

PRIVACY NOTICE

Parking Operations (General) Processing of Personal Information

Parking Operations takes your privacy and our obligations under the Data Protection Act 2018 and UK General Data Protection Regulation (GDPR) seriously. This Privacy Notice is intended to explain how any personal data collected through our interactions with you or that of our contractors, will be protected, used, stored, and processed by us to deliver our statutory duty, functions, and services, including the improvement.

Please select from the different sections of this Privacy Notice to understand our practises, your rights, and our safeguarding of your information.

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The name and contact details of the Data Controller

You may contact us through the following details:

Data Controller

London Borough of Camden
(‘Camden’ in this Privacy Notice)

Judd Street
London WC1H 9JE
020 7974 4444

Data Protection Officer (DPO)

Andrew Maughan
Borough Solicitor

dpo@camden.gov.uk

Further information on data protection and privacy in Camden can be found at [Camden.gov.uk](https://www.camden.gov.uk).

About this privacy notice

Parking Operations is a division of Camden's Corporate Services, Customer Services directorate and is responsible for the effective management of our road network and kerb space.

The scope of this privacy notice only covers our activity and not that of other departments, services, or teams irrespective of whether they offer similar services or otherwise. Camden's general privacy notice, which contains details of these services' handling of your data, is available at <http://www.camden.gov.uk/privacy>.

Camden (via Parking Operations) will in most cases be the Data Controller for any information which is collected by us through our systems, activity and interactions with you, and a Joint Data Controller for any activities undertaken on our behalf by contractors. We remain your contact for any data processed.

Purpose for processing your personal data

Parking Operations collects and processes personal data to support its function as a traffic authority under the Traffic Management Act 2004 and Road Traffic Regulation Act 1984, including associated regulations. We process personal data for the following purposes:

- The making, amending and revocation of Traffic Management Orders (TMOs) and associated public consultations.
- The enforcement of parking and moving traffic regulations.
- The provision and administration of parking permits, visitor permits and parking bay suspensions.
- The provision and administration of Paid for Parking services (formerly known as Pay and Display).
- The provision and administration of exemption lists for traffic schemes, where offered.
- The provision of ad-hoc exemptions to enforcement to support emergency services.
- The provision, operation, and administration of the vehicle removal service.
- The administration and investigation of any complaints or allegations made against any services, products, or activities of Parking Operations.

In addition to the above, we also process data for the purposes:

- Health and safety requirements in relation to our employees, officers and those of our contractors or visitors to our premises, or when they are deploying on street.
- To prevent, detect, investigate, and prosecute any fraud, false representation, security breaches, violation of laws, and any other misuse of our services, products, systems, premises or any related terms and conditions of use.
- To remind you about products or services you have with us that are about to expire or have expired, or to provide you with service notifications that may affect your use of services or products provided by us to you, where offered.
- To support internal development and improvement of our parking services or products, support data analysis, research, or statistical reporting, troubleshooting and refinement of customer journeys, support strategy and policy development.

- To contact you about the location where you have parked your motor vehicle, and where its current position is preventing scheduled or emergency works, events, or similar from proceeding, only where we hold the relevant contact information.
- To comply with our public sector obligations, such as those set out in legislation, the Prevent Strategy, Vulnerable Persons, Breathing Space, and others. Many of these will be covered by other Privacy Notices, please see www.camden.gov.uk/privacy for details.

What is our legal basis for processing your personal data?

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

- 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, the Health and Safety at Work etc Act 2917, and the Fraud Act 2006 – Article 6(1)(c) (“legal obligation”) and (e) (“public task”).
- In respect to any contracts between you and us for parking services, products, or similar as offered by Parking Operations – Article 6(1)(b) (“contracts”).
- Where Camden is compelled or legally 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”).

In specific circumstances we may collect and process your personal data with your consent, where for example you tick a box to receive communications from us or provide your email address to be include in a newsletter or bulletin update. In those cases, the legal basis is article 6(1)(a) consent.

