

## **Privacy Policy**

Last updated 12/1/2023

Performance Parking Ltd t/a Avalon takes your privacy seriously. This privacy policy tells you how we look after your personal data.

### **Who we are:**

Performance Parking Ltd  
7 Bell Yard  
London  
WC2M 2JR

[dataprotection@performanceparking.co.uk](mailto:dataprotection@performanceparking.co.uk)

Tel: 03333 050 130

Performance Parking Ltd is the data controller. ICO registration number ZB291873

Should you have any questions or complaints, or would like to exercise your rights under data protection legislation as detailed below, please contact the data controller in the first instance by email at [dataprotection@performanceparking.co.uk](mailto:dataprotection@performanceparking.co.uk). We will respond to your request within one month of receiving it.

If you feel we were unable to resolve your complaint and we cannot agree on the matter you are able to contact the Information Commissioner's Office via <https://ico.org.uk> to register a complaint with them.

### **Your rights:**

You have the right to request access and obtain a copy of the personal data we hold about you, as well as to request correction of the personal data should you believe it to be inaccurate or incomplete.

We may need to request specific information from you to help us confirm your identity to safeguard your privacy and that of the other parties that we hold data on.

Your right to obtain a copy of the data we hold on you is free of charge, but we reserve the right to make a reasonable charge should any requests be excessively frequent or otherwise disruptive. We will inform you of this should the situation arise.

### **Changes to this Privacy Policy**

We may need to update this policy from time to time in order to comply with changes to relevant legislation, or to accommodate future requirements of the business. The date of this policy is stated at the top and this policy remains relevant until such time as an updated policy is published.

### **Data we may collect:**

If you register on one of our parking payment platforms or park at one of our managed sites, we may collect the following personal information from you.

Identity Data including first and last names, title, vehicle registration mark and other vehicle details, username and password, images of your vehicle

Contact Data including email address, telephone numbers

Transaction data about payments you have made and the services you have purchased.

If your vehicle has been identified to be in contravention of terms and conditions at a managed site, we may request the following details from the DVLA:

Registered Keeper name and address

In the event that the registered keeper transfers liability for a PCN then may provide us with information on the nominated driver / hirer:

Name, Address, email, telephone number

Clients - if you are a parking area or landowner and have entered into a contract for services with us we may collect the following data:

Name, Phone number, email address, postal address, site address

If you visit our website and enter your personal data to enquire or contact us we may collect:

Name, Phone number, email address, message

### **How we collect your personal data:**

Most personal data we collect and hold will have been provided **directly** by you via various channels:

When you enquire or contact us about products or services

When you sign up to one of our systems

When you appeal a Parking Charge Notice (PCN)

When you pay a Parking Charge Notice(PCN)

Use of our website or other online services

We may receive personal information **indirectly**, for example in the following ways:

When you interact with our website or online services, we may collect technical information on your device by using cookies or similar technology.

Via any third party suppliers or third party equipment providers

Via publicly available databases

Via the DVLA

Via the Independent Appeals Service

### **How we use personal data**

All data collected will only be used in accordance with the General Data Protection Legislation (GDPR).

Data will be used to enable us to fulfil our contractual obligations to you and/or to the relevant landowner and or where it is necessary to pursue our legitimate interests:, or where we need to comply with a legal or regulatory obligation or in response to a request by law enforcement agencies.

### **How we may share information with others**

We do not share data with others for any purpose related to advertising or marketing

There may be occasions when we are required to share information with others such as those organisations necessary for the reasons we may collect personal data outlined above.

These may include:

- DVLA for the purposes of auditing our services, providing justification for any VRM lookups.
- Any Independent Appeals Service, for the purposes of reviewing and deciding your appeal.
- Trade Associations such as the British Parking Association or Independent Parking Community for the purpose of auditing our compliance with the Private Parking Code of Practice.
- Debt recovery agents for recovery of debts due to us
- Solicitors for enforcing contracts or dealing with enquiries requiring legal advice.
- Mailing providers for the purpose of printing and mailing correspondence.

### **How we store your personal information**

We store your information as securely as possible with appropriate security measures. All employees are subject to a strict confidentiality agreement.

Information is only retained for the minimum period required to fulfil our contractual obligations, legal requirements or in order to recover debts due to us.

Vehicle registration data for permitted parking will be held for as long as the client remains active.

Vehicle registration data captured via camera that has not been in contravention will be held for 90 days.

Vehicle registration data which has formed a contravention will be retained for up to six years to facilitate debt collection and enable audits by the DVLA.

Any Identity data and transaction data for registered users of Avalon Pay will be held for up to 12 months after the user chooses to delete their user account.