

## Parking & Property Management Ltd

## **Privacy Policy**

Parking & Property Management Ltd ("we' or "us" or "our") is committed to protecting your privacy. Our Privacy policy explains how we collect, use, and protect information about you in the scenarios that are described in section 2 below. By taking any of the actions listed within that section, you agree that we may collect and use your information in the ways described in this privacy policy.

#### Topics covered in our privacy policy:

- Who are we?
- How do we collect information?
- What we use your information for
- Sharing your information
- Cookies and Traffic data
- Your information
- Changes to our privacy policy
- Security and storage of information
- Transfers outside Europe
- Other Sites
- Further Information

#### Who are we?

We are a limited company registered in England and Wales company number 08645452. Our registered office is at Lily Hill House, Lily Hill Road, Bracknell, Berkshire, RG12 2SJ. We are registered on the Information Commissioner's Office Register of Data Controllers and this registration covers all of our different business divisions. For details of how to contact us, please refer to the Contact Us page.

#### How do we collect information?

We will collect information from you if you:

- register to use our website; this will include your name, address, email address and telephone number. We may ask you to provide additional information about your business and preferences on a voluntary basis
- provide your vehicle registration number via one of our parking payments machines.
- provide your vehicle registration number via one of our permit entry systems, this may include a web login, on-site portable entry system, phone-based permit system.



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- complete online forms including call-back requests and reporting a vehicle.
- provide your contact details to us when registering to use or accessing any product or service we provide (including any Apps we may offer).
- contact us offline for example by telephone, fax, email, or post.
- visit or browse our website, this will include information about your website visit or use of our products or services using cookies or similar technologies (as described in section 5 below).
- provide your contact details when using our web-based Parking Charge Notice appeals service or via postal service, this will include your name, address, email address, telephone number & Vehicle registration number.
- provide your payment details when using our web-based or telephone-based Parking Charge Notice payment service.
- Mobile Device, by our wardens and self ticketers this will include images of your vehicle, vehicle registration for evidence to pursue the parking charge notice being served.
- ANPR Camera (Automatic Number Plate Recognition or CCTV).

Our wardens also operate body cameras worn at all times for their safety and evidence purposes.

#### What do we use your information for?

Reasons why we process your personal data are as follows:

- To determine the adherence with the parking sites terms and conditions.
- To issue Parking charge notices to the windscreen of a vehicle
- To issue a notice to keeper / driver by the post.
- To process a payment for a parking charge notice (PCN) To pursue the payment of an unpaid parking charge notice.
- To issue permits and visitor scratch cards.
- Dispute resolution and legal action

# Obligations to provide Parking and Property Management Ltd with Certain information

If on the date of the contravention you were the driver of the vehicle but not the registered keeper, it is of your responsibility to transfer liability to yourself from the keeper, In that situation we would require your full name along with a full serviceable address in order to successfully transfer liability. If you do not transfer liability PPM LTD will request the information from the DVLA and will peruse the registered keeper of the vehicle unless later transferred.



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## Making a payment for a Parking Charge Notice

If you pay for a parking charge notice you will be required to provide us will your full address and payment card details for us to process the payment. If the required information is not provided then the payment will not be processed.

PPM Ltd do not retain card payment details on record.

#### Sources of information

Where we have issued the Parking charge notice to the windscreen of the vehicle or the charge has remained unpaid, PPM LTD will obtain the registered keepers name and address from the <u>DVLA (Driver and</u>)

Vehicle Licensing Agency)

How is your personal data used? To verify authorised users parking on site.

Data Process:

• Vehicle registration number Use of Data

• To check our records against the vehicle registration to ensure authorisation to park on site. Data Sharing:

• IT Service Provider and PCN Processing databases. Retention Period:

• One Month from the vehicle parking on site.

#### To issue a parking charge notice.

Data Processed:

• Vehicle registration number, Vehicle make and model, the location of the parking charge notice along with time and dated photographic evidence of the contravention that took place.

Use of data?

