

Lake Hollywood Homeowners Association (LHHA)

Website Privacy Policy

Effective Date September 1, 2025

1. Overview

The Lake Hollywood Homeowners Association ("LHHA," "we," "our," or "us") is a voluntary membership-based 501(c)(4) nonprofit mutual benefit homeowners association. This Privacy Policy describes how we collect, use, disclose, and retain information through our website, www.LakeHHA.org ("Site"). This policy applies to all visitors, users, and others who access or use our Site. For ALPR policies, see the ALPR Privacy Policy. Information related to ALPR policies is provided our "Automated License Plate Reader (ALPR) Privacy and Usage Policy."

2. Information We Collect

- Personal Information: Information you voluntarily provide to us, such as your name, address, email address, phone number, and any other contact or demographic information when filling out forms or sending emails.
- Usage Data: Information automatically collected when you visit the Site, such as your IP address, browser type, pages visited, time and date of visit, and other usage statistics.

3. Use of Cookies

Our Site uses cookies and similar technologies to enhance your browsing experience and analyze traffic. Cookies are small data files stored on your device that allow us to:

- Remember your preferences and login information
- Analyze site traffic and usage patterns
- Improve website performance

You can manage or disable cookies through your browser settings. Disabling cookies may affect the functionality of the Site.

4. How We Use Your Information

- Responding to your inquiries or requests
- Sending you LHHA communications and updates
- Improving our Site and community services
- Analyzing website usage for performance improvements

5. Data Sharing and Disclosure

We do not sell or rent personal information. We may share information only in the following circumstances:

- With service providers who assist in operating the Site or delivering LHHA communications
- As required by law or to comply with legal process
- In connection with the investigation of fraud, illegal activity, or misuse of the Site

6. Data Retention

- Personal information submitted via LakeHHA.org or to any email address ending in @LakeHHA.org, including emails sent to board members about LHHA business (whether sent to @LakeHHA.org or their personal email addresses), may be retained indefinitely to preserve records of association-related communications.
- Website usage and analytics data may be retained for up to 24 months.

7. Data Security

We use reasonable administrative, technical, and physical safeguards to protect your information. However, no system can guarantee absolute security.

8. Communications from LHHA

By providing your contact information, you consent to receive communications from LHHA. You may opt out of non-essential communications at any time by contacting us at [Insert Contact Email].

9. Rights of California Residents

Although LHHA is a nonprofit 501(c)(4) entity and is generally not subject to the California Consumer Privacy Act (CCPA), we still strive to respect your privacy rights. You may request:

- What personal information we have collected
- Correction of inaccurate information
- Deletion of information not subject to mandatory retention

Requests may be submitted per the contact information below.

10. Third-Party Links

Our Site may include links to third-party websites. LHHA is not responsible for the privacy practices or content of such sites.

11. Children's Privacy

Our Site is not intended for children under 13. We do not knowingly collect personal information from children.

12. Changes to This Policy

We may update this Privacy Policy periodically. Any material changes will be posted on this page and communicated as appropriate.

13. Contact Us

If you have any questions or concerns about this Privacy Policy, please contact us at:

Lake Hollywood Homeowners Association: Info@LakeHHA.Org

Lake Hollywood Homeowners Association (LHHA)

Automated License Plate Reader (ALPR) Privacy and Usage Policy

Effective Date: September 1, 2025

1. Purpose

The Lake Hollywood Homeowners Association (“LHHA,” “we,” or “us”) may use Automated License Plate Reader (ALPR) technology to enhance the safety, livability, and emergency preparedness of the Lake Hollywood neighborhood. This Privacy and Usage Policy is designed to ensure transparency and legal compliance with California Civil Code §§ 1798.90.5 – 1798.90.55 (commonly referred to as “SB 34”).

2. Definition of ALPR and ALPR Information

- ALPR Technology: A searchable computerized system that captures images of license plates and converts them into data using optical character recognition.
- ALPR Information: Includes images, license plate numbers, time stamps, location data, and any metadata associated with those records.

3. Primary Purpose of Data Collection

The ALPR system is deployed for the primary purpose of analyzing traffic into and out of the Lake Hollywood community in order to:

- Measure and understand the volume of non-resident traffic
- Identify traffic trends that may affect emergency response, wildfire risk, pedestrian and cyclist safety, and neighborhood tranquility
- Support neighborhood-driven advocacy with the City of Los Angeles for traffic mitigation and safety measures.

4. Data Sharing

- For private vehicles: Only consolidated and anonymized traffic data (e.g., aggregate counts, peak traffic times) will be shared with city departments, including LADOT and LAFD, to support infrastructure, safety, and emergency planning. No personally identifiable ALPR information will be disclosed for this purpose.
- For commercial vehicles: Vehicle data and images may be shared with city departments, such as LADOT and LAFD, to support infrastructure, safety, and emergency planning related to commercial traffic.

5. Law Enforcement Access and Disclosure Limitations

- ALPR data is not automatically shared with law enforcement.
- The system is not connected to any government database.
- Only the Los Angeles Police Department (LAPD) may request data.
- LAPD may not directly access the ALPR system or search its database.
- Requests from LAPD will only be considered if accompanied by a valid and active LAPD case number, and a description of the specific license plate(s), date/time frame, and incident under investigation.

Each request will be reviewed by LHHA’s authorized data administrator(s) and may be denied if it does not comply with these conditions.

6. Who Can Access the Data

Access to ALPR information is logged, periodically audited and limited to:

- Designated LHHA board members or authorized administrators
- Technical personnel under contract
- Third-party ALPR service providers under agreement with LHHA ensuring legal compliance

7. Retention of ALPR Information

- ALPR data is retained for no longer than 120 days, unless:
 - It is associated with a documented traffic or safety concern under review
 - A lawful preservation request has been made by LAPD with a valid case number
- Data is retained only for limited purposes and is not available for general discovery without subpoena.

8. Security Safeguards

LHHA and its service providers use industry-standard safeguards including:

- End-to-end encryption of data during transmission and storage
- Access controls and administrator audit logs
- Security protocols to prevent unauthorized access

9. Individual Rights and Requests

You may request any ALPR information collected about your vehicle by submitting a written request to Lake HHA as shown in Section 11. Your request must include:

- License plate number
- Approximate date/time of travel
- Proof of vehicle ownership or authorization
- Government-issued photo ID

In accordance with our third-party data management agreement, a fee not in excess of \$100 will be charged to cover the direct costs of data retrieval and processing. This fee is necessary to reimburse the Association for the actual expenses incurred by our consultant to manually retrieve, redact, and provide the specific records requested. The Association will provide an invoice and a copy of the consultant's fee for your request upon receipt of a verified request.

LHHA will respond to verified requests within 30 days of receipt of payment.

Third-Party Service Providers

LHHA may use third-party ALPR vendors under written agreements requiring:

- Compliance with California privacy laws.
- No resale, reuse, or repurposing of data
- Strict access and breach reporting protocols

10. Policy Review and Transparency

This policy will be reviewed annually by the LHHA Board and updated as needed. Residents will be notified of any material changes. The current version of this policy is available at LakeHHA.Org

11. Contact Information

For questions or concerns about this policy or the ALPR system, contact:

Lake Hollywood Homeowners Association: Info@LakeHHA.Org