Privacy & Cookie Policy

Saba Park Services UK Limited is committed to maintaining your privacy.

Saba Park Services UK Limited (Saba) is committed to maintaining your privacy and we are the data controller. The Customer Support Centre can be reached at Oak House, Reeds Crescent, PO Box 2466, Watford, Hertfordshire WD24 1QP. We can be contacted by telephone on 0330 1235 247

COOKIES

A Cookie is a small text file containing information that is downloaded onto a Users' computer or mobile device whenever they consult a website or mobile application; they are used to recognise the Users' computer whenever it accesses a website or application it has already used. Cookies are often used in order for sites to work or to improve their operation as well as provide information to the owners of the sites.

The Company uses Cookies to improve the Users' online experience and to better understand how the Site is used. Cookies also help to better target the advertising that appears online depending on your interests.

There are two main categories of cookies:

- **2.1 Original Cookies** are installed directly by the Company onto the Users' computer or mobile device. They are used only by the Company to recognise the Users' computer or mobile device whenever you use the Site again.
- **2.2 Third-party Cookie**s are installed by service providers on our Site in order to recognise the Users' computer or mobile device whenever you consult other sites. Third-party Cookies are mainly used for the purposes of analysis and for advertising.

Cookies may be kept on Users' computers or mobile device for variable durations. Certain Cookies are "Session Cookies," which means that they are only present as long as the user's browser is open. These are automatically deleted once Users close their browser. Certain Cookies are "Permanent Cookies," which means that they are kept once Users close their browser. These Cookies allow the Company to recognise Users' computer or mobile device whenever they open their browser to access the internet.

COOKIES USED BY THE COMPANY

The Site installs only the type of Cookie indicated below onto Users' computer or mobile device:

- **3.1 Required Cookies:** These Cookies are essential to provide the Services available on the Site and to use some of its features, especially in order to access certain secured zones (Personal Account). Without these Cookies, the tools required to meet the demand of the service (creating and accessing the Customer Account, recording bank details) cannot be provided.
- **3.2 Operational Cookies:** These Cookies have different purposes relating to the presentation, performance and operation of the Site. Their general purpose is still to improve the User experience and enjoyment of the Site.
- **3.3 Analysis Cookies**: Information gathered is aggregated and does not identify different visitors. For example, this information includes the number of visitors to the Site, the sites that forwarded them to the Site, and the pages they viewed on the Site. The Company uses this information to ensure that the Site functions correctly and to monitor the level of activity on the Site.
- **3.4 Content-sharing and social network Cookies**: These Cookies allow Users to share pages and their content through third-party social networks and other platforms. Companies using these Cookies may also use your information for purposes of targeted advertising on other platforms.

CONTROLLING OR DELETING COOKIES

Users may choose to accept Cookies or not; however, refusing cookies does not allow Users to enjoy all of the Sites features.

Users may define their Cookie preferences by modifying the settings of your browser so that Cookies from the Site cannot be placed onto your computer or mobile device. To do so, Users must follow the instructions of their browser (usually available in the Help, Tools or Edit menus of the browser).

- On <u>Firefox</u>
- On Internet Explorer
- On Google Chrome
- On <u>Safari</u>
- On Opera
- On Edge

You can find more information about Cookies on the website of $\underline{\text{CNIL}}$. Or here $-\underline{\text{ICO}}$

PRIVACY POLICY

This Privacy Policy sets out how we collect and use your personal data. Please read this policy carefully to understand our views and practices regarding your personal data and how we will treat it.

WHAT INFORMATION DO WE HOLD ABOUT YOU?

When we refer to "personal data" we mean any information about you which could make you personally identifiable. We may hold any of the following personal information:

- Vehicle registration number
- Images of your vehicle
- Name
- Address
- Email address
- Telephone numbers
- Any other information which you provide to us in correspondence

HOW IS IT COLLECTED?

- We collect images of your vehicle and vehicle registration number via the use of Automatic Number Plate Recognition (ANPR) cameras, Close Circuit Television (CCTV) cameras, or patrolling wardens
- If a Parking Charge Notice or Penalty Notice is issued, we will request the keeper details from the DVLA in order to obtain a name and address to send the Notice to.
- When you provide information by filling out forms on our website or app, such as your name and email address
- When you visit our website, we collect data such as location data about you, we may collect information about your computer, including where available your operating system and browser type
- When you contact us for any reason and provide personal data in the correspondence.
- We may obtain information about you from Credit Reference Agencies

WHAT IS OUR PURPOSE FOR PROCESSING YOUR DATA?

