

Data subject access request - ALPR Data & Queries for plate: [YOUR PLATE NUMBER]

To the Responsible Authority:

I am the registered owner of the vehicle bearing Minnesota license plate [YOUR PLATE NUMBER]. I am making this request **as the subject of the data**. This request is for all data you hold within the Flock Safety system associated with my license plate, including data from the cameras, and queries that included my license plate in the results. This is a request for private data about me under the Minnesota Government Data Practices Act (Minn. Stat. § 13.04, subd. 3), and it should be processed through the Department's data subject access procedures, not as a general public-records request.

Under Minn. Stat. § 13.824, subd. 2(b), all data collected by an automated license plate reader is classified as **private data on individuals** (unless it is public under § 13.82 or is active criminal investigative data). Private data on individuals is precisely the category that the data subject has the right to access and obtain copies of under § 13.04, subd. 3. The St. Louis Park Police Department's own ALPR policy (Policy 425) confirms that ALPR data captured by the Department consists of license plate numbers; the date, time, and location of capture; and photographs of the plate, the vehicle, and the surrounding area (Policy 425.4.2(a)).

Flock Safety has directed me to the Department. I previously asked Flock Safety to provide this data and was told that you, as Flock's customer, owns and controls the data and is responsible for assessing and responding to my request, because Flock acts only as a processor on your behalf and cannot fulfill it directly. Flock's written position confirms that you are the responsible authority for this data and that the request properly belongs with the City.

I request the following records concerning plate [YOUR PLATE NUMBER]:

1. **All ALPR detections/reads** of plate [YOUR PLATE NUMBER] captured, collected, received, or stored by SLP PD within the current retention period from the date of this request - including for each read the date, time, GPS or descriptive location, capturing device or camera location, and all associated photographs of the plate, vehicle, and surrounding area.
2. **The complete data audit trail** for plate [YOUR PLATE NUMBER]. Policy 425.7(a) and (e) and Minn. Stat. § 13.824 require the Department to log all access to ALPR data by name, date, and time, and to record in a data audit trail every query, search, entry, update, access, sharing, or dissemination of the data. I request that audit trail to the extent it concerns plate [YOUR PLATE NUMBER], including for each entry: the identity of the querying user and their agency, the date and time, and the stated reason, case number, or factual basis for the access. [Timeframe: 1/1/2025 through present]
3. **All records of inter-agency access or sharing** involving plate [YOUR PLATE NUMBER]. This includes (a) any ALPR data on this plate that the Department **shared with, released to, or received from** any other agency or through any Flock Safety shared network, statewide lookup, or external search capability; and (b) the

corresponding written data-sharing requests the Department is required to retain on file under Policy 425.9(c), including the requesting agency, requester name, stated purpose, and factual basis. [Timeframe: 1/1/2025 through present]

Policy 425.2 applies to the general public, not the subject of the data. As the data subject, my right of access to private data about myself is independent of, and not limited by, the public's lack of access.

Identity verification. I acknowledge the Department's right to confirm my identity and my ownership of the listed plate before releasing private data about me (Minn. Stat. § 13.05, subd. 12; Minn. R. 1205.0400). I am prepared to provide a copy of my driver's license and/or vehicle registration to verify that plate [YOUR PLATE NUMBER] is registered to me. Please tell me what specific verification you require and I will provide it promptly so this does not delay your response.

Format and cost. I prefer electronic copies (PDF, native export, or CSV as applicable). I understand that being shown my own data carries no charge, and that the Department may charge only the actual cost of making and certifying copies.

Response deadline. Please comply with this request within ten business days of the date of this request, as specified by Minn. Stat. § 13.04, subd. 3. Because ALPR data not tied to an active criminal investigation is destroyed on a rolling 60-day basis please provide any responsive data before its scheduled destruction. If you withhold any responsive data (for example, as active criminal investigative data) please identify the specific statutory basis for withholding each item.

If you deny or fail to respond properly to this request, I reserve the right to seek an advisory opinion from, and to appeal the determination to, the Minnesota Commissioner of Administration under Minn. Stat. § 13.04, subd. 4.

Thank you for your attention to this request.

Sincerely,

[YOUR FULL NAME] [email] · [phone]