

## **NPM PRIVACY NOTICE – Personal Data and Full Process:**

Company Name

**National Parking Management Limited**

Company Number

**08237818**

**Registered in England and Wales**

Registered Address

**20 Francis Street**

**Northampton**

**NN1 2NZ**

Data Protection Officer Contact Details

[paula@npmpay.co.uk](mailto:paula@npmpay.co.uk)

Telephone Number

**01604 588342**

**NPM**

## **NPM PRIVACY NOTICE – Personal Data and Full Process:**

### **Lawful Basis:**

By entering or remaining on the private land we monitor, may result in your personal data being obtained, retained and processed. The data processed may include, the vehicle registration number and images of the vehicle.

The purpose of the processing of data is:

1. To ensure compliance with your obligations under the contract entered into when you entered and remained on the private land and for the legitimate purpose of pursuing the driver and/or any other party who may become liable for payment of any fees.
2. To deter criminal activity on the private land and help detect crimes which have been committed.

Our Lawful bases for processing data is:

1. The processing is necessary for a contract which has been entered into.
2. There is a legitimate interest as details below:
  - a) To pursue motorists for unpaid parking tariff
  - b) To pursue motorist for unpaid parking charges

Where there is a fee which is payable we will request personal details of the registered keeper of the vehicle from the 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.

Where your data is obtained it could be retained for 6 years where there is no unpaid fee. Where there is an unpaid fee the 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. Examples of when we may hold your data for longer are:

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

Your personal data may be shared with third parties. This may include, debt recovery companies, solicitors and bailiffs to pursue any outstanding debts. If you decide to appeal a parking charge and we reject your appeal, then we will provide your registration number and parking charge number along with the time and date of the parking contravention to them. This is to allow you to contest the charge with an independent adjudicator.

## **NPM PRIVACY NOTICE – Personal Data and Full Process:**

Please email us at [admin@npmpay.co.uk](mailto:admin@npmpay.co.uk) (ensure you provide proof of identification when emailing and mark the subject as Personal Data) if:

- You object to your personal details being processed, or
- You believe we hold the incorrect details for you and would like us to rectify the data we hold, or
- You would like us to delete the data we hold for you, or
- You would like to restrict how we process your data, or
- If you entered into a contract with us and would like a copy of the data, we hold about you in a format which can easily be transferred to another provider.

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

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## **NPM PRIVACY NOTICE – Personal Data and Full Process:**

### **The Process in Full:**

By parking your vehicle on the private land we maintain you agree to abide by all the terms and conditions specified on our signage. Breach of any term or condition will result in the driver being liable for a parking charge of £100.00. Parking charges are to be paid within 28 days.

Terms and conditions apply 24 hours a day, all year round. Where a parking charge becomes due an application will be made to the DVLA for the keeper's details. Non-payment will result in additional charges which will be added to the value of the charge and for which the driver will be liable on an indemnity basis. Images may be captured and retained for enforcement purposes.

NPM are not liable for any loss or damage howsoever caused to any person or property whilst on the private land.

Data will initially be sought and will be obtained by NPM when a vehicle parking on private land breaches the terms and conditions stipulated for each individual area. Rules and regulations for each area will be specified on all signage. The data is necessary to be retained for enforcement purposes. Where a PCN becomes due, an application may be made to DVLA for the vehicle keeper details to allow notices to be sent through the post.

NPM use handheld devices to take photographs of any vehicle which has parked on private land without following the rules and regulations of the sites monitored. Registration and vehicle details are also taken where the contravention has taken place. This is uploaded onto the iView website.

