

Surf Thru Express Car Wash

Automated License Plate Recognition (ALPR) Privacy Policy

Purpose

Surf Thru Express Car Wash (“Surf Thru,” “we,” “our,” or “us”) uses Automated License Plate Recognition (“ALPR”) technology at certain locations. This ALPR Privacy Policy explains how we collect, use, protect, retain, and disclose ALPR information.

What is ALPR?

ALPR technology uses cameras and software to capture and recognize vehicle license plate numbers as vehicles enter or exit our property.

Purposes for and Restrictions on Our Use and Disclosure of ALPR Information

We use ALPR information for legitimate business purposes, including:

- Identifying active Unlimited Wash Club memberships
- Seamlessly opening gates for members
- Providing automatic member recognition and site access
- Improving the customer experience
- Preventing membership fraud and unauthorized account sharing
- Detecting misuse of our services
- Enhancing the security of our facilities
- Assisting customer service with account inquiries
- Analyzing customer visit frequency and operational performance
- Protecting Surf Thru’s employees, customers, and property
- Complying with legal obligations
- Promotional offers based upon wash frequency.

Surf Thru does **not** use ALPR information for unrelated commercial purposes. Surf Thru does **not** sell or rent ALPR information. We may disclose ALPR information only:

- To service providers who perform services on our behalf and are contractually required to protect the information;
 - To law enforcement or governmental authorities when required by law, subpoena, warrant, or court order;
 - To investigate fraud, security incidents, or unlawful activity; or
 - As otherwise permitted or required by applicable law.
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ALPR Information We Collect

Depending on the location and your interaction with Surf Thru, we may collect:

- License plate number
- State or jurisdiction of issuance
- Date and time of entry and/or exit
- Vehicle image
- Camera location
- Membership, Rewards, Text club and account association (if applicable)
- Wash transaction information associated with the vehicle

Surf Thru does not use ALPR to identify the driver or occupants of a vehicle.

Who Can Access ALPR Information

Surf Thru restricts access to ALPR information to internal personnel or independent contractors who must access ALPR information to perform their job responsibilities:

- Security personnel, information technology personnel, or other employees who manage or oversee the ALPR system and ALPR information.
- Surf Thru employees responsible for managing or overseeing membership or other customer service functions that use ALPR information, including area managers, site managers, customer service representatives, and corporate office employees overseeing ALPR.

Employees and independent contractors are prohibited from accessing ALPR information for personal reasons or any unauthorized purpose. Third party point of sale providers who provide the ALPR technology and CRM companies will also have access for business purposes only.

Any employees or independent contractors permitted to access ALPR information are trained on the sensitivity of ALPR information; the legal requirements concerning access, use, and disclosure of ALPR information; how to use the ALPR system; and who to contact if they believe that the ALPR information may have been accessed without authorization.

How We Monitor the ALPR System and Ensure the Accuracy of ALPR Information

Surf Thru monitors the ALPR system by conducting reasonable audits of the processes and requirements set forth in this ALPR Privacy Policy and any of Surf Thru's other relevant security and record keeping responsibilities. These audits include review of the operational, administrative, technical, and physical safeguards described below; this ALPR Privacy Policy; and the record of authorized access to the ALPR system or ALPR information.

Surf Thru conducts regular technical testing, ongoing human intervention, and takes other reasonable measures to ensure ALPR information is accurate and to correct errors.

How We Secure ALPR Information

Surf Thru maintains reasonable operational, administrative, technical, and physical safeguards designed to protect ALPR information from unauthorized access, disclosure, or alteration.

Security measures include:

- Physically securing components of the ALPR system
 - Encryption of data where appropriate
 - Role-based access controls
 - Password-protected systems
 - Logging authorized access
 - Employee confidentiality obligations
 - Vendor security requirements
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How Long We Retain ALPR Information

Surf Thru retains ALPR information only for as long as reasonably necessary to fulfill the purposes described in this ALPR Privacy Policy or as required by law.

Our general retention practices are:

- **Unlimited Wash Club Members/Rewards Club/Text Club:** While membership remains active and for a reasonable period thereafter to support customer service, fraud prevention, billing, legal compliance, rejoin offers, and dispute resolution.
- **Retail Customers:** For a reasonable period to support operational analytics, fraud prevention, customer service, security, or to issue promotional offers.
- **Security or Legal Matters:** ALPR information may be retained longer when reasonably necessary to investigate incidents, resolve disputes, comply with legal obligations, or preserve evidence.

Surf Thru deletes ALPR information that falls outside the applicable retention period. Surf Thru conducts regular audits of ALPR information to ensure we are meeting the data retention policies set out in this ALPR Privacy Policy.

How to Contact Us

The official custodian and owner of the ALPR information and ALPR system is Surf Thru.

If you have questions about our ALPR system or this ALPR Privacy Policy, please contact our Privacy Officer, below. If you send an email, be sure to include “ALPR Inquiry” in the subject line of that email.

Privacy Officer
Surf Thru Express Car Wash
11837 Bolthouse Drive
Suite 400
Bakersfield, CA 93311
privacy@surfthruexpress.com
661-369-8938

Opting Out of Our ALPR System

Please note that opting out of license plate association may require manual identification at the wash and may limit or eliminate certain convenience features, including automatic member recognition, gate access, personalized offers, and expedited service.

Membership and Marketing

Customers may choose not to have their license plate associated with a Surf Thru membership, Rewards Club, or Text Club. Customers may also request that Surf Thru discontinue using their license plate information for promotional or marketing purposes, where applicable.

Security and Operational Use

Customers who enter Surf Thru property should expect that their vehicle's license plate may be captured by our ALPR system for security, operational, and fraud prevention purposes. Because these uses are necessary for the safe and efficient operation of our facilities, they are not subject to an opt-out while on the property.

Access and Updates to This ALPR Privacy Policy

Surf Thru may update this ALPR Privacy Policy from time to time to reflect changes in our business practices, technology, or applicable law.

The most current version will always be available at:

<https://surfthruexpress.com/wp-content/uploads/2026/10/Surf-Thru-LPR-Privacy-Policy-1.pdf>

Printed copies are available upon request at all Surf Thru locations.