

# National Car Parks Ltd (NCP)

## Privacy Notice

### Contents:

1. Introduction
2. The information we collect
3. Sources of your data
4. Why we collect your personal data and our legal basis for doing so
5. How we share and disclose information
6. Data transfers
7. How we keep your information secure
8. Data retention
9. Your rights
10. Contacting us

### 1. Introduction

National Car Parks Ltd and its group companies, NCP Commercial Services Ltd and National Car Parks (EUK) Limited, each of The Bailey, 16 Old Bailey, London EC4M 7EG, are committed to respecting and safeguarding the privacy of your personal information in accordance with data protection laws. When we refer to "**NCP**", "**we**" or "**us**" in this privacy notice ("**Notice**"), we are referring to the relevant company in the National Car Parks group that is responsible for processing your personal information.

This Notice describes what personal information (or "personal data") we collect from you (our customers and prospective customers) in the course of our business, how we handle your personal data and your rights as an individual when you use our products and services.

### **Our Services**

NCP provides car parking solutions nationally across the United Kingdom to individuals and business customers. Our products/services include:

- Our network of 500+ NCP car parks in the UK
- ParkPass, Season Tickets, Pre-Book
- Gateway (for business customers)
- Pay By Mobile – Third party PaybyPhone

Our services allow you as a customer to pay for your parking through various channels such as our NCP mobile application, NCP website, payment machine and by phone.

### 2. The information we collect

In order for NCP to offer you parking products and services, we need to collect certain information about you to ensure that you have a seamless parking experience, to facilitate your parking transactions and to manage our relationship with you and in our business generally.

We collect the following personal information about you:

- Name
- Email Address

- Mobile telephone number
- Address
- Time and duration of your parking session
- Date of birth
- Identity documentation (V5C or other document)
- Your employer (if relevant, for business accounts)
- Business address (if relevant, for business accounts)
- User name and password
- Account preferences
- Make and model of your vehicle
- Vehicle Identification Number (VIN)
- Vehicle Registration Mark (VRM)
- Automatic Number Plate Recognition (ANPR)
- Location
- Payment Information and payment card details
- IP address, time stamp and device information
- CCTV Data
- Webchat interactions/transcripts
- Transaction history
- Details of any complaints, legal claims or accidents related to your use of your goods or services
- Other information you provide voluntarily to us

When you use our car parks without creating an account, we will process CCTV data (including your VRN) and your payment card information. We may process further details about you for the purposes of pursuing and collecting outstanding monies owed to NCP in respect of PCNs (Penalty Charge Notices).

### **3. Sources of your data**

We obtain information directly from you when you use or enquire about our products or services or you provide feedback to us, complete surveys or otherwise engage with us in relation to our services.

We also receive information about you from a variety of third party sources such as:

- Our business partners who provide us with Auto Pay technology by means of ANPR (Automatic Number Plate Recognition) which allows you to pay for your parking automatically if you have registered for this option.
- PaybyPhone Limited, which provides our payment by telephone service
- Service providers where they provide you with services or products on our behalf or where we use them to help us provide our products or services to you, such as our app services provider, IT support/services and website hosting provider.
- Government agencies and departments and statutory and regulatory bodies, such as the DVLA
- Your employer (for business accounts only)

## **Cookies**

Cookies are small files stored on a user's computer or device by a website or mobile application which monitor the users' interactions for the purpose of enhancing technology functionality and/or user experience.

For more information on our use of cookies, please click here to see our cookie notice <https://www.ncp.co.uk/help-centre/website-terms-and-conditions/privacy-and-cookie-policy/>

#### **4. Why we collect your data and our legal bases for doing so**

We use your personal information on one or more of the following legal bases:

- with your consent
- where necessary for compliance with a legal obligation
- where necessary for our legitimate business purposes
- where necessary to perform a contract or an agreement with you or take steps at your request prior to entering into a contract
- where necessary in the public interest

This enables us to use your personal information:

- to administer our parking services generally and to facilitate parking transactions
- to provide the service or product you've requested or purchased
- to create a NCP account
- to identify your vehicle
- to verify your identity (for the purposes of responding to a subject access request)
- to manage our relationships with you and with our business partners
- to provide webchat customer support
- to manage any issues that may arise in our premises or with your booking and to resolve any issues you may have with our products and services
- to market our services and products to you
- to understand and respond to customer feedback
- to understand the way people use our services and products so we can improve them
- to assess and analyse our market, customers, products and services
- to process payments and pursue and collect outstanding monies owed to NCP (including in respect of penalty charge notices (PCNs))
- to manage any disputes or claims, take legal advice and to comply with our legal obligations
- to deal with any accidents or damage at our car parks
- for the apprehension and prosecution of offenders
- to monitor for fraud and for the prevention or detection of crime
- to manage our business generally, including dealing with our insurers, auditors, lawyers and other professional advisers
- to provide navigation to your nearest parking location
- to send push notifications on parking session expiration
- to send push notifications on entry and exit
- to record transactions and parking history
- to analyse by means of cookies and similar technologies to enhance performance
- to comply with our legal obligations
- to carry out other activities with your consent

NCP uses CCTV for the purposes of collecting vehicle registration numbers so that we can monitor who enters our car parks for the facilitating of ANPR AutoPay parking transactions. We also use CCTV for security monitoring and PCN enforcement.

We also use your information (obtained generally in our business, including via the NCP app) to analyse and profile your purchasing preferences (e.g. market, customer and product analysis) and to enable us to provide you with a personalised customer service experience.

### **Telephone calls**

We may record telephone and intercom calls to verify content which may then be used together with other customer records we hold for regulatory compliance, quality control and staff training, preventing or detecting criminal activity and for complaint resolution.

### **Webchat Transcripts**

If you use our webchat to contact us, the webchat may collect data about your interactions such as the messages you send, IP address, time stamp and device information. Our webchat function has appropriate security measures in place to protect your data from unauthorised access or disclosure.

## **5. How we share and disclose information**

We will never disclose or share your personal data unless we have a lawful basis for doing so.

We may share information about you:

- with other companies in the NCP group for our general business purposes or where services are shared between our group
- with third party service providers/companies that provide services for us on our behalf, including IT services and mailing services, payment services, website hosting and SMS sending providers
- with our software (including ANPR) providers who may use your information to provide you with the services you request, analyse and assess their market, customers, products and services
- Government agencies and departments and statutory and regulatory bodies where lawfully permitted or required or to verify or enforce compliance with the policies and terms governing our services, such as the DVLA
- Law enforcement authorities, including the police
- Our professional advisers, such as accountants, law firms, auditors and insurers
- Fraud prevention agencies and debt collection agencies
- Your employer (for business accounts only)
- Prospective sellers, buyers or other third parties involved in the transfer, sale, reorganisation or merger of our business

CCTV data may be shared with law enforcement agencies for the purpose of criminal investigations and with law firms who act on our behalf in the event of legal claims, including against an individual for unpaid PCNs, and to seek other legal advice.

We may share your information with the relevant company to which your car parking booking relates. For example, customer data for bookings made with Birmingham Airport are sent securely to Birmingham Airport to fulfil the service you have requested and (where you have consented) for marketing purposes.

Other carefully selected partners include but are not limited to:

- Birmingham Airport
- Glasgow Airport
- Gatwick Airport

- Avanti West Coast Trains
- HS1

## **6. Data transfers**

We rarely transfer personal information outside of the United Kingdom (UK). 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). If you wish to receive a copy of the data transfer contract clauses used by NCP, please contact us at the details given below.

## **7. How we keep your information secure**

NCP takes the security of your personal data very seriously. We work hard to protect the information that you provide to us (including payment information) from loss, misuse, unauthorised access, collection, copying, disclosure and other similar risks. These steps take into account the sensitivity of the information that we collect, process and store, and the current state of technology.

Our online services are hosted by secure servers. All personal data submitted through our service(s) are stored electronically on encrypted databases and protected by multiple anti-malware firewalls. However, the internet is not a secure medium and we can't guarantee the security of any information you disclose online.

## **8. Data retention**

NCP keeps personal data for a limited period and does not keep personal information for longer than we need it and only as long as is necessary to fulfil the purposes for which the information was collected or as required by law.

When you create an account with us, your personal data will be retained for as long as you have an account with us, and then for up to an additional 2 years for compliance and audit purposes, subject to the retention periods set out below.

