

J. ENFORCEMENT AND LIABILITY

Any violation of this Policy may subject the responsible person to disciplinary action under the Association's Governing Documents.

K. COOPERATION WITH LAW ENFORCEMENT

The Association will cooperate with law enforcement and comply with valid subpoenas or court orders requiring production of video or ALPR information. The Association is not a public agency and does not engage in routine sharing of ALPR data.

L. POLICY REVIEW

The Board may review this Policy periodically and amend it as necessary to reflect changes in technology, Association operations, or applicable law.

[End of Policy]