



Surveillance Use Policy

TLOxp
San Diego Police Department

PURPOSE

TLOxp is an internet-based, online service provided by TransUnion. As defined on TLO.com, “TLOxp® is the latest generation of the technology that originated the science of data fusion. Built on an architecture of supercomputers running proprietary linking and assessment algorithms, TLOxp filters through a massive repository of public and proprietary data almost instantly.” It offers real-time resources to locate information about individuals, utilities, and assets. It is used to support San Diego Police Department criminal investigations. It is not a means to run credit reports.

USE

TLOxp is utilized by Investigative units (Homicide, Sex Crimes, Missing Persons, Narcotics, Child Abuse, etc.) as well as the Crime Analysts that support these units for investigative purposes. Access is on a “need to know, right to know” basis, meaning there is an active crime case or law enforcement event that initiates the data inquiry. Utilizing this database enhances and advances the investigative process.

Department procedures associated with TLOxp are:

- 1.45 - Use of City / Department Computer Systems
- 4.13 – Non-Official or Personal Custody of Records/Files/Recordings Policy

DATA COLLECTION

Users can make inquiries on a variety of identifiers that include name, date of birth, SSN, address, business, phone, land ownership, email addresses and social media usernames. A comprehensive report can be requested that puts this information in a report format, in logical groupings that make it easier to understand. The information is only a possible match and must be confirmed, that is, vetted for accuracy with the source agency/custodian of records before a law enforcement response can be initiated.

DATA ACCESS

Only authorized law enforcement or criminal justice personnel who have responsibilities involving investigative casework may be given access TLOxp. They must be able to articulate a “need to know, right to know” requirement. All transactions are for the furtherance of a law enforcement activity.

When accessing TLOxp, the user identifies their “need to know, and right to know” by selecting the following purpose levels:

1. GLBA (Gramm-Leach-Bliley Act)
Our purpose is “to comply with Federal, State, or local laws, rules, and other applicable legal requirements.”
2. DPPA (Driver's Privacy Protection Act)
Our purpose is “Use by any government agency, including any court or law enforcement agency, in carrying out its functions, or any private person or entity acting on behalf of a Federal, State, or local agency in carrying out that agency’s functions.”

In addition, the user enters in a case number or other unique identifier associated with the related law enforcement event in the “Reference ID” field.



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SDPD users who leave the department have their access removed.

DATA PROTECTION

Computers require user login authentication and are situated in secure law enforcement facilities. Cellphone access at crime scenes and in the pursuit of a fugitive or kidnap victim, requires multifactor authentication.

DATA RETENTION

When an agency determines that printed or electronic TLOxp information no longer has a legitimate law enforcement use, the information shall be destroyed in a manner so that the identity of the subject can no longer be reasonably ascertained, e.g., shredding printouts, deleting electronic records & clearing from trash folders in accordance with DP 4.13.

PUBLIC ACCESS

The public has no access to TLOxp, or information obtained directly from the database.

THIRD PARTY DATA SHARING

There is no third-party data sharing.

TRAINING

Training is provided for authorized users by SDPD staff.

AUDITING AND OVERSIGHT

An audit can be performed by site administrators on an as-needed basis. Users who leave the department have their access removed. At the point of conducting an inquiry, a field titled "Reference" serves as a method to demonstrate the user's "need to know, right to know" by providing case numbers, incident numbers or other unique identifiers.

TLOxp will be audited for appropriate usage on a regular basis as dictated by the Department's forthcoming audit schedule, overseen by the Special Projects and Legislative Affairs unit.

MAINTENANCE

TransUnion is responsible for uploading the information into TLOxp. Information gathered is only a pointer system. The user validates the authenticity of the information through the appropriate custodian of records, typically a law enforcement agency, or if necessary, through another non-law enforcement service provider by means of a search warrant.