

# Privacy Notice for Consumers

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you of the types of data we may process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

## A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

## B) TYPES OF DATA HELD

If a parking charge notice (PCN) becomes due, we will request the following data regarding the registered keeper of the vehicle from the DVLA using a Keeper at Date of Event (KADOE) request.

- a) Name
- b) Address

We will also hold this data on individuals who email us queries or correspondence relating to our legitimate interests in the car park management and security sectors, where that data is volunteered to the company in order to facilitate correspondence. We will also hold the following type of data in this instance:

- c) Email address

## C) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Transfer of data to debt recovery	Legitimate Interests
Corresponding to emails/responding to queries	Legitimate Interests

## D) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- a) health
- b) sex life

- c) sexual orientation
- d) race
- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data.

We will process no special category data relating to consumers.

## **E) WHO WE SHARE YOUR DATA WITH**

Employees within our company who have responsibility for recovering incurred charges will have access to your data which is relevant to their function, as will employees who correspond with consumers in order to answer queries relating to our legitimate interests. All employees with such responsibility have been trained in ensuring data processing is in line with GDPR.

Data is shared with third parties for the following reasons: Recovery of incurred charges

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

## **F) PROTECTING YOUR DATA**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

## **G) RETENTION PERIODS**

We only keep your data for as long as we need it for, which, in relation to instances where monetary charges have been recovered or monetary charges are otherwise no longer due, is twelve months. We will keep your data as necessary for the purpose of recovering incurred charges until such charges have been recovered.

Where a subject has volunteered their data in order that correspondence relating to our legitimate interests may take place between the company and the subject, we will hold the data until no longer necessary for that purpose, which, in relation to our legitimate interests, is twelve months. You may request that we destroy this data before this time period has elapsed – this will prevent us from processing your data and will halt any pending queries relating to our legitimate interests to which we have not yet responded.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data and there will be no consequences of withdrawing consent.

## **H) AUTOMATED DECISION MAKING**

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. We will make some decisions about you based on automated decision making (where a decision is taken about you using an electronic system without human involvement). Requests for registered keeper data are submitted automatically as charges become due. This process is subject to procedures to guard against improper request, accidental loss, disclosure or destruction of data.

## **I) YOUR RIGHTS**

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. We operate a separate Subject Access Request policy and all such requests will be dealt with accordingly;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';

## **J) MAKING A COMPLAINT**

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

## **K) DATA PROTECTION COMPLIANCE**

Our Data Protection Officer is:

Rhys John

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