Euro Car Parks Ltd, Personal information and the law

Our Privacy Promise

We place significant importance on GDPR compliance and are continuously reviewing our policies and adopting best practice. We will ensure the following;

- To keep your data private and secure.
- To uphold your data protection rights.
- Not to sell your data or use it for marketing.

Who we are

Euro Car Parks Ltd is registered at Companies House, our registration number is 01270612. If you would like to know more about how we use your personal information please continue reading.

For data protection information regarding our Ireland division please visit www.eurocarparks.ie

How the law protects you

Your privacy is protected by EU law, it is a considered a human right. This section explains your rights and protections.

The EU General Data Protection Regulations (GDPR) outlines that companies, including Euro Car Parks:

- Must only use your personal information with suitable reason.
- Must be clear and transparent with those reasons.
- Must ensure that the rights of that data subject are upheld.

Your rights as a data subject are described below:

- 1. The right to be informed You have the right to be informed about the collection and use of uour personal data. This is a key transparency requirement under the GDPR.
- 2. The right of access You have the right to access or obtain confirmation that your data is being processed and copies of the data personal data.
- 3. The right to rectification You have the right to have inaccurate personal data rectified, or completed if it is incomplete.
- 4. The right to erasure You have the right to request that Euro Car Park erases your personal data from our systems under certain conditions. Also known as 'the right to be forgotten'.

- 5. The right to restrict processing You have the right to request the restriction or suppression of your personal data under certain conditions.
- 6. The right to data portability You have the right to obtain and reuse your personal data in a simple format so that it can be used across different services.
- 7. The right to object You have the right to object to you data being used for:
 - Processing based on legitimate interests or the performance of a task in the public interest.
 - o Direct marketing (including profiling).
 - o Processing for purposes of scientific/historical research and statistics
- 8. Rights in relation to automated decision making and profiling.

You have the right to have you personal data not included in:

- Automated individual decision-making (making a decision solely by automated means without any human involvement).
- Profiling (automated processing of personal data to evaluate certain things about an individual).

Where we collect your personal data from

Euro Car Parks may collect personal information about you from the following sources and third parties:

Data you give us

- In letters or emails you send to us.
- In letters or emails you send to us.
- When you use our touch screen exemption consoles.
- Information included in your PCN appeal.
- When you apply for a season ticket or permit.
- When you pay for parking or a PCN.
- When you use our website.

Data we collect ourselves

- Automated Number Plate Recognition (ANPR) cameras as you enter/exit a car park.
- Parking Officer Handheld ANPR devices during your stay at a car park.

Data from third parties we work with

- The Driver and Vehicle Licensing Agency (DVLA).
- Your employer/business (in the instance of parking exemptions)
- Pay and Display machine providers.
- Vehicle hire companies.

How long we keep your personal information (Data Retention)

Vehicle Registration Mark (VRM), or license plate, data is retained for the purpose of managing a car park and is retained for no longer than ten (10) days. This allows us to ensure all data is collected pertaining to a specific car park and ensure we have captured exemptions, payments, etc. prior to calculating the length of stay. This period is subject to change and will depend on a specific agreement with the Information Commissioners office (ICO). The ten day period is currently in operation as of May 2018.

Information (data) relating to parking charge notices (PCN's) are retained under Inland Revenue guidelines for financial transactions and we have an obligation to hold this data for six (6) years.

Information (data) relating to the use of pay and display (P&D) machines, pay-by-phone and other payment mechanisms are retained for six (6) months to ensure your ability to appeal a potential parking charge notice. Vehicle registration marks from payment mechanisms are maintained separately and exclusively for the purpose of payment and are separate from ANPR data.

How personal information is used

What data we collect and why

Car Park Visitors			
Type of personal information	Purpose of Data	Our Lawful Reason	
Vehicle Registration details and images	To effectively manage car parks	To fulfil the contract to manage a car park and to maintain the parking Terms & Conditions	
Vehicle Registration & Site Visit Information	To generate reports to monitor daily performance and improvement (not used past the data Retention Period – see below)	Our Legitimate Interest	
Visit & Vehicle information – Touch Screen Exemption Console	To exempt your vehicle from overstay processing.	To fulfil a contract	
Visit &Vehicle information – Pay & Display Machines	To exempt your vehicle from 'overstay' processing after you have made a payment for parking.	To fulfil a contract	

Website Visitors		
Type of personal information	Purpose of Data	Our Lawful Reason
IP Address	To enable the delivery of website content	Provided Consent
Cookies	To validate form submissions	Provided Consent

Parking Charge Notice Appeals		
Type of personal information	Purpose of Data	Our Lawful Reason
Vehicle Registration and images	To process and file your parking charge appeal. This data may be accessed as part of compliance audits.	Provided Consent
Full name and address	To process and file your parking charge appeal. This data may be accessed as part of compliance audits.	Provided Consent
Vehicle Registration and images	To process and file your parking charge appeal. This data may be accessed as part of compliance audits.	Provided Consent
Additional appeal data supplied by applicant	To process and file your parking charge appeal. This data may be accessed as part of compliance audits.	Provided Consent