Our legal basis for processing your special category (sensitive) data is:

- 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 9(2)(g) (g) reasons of substantial public interest (with a basis in law), with the Data Protection Act 2018 schedule 1, Part 2 processing condition being para 6 statutory and government purposes, and the underlying laws being the Traffic Management Act 2004 and the Road Traffic Regulations Act 1984 and associated regulations, the Health and Safety at Work etc Act 1974, and the Fraud Act 2006.
- Where Camden is compelled or legally 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 9(2)(g) reasons of substantial public interest (with a basis in law), with the Data Protection Act 2018 schedule 1, Part 2 processing condition being para 6 statutory and government purposes, and the underlying laws being the Traffic Management Act 2004 and the Road Traffic Regulations Act 1984 and associated regulations, the Health and Safety at Work etc. Act 1974 and the Fraud Act 2006, and any other applicable legislation under which requests are made.

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/s, including any title, and name pre-fix or suffix
- Your home address, email address, and telephone number
- Your business name, address, email address, and company registration number
- Your financial information
- Your age

What types of special category (sensitive) personal information do we collect?

- Your health information
- Your disabled blue badge number

Some examples of when we collect this information include

When your vehicle is identified as having contravened parking or moving 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, we may obtain details from the new keeper regarding the previous registered keeper at the time of the contravention.
- If the vehicle is impounded, we require proof of person and vehicle ownership prior to releasing the vehicle to you.

When applying for a parking permit:

- We may ask you to provide documentary proof of where you live and vehicle ownership to enable use to verify your eligibility for a parking permit where automated processes cannot be completed.
- We may check your details against our PCN database to determine if you are eligible for a parking permit, where for example you have outstanding PCNs with Camden.

Through our general interactions:

- When you make a payment to us, query a payment with us, or when you are claiming 'financial hardship' or 'mental health breathing space' provisions.
- When you contact us by post, telephone, email, live chat via our website or in person concerning general enquires, reporting a problem with your account or username, or seeking case specific advice from us.

- When making a Freedom of Information Act or Environment Information Regulations request and we require you details to facilitate these requests.
- When we are contacted by another person(s), organisation or business about you or your vehicle.
- When you are captured in camera footage, either as part of a breach of traffic regulations, when you attend one of our public-facing buildings or when a CEO activates their body-worn camera in relation to an interaction on street.
- When you provide feedback as part of a public consultation concerning the introduction or modification of traffic restrictions.

Parking Operations may use non-personal data about you without any limitations, such as you 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 any marketing communications (including by third parties) without your consent.

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 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 contractual tasks or activities on our behalf.
- 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.
- As part of a camera recording, at one of our premises, on the highway, or by body-worn camera footage.
- 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 PCN debt.

Who is the information shared with?

Your data may be stored in databases that can be accessed by other Camden departments. We do this because we use shared council services and systems, such as those used to process transactions, manage complaints, or enquires. This helps us as an organisation to effectively manage our services, databases, understand customer journeys, record, and manage complaints, produce audit trails and

similar for interactions between us. Other departments may only access this data if there is a genuine need to use it. The Council has Role Based Access Controls in place to prevent unauthorised access.

We may share your data with the following:

Internal:

- Other teams within Parking Operations; process, Investigations, complaints, business intelligence, debt recovery, and the operations team.
- Other departments within Camden, including but not limited to the following, Highways, Transport Strategy, IT and Digital Services, Law and Governance, Internal Audit, Business Support, Complaints and Finance.

External:

