

# PRIVACY POLICY

## MANAGE MY CAR PARK SERVICE

### 1. WHAT DATA DO WE COLLECT AND HOW TO WE COLLECT DATA?

We will collect the following data in order for you to apply for and operate as a self ticketer in the capacity of a Freeholder / Landlord / Leaseholder, Agent (on behalf of the Freeholder) or Manager (on behalf of the Freeholder).

Such data will be provided by you in your application and will include: Full name; date of birth; home address; email address; phone number; details of unspent convictions, photographic identification documents for example passport, driving license, utility bills, mortgage statement, credit card statement, bank statement, criminal convictions, and if you choose to be paid as part of the service, your bank account and sort code details. Submitting photographic evidence of specific landowner / leaseholder ownership rights.

### 2. WHAT IS OUR PURPOSE AND LAWFUL BASIS FOR PROCESSING YOUR PERSONAL DATA?

Our lawful basis for processing data is the Performance of a Contract.

### 3. HOW WE PROCESS YOUR DATA AND WHY WE PROCESS IT

When using this service, personal data is collected and processed as necessary, for the performance of the contract reached with the Landowner / leaseholder including:

- Processing an application made by you to become a self-ticketer.

- Referring the application data to the International Parking Community (IPC) for assessing the applicant's eligibility. (For further information please see the IPC Privacy Policy).
- To perform contract agreed with the landowner / lease holder.
- Registering your approved application.
- We will also process data in pursuit of our, your, the landowner / leaseholder, legitimate interests, including corresponding with you and / or the landowner / leaseholder about your self-ticketing practices (if necessary).
- Provide technical support (where required).
- Pay monies due via BACS transfer (where applicable).

This processing is necessary to have an individual approved as a self-ticketer and to enable the enforcement of parking restrictions using photographic evidence of a potential parking contravention, includes the car park signage where drivers are notified of specific terms and conditions of the car park and GPS co-ordinates to demonstrate the location and accuracy of any potential enforcement. When using this service your data is collected and processed, as necessary, for the assessment and approval of an individual's status as a self-ticketer.

#### **4. PROCESSING OF SENSITIVE DATA**

Where you disclose any "special category data" when submitting an application via this service, you explicitly consent to this information being processed as part of your application, such as when assessing your eligibility by the IPC and corresponding with you about your application (including in relation to renewals). This data will not be used for any other purpose. We will continue to process any "special category" personal data provided by you, as specified above, unless we are notified that your consent to processing has been

withdrawn. If you wish to withdraw your consent, please email: [dpo@uk-cpm.co.uk](mailto:dpo@uk-cpm.co.uk).

## **5. HOW LONG WILL WE RETAIN / STORE YOUR DATA FOR?**

We may retain any information supplied as part of your application, (excluding unspent conviction data) including documents uploaded or any relevant details from such documents, for the duration of your application and the period of time you remain an approved (by the IPC) self ticketer, plus 90 days. However, we will not ask you for any more information than we need, and we do not keep your information for any longer than we need to.

## **6. AUTOMATIC DECISION-MAKING AND ONLINE PROFILING**

We do carry out automated processing of Vehicle Registration Marks at some of the sites that we manage through the use of cameras. Decisions about whether to issue a notice to keeper for a contravention of the terms and conditions is not purely made by automated means.

## **7. TRANSFERRING PERSONAL DATA OVERSEAS**

For us to perform the normal functions of our company and in providing you with goods and services, in some instances where we need to send personal data outside the UK.

We either transfer to a country that has been deemed "adequate" for personal data transfers by the UK government (such as one of the countries in the European Economic Area) or we put in place approved international data transfer contract clauses (such as the UK's International Data Transfer Addendum to the EU Commission Standard Contractual Clauses).

## **8. WHO DO WE SHARE DATA WITH?**

In order for you to be a self-ticketer, we may need to share data with certain organisations. This could include any authorised sub-contractors, such as, IT service providers, regulatory bodies such as The International Parking Community (IPC) and Law

Enforcement agencies (i.e., The Police and other security organisations as required in the detection and prevention of a crime).

## **9. WHAT ARE YOUR DATA PROTECTION RIGHTS?**

You have:

- The right to be informed.
- The right to access.
- The right to rectification.
- The right to erasure ('right to be forgotten').
- The right to restriction of processing.
- The right to data portability.
- The right to object.
- The right not to be subject to automated decision making and profiling.

If you have an issue concerning the processing of your information, then please contact our Data

Protection Officer at: [dpo@uk-cpm.co.uk](mailto:dpo@uk-cpm.co.uk). If you wish to make a complaint about the processing of your personal data by UK-CPM with regard to this service or if you feel that UK-CPM has not addressed your concern in a satisfactory manner, you can address a complaint to the ICO, via their website: [www.ico.org.uk](http://www.ico.org.uk).

## **10. CHANGES TO THIS PRIVACY POLICY?**

We will make changes to this policy all of which will be posted on our website.