### **Personal Data at this point: Photographs of vehicle and vehicle registration:**

NPM have signed agreements in place with all landowners. Parking operative will take photos of the parking breach recording the time and date of the contravention, this insures we have everything we need to back up a parking charge notice. You can see any photos relating to your charge by putting your REGISTRATION/REFERENCE PARKING CHARGE NOTICE on this link <http://pay.nmpay.co.uk/>

### **The Parking Charge Notice (Postal):**

Parking Charge Notices are not issued to windscreen NPM send Postal PCN's. As a minimum the notice has to say: when and how the parking contravention took place; the time and date when the notice was issued; how much is due; what (if any) discount is applied for prompt payment of the charge; how and to whom to make payment; and what the arrangements are for the resolution of disputes or complaints - this includes any internal arrangements offered by the parking operator as well as any independent appeals process. The contents of the notice to the registered keeper are essentially the same as a notice to the driver but must invite the registered keeper either to pay the unpaid parking charge or, if the registered keeper was not the driver of the vehicle at the time of the parking contravention, they may legally transfer the liability to the driver of the vehicle at that time.

### **Payment on Notice:**

Each PCN is £100.00, this amount is discounted to £60.00 if paid within 14 days from the date of the contravention. If full payment is made the PCN will be closed and no further action will be taken, all details will be removed from NPM system.

## **NPM PRIVACY NOTICE – Personal Data and Full Process:**

### **Appeals:**

If the Registered Keeper/Driver wishes to appeal the PCN they may appeal. Appeals must be in writing either by post, write to: - Appeals Section, 20 Francis Street, Northampton, NN1 2NZ or fill in the NPM online appeals form <http://npmpay.co.uk/disputes/>

The Registered Keeper/Driver should ensure to include the PCN number, vehicle registration, name and address in all communications as per the online form <http://npmpay.co.uk/disputes/>

If an appeal is made within the first 14 days of the date of the contravention, the Registered Keeper/Driver will be given an additional 14 days to pay the reduced amount of £60.00 from the appeal decline date if the appeal is declined.

**NPM do not accept appeals over the telephone.** Any personal data which is received via the post, once processed onto the computer system is then shredded and correctly disposed of.

### **Payments:**

Payments made before the 14-day deadline will be reduced to £60.00, after which it increases to £100. If the PCN remains un-appealed or unpaid after 28 days, it is sent to our debt collection department/agent to recover, additional charges will be added at this point.

If an appeal is accepted the parking charge notice will be cancelled and the Registered Keeper/Driver will be informed by either return letter or email all details will then be removed from the NPM system.

NPM only keep personal data in electronic format, no personal data is kept in paper format.

### **Agencies which are or may be involved**

- National Parking Management Limited (NPM)
- Driver Vehicle Licensing Authority (DVLA)
- International Parking Community (IPC) Independent Appeal Service (IAS)
- iView Ticket Hub
- Debt Collection Agency
- Worldpay
- Lexis Nexis Risk Solutions
- QuickBooks

## **NPM PRIVACY NOTICE – Personal Data and Full Process:**

### **What personal data kept and where?**

#### **NPM Email:**

All computers kept by NPM can only be accessed by allocated users, each user have their own personal logon details. All logon details are only retained by the individual user and Director.

The only relevant personnel who have access to the emails do so by also having their own unique logon to the email system. Emails received that are relevant to parking charge notices are copied and placed onto the iView Ticket Hub system, once completed the email is placed in the deleted items folder. All emails which are older than 6 months are deleted from the system completely.

NPM Computer Security – please see Computers and Electronic Communications policy.

NPM have a contract with iView Ticket Hub – NPM have individual personal logon details to the iView website. Data is only ever transferred electronically between all companies involved. By using the iView Ticket Hub.

#### **iView Security:**

Connectivity and data transmission is encrypted and sent over an SSL connection to the server. No personal details are stored on the mobile device and access is controlled via a user ID and password. Parking charge notice data is only stored on the device for a short period and automatically deleted after a predetermined time.

You can personally view details regarding iView Ticket Hub by following this link  
[http://www.iview.co.uk/content/ticket\\_mobile\\_pcn.htm](http://www.iview.co.uk/content/ticket_mobile_pcn.htm)

#### **Personal Data at this point: Photographs of vehicle and vehicle registration:**

## **NPM PRIVACY NOTICE – Personal Data and Full Process:**

### **DVLA:**

NPM have a contract in place with DVLA – NPM do not contact the DVLA directly. The information which has been uploaded to the iView system (vehicle details and registration) is transferred electronically to the DVLA to request Registered Keeper details. This information is electronically sent back to the iView Ticket Hub. Once iView has received this data NPM can view these details using the iView system.

