

## **City Parking (Glasgow) LLP**

### **Information Use and Privacy Policy**

#### **Background**

The law in relation to Data Protection Act is changing and the new General Data Protection Regulation (GDPR) comes into force on 25 May 2018 across all EU member states. The UK Government's Data Protection Bill 2017 brings this into UK law so this will not be affected by Brexit.

Data protection laws ensure that personal information is handled appropriately and securely by organisations including businesses, government agencies and charities. City Parking (Glasgow) LLP has a legal duty to follow these laws when gathering, storing, sharing or processing this data.

#### **Who we are:**

City Parking (Glasgow) LLP is an ALEO (Arms-length External Organisation) of Glasgow City Council. Glasgow City Council (GCC).

City Parking (Glasgow) is a limited liability partnership incorporated in Scotland under the Liability Partnership Act 2000 (Registered Number SO301266) and having its Registered Office at 3rd Floor, Cadogan 5, The Anderston Centre Glasgow, G2 7PH. The members of City Parking (Glasgow) LLP are Glasgow City Council and GCC LLP Investments Limited. Accordingly we take the services of GCC to provide our data protection advice.

You can contact our Data Protection Officer by post at City Chambers, George Square, Glasgow G2 1DU, United Kingdom, by email at: [dataprotection@glasgow.gov.uk](mailto:dataprotection@glasgow.gov.uk), and by telephone on 0141 287 1055.

#### **Why do we need a Privacy Policy?**

This Privacy Policy explains what we do with your personal data. Your privacy is important to City Parking and we take our obligations concerning the privacy of your data seriously.

This policy is relevant if we are providing you with a service, receiving a service from you, using your data to ask for your assistance, or if you are visiting our website/social media platforms.

A Privacy Policy sets out the rules we have put in place to ensure the requirements of GDPR are being met by City Parking in relation to the legal conditions that must be satisfied for obtaining, handling, processing, storing, transporting and destroying personal information.

Please note we may amend this Privacy Policy from time to time.

#### **Why do we need your personal information and what do we do with it?**

##### **Customer Data:**

We use your personal information to allow us to provide you with parking products, receive payment from you and keep you up to date with useful information. We also use your information to verify your identity where required, contact you by post, email or telephone and to maintain our records.

Where it is necessary personal data may need to be used for the establishment, exercise or defence of legal claims.

### Statutory Enforcement

Processing your personal information is necessary for the performance of a task carried out on behalf of GCC in the public interest.

The collection of data is necessary to allow compliance with a legal obligation to which GCC is subject in relation statutory parking enforcement and bus lane enforcement.

Where it is necessary personal data may need to be used for the establishment, exercise or defence of legal claims.

### Supplier Data

We may need information from our Suppliers in order to contact relevant individuals at your organisation and so that we can communicate with you as part of the contractual arrangements between us

Where it is necessary data may need to be used to perform certain legal obligations or for the establishment, exercise or defence of legal claims.

### **Legal basis for using your information:**

#### Customer Data:

We require this information as it is necessary for the performance of a contract with you (or to take steps to enter into a contract with you).

If you do not provide us with the information we have asked for then we will not be able to provide this service to you.

### Statutory Enforcement

We provide these services to you on behalf of GCC, as this is necessary for compliance with a legal obligation to which the Council is subject.

### Supplier Data

We require this information as it is necessary for the performance of a contract with you (or to take steps to enter into a contract with you) or as part of our legitimate interests in dealing with your organisation.

### **Who do we share your information with?**

This privacy policy applies to the personal data of our customers, website users, clients, suppliers and other people whom we may contact in order to carry out our contractual, legal or statutory obligations.

We take the services of GCC to provide our Data Protection Advice and accordingly data share, as necessary, with Glasgow City Council.

