

Privacy Notice – Car Parks, Parking Permit Holders and Parking Enforcement.

1. Who we are

Data Controller:

The data controller responsible for processing personal data in connection with parking facilities is the relevant Lulworth Estate company operating the parking location concerned. References to 'The Lulworth Estate' refer collectively to the Lulworth Estate group of companies and associated entities.

Data Protection Contact:

The Lulworth Estate has not appointed a statutory Data Protection Officer. Data protection matters are managed through our Data Protection Contact at gdpr@lulworth.com

Email: gdpr@lulworth.com

If you have any questions regarding the processing of your personal data or wish to exercise your rights, please contact us using the above email address.

If you believe your personal data has been compromised or misused please contact us immediately using the details above.

Responsible Owner: Director of Visitor Experience.

2. Purpose of this notice

This notice explains how The Lulworth Estate collects and uses personal data in connection with the management of its car parks, parking permits, visitor parking, vehicle access controls, Automatic Number Plate Recognition (ANPR) and the administration and enforcement of parking terms and conditions.

3. What personal data we collect

We may collect:

- Registered keeper information obtained via enforcement providers where permitted by law
- Name, address, email and telephone number.
- Appeal and dispute information
- Vehicle registration numbers

- Correspondence relating to requests made under data protection legislation
 - Permit details and permit status
 - Vehicle entry and exit records
 - ANPR images and timestamps
 - Parking session information
 - Payment and transaction records
 - Parking Charge Notice records.
 - Correspondence and appeals
 - Evidence relating to parking enforcement and investigations.
 - CCTV images
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4. CCTV Processing

We may process CCTV footage for security, health and safety, crime prevention, investigation of incidents, protection of company assets and safeguarding both employees and visitors.

5. ANPR Processing

We use ANPR cameras at certain car parks and access points to:

- Manage parking facilities.
- Verify parking permissions.
- Monitor vehicle entry and exit times.
- Calculate parking duration and parking charges.
- Support permit administration.
- Prevent misuse and fraud.
- Issue and manage Parking Charge Notices where parking terms and conditions are breached.
- Protect Estate property visitors and staff.

ANPR systems capture vehicle registration numbers together with images, dates and times.

ANPR information is not used for automated decision-making and any enforcement activity is subject to appropriate human review.

ANPR cameras are positioned at vehicle entry and exit points and operate continuously. Appropriate signage is displayed to inform drivers that ANPR monitoring is taking place.

ANPR data may be shared with NSGL for permit validation, parking management, parking charge administration, appeals handling and enforcement of parking terms and conditions. NSGL processes personal data as an independent controller for these purposes.

6. CCTV and Surveillance signage

Clear signage is displayed at relevant locations to inform drivers and visitors about the operation of CCTV monitoring, ANPR systems, parking terms and conditions and how personal data is processed.

Signage forms an important part of ensuring transparency and assisting individuals understand how their information is used when entering our parking facilities.

7. How we collect your data

We collect data from:

- ANPR Cameras
- Payment systems
- Parking machines
- Online payment systems
- Online permit applications
- Appeals and Complaints
- DVLA (where applicable)
- Enforcement providers such as NSGL.

We may receive personal data from third parties involved in the operation and enforcement of our parking facilities including NSGL Limited. NSGL may collect and process personal data independently where it administers parking permits, parking charge notices, appeals and enforcement activities.

Where a Parking Charge Notice is issued and the driver has not been identified, registered keeper information may be obtained from the Driver and Vehicle Licensing Agency (DVLA) by our enforcement partners in accordance with all applicable regulations.

We may also receive information from motorists, vehicle keepers, representatives, legal advisors, debt recovery agents and appeals services where relevant to the administration or enforcement of parking terms and conditions.

8. Why we use your data (lawful basis)

Purpose	Lawful Basis
Issuing and managing permits	Contract
Managing Parking facilities	Legitimate interests
Vehicle access control	Legitimate interests
ANPR monitoring	Legitimate interests
Parking charge administration	Legitimate interests

Appeals management	Legitimate interests
Fraud prevention	Legitimate interests
Responding to legal claims	Legitimate interests and Article 6(1)(f), and where necessary for the establishment, exercise or defence of legal claims.
Financial record keeping	Legal obligation

9. Our legitimate interests

Where we rely on legitimate interests, these include:

- Ensuring compliance with parking terms and conditions
- Effective parking management.
- Managing customer enquiries and appeals
- Protection of Estate assets.
- Protecting revenue associated with parking facilities.
- Management of visitor access.
- Prevention of parking abuse.
- Prevention and detection of fraud.
- Management of parking capacity.
- Enforcement of parking terms and conditions.
- Recovery of unpaid parking charges.
- Protection of visitors, staff and property.

