

Privacy Policy

Company name: Brewerygate Limited

Registered address: 71-75 Shelton Street. London WC2H 9JQ

Company Registration No: 13160322

Correspondence address: 71-75 Shelton Street. London WC2H 9JQ

Data Protection Officer contact details: info@brewerygateltd.co.uk

Phone Number: 07908 427791

Overview

Brewerygate Ltd is a parking management company for privately owned sites. Brewerygate Ltd are the 'data controller' for the purpose of General Data Protection Regulation. This policy has been produced and will continue to be updated in line with the Data Protection Act 2018 and General Data Protection Regulation.

This policy will explain your rights and what to expect when we 'the data controller' collect personal data from you, including information about the right to access the information obtained.

Brewerygate Ltd have authorization from 'Landowners' to manage and operate their car parks using a variety of different services. This may include Enforcement officers patrolling our sites, ANPR, MNPR and CCTV monitoring.

What we do

We monitor the entry and exit of our privately managed ANPR, CCTV or patrolled car park sites.

We obtain Images of people and vehicles, including vehicle registration numbers, these are obtained to confirm the length of stay and enforce non-compliance of the Terms and Conditions of entry onto our privately-owned sites.

We also use our cameras to detect and deter criminal activity and to provide activity information to our client.

Who we are

Brewerygate Ltd (13160322) is a company registered in England and Wales whose registered office is at 71-75 Shelton Street. London. WC2H 9JQ.

Our Data Protection Team can be contacted by emailing info@brewerygateltd.co.uk

Or you can contact us on: 07908 427791

What data do we collect?

We collect data for the purposes of delivering our services, which include, but not limited, to executing parking charge notices to motorists deemed to be in contravention of our contractual terms and conditions upheld on behalf of our client. The data we collect comprises of images of vehicles within the premises or the VRM (Vehicle Registration Mark) and may include written notes as supporting evidence of a motorist failing to comply with site terms and also vehicle movements during the period of contravention.

How do we collect data?

If you are the registered keeper of a vehicle which has had a Parking Charge Notice issued against it, your details will be requested by the DVLA (Driving Vehicle Licencing Agency)

If you are not the registered keeper of the vehicle there are other methods we use to obtain your information this includes no longer living at the address held by the DVLA.

A third party has confirmed that the vehicle was on hire or lease to you at the time of contravention

A third party has confirmed you were either accountable or driving the vehicle at the time of contravention

A third party credit reference

A third party living at the residents who can confirm you no longer live at the address

A third party passing over forwarding addresses

Brewerygate Ltd for the purposes set out in this Privacy Policy under all sections; when information is provided in relation to a Parking Charge, Brewerygate Ltd may share it with the following services outlined below:

The payment processor for the processing of any online payments

The International Parking Community for auditing purposes of our car park management services.

The DVLA (Driver Vehicle Licence Agency) for the purpose of obtaining the registered keeper details.

The Independent Appeal Service (IAS) for the purpose of considering any appeal made.

Print and mail service providers for the purpose of responding to any queries or appeals.

Email Service Providers for the purpose of responding to queries or appeals by email.

Credit reference agents for the purpose of ensuring we are writing to you at the most recent correspondence address.

Collection Agents for the purpose of enforcing a parking contract.

Company Solicitors or any third party they may instruct on their behalf for the purpose of enforcing a parking contract or responding to a legal query or any other duty authorized sub-contractor

Other than stated above, information supplied to us is subject to confidentiality and will not be disclosed otherwise without your prior consent.

We will not ask you for any more information than we need, and we do not keep your information for any longer than we need to.

We take reasonable steps to keep your details up to date and accurate. Please keep in mind that we may hold your records after your appeal has been considered as we are required to have effective audit trails and to comply with regulatory and legislative requirements.

General Data Protection Regulation gives you the right to access information held about you. You can access personal data we hold of you by sending an email to info@brewerygateltd.co.uk.

As an organisation, we look after your personal data by having security that is appropriate for its nature and the harm that might result from a breach of security. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your

personal data, we cannot guarantee the security of your data transmitted to our site. Any transmission therefore is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

The Legal Position

This privacy notice includes the following information to help you understand clearly how your data is being used:

- The lawful basis for processing your data
- Categories of data processed
- What we do with your personal data

Your rights under the DPA are as follows:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

Please note that you have the right to request the above, however, when we receive your requests we may object to your request if we do not agree with it. However, if you do make the request, we will tell you if the request has been granted or not and the reason why.