- Other local authorities such as Westminster City Council, Brent Council, City of London, and Islington Council in relation to the management of boundary roads with shared parking.
- London Council's TRACE vehicle tracking service for any vehicles which have been impounded, relocated, or immobilised by us.
- The Metropolitan Police service for the reporting of any unclaimed vehicles left in the Camden car pound or when reporting incidents of law breaking.
- Other law enforcement agencies in connection with any investigations.
- London Tribunals for any Penalty Charge Notice (PCN) cases referred to the Environment and Traffic Adjudicators (ETA).
- Traffic Enforcement Centre (TEC), Northampton County Court for the enforcement of unpaid PCN.
- Driver and Vehicle Licensing Agency (DVLA) for the purpose of obtaining registered keeper details for vehicles and vehicle information.
- NSL Services Limited (part of Marston Holdings) who is the civil enforcement contractor for Parking Operations.
- NEC Software Solutions (formerly Northgate Public Services).
- Yunex Traffic (formerly Siemens Mobility) the supplier of the LaneWatch unattended cameras.
- Taranto Systems Limited (TSL) who are the provider of the Taranto PCN Management System.
- Johnson Controls International (formerly Tyco) who are the CCTV contractor to Camden.
- JustPark who are the cashless parking provider.
- Buchanan Computing who facilitates Traffic Management Order (TMO) consultations.
- Ricoh who are our print and scan service provider for the council.
- Capita payment services for any transaction processing.
- Redcorn Ltd for the collection and disposal of any unclaimed or declaimed vehicles from the Camden car pound.
- European Parking Collection (EPC) for any PCNs issued to non-UK vehicles.
- Collection and Enforcement Agents working on our behalf to recover outstanding debt owed to Camden - Ceder, Newlyn, Marston and Equita.
- The Local Government and Social Care Ombudsman (LGSCO) in respect to complaints about Parking Operations and Camden.

- Government departments, such as the Department for Work and Pensions (DWP), HM Revenue & Customs (HMRC), Home Office, etc.

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 [Camden.gov.uk](https://www.camden.gov.uk).

We will not transfer your personal data outside of the European Union (EU) or European Economic Area (EEA).

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

Generally:

- We are required by law to retain financial information for 7-years to comply with income and expenditure reporting to the Department for Levelling Up, Housing and Communities, HM Revenue and Customs and London Mayor for audit purposes.
- We retain PCN information for up to 7-years to account for any revenue generated and expenditure, and to pursue any outstanding debt under the Traffic Management Act 2004 and Road Traffic Regulation Act 1984.
- Recorded telephone calls made to Contact Camden via the main switchboard number 020 7974 4444 are retained for 12-months.
- Complaints may be stored up to a maximum of 15-years to allow for legal proceedings.
- Parking permits, parking bay suspensions, parking permissions or non-enforcements are retained for as long as necessary to provide the service.
- Resident permit accounts that are inactive for more than 12-months will be deleted.
- Emails sent to Camden email addresses are retained for a maximum of 7-years.
- Consultation information is retained for up to 7-years.
- Premises CCTV footage is stored for 30-days before being overwritten.
- Body-Worn Camera footage is held for 45-days by our civil enforcement contractor.

How do we keep and protect your personal data?

We endeavour to protect your personal information by storing it on secured servers, provided by Camden or that of a service provider or contractor, and by using technology, technical and organisational security measures to safeguard your personal data and to reduce the risk of loss, theft, interception, unauthorised access, disclosure, or alteration. Some of the measures we use are firewalls, port restricting and filtering, data encryption, role-based access control, physical access controls and information access controls.

Although we have appropriate security measures in place, no system is impenetrable, nor can we guarantee that unauthorised access or theft of your data will never occur. However, by putting in place appropriate measures it should be possible to reasonably mitigate the risk of such occurrences.

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

- You have chosen to create a username and password to access any of our products or services and have subsequently shared these credentials with a third-party.
- You are using unsecured public internet connection to transmit your personal data over the internet to us.
- You are using a shared or public computer or device to access the Camden website and any parking services or products with your user account and have not signed out afterwards or have chosen to use autofill/remember username and password options.

What automated decision making is in place?

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. However, this does not meet the definition of automated decision making in GDPR but is provided for clarity.

To streamline the process of obtaining a resident parking permit, we try to confirm the address supplied by you in the application automatically 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 emission information from the DVLA vehicle database. Again, this does not meet the definition of automated decision making in GDPR but is provided for clarity.

If we are unable to match details using these processes, you will be required to manually provide documentary proof of these.

What rights do you have?

You have several data rights, please see Camden's main [privacy page](#) for more information on these and how to active:

- to be informed
- to access your personal data
- to rectify your personal data
- to restrict our processing of your personal data
- to object to processing of your data
- in relating to automated decision making
- in respect to lodging a complaint with a supervisory authority

Review of this statement

Parking Operations will keep this privacy notice under regular review and amend where changes to services or processing of personal data by us occurs.

November 2022