

1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The IT and Data Governance Committee is responsible for ensuring that this notice is made available to data subjects prior to BaySentry Solutions Limited collecting/processing their personal data.
- 2.2 All Employees/Staff of BaySentry Solutions Limited who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention.

3. Privacy notice

3.1 Who are we?

BaySentry Solutions Ltd is a company registered in England under number 12133595 whose registered office is at 20 Wenlock Road, London, England, NW1 7GU. BaySentry Solutions Ltd is a parking operator and enforcement provider, operating throughout the UK. BaySentry Solutions Ltd provides enforcement services to land owners and operators on private land. These services are offered through the following products:

- Contract season permits in monthly, quarterly or annual options both business customers and members of the public.
- Short-Term Parking customers, this is the standard product available to all customers whereby a customer uses the car parks in the standard fashion.
- Prebook parking. This is parking booked and paid for in advance.
- Enforcement of vehicles that have breached a sites terms and conditions

The IT and Data Governance Committee can be contacted directly here:

- privacy@baysentry.co.uk

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The personal data we may collect from you is:

Personal data type:
Name
Address Information
Contact Phone number
Email Address
Payment Details
CCTV Images
Vehicle Registration (VRM)
DVLA Lookup – Keeper Details

The personal data we collect will be used for the following purposes:

- Payment Processing for parking related products
- Correspondence relating to your parking products
- Gain access into the car parks through Automatic Number Plate Recognition
- Issuance of parking enforcement notices for breach of terms and conditions

Our legal basis for processing for the personal data:

- Performance of Contract
- Legitimate Interests
- Legal Obligation

Any legitimate interests pursued by us, or third parties we use, are as follows:

- To ensure smooth operation of assets
- Statistics and Analytics
- Providing a platform for a means of payment for services provided.
- Enforcing terms and conditions of assets managed by BaySentry Solutions Ltd

We do not collect Special Categories of Personal Data about you, however, if you provide this data to us when appealing a Parking Charge Notice we will ensure it is kept secure.

Customers or clients using our permit portal for, and on the behalf of the Landowner, accept in their own capacity as a data subject, or have gained valid acceptance from the data subject permission to provide or access the personal data for the purpose of car park management.

3.2 Disclosure

BaySentry Solutions Limited will pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data outside of the EU for the following purpose as part of the processing activities.

Third country (non-EU)/international organisation	Safeguards in place to protect your personal data	Retrieve a copy of the safeguards in place here:
Zendesk – Customer Support helpdesk. Location: U.S.	Privacy Shield and Binding Corporate Rule	https://www.privacyshield.gov/ https://www.zendesk.com/

We may have to share your personal data with the parties set out below **External Third Parties such as:**

- a. the British Parking Association for the purpose of audit of our car park management service;
- b. the driver vehicle licence agency (DVLA) for the purpose of audit of our car park management service;
- c. the Parking On Private Land Appeals (POPLA) Service for the purpose of reviewing and your appeal;
- d. print and mail service providers for issuing Parking Charge Notice and responding to your correspondence;
- e. email service providers for responding to your correspondence;
- f. collection agents for recovery of debts due to us;
- g. solicitors for the purpose of enforcing the parking contract or responding to queries of a legal nature;
- h. any other duly authorised sub-contractors.
- i. Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in

accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- parking management equipment providers based inside the EU;
- payment service providers based inside the EU;
- collection agents based inside the EU;
- Solicitors based inside the EU.
- the driver vehicle licence agency based inside the EU;
- the Parking on Private Land Appeals (POPLA) service based in the EU.

3.3 Retention period

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We design our services so that we don't hold your personal data for longer than we have to.

3.4 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that BaySentry Solutions Limited refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

3.5 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by BaySentry Solutions Limited (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and BaySentry Solutions Limited's data protection representatives The IT and Data Governance Committee.