You can personally view details regarding DVLA security by following this link

<https://www.gov.uk/government/publications/security-policy-framework>

Letters (Postal Parking Charge Notice PCN's) are automatically generated from the information which has been received on the iView system and sent out in the post.

**Personal Data at this point: Photographs of vehicle, vehicle registration, name and address of registered keeper received by DVLA:**

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## **NPM PRIVACY NOTICE – Personal Data and Full Process:**

### **3<sup>rd</sup> Parties (Hire Companies):**

NPM do not request any personal data from any 3<sup>rd</sup> party companies. However, if a vehicle which has received a parking charge notice is a hire vehicle, the DVLA will hold the hire company as the registered keeper. When this occurs, and the hire company will receive the postal parking charge notice in which they can legally transfer the liability to the vehicle hirer.

Hire companies will transfer liability by sending NPM details of the driver to whom they have an agreement with along with their address.

These details are usually received via the post. Once NPM has receive this information, it is scanned onto the iView website and the paperwork is then shredded and disposed of appropriately.

**Personal Data at this point: Photographs of vehicle, vehicle registration, name and address of vehicle hirer received by hire company:**

### **Transfer of Liability:**

Registered Keepers are legally allowed to give name and addresses of the driver of their vehicle if a contravention has taken place. Vehicle keepers will transfer liability by sending NPM details of the driver with along with their address. Once NPM receive this information, it is scanned onto the iView website and paperwork is then shredded and disposed of appropriately.

**Personal Data at this point: Photographs of vehicle and vehicle registration, name and address of vehicle driver received by registered keeper:**



## NPM PRIVACY NOTICE – Personal Data and Full Process:

### IPC/IAS:

NPM have a contract in place with the International Parking Committee (IPC (NPM's Governing Body)). The IPC have an independent appeals service for motorist International Appeals Service (IAS). NPM have individual logon details to access the IAS website. Data is only ever transferred electronically between NPM and IAS if required.

Only once and appeal has been declined by NPM, we manually input onto the IAS website the following details: -

- Parking charge notice number
- Vehicle registration number
- Date of the contravention
- Date the appeal was declined

These details are placed onto the IAS website for each PCN each time an appeal has been declined.

**The bullet points above is the only data we share with IAS at this point, if the registered keeper/driver then appeals with the IAS, they themselves provide and share additional information.**

If the registered keeper/driver believes that the appeal decision from NPM is incorrect, they are entitled to appeal to the Independent Appeals Service (IAS). Appeals must be submitted to the IAS within 21 days of the date of the appeal declined letter/email.

To appeal, the registered keeper/driver can visit the following link <https://www.theias.org/>. Should the registered keeper/driver appeal to the IAS the discounted amount of £60.00 will be withdrawn.

If the registered keeper/driver appeal to the IAS and the appeal is upheld, NPM will cancel the PCN and remove all data from the NPM system. However, should the appeal be dismissed the full amount of £100.00 will be payable.

**Personal Data shared at this point If appealed, and NPM defend their case with IAS: Photographs of vehicle, vehicle registration, name and address of registered keeper/driver received by DVLA, any other information that is legitimately relevant to the parking charge notice which will have been additionally supplied by the registered keeper/driver in appeal process:**

## NPM PRIVACY NOTICE – Personal Data and Full Process:

### Debt Collection Department/Agency:

NPM have their own internal collections department and therefore no information is shared with an outside agency if this route is taken (NPM decided how many they wish to do themselves).

### *Alternatively:*

NPM have a contract in place with ZZPS Debt Recovery Agency – NPM have individual personal logon details to the ZZPS website. Data is only ever transferred electronically to ZZPS by using the iView Ticket Hub.

