

Care Parking Privacy Policy

INTRODUCTION

Your privacy is important to us so we've developed a Privacy Policy that covers how we collect, use, disclose and store your personal information. Please take a moment to familiarize yourself with our privacy policy and contact us if you have any questions.

We are a car park management company called Care Parking which is a trading name of Anchor Security Services Limited (2548101) and we are the data controller. This Privacy policy relates to the car park management data processing carried out by Care Parking. Please see separate Anchor Security Services Group Privacy policies for all other legal entities within the group.

This policy explains how we will use any personal data (i.e. information about you and your vehicle) we collect from you, or that you provide to us, in order to provide you with parking services under our parking contract with you. This policy should be read together with our parking and payment terms which can be found on our car park signage. If you would prefer to listen to this Privacy Policy please call 01244 354700 and press Option 6.

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how Anchor Security Services Ltd, trading as Care Parking collects and processes your personal data, including any data collected when you enter or remain at one of our car parks, contact us in any way or visit our website.

It is important that you read this privacy policy in order to understand how we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices about privacy.

THE TYPES OF DATA WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- VRM, images of your vehicle, images tracking movement to and from a vehicle;
- First name, last name, marital status, title, date of birth and gender
- Address, email address and telephone numbers
- Payment details
- Any information you provide to us in correspondence
- Cookies, IP information
- Details of your marketing and communication preferences
- We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). However, if you provide us with any of this information, for example within correspondence or as part of an Appeal, we will process it appropriately.

All information we collect and receive about you will be processed in accordance with this policy.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- When you use a car park managed by us, we may collect personal data about you via ANPR and CCTV Cameras, Parking attendants, payment terminals, mobile applications.
- Where the parking terms and conditions have not been complied with, we may request and obtain your personal details from the DVLA
- You may give us your personal information when you make an appeal, or contact us for any other reason
- We may monitor and/or record phone calls between administration staff and you in order to assist in providing both you and our staff additional security, to help resolve complaints and for overall training and quality purposes.
- We collect personal data by using cookies when you use our website

WHAT IS OUR LAWFUL BASIS FOR PROCESSING YOUR DATA

Our lawful bases for processing personal data are:

- **Contract** – The processing is necessary for performance of the parking contract which has been formed when you or your vehicle entered and remained in the parking area
- **Legitimate Interests** – The processing is required to protect and enable pursuit of legitimate interests in ensuring the car park is effectively managed, unpaid parking tariffs and charges arising as a result are sought and to promote the safety and security of the parking area
- **Legal Obligation** – In order to fulfil our obligations to HMRC

We have set out below, a description of the ways we may use your personal data, and which of the legal bases we rely on to do so.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our car parks	(a) VRM (b) Image of vehicle	(a) Performance of a contract with you (b) Necessary for our legitimate business interests and those of the land owners was assist

<p>(a) To contact the DVLA or a hire or vehicle company</p> <p>(b) In order to issue a PCN</p>	<p>(a) VRM</p> <p>(b) Name and address</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to allow us to contact the registered keeper and recover debts due to us)</p>
<p>(a) To review an appeal made to us and respond</p> <p>(b) To review and respond to an appeal made to POPLA</p>	<p>(a) Identity information</p> <p>(b) Contact details</p> <p>(c) VRM/Images</p> <p>(d) Any information provided in your appeal</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Legitimate interests (to improve the parking experience for motorists)</p>
<p>To take payment in respect of a Parking Charge Notice</p>	<p>(a) Identity information</p> <p>(b) Payment information</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (Operating our business and recovering debts due to us)</p>
<p>To share your details with a third party in order to enforce the debt where a Parking Charge Notice remains unpaid</p>	<p>(a) Identity</p> <p>(b) Contact details</p> <p>(c) VRM/Contravention details</p>	<p>(a) Performance of the contract</p> <p>(b) Legitimate Interests (to enforce the debt, our business interests)</p>
<p>To administer the website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Cookies/technical personal information</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud)</p>
<p>In order to administer the business, for example:</p> <p>(a) our mail service provider</p> <p>(b) IT and technical assistance</p> <p>(c) Payment service providers</p> <p>(d) Credit reference agencies</p> <p>(e) Collection agents</p>	<p>(a) Identity</p> <p>(b) Contact details</p> <p>(c) Cookie/IP information</p> <p>(d) Payment information</p>	<p>(a) Necessary for our legitimate interests (running a business, provision of support/admin services, to provide a good service for our customers)</p>

To comply with our auditing obligations to the DVLA, HMRC etc	(a) Identity (b) VRM/Contravention information	(a) For the performance of our contract with the DVLA (b) To comply with a legal obligation
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We will only use your personal data for the purposes listed above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original reason for capturing your data.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

COOKIES

When someone visits www.careparking.co.uk we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make any attempt to find out the identities of those visiting our website.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website

WHO DO WE SHARE DATA WITH AND WHY?