The details for each of these contacts are:

	The IT and Data Governance Committee contact details:	Supervisory authority contact details
Contact Name:	The IT and Data Governance Committee	Information Commissioners Office
Address line 1:	BaySentry Solutions	Wycliffe House
Address line 2:	20 Wenlock Road	Water Lane
Address line 3:	London	Wilmslow
Address line 4:	England	Cheshire
Address line 5:	N1 7GU	SK9 5AF
Email:	privacy@baysentry.co.uk	
Telephone:	0333 533 4540	+44 (0)303 123 1113

3.6 Privacy statement

Read more about how and why we use your data here: www.baysentry.com/privacy

4. Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How we use your information

This privacy notice tells you how we, BaySentry Solutions Limited, will collect and use your personal data for services and activities relating to parking using the various products available from us or our clients both online and in car parks that personal data is collected for. These services include contacting us relating to enquiries and complaints, cookies, profiling, online purchases for prebooking and contract parking and registration for partnership parking, enforcement appeals and payments.

**_ga, cookies
beginning with
_gat, _gid**

We use Google Analytics to collect information how visitors use our Site, which pages are most frequently visited and record if advertising is effective or not. Please visit Google Privacy Policy (<http://www.google.com/analytics/learn/privacy.html>) for details. If you want to opt out of Google Analytics for all sites, you can download an add-on for your browser (<https://tools.google.com/dlpage/gaoptout/>)

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Google Remarketing, DoubleClick, Microsoft Advertising	We may use Remarketing with Google Adwords, Microsoft Advertising and third party remarketing services (eg DoubleClick) to make our online ads more relevant. The remarketing cookies help to serve our ads at a later time when you are browsing sites on the web. Remarketing cookies expire after 30 days and are not used for personal identification. To opt out of third party interest-based advertising, please visit Network Advertising Consumer Opt-outpage (http://www.networkadvertising.org/choices)
NREUM, JSESSIONID	We use New Relic to monitor the performance of our Site and notify us if any of our web servers should have problems. Please visit New Relic Privacy Policy for details (https://newrelic.com/termsandconditions/privacy)
laravel_session	We use a platform called Laravel to enable customers to log into their accounts. This cookie stores a session which links your device to your account. It is only used to authenticate you between requests, not to track your behaviour or for advertising.

Why does BaySentry Solutions Limited need to collect and store personal data?

In order for us to provide you with parking services we need to collect personal data for the provision of services including access into and exit from our car park locations, ensuring smooth operation and efficiency of our client's car parks and services.

In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose and does not constitute an invasion of your privacy. We will then use collected data to gather additional data relating to any vehicles which are in contravention of the terms and conditions of a client site to enable BaySentry Solutions Ltd to issue enforcement notices and pursue outstanding monies owed.

In terms of being contacted for marketing purposes BaySentry Solutions Limited would contact you for additional consent.

Will BaySentry Solutions Limited share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to BaySentry Solutions Limited in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to process penalty charge notices including DVLA lookups and payment services providers. When they no longer need your data to fulfil this service, they will dispose of the details in line with GDPR Compliance.

How will BaySentry Solutions Limited use the personal data it collects about me?

BaySentry Solutions Limited will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. BaySentry Solutions Limited is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will BaySentry Solutions Limited contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

BaySentry Solutions Limited at your request, can confirm what information we hold about you and how it is processed. If BaySentry Solutions Limited does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of BaySentry Solutions Limited or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.

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- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

BaySentry Solutions Limited accepts the following forms of ID when information on your personal data is requested:

Passport, driving licence, birth certificate, utility bill (from last 3 months)

Contact details of the Data Protection Officer / The IT and Data Governance Committee:

	The IT and Data Governance Committee contact details
Contact Name:	IT and Data Governance Committee
Address line 1:	BaySentry Solutions
Address line 2:	20 Wenlock Road
Address line 3:	London
Address line 4:	NW1 7GU
Address line 5:	
Email:	privacy@baysentry.co.uk
Telephone:	0333 533 4540

Document Owner and Approval

The IT and Data Governance Committee is the owner of this document and is responsible for oversight, implementation, updates and ensuring that this procedure is reviewed in line with the review requirements of the GDPR.