

Universal Parking Enforcement Ltd

Personal Data Privacy Policy

This privacy notice explains how Universal Parking Enforcement Ltd uses your personal data (i.e. information about you and your vehicle) in order to provide you with parking services under our contract with you. These terms should be read together with our parking and payment terms, which can be found here www.universalparking.co.uk/parking-terms-and-conditions

These terms also explain how we comply with the General Data Protection Regulation and the Data Protection Act 2018; we will refer to these laws as 'Data Protection Law'.

This privacy notice also explains how we use your personal data on data collection only sites, in order to provide managed services.

This privacy notice can also be obtained by telephone, by calling 0800 702 2604 and includes the following information to help you understand clearly how your data is being used:

- What we do with your personal data
- Your rights
- The lawful basis for processing your data
- Categories of data processed

Who we are

UNIVERSAL PARKING ENFORCEMENT Ltd (12907026) is a company registered in England and can be contacted at 960 Capability Green, Luton, Bedfordshire, LU1 3PE. Our Data Protection Officer can be contacted by emailing mail@universalparking.co.uk or by calling 01582 322815.

What we do

When you enter, remain and exit a car park operated by us, we take photographs of the vehicle and registration by Automatic Number Plate Recognition (ANPR) and CCTV cameras. In car parks where ANPR and CCTV cameras are not in operation our parking attendants are present to deter criminal activity and they may take notes and images about your vehicle and your activity in the parking area. The data gathered by cameras or parking attendants is needed to determine your compliance with the parking and payment terms of your contract with us.

Your personal data is being obtained, retained and processed, depending on the category of user you are of our site. We also use our cameras to detect and deter criminal activity.

Your rights

Under Data Protection Legislation you have the following rights:

- To be informed
- Of access
- To rectification
- To erasure
- To restrict processing
- To data portability
- To object

Please note that you have the right to request the above, but under data protection law we must; confirm who you are before providing information and; provide you with an explanation if we do not agree with your request. So, if you do make the request, we will tell you if the request has been granted or not.

Right of access

You have the right to submit a Subject Access Request and this can be done by emailing mail@universalparking.co.uk or by calling 01582 322815 or in writing to our Data Protection Office at the above address. We will need to confirm who you are obtain proof of your identity before providing you with information we may hold about you.

Our purpose and legal bases for processing your personal data

- The purpose of processing your data is to enable effective car park management and ensure compliance with your contractual obligations having come onto and remained on the car park. There are also legitimate interests for us to do so in order to pursue anyone who may be liable to pay sums due, defend legal claims, protect the rights of a landowner and for our business interests.
- We are entitled to:
 - a. Pursue a motorist for an unpaid parking tariff
 - b. Pursue a motorist for an unpaid parking charge
 - c. Ensure safety and security and help deter/detect criminal activity
 - d. Carry out data analytics, including reporting on vehicle turnover, vehicle type and repeat visits, to analyse the overall site activity
- In the case of Data Collection Only Sites, the purpose of processing your data (i.e. information regarding your vehicle activity) is in order to provide effective car park managed services. This is done under the basis of protecting legitimate interests in order to provide a more effective customer experience.

- We are entitled to:
 - a. Ensure safety and security and help deter/detect criminal activity
 - b. Carry out data analytics, including reporting on vehicle turnover, vehicle type and repeat visits, to analyse the overall site activity

The Categories of "Personal Data" we process and how long we retain this information

1. Where there has been no breach of the parking contract

As a compliant user of this Private Land, the personal data we obtain is your vehicle registration number. We may also capture images of the vehicle, occupants or bystanders. A full list of your Rights under data protection law are summarised above. Where your data is obtained it will be retained for 24 months only in order to be able to cross reference registration numbers for discrepancies, retaining this data in this way enables us to properly and fairly manage the car park which sometimes means cancelling Parking Charges. After this time, we then erase your registration and any other images from our records.

