Camden

PRIVACY NOTICE

PARKING OPERATIONS (PROCESSING OF PERSONAL DATA)

This Privacy Notice explains how any personal data collected by us or through our interactions with you or that of our contractors and service providers will be used, protected, and stored in delivering our services and functions, and your rights under the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018 in respect.

Parking Operations is a department within the Supporting Communities directorate of the London Borough of Camden and is responsible for the effective management of the council's road network and kerb space.

The scope of this Privacy Notice pertains exclusively to our activities and does not encompass other departments, services, or teams irrespective of whether they offer similar services or otherwise. The Council's main privacy notice is available at www.camden.gov.uk/privacy or by using the following code:



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The name and contact details of the Data Controller

Data Controller

Data Protection Officer (DPO)

London Borough of Camden Town Hall Judd Street London WC1H 9JE Andrew Maughan Borough Solicitor

DPO@camden.gov.uk

Camden.gov.uk

Purpose for processing your personal data

Parking Operations collects and processes personal data in support of its statutory function as a traffic authority under Road Traffic Regulation Act 1984, London Local Authorities Act 1996, London Local Authorities and Transport for London Act 2003, Traffic Management Act 2004 and including associated regulations.

We process personal data for the following purposes:

- The monitoring of compliance against parking and moving traffic regulations and to undertake enforcement for any breaches of those regulations.
- When proposing and making of Traffic Management Orders and associated consultations.
- The provision and administration of parking permits, visitor permits, parking permissions, and parking bay suspensions.
- The provision and administration of paid-for-parking (pay by phone) service.
- The provision and administration of a vehicle removal and clamping service.
- The provision and administration of exception lists and non-enforcements (where offered).
- The provision and administration of off-street parking and car parks and related contracts.
- To manage complaints about Parking Operations and our contractors or suppliers.

Further to the above, we may have cause to process personal data for other purposes:

- To comply with health and safety regulations for employees, contractors, and visitors to our premises.
- To detect, prevent, investigate, and prosecute fraud, security breaches, unlawful acts, or misuse of our services, products, premises, or systems.
- To contact you about expiring or expired products or services and provide service notifications affecting your use of these.
- To support the development and improvement of our parking services or products, and wider council services, troubleshoot customer journeys, and conduct data analysis, research, and reporting.

- To contact you about your parked vehicle if it causes an obstruction, hazard, or prevents important works from proceeding, provided we have your contact information.
- To comply with our public sector duties and obligations as set out in legislation, statutory guidance, or government policy.
- Parking Operations may combine information about you from our systems, services, or products, or as collected by us or provided by you for the purpose of delivering services, considering appeals against PCNs, managing debt, detecting, and reporting of fraud of crime, making police reports or bringing private prosecutions.

What types of personal information do we collect?

Parking Operations processes personal information to undertake our statutory functions as a traffic authority, but also to provide you with parking services and products, or exemptions which we could not otherwise do.

The scope of personal information collected by us will vary against the specific function being carried out. Generally, we collect the following information:

- Your Vehicle Registration Mark (licence plate number)
- Your full name, including any titles
- Your home address, email address, and telephone number
- Your business name, business rates information, address, email address, and company registration number
- Your financial and payment information
- Any personal identification such as a passport, driving licence, birth certificate, or Biometric Residence Permit
- Proof of Residency evidence in the form of a Council Tax bill or tenancy agreement
- Evidence of Vehicle Custody in the form of a vehicle registration document, hire/lease agreement, a company letter if the vehicle is owned by a company and you are the sole user
- Information obtained by body worn video by NSL or other CCTV

Some examples of when we collect this information include

When your vehicle is identified as having contravened traffic regulations:

- When we request registered keeper information from the DVLA about your vehicle following the issuing of a Penalty Charge Notice (PCN).
- When we are contacted by a hire company in respect to a vehicle which was leased or hired by you at the time, and where we may request a copy of the agreement and driving licence information for the purpose of transferring liability.

• If the vehicle has been sold or re-registered, we may obtain your details from the new or previous registered keeper.