You can personally view details regarding ZZPS by using this link <http://www.zzps.co.uk/cookies>

Once a PCN has reached 28 days or older from the date of the contravention and no appeal has been received, or where an appeal has been received but not accepted and 28 days have accrued from the date the appeal was declined. PCN's are sent to debt collection. If outsourced to ZZPS it is sent by clicking a link on the iView Ticket Hub system. At this point additional charges will be added to the PCN of £60.00 amount of PCN would now stand at £160.00. Further and additional charges may be applied depending upon the course of further action.

Further Action could include, solicitor's fees and court fees, these charges may not apply.

**Personal Data which ZZPS has access to, is accessible via the iView ticket hub website, including if appealed: Photographs of vehicle, vehicle registration, name and address of registered keeper received by DVLA, any other information that is legitimately relevant to the parking charge notice which will have been additionally supplied by the registered keeper/driver in appeal process:**

## NPM PRIVACY NOTICE – Personal Data and Full Process:

### **Worldpay:**

NPM have a contract in place with Worldpay – NPM have individual personal logon details to the Worldpay website. Data is only ever entered electronically via the Worldpay links. NPM is PCI DSS compliant with Worldpay – More information regarding Safer Payments can be found following this link: <https://www.worldpay.com/uk/support/saferpayments-faqs>

Payments can be made via Worldpay by either visiting our website <http://pay.nmpay.co.uk/> or paying over the telephone 01604 588342 during office hours - 9am to 5pm.

### Payments on website:

If you pay via the NPM website, you will be directed to Worldpay website where secure payment can be made.

### Payments over the telephone in office hours – 9am to 5pm:

If you pay over the telephone, NPM staff have individual logon details to the Worldpay website directly. Details will be taken over the telephone, at no point will information be written down. Telephone calls are not recorded, and therefore, data cannot be retrieved once payment has been made.

### Payment via customers own on-line banking:

NPM's own bank details are: -

NatWest Bank Plc.

Sort code: 56 00 60

Account Number: 36196177

The NPM bank account is only accessible by the Director of NPM who has his own personal logon details to the account. NPM only ever request that when payments are made directly into our account, PAYEES should use the **PCN REFERENCE NUMBER ONLY** therefore, not providing any personal data themselves on bank statements, these payments will then be allocated correctly.

### At any bank:

By Cash, Cheque or Postal Order; fill in a bank paying slip and make your payment at your local branch or any bank using **PCN REFERENCE NUMBER ONLY**. NPM do not set up direct debits a standing order can be set up by any individual themselves at their own bank. NPM therefore, do not receive any information to process internally.

### By post:

Payment can be sent cheque/postal order made payable to National Parking Management Limited, to 20 Francis Street and quote **PCN REFERENCE NUMBER ONLY** on reverse of your payment. **DO NOT SEND CASH.**

Any personal data which is received via the post, once processed onto the computer system is then shredded and correctly disposed of.

## **NPM PRIVACY NOTICE – Personal Data and Full Process:**

For information regarding Worldpay please follow this link

<https://www.worldpay.com/uk/about/company-overview>

**NPM do not retain Payment Personal Data on our own system so this information would never be shared between any other agency.**

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## **NPM PRIVACY NOTICE – Personal Data and Full Process:**

### **Lexis Nexis Risk Solutions - Search of Addresses:**

NPM have a contract in place with Lexis Nexis Risk Solutions – Authorised employees only have individual personal logon details to the Lexis Nexis Risk Solution website.

If a registered keeper of a vehicle has not legally informed the DVLA of change of address. NPM may trace an up to date address of the registered keeper.

For NPM to do this each authorised user has individual logon onto the Lexis Nexis website. The information gathered on this website is legally and publicised information. The information which is provided from Lexis Nexis is sourced from many various locations e.g. Equifax, Experian and government websites etc. This information can only be sourced if you personally have previously consented to share your information from these places.

On the Nexis Lexis website, NPM can only enter your name and old address which is what would have been provided by the DVLA. Once this information is entered NPM will have access to your current address, this is the only data which NPM will take from the information provided.

