Surveillance Use Policy
Code5Group GPS-Integrated Bike
San Diego Police Department

PURPOSE

Code5Group GPS Bike technology allows the San Diego Police Department to address bicycle thefts without the need for officers in static positions while giving the ability to track and recover the equipment using the Global Positioning System (GPS). The software and application allow virtual perimeters around GPS-integrated bicycles and enable alert notifications. Officers use the Code5Group phone application to create virtual perimeters, live track a GPS-integrated bicycle, and collect data for reports.

USE

Code5Group GPS Bike technology allows officers to safely and efficiently conduct operations addressing bicycle thefts in the community. These operations are very effective in recovering stolen bikes in high-theft areas of San Diego. The operation and access to the GPS software shall be for official law enforcement purposes only. Officers operating the GPS-integrated bicycle devices and software are trained and given authorization from supervisors prior to use. To ensure accountability of use, Northern Division has established a tracking log to document deployments of the technology. This log began tracking uses as of late April 2024.

GPS-integrated bicycles allow officers, through a phone application or desktop computer, to place and remotely monitor GPS-integrated bicycles. Officers are notified of movement and can track the bicycle's location in real-time. This provides the ability to safely track and apprehend suspects.

DATA COLLECTION

The Bait Bike devices use GPS technology to track the location of the device, utilizing satellites for accuracy. The device gathers the following information:

- Geographic location (Latitude/Longitude)
- Time
- Speed
- Direction of travel

The information is not open source and is only accessible by the account holder and vendor. All data is web-based.

DATA ACCESS

Personnel authorized to use the GPS equipment or access information collected using such equipment shall be specifically trained in such technology and authorized by the Chief of Police or designee. The information will only be accessed during an operation, investigation, or court

process. If the information is included as evidence in a criminal case, the information will be accessed by the prosecuting attorney and the defense attorney through the discovery process.

Code5Group is bound by strict requirements that they may not share any information collected by the San Diego Police Department.

DATA PROTECTION

The GPS-integrated bicycle has an account administrator that assigns trained officers to use the product. The person assigned to administration accounts is the Northern Beach Team Sergeant or a designated officer. The Sergeant or designee can assign "users" who can access the software, conduct operations, and access a GPS "breadcrumb trail" to make reports. A breadcrumb trail allows the officer to obtain the GPS route taken during a theft. The Sergeant or designee can also assign and / or change passwords and usernames. All GPS data downloaded to the mobile workstation or in storage shall be accessible only through a secure login / password-protected system capable of documenting all access of information by name, date, and time. Only authorized employees of the San Diego Police Department working in an investigative or enforcement function shall access the GPS data.

DATA RETENTION

All evidence is stored within the software history with access restricted to authorized persons. Data can be attached to criminal investigations. Any downloaded data from the software history is immediately deleted after being attached to a criminal case and not retained outside of a criminal case.

PUBLIC ACCESS

All evidence collected is considered an investigative record for the Department and is for official use only. Requests for data from the public or the media shall be processed similarly to requests for Department public records.

THIRD PARTY DATA SHARING

Data is generally only used by San Diego Police Department. However, data can be shared with various prosecutors' offices, such as the District Attorney, City Attorney, and criminal defendants and their attorneys through the criminal discovery process.

TRAINING

Training is required for any individual authorized to use surveillance technology or to access information collected by the surveillance technology. Training is conducted by the program supervisor and covers the use of the software application and notification system. Training takes

approximately two hours to complete. The supervisor oversees officers who have access to the application. All employees who utilize the GPS software shall be provided a copy of this Surveillance Use Policy, along with instructions on the constitutional protections and case law requirements associated with its lawful use.

AUDITING AND OVERSIGHT

Only authorized users may access the GPS software system and must complete training with the program administrator. Personnel authorized to access the system shall be designated in writing, and the designation shall ensure that their access to and use of the data complies with the Ordinance. The administrator is notified when the software system is accessed for operations and approves any changes to alert contacts. Alert contacts are those who would be notified during an operation.

The system maintains a digital log documenting the name, date, and time a user accessed the technology.

The assigned Northern Division Night Beach Team Sergeant monitoring the use of the GPS-integrated bike shall ensure their use complies with the Surveillance Use Policy.

The assigned Northern Division Night Beach Team Sergeant shall be responsible for gathering and inputting related statistical data (deployment date/time, theft time, etc.) into a tracking log. The assigned Northern Division Service Area Lieutenant for the "120's Service Area" will be responsible for the auditing of the tracking log.

MAINTENANCE

Code5Group maintains the security and integrity of the GPS software system. The program administrator oversees approved officers with access to the software and can add or delete users based on operations. The hardware is checked prior to all operations for proper functioning. If the hardware malfunctions, it is sent back to Code5Group for repair. The hardware does not contain any data. All data is kept within the software system. The program administrator is notified when new updates are available and ensures all updates have been properly applied. The San Diego Police Department shall maintain robust security procedures and practices, including operational, administrative, technical, and physical safeguards, to protect GPS information from unauthorized access, destruction, use, modification, or disclosure.

The application will be updated approximately once per month for GPS software and other updates. The Northern Division Night Beach Team will maintain the GPS-integrated bike(s).