When applying for a parking permit:

- We may ask you to provide documentation confirming proof of residency and ownership of your vehicle to enable us to verify your eligibility for a parking permit where automated processes cannot be completed.
- We may also check your details against our databases to determine if you are eligible for a parking permit e.g. where you have outstanding debt or PCNs with Camden or live in 'car free housing'.
- We may ask for evidence to verify your age and/or disability to support applications for discounted permits.

Through our general interactions:

- When you make or query a payment to us, or when you are claiming 'financial hardship' or 'mental health breathing space' provisions.
- When you contact us by post, telephone, email, web chat or in person concerning general enquires, reporting a problem, or seeking case specific advice from us.
- When making a Freedom of Information (FOI) or Environment Information Reporting (EIR) request, and we require your details to facilitate these requests.
- When we're contacted by another person(s), organisation or business about you or your vehicle.
- When you are captured on video recording equipment as part of a parking or moving traffic contravention, when you attend one of our premises, car parks, or when a Civil Enforcement Officer activate their body-worn camera.
- When you respond to a public consultation we run.

Parking Operations may use non-personal data about you without any limitations, such as your gender, age, vehicle make, model and type, or similar when creating internal reporting statistics or when analysing data about our parking services, parking products or traffic controls in general.

We will not use your personal data for marketing communications (including any third-party) without your consent. We do not sell personal data to third parties.

Special categories of personal data that we may process

- Your health information
- Your disabled blue badge number, Personal Independence Payments, Disability Living Allowance, registered blind certification, war or service disablement pension letter(s)

There may be occasions where we process 'special categories' of personal data. This will be on a case-by-case basis and will often be very situational, for example:

- When you provide us with a copy of your disabled blue badge, medical information, appointment or hospital discharge papers as part of a PCN appeal or when you request a dedicated disabled parking space and provide evidence to support your request.
- Where you are under a court appointed Lasting Power of Attorney or Court of Protection order and we are made aware of that fact.
- When you make or query a payment to us, or when you are claiming 'mental health breathing space' provisions.

While parking matters are typically not criminal in nature, there may be instances where Parking Operations becomes aware of criminal offence data. Generally, this information is related to parking contraventions and issued PCNs, particularly when we are informed by you, someone acting on your behalf, or another third party with knowledge that you were detained, arrested at the scene, or otherwise unavailable due to incarceration at the relevant time.

What is our legal basis for processing your personal data?

Our legal basis for processing your personal data depends on the specific circumstances and function or task being carried out by us, but in any case, it is constrained within Article 6 (Lawfulness of Processing) of the UK General Data Protection Regulation (GDPR):

- Camden's general function as a local authority and our statutory functions relating to the Traffic Management Act 2004 and the Road Traffic Regulations Act 1984 and associated regulations – Article 6(1)(c) ("legal obligation") and (e) ("public task").
- In respect to any contracts between you and us for the purpose of providing and administrating parking products, services, car park spaces or similar offered by Parking Operations – Article 6(1)(b) ("contracts").
- Where Camden is required or able to provide information to other local authorities, the Police, UK Courts, or HM Government departments in relation to an investigation, legal proceedings or similar being conducted –
- Article 6(1)(c) ("legal obligation") and (e) ("public task").
- Where officers make a safeguarding referral Article 6 (1)(c) and (e) and rarely in emergency (d) (vital interests).
- In other circumstances we may collect and process your personal data with your consent, where for example you have opted in by ticking a box or signing up to receive communications from us. In this case the basis will be Article 6(1)(a).

For special category data:

Article 9(2)(g) Reasons of substantial public interest (with a basis in law) and the Data Protection Act 2018 Schedule 1 Part 2 condition Paragraph 6 Statutory and government purposes, and where appropriate Paragraph 18 safeguarding. In rare cases Article 9(2)(c) Vital interests for safeguarding may be engaged.