Nexis Lexis themselves do not see what we at NPM search for. You can personally view details regarding Nexis Lexis by using this link <http://www.lexisnexis.co.uk/en-uk/home.page>

### **Personal Data at this point: New name and address of vehicle keeper:**

## **NPM PRIVACY NOTICE – Personal Data and Full Process:**

### **QuickBooks – (Used for Paid for Parking Bays):**

NPM have a contract with QuickBooks which is an online accounting system. Authorised employees only have individual logon details to access this website.

NPM use QuickBooks to invoice clients who personally pay for parking bays. The information kept on this system are Name, Address (sometimes business addresses not personal ones), telephone number and email address (if provided). This information is kept only on the QuickBooks website and is not accessed for any other purpose.

All the while a customer is paying for a service the information will be kept. Once the customer no longer requires the service the individuals information is removed/deleted from QuickBooks itself.

No information on this website is shared with any other agency.

For information regarding QuickBooks please follow this link <https://quickbooks.intuit.com/uk/>

**Personal Data at this point: Name and address of client – email and telephone number (if applicable):**

## NPM PRIVACY NOTICE – Personal Data and Full Process:

### Other Relevant Information

#### **Permits:**

NPM have their own internal spreadsheet to keep track of permits which have been issued. All computers kept by NPM can only be accessed by allocated users. Each user has their own personal logon details. All logon details are only retained by the individual user and Director.

The only relevant personnel who have access to the permit spreadsheet do so by also having their own unique logon to the document.

#### What information do NPM request

If NPM are sending out bulk permit renewals to an area, no personal data is recorded other than the permit numbers and the area that they have been allocated to.

#### If a resident has just moved into a property

NPM will request a copy of the resident's tenancy agreement, this is to validate that the person requesting the permit is legitimately living in the area. NPM need to confirm on this document the residents name, address and date the tenancy started. **NPM record on the permit spreadsheet the permit number, first line of address and occasionally the vehicle registration number.**

#### ASRA permit allocation

Residents who reside in ASRA properties at the end of each year and in order to receive new permits, MUST send NPM a copy of their vehicle log book (Front) and tenancy agreement (name and address). This has been requested by ASRA to ensure that NPM can validate that the person requesting the permit is eligible to receive them. **NPM record on the permit spreadsheet the permit number, first line of address only and vehicle registration number.**

Emails received that are relevant to tenancy agreements once completed, the information is placed in the deleted items folder. All emails which are older than 6 months are deleted from the system completely.

Any personal data which is received via the post, once processed onto the computer system is then shredded and correctly disposed of.

## **NPM PRIVACY NOTICE – Personal Data and Full Process:**

### **Payment Plans**

For individuals who have received a PCN and have made an agreement with NPM to make monthly payments. Personal data such as name, address, telephone number and email if requested will be written on an internal payment plan form. This form is kept in the NPM office in a locked drawer. Only relevant personnel will have access to this folder. Once a payment plan has been completed or payment has not been received and the PCN has been passed over to the debt recovery department, the form will be shredded and disposed of.

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**NPM DO NOT HOLD OR OBTAIN ANY PERSONAL DETAILS OTHER THAN EXPLAINED IN THIS PRIVACY NOTICE.**

**NPM DELETE IRRELEVANT INFORMATION RECEIVED IF IT IS NOT RELEVANT TO THE PARKING CHARGE NOTICE.**

**NPM DO NOT SELL DATA.**

**NPM DO NOT REFUND PAID PARKING CHARGE NOTICES.**

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### **Passwords**

NPM passwords are a combination using digits, numbers and alphabet.

### **Retention period**

Data could be kept for a period of 6 years if NPM feel they have legitimate grounds to keep the data.

### **Court if applicable:**

NPM may consider proceeding to court with any PCN which has been issued. This is not definite and each case which we consider for this will be looked at individually.



# NPM PRIVACY NOTICE – Personal Data and Full Process:

## Diagram of PCN Process

Contravention on Private Land

