Privacy Policy

University of Greenwich Car Park Permit System

1. Introduction

This document explains how we 'University of Greenwich' use the personal information collected from you for the operation of the car park permit system. This includes the Visitor Parking Permit requests. The policy includes how long we keep the information for and the circumstances we might share it with third parties.

2. Who holds your information?

The information is held electronically by Solutionlabs Ltd on behalf of S&K Car Park Management Ltd T/A Secure Parking under contract to University of Greenwich. This arrangement is covered by a Data Sharing Agreement. The permit system is hosted on Solutionlabs' Cloud based servers hosted by Amazon web services stored in London or Ireland. It is accessed by University of Greenwich authorised staff via secure system administrator logins. The Data Controller for the purpose of the General Data Protection Regulation (GDPR) is University of Greenwich.

3. Personal details we hold about you

We hold the data you provide when you register your details on the permit system and apply for a permit. This includes your name, university identification number, e-mail address, telephone number(s), department, and vehicle details. Passwords are stored in encrypted form. Visitor data (guests external to the university) is input by the university requester and as a minimum will include their name and vehicle details and may include an e-mail address. All data is transmitted using https secure internet connections. We need this data to establish your personal entitlement to a permit, contact you about your permit, and to identify your vehicle.

The permit system also records when you or we transact changes to your details or permit. In addition to this, where applicable, comments may be recorded by a system administrator to provide background to changes we make or other issues relating to your use of our car parks.

4. How we use your information

We use the information held to authorise vehicle use of our car parks and manage your permit e.g. we may contact you to tell you that your permit is due to expire, or if a problem has been identified with your vehicle in one of our car parks. We may also use your details in relation to any reports of misuse or misconduct in our car parks.

If we have reason to believe that the information held is incorrect we may change it on your behalf and notify you of this. Note incorrect information may result in

enforcement action being taken against you which could result in your vehicle being issued with a Parking Charge Notice.

5. How long we hold your information

In order to comply with the GDPR we only hold your data for a reasonable minimum period. This varies depending on the type of permit you have.

Solutionlabs provides a copy to University of Greenwich of all data held on its servers every 12 months. Where this data relates to a financial transaction to pay for a permit, records of your account are kept separately by the university for 7 years in order to comply with the Companies Act 2006.

If your permit account is no longer active then after a reasonable period of time your data will be completely deleted from the permit system as follows:

Students and Contractors

• Account deleted after 12 months of there being no active permit in place.

Staff

- Account deleted after 12 months of there being no active permit in place.
- Account deleted after 5 years of no activity irrespective of permit status.

<u>Visitors</u>

• External guest data older than 24 months from visit will be deleted.

In all cases, other than guest visitor data, an e-mail will be sent to the account holder warning them that their data will be deleted in 30 days if they do not respond.

6. How to access your personal data

You can access and correct most of the data we hold on you by logging in to the system and amending the relevant field. If you are unable to amend data that is incorrect please e-mail travel@gre.ac.uk with the details.

If you would like to access all the information we hold on you, you will need to make a subject access request under the GDPR. To initiate this please e-mail compliance@gre.ac.uk.

Requests for removal of data in advance of the normal protocol outlined in Section 5 above or objection to your data being processed must similarly be directed to compliance@gre.ac.uk for consideration.

7. Keeping your data secure

Your details are kept securely on Solutionlabs cloud based Amazon servers based in London or Ireland. These servers are regularly penetration tested and access is monitored by the CloudWatch system with suspicious activity alerted to Solutionlabs. Daily back-up files are encrypted at source and uploaded by Solutionlabs using https

secure internet connection. Report data is downloaded by University of Greenwich at least every 3 months in the same way.

Online financial transactions are re-directed to the Realex payment system. No bank card details or tokens are stored.

8. Sharing your personal information

To support the prevention and detection of crime we may provide data held about you to the Police, local authorities, or other statutory law enforcement agencies if requested.

We may also share data held about you with Solutionlabs Ltd under contract to S&K Car Park Management Ltd T/A Secure Parking related to misuse of the car parks. In particular to assist with recovery of unpaid Parking Charge Notices. This data may in turn be shared with debt collection organisations working on their behalf.

Updated: 21 May 2018

Ends