

Privacy Notice

Processing of staff personal data in relation to University parking services

1. This privacy notice explains how your personal data will be collected and processed in connection with your application for a University parking permit ("Permit") and your use of University car parks, as provided for in the University's Vehicle Parking Policy ("the Policy").
2. The University is the data controller of the information it collects and processes in connection with the Policy. This means that it has the core legal responsibility to safeguard the information and ensure it is processed in accordance with data protection law: this is set out in the EU General Data Protection Regulation and the UK Data Protection Act 2018. In particular the University will:
 - a. Take steps to ensure that the data it processes is accurate and up to date: but this is subject to your responsibilities, as set out in the [Parking Policy](#), to notify the University of any changes to your information;
 - b. Only process your data for the specific purposes set out below, and only share with third parties as provided for below; and
 - c. Keep your data secure.

3. How and why we process your data:

For the purposes set out below we collect and hold information provided by you in your permit application and information already held within our HR systems. Further information about you may then be generated through the processing of your permit application. This information is held by us in a dedicated parking permit system. This is accessible only to a limited number of authorised staff who need access in order to manage parking provision and the permit application process. Some information is also processed by the HR department as described below.

We process your data for the following purposes:

- a. To manage University parking provision appropriately, including care and maintenance of the parking areas and ensuring health, safety and security within car parks: for these purposes we collect and hold information about your vehicle and may contact you about any problems involving your vehicle. This processing is necessary for the performance of a contract you enter into (for provision of parking/use of a Permit) and/or is necessary for the legitimate interest of managing car parking provision and protecting the interests of all car park users;
- b. To administer the system of parking Permits: this includes dealing with permit applications and associated appeals, confirming the issue of permits, administering payments, verifying information provided in permit applications and taking any disciplinary action which relates to provision of inaccurate information. For these purposes we will process the personal information

within your permit application. This processing is necessary for the performance of a contract you enter into (for provision and use of a Permit) and/or is necessary for the legitimate interest of managing car parking provision and enforcing the conditions on which the Permit is issued;

- c. If you are applying for a Permit under an exemption (see paragraph 2.1 of the Parking Policy), the University will need to process information about your health/relevant medical conditions or disabilities and/or about members of your family as follows in order to determine whether an exemption applies.
 - i. When you first apply for a permit under paragraph 2.1.1 or 2.1.2 (staff with children aged 12 or under or blue badge holders), the Parking Services team will ask you to supply a copy of your child's full birth certificate or a copy of your blue badge (as appropriate). This documentation will be reviewed by a member of the Parking Services team and then deleted. Following deletion we will retain within the BU parking permit system:
 - confirmation that documentation has been seen;
 - the names and dates of birth of children for which birth certificates have been supplied; and
 - the expiry date of any blue badge.
 - ii. When you apply for a permit under paragraph 2.1.3 or 2.1.4 (medical condition or carer responsibilities), the BU HR department will contact you to confirm the basis of your application and may review information about you already held within the HR department and/or ask you to provide new supporting evidence. Any evidence reviewed for this purpose will be seen only by the HR department, who will notify the Parking Services team as to whether you are within the exemption so that a permit can be issued but will not share any other information about your circumstances.

This information is retained to verify the basis on which a permit has been issued and for the purposes of any disciplinary action which relates to provision of information in support of a permit application. In addition, retaining children's information and blue badge expiry dates will enable us to process some future permit applications without asking for supporting documentation.

This processing of supporting evidence is carried out on the basis of your consent. You will be asked to give your consent when you are contacted about providing supporting information as described above. Your consent can be withdrawn at any time during our processing of the relevant information.

If you intend to apply for a permit from Bournemouth, Christchurch and Poole Council to use the Madeira Road car park, we will share with the Council your

email address so that they can contact you with a link to the application process. The Council is a data controller of that information and the further information that you will need to provide in connection with your Madeira Road permit application. The Council will provide you with a separate privacy notice about its processing of your information.

4. Processing of personal data for the purposes of parking enforcement

- a. Parking Charge Notices (PCNs) issued to enforce the Terms & Conditions of parking on University grounds will usually be issued by a contractor acting on behalf of the University, as described in the Policy. Currently parking enforcement services are provided by UK CPM, which is contracted to provide the University with parking management and enforcement services.
- b. Automatic Number-Plate Recognition (ANPR) systems are used in some University car parks or parking areas for the purposes of enforcement. On-site signage will indicate where such systems are being used. The University discloses to UK CPM a list of vehicle number-plates which are registered/linked to Permits or which have otherwise been authorised to park on University premises. This enables UK CPM staff to identify whether a vehicle is parked in accordance with the Parking Policy or whether there is a basis for enforcement action. This list is updated frequently (usually twice a day). No other data is shared with UK CPM in association with the number-plates and therefore UK CPM is not able to identify individuals from the information received. This means that we do not share any personal data with UK CPM, as defined in the data protection legislation. Any information obtained from the ANPR system which is shared by UK CPM with the University is in statistical format only: UK CPM does not usually share any data with the University regarding the movements or locations of specific vehicles. If personal data is required to enforce PCNs, this is obtained by UK CPM itself from the DVLA as described in the next section.
- c. If action is required to enforce PCNs, i.e. where PCNs are not paid within the fixed period, UK CPM will obtain personal data required to enforce PCNs from the DVLA under national arrangements for such purposes. UK CPM will be a data controller of such data, and further information about UK CPM's processing of your personal data for these purposes will be provided by UK CPM, for example in signs displayed in the car parks.
- d. The University may disclose information to UK CPM (or any other contractor/sub-contractor with responsibility for parking enforcement) where this is necessary for the purposes of appropriate enforcement action or legal proceedings. Such disclosures would be made on the basis that they are necessary for a substantial public interest and/or for the legitimate interest of enforcing parking conditions.
- e. Enforcement of parking terms and conditions in respect of the Madeira Road car park used by staff working in Melbury House is subject to separate enforcement arrangements made by Bournemouth Borough Council. The University is not a data controller of personal data processed for these purposes.

5. Retention and your rights as a data subject

We will retain your personal data only for as long as necessary for administration and audit purposes, and for the purposes of any disciplinary or legal proceedings relating to your Permit application or your use of University car parks.

a. Under the data protection laws you have a number of rights in relation to our processing of your data. In summary these are:

- Right to request access to your data as processed by BU and information about that processing [“subject access request”]
- Right to rectify any inaccuracies in your data
- Right to request erasure of your data from our systems and files
- Right to place restrictions on our processing of your data
- Right to object to our processing of your data
- Right to data portability: where we are processing data that you have provided to us, on the basis of consent or as necessary for the performance of a contract between us, you have the right to ask us to provide your data in an appropriate format to you or to another controller.

Most of these rights are subject to some exceptions or exemptions, depending on the purposes for which data is being processed.

If you have any questions or concerns about our processing of your data, please contact the

BU Data Protection Officer (DPO):

dpo@bournemouth.ac.uk

01202 962472

If you would like to exercise any of your rights as outlined above, you can contact the DPO as above or visit the Data Protection page on our website [[link](#)] to access the relevant forms.

We will always aim to respond clearly and fully to any concerns you have about our processing and requests to exercise the rights set out above. However, as a data subject if you have concerns about our data processing or consider that we have failed to comply with the data protection legislation then you have the right to lodge a complaint with the data protection regulator, the Information Commissioner:

Online reporting: <https://ico.org.uk/concerns/>

Email: casework@ico.org.uk

Tel: 0303 123 1113

Post:

Information Commissioner’s Office

Wycliffe House

Valid from 7 May 2019

Water Lane
Wilmslow
Cheshire SK9 5AF