



# Surveillance Use Policy

Object Trackers  
San Diego Police Department

## PURPOSE

The San Diego Police Department utilizes object tracking devices to track suspects and locate stolen property.

## USE

Object Trackers are issued to San Diego Police Department (SDPD) members for a limited duration during the course of a specific criminal investigation. Object Trackers are used to locate stolen property and to locate suspects who possess the stolen property. The trackers can be monitored by an authorized user and / or Communications can be alerted to assist personnel to track the device once the device is activated and begins to move.

When a tracker is requested by a SDPD member, a Special Equipment Technician of the Robbery Unit is assigned the request. The technician speaks with the SDPD Member to fully understand the mission of how the device will be used. The request is evaluated for equipment suitability and legal standing. If equipment deployment is appropriate, a request form is completed stating the crime being investigated and the legal authority to use the Object Tracker. The request form also states all personnel authorized to monitor the equipment.

All requests for an Object Tracker must be approved by a Robbery Unit sergeant and a Robbery Unit lieutenant. The program administrator will grant authorization to all required members to monitor the device and create the required reports about possible evidence collected from the device.

Department procedures associated with Object Trackers are:

- 3.02 - Impound, Release, and Disposal of Property Evidence
- 3.26 - Media Evidence Recovery and Impounding / Preserving Procedures.

## DATA COLLECTION

Object Trackers collect location data only of where the actual device is by using GPS and cell towers. As the tracker moves, it collects the GPS coordinates and speed of the device when it is traveling. All data gathered by the trackers are for the official use of SDPD.

## DATA ACCESS

Personnel authorized to use Object Trackers or access to data collected through the use of such equipment shall be specifically trained in such technology and authorized by the Chief of Police, or designee. Such personnel shall be limited to designated captains, lieutenants, sergeants, officers, detectives, and police department personnel unless otherwise authorized.

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## DATA PROTECTION

The City's Department of Information Technology oversees the IT governance process and works with SDPD's Department of IT regarding project execution and risk assessment, selecting, and approving technology solutions. Cyber security and technology risks are also assessed by the Department of IT. For additional details related to IT governance processes, refer to the information at the following link:

- <https://www.sandiego.gov/sites/default/files/fy23-fy27-it-strategic-plan-sd.pdf>

All Object Tracker data is downloaded from a data management solution to a mobile workstation and is accessible only through a login / password protected system. All department members who have access to the system while the devices are deployed are documented.

All data on the data management platform is stored in a secure and locked facility that meets ISO27001 compliance for internet security standards and is audited annually by a third party.

## DATA RETENTION

After the completion of the operation, the location data is downloaded from the data management platform and impounded per D.P. 3.02 Impound, Release, and Disposal of Property Evidence and D.P. 3.26 Media Evidence Recovery and Impounding / Preserving Procedures.

The data of the GPS locations remains on the data management platform until the device is upgraded or replaced.

## PUBLIC ACCESS

Location data collected by the device can only be accessed by the SDPD members who are authorized users. Once the location data is downloaded and impounded into the SDPD Property room, access to the location data is controlled and regulated by DP 3.02 Impound, Release, and Disposal of Property Evidence

Location data can be obtained by criminal defendants utilizing the discovery process as detailed in California's Evidence Code.

## THIRD PARTY DATA SHARING

Location data may be released to other authorized and verified law enforcement officials and agencies for legitimate law enforcement purposes, which includes criminal investigations and prosecution as allowed by law. The location data will not be used in immigration enforcement.

## TRAINING

Individualized training is provided to new users by Robbery Unit personnel upon being issued their first device or when first granted access. Familiarity on operation and placement is provided along with a data management tutorial. The department member is shown where to locate additional training to refresh or research any topic regarding the operation of the device.



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## AUDITING AND OVERSIGHT

Authorized users shall ensure their access and use of the Object Trackers complies with the Surveillance Use Policy.

The request forms shall be retained of who has access to the monitoring software and who was issued a device and for what purpose. The request forms shall be available for presentation for all required internal and external audits, and oversight will be maintained by the system Program Manager or their designee.

## MAINTENANCE

SDPD shall maintain robust security procedures and practices, including operational, administrative, technical, and physical safeguards, to protect object trackers and data they collect from unauthorized access, destruction, use, modification, or disclosure.

The Robbery Unit will maintain the Object Tracker devices.