



June 14, 2022

Re: Surveillance Ordinance Group 4b Request for Clarification from CTAB Privacy & Cybersecurity

The Community Technology Advisory Board (CTAB) Privacy & Cybersecurity Committee appreciates the opportunity to provide comments on the Group 4b Surveillance Impact Reports (SIRs). Group 4b includes six Seattle Police Department (SPD) surveillance technologies under review. The vendors for five of these technologies are not indicated in the SIRs. This lack of transparency hinders our ability to provide comments on the use of these tools.

Our expectations for the onboarding of new technologies and the use of current technologies extend those as communicated in our March 2019 memo to the Seattle City Council regarding Group 2 technologies and June 2020 memo regarding Group 4a technologies, with additions. We request that the SIRs include the following:

- The complete list of vendors used to provide services for each category of surveillance technology, if they hold or retain data from use of the technology for any time, and what data governance standards each maintains.
- Schedule of regular external security audits: Coordinated by ITD (Seattle IT), routine third-party security audits are invaluable for both hosted-service vendors and on-premises systems.
- Previous or pending mergers and acquisitions: These large, sometimes billion-dollar ownership changes introduce uncertainty. Any time a vendor, especially one with a hosted service, changes ownership, a thorough review of any privacy policy or contractual changes should be reviewed.

Sincerely,

**Community Technology Advisory Board**

**Femi Adebayo**, CTAB Vice-Chair  
**Nicole Espy**, CTAB Member  
**Dr. Tyrone Grandison**, CTAB Member  
**Annie Shaw**, CTAB Member  
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