

MEMORANDUM

DATE: [xxx]  
FROM: City of San Diego Privacy Advisory Board  
TO: The Honorable Council President Elo-Rivera and Members of the San Diego City Council  
RE: San Diego Police Department's Proposal for Object Tracker

I. RECOMMENDATION

The Privacy Advisory Board (PAB) recommends that the City Council approve the proposal with modifications as indicated below.

II. RECOMMENDED MODIFICATIONS

- A. **USE:** The Use Policy outlines the use of object trackers for locating stolen property and suspects but it could be more explicit in prohibiting the use for minor infractions or non-violent crimes. The Use Policy mentions legal standing and authority but does not explicitly require reasonable suspicion or probable cause for deploying trackers. This should be clearly defined.
- B. **DATA ACCESS:** The Use Policy restricts access to trained personnel and requires authorization, but it doesn't specify high-level end-user restriction or in-house (City/department specific) limitations explicitly. It could also better define data sharing on a need-to-know/right-to-know basis, detailing legal rights and direct involvement in investigations as criteria.
- C. **DATA PROTECTION:** The Use Policy notes that data stays on the platform until the device is upgraded or replaced, not necessarily the minimum necessary duration. Introducing automated deletion schedules and specifying retention periods would strengthen compliance.
- D. **AUDITING AND OVERSIGHT:** The policy mentions retaining request forms for auditing but could benefit from a more detailed audit mechanism that tracks access, sharing, use against authorized uses, and the efficacy of technology in improving public safety metrics.

For the above stated reasons, the Privacy Advisory Board respectfully recommends that the City Council **approve the proposal** with the modifications stated.

Cc: SDPD Chief Nisleit  
Chloe Madison