Right of Access:

You have the right to submit a Subject Access Request and this can be done via an email request to our DPO. We will need to obtain proof of your identity before providing you with information we hold about you. You can do so by emailing info@brewerygateltd.co.uk or by calling 07908 427791. If you require more information about items raised in this notice, we would recommend the ICO website, www.ico.org.uk

Our Legitimate Interest for Processing Your Personal Data

The processing is necessary for a contract which has been entered into and there is a legitimate interest to do so. We are entitled to:

- Pursue a motorist for an unpaid parking tariff
- Pursue a motorist for an unpaid parking charge
- Ensure safety and security and help deter/detect criminal activity.

Sharing Your Personal Data

Your personal data may be shared for the payment of a parking tariff or charge with: third parties, such as a payment facilitator, an external software provider, debt recovery companies, solicitors and

high court officers/bailiffs where necessary to ensure compliance with your obligations under the contract. We will not transfer your personal data out of the EU.

The Five Categories of “Personal Data” we Process:

Unpaid Charge/Tariff:

As a compliant user of our privately managed car parking site, the personal data we obtain is your registration number. We may capture images of the vehicle, occupants or bystanders. A full list of your Rights under GDPR are summarised above. Where your data is obtained it will be retained for 3 months only. We then erase your registration and any other images from our records.

Unpaid Fee:

Where there is a fee which is payable, we may request personal details of the registered keeper of the vehicle from the Driver and Vehicle Licensing Agency “DVLA” and other third parties (for example the registered keeper or hire companies where applicable) who may possess information which could assist in resolving any dispute.

Appeals

If you decide to challenge a parking charge and we reject your challenge, then we will provide your registration number and parking charge number along with the time and date of the parking event to the Independent Appeals Service (IAS) and/or the International Parking Committee (IPC). This is to allow you to contest the charge with an independent adjudicator.

Windscreen Parking Charge:

If you have received a Parking Charge Notice on your windscreen, at the point the notice is placed on your windscreen, we will have obtained your personal details, which could include images of your vehicle, occupants/bystanders and the vehicle registration number.

If you or a third party pay the Parking Charge Notice within 28 days, your personal details will not be retained for longer than 3 months.

Where there is an unpaid fee over 28 days, we may request personal details of the registered keeper of the vehicle from the Driver and Vehicle Licensing Agency “DVLA” and other third parties (for example the registered keeper or hire companies where applicable) who may possess information which could assist in resolving any dispute.

Postal Parking Charge:

If you have received a Parking Charge Notice by post, we will have previously obtained your personal details, which could include images of your vehicle, occupants/bystanders and the vehicle registration.

We will also have obtained personal details of the registered keeper of the vehicle from the Driver and Vehicle Licensing Agency “DVLA”.

The personal details we will obtain include:

- The name and address of the registered keeper
- The make, model and colour of the vehicle
- Confirmation of the registration number
- Any other information that we gather, in pursuance of the unpaid fee, including information that is shared by you with us.

Your data will be held for sufficient time to enable the fee to be settled, by you or another person and resolve any dispute. However, your data will not normally be held for longer than 6 years in such circumstances. In some circumstances your data may be held for longer than 6 years. Examples of when we may hold your data for longer are;

- When there is an on-going dispute which requires us to hold the data for longer than normal.
- Where a court order has been made allowing us to pursue outstanding money after the expiration of 6 years.

Changes to Our Privacy Notice

From time to time we may amend the way in which we process personal data. This may lead to changes in how we collect and/or use your personal information. We may amend the terms of this Privacy Policy at any time.

Brewerygate Limited Website Privacy Policy

We take care to protect the privacy of users of the Brewerygate Ltd Website, with regard to each of your visits to our website we may automatically collect technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

The information which we collect and store during normal use of the site is used to monitor and analyse how parts of the site are used. Such use does not result in any personally identifiable data being collected or stored.

By submitting your information and/or use of this website, you consent to the use of that information as set out in this Privacy Policy.

Brewerygate Ltd Privacy Policy on Appeals

This privacy statement has been produced in accordance with the General Data Protection Regulation and The Data Protection 2018 and applies to all personal data, as defined in the acts submitted when you click on the “to Appeal your Parking Charge Notice” button.