We use third party data processors to provide elements of our service. We have processing agreements in place with these companies. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from what is agreed with us. They will hold it securely and retain it for the period we instruct.

We will only share data in a way that is proportionate to the purposes explained above and ensure your information is processed securely. We will only share information about you and your vehicle with the types of organisations listed below:

- **The Driver Vehicle Licensing Agency (DVLA)**
Where a Parking Charge Notice (PCN) is issued under the parking and payment terms of the parking contract, the PCN may be placed on the vehicle or sent to the registered keeper of the vehicle by post. In both cases we may request the registered keeper's details from the DVLA. We may provide the DVLA with data captured by our cameras and/or parking attendants
- **Lease, Hire Companies, Third Parties**
Where you are not the registered keeper of a vehicle that caused a PCN to be issued, we may share data with a vehicle hire or Lease Company or an individual that has confirmed that they hired, leased or authorised your use of the vehicle at the relevant time.
- **Third Party Agents**
Where necessary in relation to a PCN we may share data about the registered keeper (name, address, registration number, details of the parking contravention including movements within the parking area) with:
 - i. agents who act on our behalf such as legal advisors including those who collect sums due such as debt recovery agents and bailiffs;
 - ii. Our Accredited Trade Association the British Parking Association (BPA) and independent parking appeals service the Parking on Private Land Appeals service (POPLA) in relation to dealing with PCN queries, complaints and appeals

- iii. Landowners, managing agents and tenants of land on which we manage car parks
 - iv. Authorised agents such as subcontractors such as mail, IT, business process and payment service providers for processing on-line agencies, credit reference agencies and collection agents.
- **Police and Security Services**
Where necessary for the purposes of preventing or detecting crime, we may share or be requested to share data about you or your vehicle with the police or other security organisations
 - **Government Agencies**
We are required to retain certain information with regard to payments for HMRC. We will only retain information necessary for HMRC auditing purposes and this should not ordinarily involve your personal data unless we are required to share your personal data for the prevention or detection of crime.
 - **Data Analytics**
We may share data about vehicle numbers, repeat visits and the use of car parks we manage generally with companies providing marketing and analysis services. We will not share with them any data that could identify you or any other individual.

INTERNATIONAL TRANSFERS

In some instances, personal data may be transferred or stored outside the European Economic Area. Where this is the case, we have in place the appropriate safeguards required by data protection law/the data is transferred to a country which has been classed to have adequate safeguards by the ICO/is covered by the US Privacy Shield.

DATA SECURITY

We will keep all your information including DVLA keeper details, information provided to us by third parties, your written and electronic correspondence and telephone messages securely and confidentially. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

We cannot guarantee the security of your data transmitted from our site; any transmission via the internet is at your own risk. Once we have received your information, we will apply our security safeguards to prevent unauthorised access.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

HOW LONG WILL WE KEEP MY PERSONAL DATA FOR?

We will keep your personal data for no longer than is necessary to carry out the purposes explained above. Including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

YOUR DATA RIGHTS

In relation to the personal data which we may hold about you, you have the following rights, to:

- Be informed how we process your data as explained above
- Access the information we hold about you, you can do this by making a subject access request.
- Ask us to
 - Rectify information about you that is incorrect or incomplete
 - Delete (erase) information about you
 - Restrict how we process your information
 - Transfer your data in an accessible electronic format
 - Object to our processing of your information

- Complain to us via our contact details below
- Complain to the data regulator the Information Commissioner's office (ICO) via www.ICO.org.uk or you can contact the Information Commissioner's Office on 0303 123 1113

Please contact us using the details below if you wish to assert your rights ensuring you provide proof of your identity with any request. Under data protection law we must verify your identity before carrying out your request or supplying any information and provide you with an explanation if we do not agree with your request. Once your identity has been confirmed we will respond to your request within one calendar month.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy

CONTACT DETAILS AND INFORMATION

If you would like more information about how we process your data or if you wish to assert any of your rights set out above please contact our data protection officer/ privacy team by:

- Email. DPO@anchorgroupservices.co.uk
- Write to us at:
Data Protection Officer,
Anchor Security Services,
Seasons House,
Lakeside Business Park,
Ewloe, CH5 3YE.
- Call us: 01244 354700

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