• To issue a parking charge notice to the offending vehicle. Data Sharing:

• IT Service Providers and PCN Databases, DVLA. Retention Period



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• Two years from PCN date – Once paid in full.

#### To issue a Notice to Keeper:

Data Processed

- Keeper Name and Address / Driver Name and address. Vehicle registration number, Vehicle make and model, the location of the parking charge notice along with time and dated photographic evidence of the contravention that took place.
  Use of data?
- To issue a parking charge notice to the offending vehicle. Data Sharing:
- IT Service Providers and PCN Databases, DVLA. Retention Period

## To handle driver / Keeper / Hirer Complaints or appeals Data Processed

- Name, Address, Vehicle Registration Number and PCN reference number Use of data:
- To confirm the identity of the appellant before disclosing any details / discussing the charge. **Data Sharing**
- IT Service Providers, DVLA

## Taking payment for a PCN Data Processed

- Card Payment details Use of Data
- To Process a payment

#### **Data Sharing**

• Card Payment Processor

#### **Retention Period**

• PPM do not retain any payment details.



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## To Pursue an unpaid Parking charge Notice. Data

#### Processed

Keeper Name and Address / Driver Name and address. Vehicle registration number, Vehicle make and model, the location of the parking charge notice along with time and dated photographic evidence of the contravention that took place.

#### Use of data?

- To instruct our debt recovery agents / Solicitors. **Data Sharing:**
- IT Service Providers and PCN Databases, DVLA, Debt Recovery.

## To handle Requests under the GDPR Data Processed

- Name, Address, Vehicle Registration Number and PCN reference number. Use of data:
- To confirm the identity of the appellant before disclosing any details / discussing the charge and to facilitate a data protection related request.

#### **Data Sharing**

• IT Service Providers, DVLA, ICO

The main purposes in which your data is processed is to ensure compliance with your obligations under the contract entered into when your vehicle enters and remains on private land.

PPM also have a legitimate purpose of pursing the driver and or any relevant party in relation to these contractual obligations.

Our schemes are in place to protect our client's rights as owners of private land, and any rights users of the land may be granted.

Our Lawful basis of processing your data is outlined under the General Data protections regulations 2018, Chapter 2, Article 6, Clause 1, Subsets (a) (b) and (f):

1. Contract – "processing is necessary for the performance of a contract with the data subject or take steps to enter into a contract"



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- 2. Legitimate interests "processing is necessary for the purpose of the legitimate interests pursued by the controller or a third party..."
- **3.** Consent "the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

For the avoidance of doubt, the legitimate interests referred to above are for the pursuance of unpaid parking charges / related enforcement and the legitimate interests of our clients in the protection of their rights as landowners / managing agents on behalf of the land-owners.

#### The retention of your data

In most common circumstances your data will be retained for the life of its debt, and 6 years thereafter. In some cases, data can be held for a longer time frame. For example, if there is an ongoing dispute in regards to the debt or a court order has been made allowing us to pursue the outstanding amount after the expiration of the six years.

## Sharing your information

We may share your information with:

 Other organisations such as the International Parking Community (IPC), the Independent Appeals Service (IAS), landowners, managing agents, tenants, and any authorised subcontractors, such as mail service providers, business process outsourcers, credit reference agencies, collection agents, legal advisors, IT service providers, and payment service providers.

As a data subject, you have the right to request all data held regarding yourself through a subject access request. This request must be made in writing either to our head office or email address <u>info@pandpmanagement.co.uk</u> where our data protection officer will fulfil your request once proof of identity has been supplied. The request will be completed and returned either by email or post within one month of request.

Please note that subject Access requests are free of charge, however if they request is manifestly unfounded or excessive, particularly repetitive, PPM have the right to request an administration reasonable charge of £10.00.

We may pass collective information about the use of our website or our



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products or services to third parties, but this will not include information that can be used to identify you.

We will disclose your information if we are required to by law. We may disclose your information to enforcement authorities if they ask us to, or to a third party in the context of actual or threatened legal proceedings, provided we can do so without breaching data protection laws.