Season Ticket/Parking Permit Holders		
Type of personal information	Purpose of Data	Our Lawful Reason
Vehicle Registration details	To exempt your vehicle from 'overstay' processing as you have permission for parking.	To fulfil a contract
Contact details	To aid us managing your exemption and to allow us to contact you with appropriate cause.	To fulfil a contract

Recruitment		
Type of personal information	Purpose of Data	Our Lawful Reason
Contact details	To allow us to contact you in regards to the progress of your application.	Our Legitimate Interest
CV details	To manage the recruitment process and to assess and confirm a candidate's suitability for a given role.	Our Legitimate Interest
Background check details including criminal convictions	To ensure that we are complying our legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.	To fulfill our legal obligations

Our Clients (Existing and Potential)		
Type of personal information	Purpose of Data	Our Lawful Reason
Contact details	To allow us to contact you and manage your account.	To fulfil a contract
Employee Vehicle Details	To manage your exemption lists	To fulfil a contract

Who we share your personal data with

We may share your personal information with outside organisations such as our service providers or government authorities. This is so that we can fulfill contracts, run our business, and obey rules that apply to us. Below is a list of all the types of organisation that we may share your personal information with.

Authorities

- HM Revenue & Customs, regulators and other tax authorities
- Law enforcement agencies
- Driver and Vehicle Licensing Agency (DVLA)
- The British Parking Association

Parking and Technology Services

- · Pay and Display Machine Providers
- Payment provider for processing any online/telephone payments

- Email service providers
- ANPR Equipment Manufacturers (to provide support/troubleshooting)
- Cloud Storage Providers (Such as Azure)
- Website Hosting Companies
- IT Management Services

Other Services/Schemes

- · Debt collection agencies
- Solicitors (to enforcing a parking contract or responding to a legal query)
- The Parking On Private Land Appeals (POPLA) Service
- Employment background check providers

General Business

- Companies you ask us to share your data with (In accordance to your Right to Data Portability)
- · Current and former employers
- Our Clients (to manage 'exempted from processing' lists)
- · Other duly authorised sub-contractors

Sending data outside the EEA

Euro Car Parks has policies and procedures in place to prevent your data leaving the European Economic Area (EEA) however in some cases we may have to. We will only send your data outside of the EEA to:

- Follow your instructions
- Comply with a legal duty

Cookies

Euro Car Parks Ltd uses cookies on the https://www.eurocarparks.com/ website (the "Service"). By using the Service, you consent to the use of cookies.

What are cookies

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you. Cookies can be "persistent" or "session" cookies. Persistent cookies remain on your personal computer **Or mobile device** when you go offline, while session cookies are deleted as soon as you close your web browser.

When you use and access the Service, we may place a number of cookie files in your web browser. We use cookies for the following purposes:

To enable certain functions of the Service.

We use both session and persistent cookies on the Service and we use different types of cookies to run the Service: Essential cookies. We may use essential cookies to authenticate users and prevent fraudulent use of user accounts.

What are your choices regarding cookies

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

- For the Chrome web browser, please visit this page from Google
- For the Internet Explorer web browser, please visit this page from Microsoft
- For the Firefox web browser, please visit this page from Mozilla
- For the Safari web browser, please visit this page from Apple
- For any other web browser, please visit your web browser's official web pages.

Where can you find more information about cookies

You can learn more about cookies and the following third-party websites:

- AllAboutCookies
- Network Advertising Initiative

The control you have

How to get a copy of your personal data

If you wish to obtain a copy of your personal data then you can contact us via email at DPO@eurocarparks.com

We will take reasonable steps to verify your identity and that you are entitled to the information and we will ensure that your request is processed and resolved within 30 days.

Letting us know if your personal information is incorrect

If you believe that any data we hold may be inaccurate, incomplete or out of date then you can contact us via email at DPO@eurocarparks.com

We will take reasonable steps to verify your identity and to correct any inaccurate data and ensure that your request is processed and resolved within 30 days.

What if you want us to stop using your personal information?

If you wish to object to us using your personal data then you can contact us on DPO@eurocarparks.com

We will take reasonable steps to verify your identity and to process your request. Euro Car Parks Ltd does not have to agree with your request but under data protection law must advise you why such a decision has been made.

How to withdraw your consent

You can withdraw any provided consent at any time, if you wish to do so contact us via email DPO@eurocarparks.com

This will only affect data that we use under the basis of consent and once withdrawn we may not be able to provide certain products or services to you. If this is so, we will tell you.

How to complain

Euro Car Parks is committed to ensuring your data rights are upheld, if you are unhappy with how we have used your personal information you can contact us via email DPO@eurocarparks.com

You also have the right to take your complaints directly to the regulator, and to lodge an appeal with them if you are not happy with the outcome of a complaint.

In the UK this is the Information Commissioner's Office. Find out on <u>their website</u> how to report a concern.