Rhode Island Turnpike and Bridge Authority
Policy and Procedure
Toll Account and Transaction Information

POLICY

It is the policy of the Rhode Island Turnpike and Bridge Authority (RITBA) to fully and properly protect the privacy information of its customers as it relates to Toll Accounts used for E-ZPass or other approved electronic toll payment purposes and transactional data related to billing for tolls or for collection of violation payments. These protections anticipate access to the records by the account holder and certain employees, agents or vendors of the Authority for the purpose of maintaining the accounts and collecting the tolls and/or fees.

RITBA is a member of the E-ZPass Group and is bound by Reciprocity Agreements with the other members that stipulate protection and safeguarding of account information for account holders of the member organizations. Therefore these policies shall also apply to transactional information related to all E-ZPass transactions.

RITBA, either itself or through its agents, maintains credit card account information related to certain customers. It maintains this data in compliance with Payment Card Industry (PCI) regulations.

By reference, any modification to E-ZPass Reciprocity Agreements or PCI regulations which are stricter than the requirements outlined below shall also apply to all RITBA held information.

Application of Policy to Contractors

Unless this Agreement otherwise specifies or RITBA otherwise authorizes in writing, RITBA's tolling contractors (Tolling Contractors) may only collect or create personal information that is necessary for the performance of the Tolling Contractor's obligations, or the exercise of the Tolling Contractor's rights, under this Agreement (Personal Information).

Unless this Agreement otherwise specifies or RITBA otherwise authorizes in writing, the Tolling Contractors must collect Personal Information directly from the individual the information is about or RITBA. **A third party can not establish an account in another's name but can add someone else to an account.**

Unless this Agreement otherwise specifies or RITBA otherwise authorizes in writing, the Tolling Contractors (or RITBA) must advise an individual from whom the Tolling Contractor collects Personal Information:

(a) The purpose for collecting it;
(b) The legal authority for collecting it.

TOLL ACCOUNT INFORMATION

RITBA's customers may establish a prepaid toll account that can be used on any system accepting E-ZPass transactions in accordance with the E-ZPass Interoperability and Reciprocity Agreements. This information shall include each customer's name, address, contact information and credit card information. The customer shall be given an account number and shall establish a Personal Identification Number (PIN) at the time the account is set up. In addition, any transponders issued to the customer shall be associated with the account information. The information shall be maintained in related databases on servers of RITBA or its designated agent. The servers shall be adequately protected by firewalls consistent with the industry requirements. This information shall be called Toll Account Information.

ACCESS TO TOLL ACCOUNT INFORMATION

Toll Account Information shall be available on-line, via telephone or in person, to persons providing the valid account number and associated PIN. It is the responsibility of the both RITBA and the account owner to properly safeguard this access information. This information shall be deemed private and not subject to the freedom of information requirements.

Persons requesting information, but unable to provide a valid account number or PIN, shall not have access to the information. An accountholder who forgets either the Account Number or PIN may request that information be sent to the address of record upon presentation of the transponder number. The account number and PIN shall be sent by US Mail to the address of record by RITBA staff.

The PIN may also be given to a walk in customer at RITBA's offices upon presentation of a transponder, credit card used for the account and other officially accepted form of identification unless the transponder has been reported lost or stolen.

RITBA staff, its agents or vendors may have access to account information only for the purposes of account setup, account transaction or payment postings, account adjustments, license plate tolling transactions associated with the account, credit card transactions and replenishment, account troubleshooting, contacting account holders or providing information to the account holder who has provided proper identification. Any use of account information for any other purpose without written approval of the RITBA Executive Director or formal designee shall be a violation of this Policy. Such acts shall be subject to disciplinary or legal action, including, but not limited to, termination or loss of a contract to do work with RITBA.

RITBA's Customer Service Representatives are not permitted to release any customer account information to anyone other than the account holder. Account holders are defined as the individual(s) whose name is on the account

Requests for information via a subpoena or court order will be handled on a case-by-case basis. All such requests shall immediately be brought to the attention of the Executive Director.

