

Title: PrePass Event Data Retention Policy

Policy: It is the policy of PrePass Safety Alliance to ensure that PrePass carriers are not subjected to a higher level of regulatory compliance screening than non-PrePass carriers. To that end, PrePass Safety Alliance may retain PrePass site screening event data for a defined period of time for the purpose of operating the PrePass System. PrePass Safety Alliance will not provide event data attributable to a specific carrier or vehicle without authorization of the individual carrier, or by subpoena, or as noted below in Section 4.0.

Purpose: To establish the procedures for collecting and retaining carrier event data.

Scope: This policy is applicable to everyone who will collect, retain or destroy PrePass data.

Procedures:

- 1.0 Data Collection** – In the normal course of PrePass site operations, carrier data is collected and retained. This event data is retained for multiple purposes and is used as the basis of: billing, site operations, and state and site activity reports that are periodically provided to participating state agencies.
- 2.0 90 Day Data Retention** – Carrier data collected during the course of PrePass site operations shall be retained for a period not to exceed 90 days beyond the end date of the period billing. This 90-day retention period will allow for mailing times to and from the customer and accommodate most customer bill payment cycles. Billings will normally cover a calendar month period. Therefore, a carrier's January billing will reflect activity from 1 through 31 January. The data supporting an unprotected January billing will be retained until April 1st, which is a maximum of two months beyond the billing end date of January 31. Data will be de-identified with respect to a specific carrier or vehicle only after (a) payment by or on behalf of the specific carrier of an unprotected billing has been received by the PrePass Service Center, or (b) a protested billing has been resolved.
- 3.0 Cumulative Data Retention** – General data that does not relate a specific bypass event to a specific carrier or vehicle may be retained indefinitely.

- 4.0 Exceptions** - Upon request from a law enforcement agency, the CEO of PrePass Safety Alliance or the CEO's designated representative may authorize the release of data that is directly related to a felony criminal investigation or emergency, defined as:
- an actual or impending situation that may cause injury, loss of life or destruction of property;
 - a situation in which a person is dangerous to him/herself or others or at imminent risk of severe physical injury or death; or
 - an event or situation that threatens serious damage to human welfare or terrorism which threatens damage to the security of the country.
- 5.0 Additional Services** – Data requested pertaining to other PrePass services, such as PrePass Plus, will be referred to the authoritative source.