The 'Underpinning Laws' are:

- Traffic management powers: Traffic Management Act 2004, London Local Authorities Act 1996, Road Traffic Regulation Act 1984 and associated legislation
- Safeguarding: Care Act 2014 and Children Acts, Health and Safety at Work etc. Act 1974
- Reasonable adjustments: Equality Act 2010

How we collect your information

We may collect your personal information in several ways:

- When you register or sign-up to one of our services, products, or through general correspondence with us about services, products or general enquires and you provide information directly to us
- When we receive information through correspondence from you in the post or by email, verbally in face-to-face meetings, over the telephone, electronic (online) forms, or through the live chat service on our website
- Information which is provided to us by another person(s), organisation or business concerning you or your vehicle.
- Information supplied to us by our contractors when performing contract tasks or activities on our behalf.
- As part of a camera recording, at one of our premises, on the highway, or by body-worn camera footage.
- When we request information from the DVLA about your vehicle.
- When we request and receive information from a hire company in respect to a vehicle leased or hired by you that breached traffic regulations for the purpose of transferring liability.
- If you tag us into any social media posts, blogs, images, or videos.
- Information which is supplied to us from enforcement agents in relation to outstanding debt.

Who is the information shared with?

Your data may be stored in databases accessible by other Camden departments due to our use of shared council services and systems for processing transactions, managing complaints or enquiries. This enables us to effectively manage services and databases, understand customer journeys, record and manage complaints, and produce audit trails for interactions.

We may share your data with the following:

• London Borough of Camden officers such as within Parking Operations, Estate Services, Highways, Transport Strategy and Complaints Team.

- Other London Borough of Camden departments and teams Camden Accessible Transport, Internal Audit, relevant safeguarding services, and Legal Services.
- Other London local authorities such as Westminster City Council, City of London, the London Boroughs of Brent, Barnet, Haringey and Islington in relation to boundary roads and where parking controls are shared.
- London Councils via the TRACE service for any vehicles which have been removed, relocated, or clamped by us.
- Traffic Enforcement Centre, Northampton County Court
- London Tribunals
- Northgate Public Services
- Our Civil Enforcement Contractor NSL Services Ltd
- Our CCTV contractors Yunex Traffic UK and Johnson Controls International (formerly Tyco International)
- Our Parking Management System provider Taranto Systems Ltd
- Our Permit Management System is supported by DATB Limited
- Our paid-for-parking provider RingGo Ltd
- Our print, scan and post provider The Ricoh Company, UK
- Payment transactions Access (formerly Capita)
- European Parking Collection (EPC) for any PCNs issued to non-UK vehicles
- Vehicle disposal contractor Redcorn Ltd
- The Metropolitan Police Service for any vehicles unclaimed at the Camden car pound or reporting of crime
- Other law enforcement agencies in connection with any investigation
- Driver and Vehicle Licensing Agency (DVLA)
- Our enforcement agents: Equita, Marston, Newlyn PLC, CDER
- Central government departments, agencies and regulators: such as Department for Work and Pensions (DWP), HM Revenue & Customs (HMRC), Foreign, Commonwealth & Development Office (FCDO), Home Office, NHS England, Health & Safety Executive (HSE), Local Government & Social Care Ombudsman, Information Commissioner's Office

We also undertake general data matching or data sharing in certain areas for the prevention or detection of crime, fraud, or false representation. You can find out more information on that at <u>Camden.gov.uk</u>.

How long do we keep your personal information?

We will only hold your personal information for as long as necessary to fulfil the purpose to which it was originally collected, including to satisfy any legal accounting and reporting requirements.

• We are required by law to retain financial information for 7 years to comply with income and expenditure reporting to the Ministry of Housing, Communities &

Local Government, HM Revenue and Customs, and London Mayor for audit purposes.

- We retain PCN information and Notices for up to 7 years to comply with reporting of expenditure and income and pursue debt under the Traffic Management Act 2004 and related legislation.
- Registered Keeper details are removed within month where keeper details have been retrieved in error due to an incorrect vehicle registration being captured.
- Recorded telephone calls made to Parking Operations via the main switchboard number are retained for 3 months.
- Parking permits, parking bay suspensions, or parking permissions are retained for as long as necessary to provide the service.
- Resident permit accounts which are inactive for more than 2 years from the last active date are purged.
- Emails sent to Camden email addresses are retained for 7 years.
- Consultation information is retained for up to 7 years.
- CCTV footage for the Car Pound and Car Parks is held for 30 days before being overwritten.
- Body-Worn Video footage is held for 45 days by our contractor.
- Non-enforcement and exception list information (VRM) within our systems is held for as long as necessary to provide the service.