We retain:

- **Phone calls/ intercom calls**, which are recorded, for 456 days.
- **CCTV recordings** are generally retained for 30 days. ANPR Data captured by CCTV is retained for 12 months.
- **Parking Charge Notice (PCN)** records for 3 years
- **Webchat transcripts** for 365 days.

Personal information may be retained for longer that set out above to establish, exercise or defend legal claims or to comply with our legal or regulatory obligations, but for a limited period and only for so long as is necessary for such purposes.

## **9. Your rights**

In accordance with data protection law, you may have the right to request access to your personal information, as well as other rights, including the rights to seek to update, delete or correct this information.

You have the following rights as an individual:

**To be Informed:**

You have “the right to be informed” about the processing of your personal information by means of this Notice which outlines our organisation's data processing activities and your rights as an individual.

**Access:**

Subject to certain conditions, you have "the right to access" the personal data we hold about you; this is known as a Subject Access Request (SAR). For information on making a SAR click here <https://www.ncp.co.uk/help-centre/privacy-and-data-protection/subject-access-request-customer/>

**Rectification:**

You have “the right to rectification” to ensure your data is accurate and up to date. You can rectify your account details by logging into your NCP account and visiting the “My account section”.

**Erasure or the "Right to be forgotten":**

Subject to certain conditions, you are entitled to have your data erased (also known as the "right to be forgotten"), including where the personal data is no longer necessary for the purposes for which it was collected or where the personal data has been unlawfully processed.

If you decide to close your account or delete the NCP app, you can request that we erase your personal data. You can make a request for erasure through the mobile application or by contacting us at the details given below. We will make every effort to fulfil your request for erasure but in some instances we may not be able to comply with your request (such as when there is a legal obligation for us to retain your data). If you delete the NCP mobile app, your account stays active (subject to our retention periods), unless a request for data erasure has been made.

**Restriction and Objection:**

In certain circumstances, you have the right to object to, or ask us to restrict, the processing of your personal data. This includes a right to object to our processing of your personal data for direct marketing purposes.

**Data Portability:**

Subject to certain conditions, you have the right to receive the personal data that you have provided to us and which is processed by us by automated means, in a structured, commonly-used and machine-readable format, and to transmit that data to another data controller without hindrance, where:

- the processing is based on your consent or on our contract with you; and
- the processing is carried out by automated means.

We may also provide you with the option to directly export your personal data from our website or service in a structured, commonly-used and machine-readable format.

**Withdraw consent:**

NCP relies on your consent as a lawful basis for some of our processing of your personal data and you have “the right to object” and to withdraw that consent at any time:

- You can withdraw your consent for certain types of communications and change your preferences within the NCP mobile application, via the website or by contacting us using the contact details set out below.
- You can unsubscribe from marketing communications at any time by clicking unsubscribe at the bottom of emails.
- You can change the settings for push notifications within the app and on your mobile device.
- Cookies can be changed on our website or from the settings within your browser.
- You can turn off location access from your mobile device and within the app.

If you withdraw your consent, this will only take effect for future processing of your personal information. You should also be aware that changes to consent may change the functions of the app, ease of use and overall experience.

### **Third party consent**

You must ensure that you have the consent of any individuals whose personal information you provide to us and that you either remove their personal data from your accounts where you no longer have such consent or contact us so that we can help you to do so. You should also provide a copy of this Notice to such individuals.

### **10. Contacting us**

If you would like to contact our Data Protection Officer to make a request, exercise your data protection rights, lodge a complaint or for anything else relating to your personal data, you can do so in writing to:

[dataprotection@ncp.co.uk](mailto:dataprotection@ncp.co.uk)

or

The Data Protection Officer  
National Car Parks Limited  
Saffron Court  
14b St Cross Street  
London  
EC1N 8XA

Please note that we may require additional information to verify your identity before we are able to respond to your request or respond to the exercise of your rights as set out above.

You have the right to complain to the Information Commissioner's Office about our processing of your personal data. The ICO's contact details are:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
<https://ico.org.uk/>  
Tel: 0303 123 1113

### **Updates to this Notice**

If you have an account with us, we will inform you of any material changes to our data processing activities by providing you with an updated copy of our Notice. Please also check back to this page frequently to see any changes or updates to our Notice.

**Version1 - Updated 11 May 2023**