TRANSACTION INFORMATION

RITBA shall maintain information on all electronic toll transactions, both transponder based and license plate video-based, which shall be deemed private and not subject to the freedom of information requirements.

Transponder based transactions shall be associated with the appropriate account and maintained in a related database. The account owner shall be sent such information on a periodic basis. In addition, the account holder shall have access to this information on line, via telephone or in person upon presentation of the account number and associated PIN.

RITBA staff shall have access to transponder based transaction information for the purpose of addressing customer questions. They may also address data for statistical, administrative or legal activities related purposes necessary to carry out the functions of toll collection. These activities may also be performed by agents or vendors of the Authority.

Video based transactions result when a vehicle travels through an electronic toll lane. Where the image is associated immediately with a transponder-based transaction, the image shall be stored until such time as the transaction has been completed and a reasonable time for challenging or appealing the transaction has expired. This data shall be accessed only for the purpose of addressing a question form the associated account holder or E-ZPass agency. Should the transaction be assigned to the wrong account, RITBA employees shall review the transaction image and any associated transaction information for the purpose of properly assigning the transaction.

A video based transaction which is not immediately associated with a valid and funded transponder based transaction shall be reviewed by the RITBA staff for the purpose of properly registering the plate number, state of issuance and when possible the plate type. This information shall be used to determine if the license plate is registered with a valid E-ZPass account. If the license plate is associated it shall be processed as an I-Toll and proceed as if it were a valid transponder based transaction. It shall have the same protections as a valid transponder based transaction.

A video based transaction that does not relate to a valid account shall be deemed to be a billed customer or a violation. In either case the information from the video image shall be used to identify the owner of the vehicle. That information shall be stored in a database with one or more photos of the transaction and the transaction information (date, time, location, anticipated toll and any associated fees). This file shall be considered private information and shall not be subject to the freedom of information requirements. The information will be sent to the owner of record for the vehicle identified in support of

the payment request. Once full payment is received the transaction shall be closed. Failure to pay the associated toll and fees shall result in a violation that may be pursued. As such, the privacy protections shall not be afforded thirty days after a third notice has been issued. [

For billed customers and violators, the license plate image shall be used for the purpose of obtaining the name and address of the owner of record. That information shall be used in accordance with the restrictions place by the issuing agency and protected as per those requirements. RITBA, it agents and vendors shall not use this information for any purpose other than the collection of tolls, fees and associated costs.

SURVEILLANCE VIDEO IMAGES

The RITBA maintains surveillance cameras on its properties. These moving images are not read for the purpose of identifying a vehicle owner. RITBA, through approval by the Executive Director or Security Director, may release this information to law enforcement or those involved in an incident on the bridge or roadway when they deem it appropriate or as otherwise required by subpoena or court order. This information is not considered confidential information. These records shall be maintained for sixty days and then the tapes reused or destroyed

ACCESS TO RECORDS

All Toll Account and Toll Transaction Information shall be considered private and not subject to the freedom of information requirements. Staff, RITBA agents and RITBA vendors shall use the information in accordance with this Policy. The Executive Director may, with good cause and within his or her reasonable discretion, authorize additional uses of the information to meet the toll collection needs of RITBA.

The public shall not have access to Toll Account and Toll Transaction Information except:

1. The account holder shall have access in accordance with the requirements specified above.
2. Persons authorized by the account holder (by providing the account number and PIN) shall have access to the information.
3. The executor of an estate shall have access to the information upon presentation of a death certificate and appropriate appointing documents.
4. An officer of the Court shall have access to the information only upon submittal of a subpoena or court order specifying the actual data required.
5. A police organization shall have access to the information upon presentation of a subpoena or court order.
6. A person charged with a toll violation shall have access in accordance with a violation notice issued by RITBA.