We may anonymise any personal data (remove identifying information) that is provided to us so we may retain the general data to understand and analysis the effectiveness of some provisions of service, enforcement and traffic measures over several years.

How do we keep and protect your personal data?

We are committed to protecting your personal information through a range of security measures. Your personal information is stored on secure servers, either provided by Camden, or by a service provider or contractor working on our behalf. We use a combination of technologies, as well as technical and organisational safeguards to protect your personal data and minimise the risk of loss, theft, interception, unauthorised access, disclosure, or alteration. These measures include firewalls, port restriction and filtering, data encryption, role-based access control, physical security, and information access controls.

While we have implemented robust security measures, no system can be considered completely impenetrable. As such, we cannot guarantee that unauthorised access or data theft will never occur. Nevertheless, by maintaining and continuously improving appropriate safeguards and procedures, we can reasonably mitigate the risk of such incidents.

Camden and Parking Operations cannot be held responsible for the interception of your personal data where:

- You have created a username and password to access our products and services and have shared these credentials with a third party, either intentionally or inadvertently.
- You are transmitting personal information over an unsecured or public internet connection, which may be intercepted by malicious actors.
- You are accessing your Camden account from a shared or public device and have not signed out or have enabled features such as "remember me" or "auto-login," potentially allowing others to access your account.
- Your Camden account credentials, or personal information have been stored or linked to an external website or software application that has experienced a data breach, exposing your information to hackers or scammers.

What rights do you have?

The law provides you with rights around your personal information and special category information. There are some exemptions to these rights. If you would like more information on your rights and the exemptions, please see these websites:

- Camden Council <u>www.camden.gov.uk/your-rights</u>
- The Information Commissioner's Office Individual rights <u>ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/</u>

To exercise your rights please use our Data Subject Rights form available from <u>www.camden.gov.uk/data-subject-rights-form</u>. It is not possible to use this form to query or challenge any PCNs you may have received and instead we ask you visit <u>www.camden.gov.uk/parking</u> to do that or <u>www.camden.gov.uk/complaints</u> if you would like to raise a complaint about Parking Operations.

If you have a data protection complaint concerning the data we hold about you or our processing, please contact us at <u>DPO@camden.gov.uk</u> to see if we can resolve the problem for you. Alternative you can make a compliant to the Information Commissioner's Office (ICO), without charge, if you are unhappy with how the council has handled your personal data either by telephone on 0303 123 1113, live chat at <u>ico.org.uk/global/contact-us/live-chat</u> or webform <u>ico.org.uk/global/contact-us</u>.

What automated decision-making is in place?

We do not undertake Automatic Decision Making or Profiling under the UK GDPR definitions.

To improve the process and speed of applying for a resident parking permit we attempt to automatically confirm the address you supply in the application and the vehicle information for charging purposes. We do this by checking the address details you gave us against our Council Tax records and by retrieving vehicle emissions information from the DVLA vehicle database using the supplied VRM. If

we are unable to match details using these processes, you will be required to manually provide document proofs of these.

Transferring your personal information outside of the UK & European Union – European Economic Area

Parking Operations currently process data exclusively within the UK and the <u>European Union - European Economic Area</u> (EU countries and others such as Norway, Iceland and Liechtenstein).

We will not transfer your information outside of the EU or EEA unless the country has been certified as having an 'adequate level of protection' (the same level of protection as the UK).

Review of this statement

Parking Operations will keep this privacy notice under regular review and will amend it where any changes occur to the services and/or processing of your personal data by us. This notice was last updated in June 2025.

This Privacy Notice is available in large print format upon request.

END

Revision History

Version	Date
1.03	June 2025
1.02	November 2022
1.01	June 2019
1.00	May 2018