We are also legally obliged to share certain data with other public bodies, such as HMRC and will do so where the law requires this. We will also generally comply with requests for specific information from other regulatory and law enforcement bodies where this is necessary and appropriate. Your information may also be analysed internally to help us improve our services. This data sharing is in accordance with our privacy statements as available on our website at: [www.cityparkingglasgow.co.uk](http://www.cityparkingglasgow.co.uk)

It also forms part of our requirements in line with our Records Management Plan.

### **How long do we keep your information for?**

We only keep your personal information for the minimum period amount of time necessary. Sometimes this time period is set out in the law, but in most cases it is based on the business need. We maintain a records retention and disposal schedule which sets out how long we hold different types of information for. You can view this on our website at [www.cityparkingglasgow.co.uk](http://www.cityparkingglasgow.co.uk) or you can request a hard copy from the contact address stated above.

### **Your rights under data protection law:**

- Access to your information – you have the right to request a copy of the personal information that we hold about you.
- Correcting your information – we want to make sure that your personal information is accurate, complete and up to date. Therefore you may ask us to correct any personal information about you that you believe does not meet these standards.
- Deletion of your information – you have the right to ask us to delete personal information about you were:
  - I. you think that we no longer need to hold the information for the purposes for which it was originally obtained.
  - II. We are using that information with your consent and you have withdrawn your consent – see [Withdrawing consent to using your information](#) below [delete if not on basis of consent]
  - III. You have a genuine objection to our use of your personal information – see [objecting to how we may use your information](#) below
  - IV. Our use of your personal information is contrary to law or our other legal obligations.

[Objecting to how we may use your information](#) – You have the right at any time to tell us to stop using your personal information for direct marketing purposes.

[Restricting how we may use your information](#) – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information that we hold about you or we are assessing the objection you have made to our use of your information. This right might also apply if we no longer have a basis for using your personal information but you don't want us to delete the data. Where this right is realistically applied

will mean that we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

### **Withdrawing consent to use your information**

Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us as stated above if you wish to exercise any of these rights.

### **Information you have given us about other people:**

If you have provided anyone else's details on this form, please make sure that you have told them that you have given their information to City Parking (Glasgow) LLP. We will only use this information to provide information on promotional parking products and keep you/them up to date with useful information. We may also use their information to verify identity where required, contact by post, email or telephone and to maintain our records. . If they want any more information on how we will use their information they can visit our web site at [www.cityparkingglasgow.co.uk](http://www.cityparkingglasgow.co.uk)

### **Profiling or automated decision-making processes:**

Complaints:

We aim to directly resolve all complaints about how we handle personal information. However, you also have the right to lodge a complaint with the Information Commissioner's Office, who can be contacted by post at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. By phone on 0303 123 1113 (local rate) or 01625 545 745. Visit their website for more information at- <https://ico.org.uk/concerns>

### **More information:**

For more details on how we process your personal information visit [www.cityparkingglasgow.co.uk](http://www.cityparkingglasgow.co.uk)

If you do not have access to the internet you can contact us via telephone to request hard copies of our documents.

## APPENDIX

### Understanding Data Protection Terms

- Data-This is information which is stored by an organisation, this can be electronically, on a computer, or in certain paper-based filing systems.

- Personal data: This is any data from which a living individual can be identified. This can come from the information alone, or when combined with other information held. Examples of personal data include names, addresses, photographs, CCTV images etc., which could allow an individual to be identified.

- Sensitive personal data: This contains information which could identify a person's sexuality, racial or ethnic origin, religious affiliations, health, trade union membership, criminal background etc.

Sensitive personal data can only be processed under strict conditions, and will usually require the express consent of the person concerned.

- Data subjects: This is all living individuals about whom we hold personal data. All data subjects have legal rights in relation to their personal data.

- Data Controller: This is the legal person, who alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes the purposes for which, and the manner in which, any personal data is processed.

- Data processors are any person who processes personal data on behalf of a Data Controller.

- Data users include those whose work involves using personal data. Data users undertake data protection and information security training and have a duty to protect the information they handle.

- Processing is any activity or set of operations that involves use of the personal data or on sets of personal data, whether or not by automated means.