Our lawful bases for processing your data in line with our parking services is:

In order to ensure that the parking *contract* which you entered into by parking onsite, and or purchased parking onsite, via the smartphone app or website is correctly performed and in order to protect the *legitimate interests* of us, the landowner and the public in the following ways:

- pursuing any unpaid sums due
- for our business interests
- to defend any legal claims
- by assisting the police with the prevention and detection of crime
- to ensure safety and security on site

Where you have *consented* to receive marketing information from us, we will process your personal data in order to provide you with information about:

- existing and new services,
- promotions and special offers from us;
- related products or services of selected third parties that may be of interest to you

If you agree to us providing you with marketing information, you can always opt-out at a later date. To opt-out of receiving any such communications, you can either:

- Unsubscribe from any e-newsletter sent all email messages and email newsletters will contain information on how you can unsubscribe.
- Or contact us stating that you do not wish to receive further communications from us by: email <u>marketing.uk@sabagroup.com</u>
- Writing "unsubscribe" in the subject heading or write to us at Saba Park Services UK Limited, Marketing, Reeds Crescent, Watford, Hertfordshire WD24 4PH

If you no longer consent for us to hold or use your personal details, you can opt out by emailing dpo.uk@sabagroup.com.

DO WE USE YOUR PERSONAL DATA?

We use your personal data in order to:

- Manage the car park and ensure that the terms and conditions are complied with
- Where they have not been complied with, we will process your personal data in order to issue a Parking Charge Notice or Penalty Notice
- To process payment in respect of the Notice,
- To review and respond to any appeal in respect of the Notice
- To enforce the Notice if not paid.

We may also use information about you to help us provide you with a more personalised service which is tailored to suit your needs, this may include:

- processing any orders, you may make and/or provide services including processing payments;
- monitor, develop and improve the Website, App, services and your experience;
- ensure that content from our Website and App is presented in the most effective manner for you, and your computer and or smartphone, tablet:
- allow you to participate in any interactive features of our Website and App when you choose to do so;
- keep our Website and App safe and secure;
- notify you about changes to the Website, App or services;
- process and deal with any complaints or enquiries made by or about you;
- to monitor compliance including by way of checking postings or submissions to the Website and App and using keyword triggers to investigate usage that may be inappropriate;
- where you are a prize winner, to administer the competition prize and to publish or otherwise make available a list of prize winners.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We may share your personal data with the following classes of people:

- The operator of a car park which you have paid to use
- The DVLA
- An independent Appeals adjudicator
- Debt recovery companies
- Police and security services
- Solicitors and high court officers/bailiffs where necessary to ensure compliance with your obligations under the contract
- Any other members of the Saba company group
- If we or part of the company is sold we will transfer your personal data to the new owner, to allow them to provide your services
- We may pass your personal data to car park operators in order for them to provide you with parking services where you have used our services. If, for example, there is a change of car park operator. Please see Section 24 of our Terms and Conditions for further information on this. www.sabaparking.co.uk/terms-and-conditions
- Our suppliers, these include MPL Systems, Mobile Worker Plus, Arepo, Travel Sciences
- Our IT providers
- Our Clients hospital clients, rail clients Govia Thameslink Railway, Southeastern and West Midland Trains, retail clients and local authority clients.

DO WE SHARE ANY OF YOUR DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA?

Where the site which you have visited is within the European Economic Area (EEA), the data which we collect about you will not be transferred out of the EEA.

We have some sites in countries which are outside of the EEA, where this is the case, data may be transferred outside of the EEA if necessary to carry out our services. Your data may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. This will be subject to appropriate safeguards.

HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

We will not store your personal data for any longer than six years in line with our Data Retention Policy and our legal and legitimate requirements. Personal Information on Tickets, Permits, PCNs and PNs from the parking end date for tickets/permits or cancelled/paid/progressed date on PCNs/PNS will be retained for 18 months.

YOUR DATA RIGHTS

Under the General Data Protection Regulations (GDPR) you have the right:

- To be **informed** about and why we use your data, this information is provided in this policy
- To access a copy of all information which we hold about you
- To **portability** of your data, which means you can ask us to send a copy of your information to a third party on your behalf
- To request **rectification**, when you think we have incorrect or incomplete information about you
- Request we **erase** the data we hold about you when there is no longer a reason for us to process the data.
- To **object** to the way that we are processing your data
- To request we restrict our use of your data, so we do not process it, but only store it securely

Please note that when you make any of these requests, under data protection law we must confirm who you are before providing any information. Once we have verified your identity, we will contact you within one month, either to confirm that we have actioned your request or, if we do not agree with your request to provide you with an explanation.

If you have any questions about our privacy policy or your data please contact:

dpo.uk@sabaqroup.com

You also have the right to complain to the Information Commissioners Office (ICO) about how we have handled your data. In order to do so, please go to: www.ico.org.uk

For all other enquiries please visit www.sabaparking.co.uk/faq or contact us by telephone on 0330 1235 247 or by email at customersupport.uk@sabaqroup.com

SECURITY/HOW DO WE PROTECT YOUR INFORMATION?

We endeavour to take all reasonable steps to protect your personal data. Where possible we use industry-standard Secure Sockets Layer (SSL) technology to allow for the encryption of:

- potentially sensitive information such as your name and address; and
- critically-sensitive information like your credit card number

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 Website; any transmission 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.

CHANGES TO OUR PRIVACY POLICY

Please note that we may update and amend the Privacy Policy from time to time and any changes will be posted on this page and, where appropriate, notified to you by email.

This Privacy Policy was last updated on 10 October 2018

Registered address is: Oak House, Reeds Crescent, Watford, Hertfordshire WD24 4PH.Company Registration Number: 2362957

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