2. Unpaid Parking Fee and where a parking charge becomes due:

a. ANPR and CCTV Camera enforcement

Where there is a fee which is payable for parking and it appears it has not been we may request details of the registered keeper of the vehicle from the Driver and Vehicle Licensing Agency "DVLA" and other third parties (for example the registered keeper or hire companies where applicable) who may possess information which could assist in pursuance of the unpaid parking fee and resolving any disputes, this could include the name and address of the registered keeper.

b. Windscreen Parking Charge issued by a Parking Attendant

If you have received a Parking Charge Notice on your windscreen, at the point the notice is placed on your windscreen, we will have obtained your personal details, which could include images of your vehicle, occupants/bystanders and the vehicle registration number. If you or a third party pay the Parking Charge Notice within 28 days, your personal details will not be retained for longer than 24 Months. Where there is an unpaid fee over 28 days, we may request personal details of the registered keeper of the vehicle from the Driver and Vehicle Licensing Agency "DVLA" and other third parties (for example the registered keeper or hire companies where applicable) who may possess information which could assist in resolving any dispute.

The personal details we may obtain from the DVLA for both Camera and Parking Attendant Windscreen Parking Charges include:

- The name and address of the registered keeper;
- The make, model and colour of the vehicle;
- Confirmation of the registration number;

- Any other information that we gather, in pursuance of the unpaid parking fee, including information that is shared by you with us.

Your data will be held for sufficient time to enable the fee or outstanding parking charges to be settled, by you or another person and resolve any dispute. However, your data will not normally be held for longer than 6 years in such circumstances. In some circumstances your data may be held for longer than 6 years, examples of this are:

- When there is an ongoing dispute which requires us to hold the data for longer than 6 years.
- Where a court order has been made allowing us to pursue outstanding money after the expiration of 6 years.
- Where contractual or legal obligations specific to a site require us to and we will only keep data for longer if there is no other way of meeting those obligations.

3. Appeals

If you decide to challenge a parking charge and we reject your challenge, you will be provided the opportunity to appeal to the Independent Appeals Service (IAS). This is to allow you to contest the charge with an independent adjudicator who will be provided with your data.

4. Managed Services

On sites where we are using ANPR cameras, for data collection purposes only, and where we are not enforcing and not relying on a contractual basis, we retain the VRN and any images for a period of 90 days. This data is kept long enough to ensure we can process the data into raw site statistics, and provide effective managed services, in order to protect our legitimate interests.

5. Data Analytics

We may use your individual vehicle activity, in order to derive raw data values of total entries and total exits of all vehicles, or vehicle types that have entered a given car park on a given day. It should be noted that we don't analyse individual data subject's activity but analyse the overall site activity. This derived data can no longer be linked to any data subject and is therefore retained for as long as is needed in order to provide effective managed services.

Sharing your personal data

Your personal data may be shared with:

- A parking tariff payment facilitator
- External software providers,
- Independent appeals adjudicator IAS
- Debt recovery companies,
- Police and Security Services

- Solicitors and high court officers/bailiffs where necessary to ensure compliance with your obligations under the contract.
- The landowner to assist with the administration of the parking enforcement operation on site, including the administration of any relevant site whitelists. They may also receive any data analytics on overall site activity, as this derived data that can't be linked to the individual.
- Data sharing agreements will be put into place, before any personal data is shared that has not been provided by the party themselves (i.e. whitelists), to ensure relevant safeguards of that data are in place, and only if it is required to share under a legitimate interest.

Other than the list above we do not share information about you or your vehicle with any other third party. Where data is transferred outside the EU we have ensured that those from the list above accessing the data have the appropriate safeguards in place and are subject to an appropriate supervising authority.

Changes to our Privacy Notice

From time to time we may amend the way in which we process personal data. This may lead to changes in how we collect and/or use your personal information. We may amend the terms of this Privacy Policy at any time. This privacy policy was last updated on 30/10/20.

Further information and complaints

If you require more information about items raised in this notice please contact us or you may wish to ask or complain to the Information Commissioner's Office via the ICO website, www.ico.org.uk or by mail to:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline number: 0303 123 1113