



**Have you purchased or obtained a parking permit or are you intending to visit or have you visited one of our Car Parks?**

**Our Commitment to Personal Privacy**

**Who we are:**

NAPIER PARKING LTD (06009471) is a company registered in England and Wales whose registered office is at Atterbury Lakes Fairbourne Drive, Atterbury, Milton Keynes, MK10 9RG.

Our Data Protection Officer (DPO) can be contacted by emailing [dpo@napierparking.co.uk](mailto:dpo@napierparking.co.uk) or by calling 01730 828 103.

We operate under the General Data Protection Regulations which will take effect in law on 25th May 2018 along with a new Data Protection Act (collectively referred to below as the DPA).

**What we do:**

We monitor our site with parking attendants, who use manual cameras and ANPR technology.

In some cases we will have fixed ANPR cameras at the entrance and exit to our sites. In these case we will notify you on our on-site privacy signs that we are monitoring the entry and exit of our privately managed land.

Images of people and vehicle number plates will be obtained for the purpose of car park management, ensuring compliance and enforcing the Terms and Conditions for this private land.

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.

**The Legal Position:**

This privacy notice includes the following information to help you understand clearly how your data is being used:

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

**Your rights under the DPA are as follows:**

1. The right to be informed.
2. The right of access.



Registered in England & Wales, Company No: 06009471  
Registered Address: Atterbury Lakes, Fairbourne Drive,  
Atterbury, Milton Keynes, MK10 9RG  
[www.napierparking.co.uk](http://www.napierparking.co.uk)  
01730 828 103

3. The right to rectification.
4. The right to erasure.
5. The right to restrict processing.
6. The right to data portability.
7. The right to object.
8. Rights in relation to automated decision making and profiling.

Please note that you have the right to request the above, however, when we receive your requests we may object to your request if we do not agree with it. However, 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 (SAR) and this can be done via an email request to our Data Protection Officer (DPO). We will need to obtain proof of your identity before providing you with information we hold about you. You can do so by emailing [dpo@napierparking.co.uk](mailto:dpo@napierparking.co.uk) or by calling 01730 828 103. Subject Access Requests must be made in writing. There is a SAR form that may assist you with your request on our website [www.napierparking.co.uk](http://www.napierparking.co.uk), the form can be found on Privacy Policies page.

If you require more information about items raised in this notice we would recommend the ICO website, [www.ico.org.uk](http://www.ico.org.uk)

#### **Our Lawful Justification for Processing Your Personal Data:**

1. The processing is necessary for a contract which has been entered into and there is a legitimate interest to do so.
2. We are entitled to:
  - a. Know who is using our managed private land.
  - b. Pursue a motorist for an unpaid parking tariff.
  - c. Pursue a motorist for an unpaid parking charge (Fixed Charge Notice).
  - d. Ensure safety and security and help deter/detect criminal activity.
  - e. Know who is using our privately managed car park or land for car park management purposes such as statistical analysis and in order to study consumer behaviour.
  - f. Retain transactional information for accurate record keeping.

#### **The Five Categories of "Personal Data" we Process:**

1. *Permit holder or payment system user:*

As a user of our privately managed site, you may provide us with your personal data, for example if you purchase a permit from us or if you enter your vehicle registration into a payment machine. Your data may also be passed to us by a third party such as a landowner, for example if you have given the landowner your data so you can be added to a permit holder register for the site. The data may include your vehicle registration number, your name, address, email and phone number.



## *2. No Unpaid Charge/Tariff:*

As a compliant user of our privately managed car parking site, the personal data we obtain is your registration number. We may capture images of the vehicle, occupants or bystanders.

## *3. Windscreen Fixed Charge Notice:*

If you have received a Fixed Charge Notice on your windscreen or if it was handed to the driver, at the point the notice is placed on your windscreen or handed to the driver, we will have obtained your personal details, which could include images of your vehicle, occupants/bystanders and the vehicle registration number.

You may provide us with your data when appealing or paying the Fixed Charge Notice.

Where there is an unpaid fee over 28 days and the drivers full name and serviceable postal address is not known, 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.

## *4. Postal Fixed Charge Notice:*

Where there is a fee which is payable 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 will obtain include:

- a) The name and address of the registered keeper;
- b) The make, model and colour of the vehicle;
- c) Confirmation of the registration number;
- d) Any other information that we gather, in pursuance of the unpaid fee, including information that is shared by you with us.

## *5) Appeals:*

If you decide to challenge a Fixed Charge Notice and we reject your challenge, then we will provide your registration number and fixed charge number along with the time and date of the parking event to the Independent Appeals Service (IAS) and/or the International Parking Committee (IPC). This is to allow you to contest the charge with an independent adjudicator.

A full list of your Rights under GDPR are summarised above.

## **Retention of your data:**

Your data will be held for sufficient time to enable the fee to be settled, by you or another person and resolve any dispute. Your data may be held so that we have transactional information for accurate record keeping. 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 when we may hold your data for longer are;

- When there is an ongoing dispute which requires us to hold the data for longer than normal.
- Where a court order has been made allowing us to pursue outstanding money after the expiration of 6 years.

We may retain some information about your visit but it will be anonymised, leaving only your registration data. Vehicle registration data may be held for statistical analysis and in order to study consumer behaviour.

#### **Sharing Your Personal Data:**

Your personal data may be shared for the purpose of car park management, payment of a parking tariff or charge with our chosen processors: such as an independent appeals service, payment facilitator, mail service provider, an external software provider, an Accredited Trade Association, the landowner or landowners agent, debt recovery companies, solicitors, credit reference agents, tracing agents and high court officers/bailiffs where necessary to ensure compliance with your obligations under the contract. We will not transfer your personal data out of the EU.

#### **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.

#### *Contact Us:*

If you have any queries relating to this Privacy Notice, please contact us by e-mail at: [dpo@napierparking.co.uk](mailto:dpo@napierparking.co.uk) or call 01730 828 103.