#### **Cookies and Traffic Data**

Cookies are small text files which are transferred from our website, product or service and stored on your computer's hard drive. They are widely used to help websites work, or work more efficiently, as well as to provide general usage information to the owners of the site. We are currently looking into making further improvements to our privacy policy and how cookies are managed on our website, so please check back here for updates.

#### Web analytics and similar services

Our website uses web analytics services. Web analytics cookies allow us to recognise and count the number of visitors and see how they move around the website, product, or service. This helps us to improve our service to you.

We also use cookies and similar software known as web beacons or pixels to count users who have visited our website after clicking through from one of our advertisements on another website or in emails and to collect details of any products purchased. These web beacons collect limited information which does not identify individuals. It is not possible to refuse the use of web beacons, however, because they are used in conjunction with cookies, you can effectively disable them by setting your browser to restrict or block cookies.

We keep a record of traffic data which is logged automatically by our server, such as your Internet Protocol (IP) address, the website that you visited before ours, the website you visit after leaving our site. We also collect some site, product, and service statistics such as access rates, page hits and page views. We are not able to identify any individual from traffic data or site statistics.

Most web browsers allow some control to restrict or block cookies if you wish, however if you disable cookies, you may find this affects your ability to use certain parts of our website, products, or services. For more information about cookies and instructions on how to adjust your browser settings, see the Internet Advertising Bureau website <u>www.youronlinechoices.co.uk</u>.

#### Your information

You have the right to make the following requests about personal data we may hold:



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- To inform you how and why it is processed; to give you access to it; rectify and incorrect information; to delete it; to restrict our use of it; to ask us to transfer a copy to a third party and object to our use of it.
- Data protection law requires us to verify your identity before providing information, respond to your request and tell you why, if we do not agree with it.

If we hold any information about you which is incorrect or if there are any changes to your details, please let us know so that we can keep our records accurate and up to date. If you would like to update your records or see a copy of the information that we hold about you, you can contact us at Data Protection Officer, Parking & Property Management Ltd, Lily Hill House, Lily Hill Road, Bracknell, Berkshire, RG12 2SJ, or by email at <u>info@pandpmanagement.co.uk</u>. If you request a copy of your information, you will not need to pay any fee.

#### Changes to our privacy policy

We may change our privacy policy from time to time. We will always update the privacy policy on our website, so please try to read it when you visit the website.

#### Security and storage of information

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction, or damage. Some communications sent over the internet, such as email, may not be secured unless they are encrypted. Although we do our best to monitor and improve how we protect your personal data, we cannot guarantee the security of your data which is transmitted to our website or other products and services via an internet or similar connection and any transmission of data to our site is at your own risk. We do however use secure connections in our payment pages.

If we have given you (or you have chosen) a password to access certain areas of our website, product or service please keep this password safe – we will not share this password with anyone.

## Transfers outside Europe

Personal data in the European Union is protected by data protection laws but other countries do not necessarily protect your personal data in the same way. Our website and some of our products or services or parts of them may be hosted in the United States and this means that we may transfer any information which is submitted by you through the website, product, or service outside the European Economic Area

(which means all the EU countries plus Norway, Iceland, and



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Liechtenstein) ("EEA") to the United States. When you send an email to us, this may be stored on email servers which are hosted in the United States, if we do this, we will take steps to ensure that our hosting provider uses the necessary level of protection for your information but if you do not want your information to be transferred outside the EEA you should not use our website, product or service or contact us via email.

#### **Other Sites**

If you follow a link from our website, product or service to another site or service, this policy will no longer apply. We are not responsible for the information handling practices of third-party sites or services and we encourage you to read the privacy policies appearing on those sites or services.

## **Further Information**

If you would like further information about data protection, or if you would like to view the register of Data Controllers, you can visit the Information Commissioner's site at <u>https://ico.org.uk/</u>.

Thank you for visiting our website.



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