When relying on legitimate interests, we assess the impact on individuals and balance these interests against their rights and freedoms.

10. Special category data

We do not routinely collect or process special category personal data for parking operations.

In limited circumstances, special category data may be provided during appeals, complaints, accessibility requests, legal proceedings or incident investigations. Where this occurs, information will be processed only where necessary and in accordance with Article 9 UK GDPR and the Data Protection Act 2018.

11. Who we share your data with

We may share personal data with:

- NSGL Limited for the administration of parking permits and enforcement of parking terms and conditions..
- Newpark Solutions as our parking management provider.
- Payment processing providers.
- Parking technology providers.
- ANPR system providers.
- IT service providers.
- Professional advisers.
- Legal advisers.
- Debt recovery agencies where parking charges remain unpaid.
- Regulatory bodies.
- Law enforcement agencies where required.
- Other Lulworth Estate companies where necessary to administer parking services.

NSGL acts as an independent data controller in relation to parking permit administration, parking charge notices, appeals and enforcement activities. NSGL is responsible for its own compliance with data protection legislation when carrying out those activities.

Individuals can obtain further information regarding NSGL's processing activities by consulting NSGL's privacy notice available via its website.

12. Parking Enforcement

The Lulworth Estate has appointed NSGL Limited to administer parking permits and manage parking enforcement activities on certain sites.

Where vehicle parking terms and conditions are breached, NSGL may process personal data, including vehicle registration information, ANPR records, registered keeper information, correspondence, appeals and payment information for the purposes of issuing and managing Parking Charge Notices.

In carrying out these activities, NSGL acts as an independent data controller and has its own privacy notice explaining how personal data is used.

Individuals should refer to NSGL's privacy notice for information regarding NSGL's processing activities and their data protection rights in relation to data processed directly by NSGL.

Where registered keeper information is obtained from the DVLA, this will only occur when statutory conditions for obtaining such information have been satisfied.

13. International transfers

We do not routinely transfer data outside the UK. Where personal data is transferred outside the UK we will ensure appropriate safeguards are in place in accordance with UK GDPR requirements.

14. How we protect your data

We use appropriate technical and organisational measures, including:

- Restricted access (role-based permissions)
 - Secure IT systems and password protection
 - Regular review of ANPR and parking management system access permissions.
 - Locked storage for paper records
 - Staff training on data protection
 - Secure document retention and destruction procedures
 - Audit logging where appropriate
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15. How long we keep your data

Retention periods may vary where required by legal obligations, active investigations, appeals, litigation, insurance requirements or the need to establish, exercise or defend legal claims.

Record Type	Typical Retention
Active permits	Duration of permit + 6 years
Expired permit records	6 years
ANPR records	12 months or less unless required for ongoing investigation, claims or enforcement.
Parking payment records	7 years
Parking charge notices	6 years from closure
Appeals correspondence	6 years
Enforcement records	6 years
Legal claims records	6 years after conclusion

16. Is providing your data mandatory?

Failure to provide required information may prevent us from issuing permits, processing payments, investigating appeals, administering parking facilities or enforcing parking terms and conditions.

17. Your rights

Standard UK GDPR rights apply:

- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to object
- Right to data portability
- Rights regarding automated decision-making

Where processing is based on consent, you have the right to withdraw consent at any time. Withdrawal of consent will not affect the lawfulness of any processing carried out before consent was withdrawn.

Requests relating to your data protection rights should be directed to: GDPR@lulworth.com

18. Complaints

We encourage people to contact us first if they have concerns regarding the processing of their personal data.

You also have the right to lodge a complaint with the ICO:

- Website: www.ico.org.uk
 - Helpline: 0303 123 1113
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19. Automated decision-making

ANPR technology is used to record vehicle movements and identify parking events. Parking Charge Notices, appeals and enforcement decisions are not made solely by automated means and remain subject to appropriate human review.

20. Changes to this notice

This notice may be updated periodically to reflect changes in legislation, regulatory guidance, parking operations, service providers or business practices.

21. Document control

- Version: 2.1
- Owner: Director of Visitor Experience.
- Review cycle: Annual