For an Appeal

The parking charge reference, the vehicle registration number, your capacity e.g. driver, registered keeper, hirer/lease or other, your name, postal address, email address and telephone number, the details of the appeal and any uploaded evidence. These details will be used for the purpose of progressing your parking charge to cancellation or payment and may be shared appropriately to do

so and for audit. Information supplied to us is subject to confidentiality and will not be disclosed without your prior consent other than in line with this purpose, whereby it may be necessary to share data with the IPC, DVLA, IAS, print and mail service providers, email service providers, credit reference agents, collection agents or solicitors or any other duly authorised sub-contractors.

Use of the Information

When you make an appeal via the “Appeal” button, you accept Brewerygate Ltd will collect and process personal data you supply via the Brewerygate Ltd website for the following purposes, such information may include:

Information supplied to us is subject to confidentiality and will not be disclosed without your prior consent other than in line with this purpose, whereby it may be necessary to share data with the IPC, DVLA, IAS, print and mail service providers, email service providers, credit reference agents, collection agents or solicitors or any other duly authorised sub-contractors.

Depending on the nature of your appeal, the information you may give may be classed as sensitive personal data. For example, if you give information relating to a medical condition you may have. We will only use this information as part of your appeal and we will not use it for any other purpose.

We will request your consent where we need to disclose this information to a third party, in order to verify your appeal

By Submitting your appeal you consent to the use of all information as set out in this privacy policy.

Brewerygate Ltd Privacy Statement concerning Payment Page

This privacy statement has been produced in accordance with the General Data Protection Regulation and applies to all personal data, as defined in the Act submitted when you choose to pay for your Parking Charge Notice through our website.

Accepted Use of the Information

When you select to pay your PCN online, you will be redirected to the separately hosted web pages of the Payment Processor for Card Payments.

Making an Online Payment

Any personal data you supply via Payment Processor will be collected and processed by the Payment Processor only for the following purposes, such information may include:

- Your parking charge reference
- Card number
- Expiry date
- Security Code

The parking charge reference will be used for the purpose of locating the relevant parking charge to enable the Payment Processor to populate the payment screen with the outstanding amount payable and the other details will be used by the Payment Processor to process the transaction. We will be supplied with the status of the parking charge, e.g. “paid”, and the parking charge reference to help us allocate the payment made.

We look after your personal data by having security that is appropriate for its nature and the harm that might result from a breach of security. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk and you should take the appropriate steps in respect of this risk.

Our payments are processed by Network Merchants Limited

We shall provide Network Merchants Limited with information in respect of the Parking Charge value due for payment. This information and any information you provide to Network Merchants Limited shall be processed in line with the Network Merchants Limited Privacy policy, which is available to view at <http://www.nmi.com>

All online card payments are protected by Secure Socket Layer (SSL) with an encryption key length of 128 bits. Your payment card details are directly processed by the Payment Processor and are neither collected nor accessible by Brewerygate Ltd. The Payment Processor's online payment management solutions are independently and rigorously security assessed, and is certified by Visa and MasterCard as a Payment Card Industry Data Security Standard (PCI DSS) Level 1 payment processor. Further information about this payment card security standard can be found at PCI Standards Security Council website: https://www.pcisecuritystandards.org/security_standards/pci_dss.shtml

The Payment Processor facilitates transactions that are carried out when redirected from the Brewerygate Ltd website. The Payment Processor provides a checkout facility only, via its own independent site.

Police Enquiries – Privacy Statement

This privacy statement has been produced in accordance with the Data Protection 2018 and the General Data Protection Regulation. The statement applies to all personal data. Park Watch will only process and supply information to the Police Services for the purpose of their grounds to request personal data as stated in the British Transport Police information request form under the Data Protection 2018 and in line with the General Data Protection Regulation (GDPR).

How to Complain

Brewerygate Ltd are committed to ensuring your data rights are upheld, if you are unhappy with how we have used your personal data or with any correspondence received you can contact us via email info@brewerygateltd.co.uk or by calling 07908 427791.

Contact Us

If you have any queries relating to this Privacy Policy, please contact us by e-mail at: info@brewerygateltd.co.uk or call 07908 427791