UNIVERSITY TRANSPORT TEAM PRIVACY NOTICE

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1. Purpose of this Notice

This Notice explains how we will collect and use your personal data.

We are the University of Kent and we are the Data Controller for the personal data that we process.

Throughout this Notice, "University", "we", "our" and "us" refers to the University of Kent "You" and "your" refers to those data subjects using the University car parks.

2. Where does the University get your personal data from and what data do we collect?

- 2.1 Registered Permit Holders
 - 2.1.1 From Individuals

If you hold a current permit at the time your vehicle was parked in the University private land, the University maintains a database of all registered users of its car parks on a system called Permitsmarti. PermitSmarti is the system which is used when a person applies for a virtual permit to park and provision of personal details within their application are taken from other internal systems (section 2.1.2 and 2.1.3 refers).

As part of the permit application process, an individual may need to send supporting documentation to the dedicated <u>TransportTeam@kent.ac.uk</u> or <u>parkingpanel@kent.ac.uk</u> email address. Access to the <u>TransportTeam@kent.ac.uk</u> or <u>parkingpanel@kent.ac.uk</u> email folder is restricted. Where an individual is applying for a temporary parking permit on the basis of a medical condition, the individual is required to apply to the University Medical Centre (for Canterbury Students) or submit supporting documentation from their GP to the Head of Student Support (for Medway Students), and Occupational Health (for staff) for the application to be considered. The corresponding department will advise the Transport Team if a permit is to be issued and the type of permit required. Details of the medical condition will not be shared with the Transport Team. Individuals give their consent to provide information about the health (special category for personal; data) to the University Medical Centre, Head of Student Support or Occupational Health (as appropriate) as part of the application, who may discuss this information with your GP's Surgery. Consent can be withdrawn by the individual at any time, however if consent is withdrawn the individual forfeits the application and a temporary permit will be issued

2.1.2 University HR system

The personal data of registered users and permit holders will be retrieved from the University's HR system at regular intervals. This data includes name, address, University username, and University email address and payroll number. Salary information will be drawn from the University payroll system for the purpose of determining the price bracket of an individual's parking permit.

2.1.3 Student Data System (SDS)

The personal data of registered student users and permit holders will be retrieved from SDS at regular intervals. This data includes name, address, University username, and University email address The Transport Team may refer to the SDS if further information is required to assist with the application or an appeal for a permit to park.

2.1.4 DVLA

The University may contact the DVLA to retrieve the registered keeper contact details of any vehicle (including registered vehicles and permit holders) that is parked on campus in contravention of the University of Kent's Car Parking Terms & Conditions, which are set out within section 4.0.12 of the Regulations for the Management of Traffic at the University of Kent

2.1.5 Automatic Number Plate Recognition (ANPR)

ANPR cameras will take pictures of vehicles as they enter one of the University car park known as Giles Lane car park from March 2019. These cameras focus on your vehicle's number plate but may also capture images of the driver, and any pedestrians walking in front of the camera.

2.2 Non registered permit holders

2.2.1 DVLA

The University may contact the DVLA to retrieve the registered keeper contact details of any vehicle that is parked on the campus in contravention of the University of Kent's Car Parking Terms & Conditions which are set out within the Regulations for the Management of Traffic at the University of Kent

2.2.2 Automatic Number Plate Recognition (ANPR)

ANPR cameras will take pictures of vehicles as they enter one of the University car park known as Giles Lane car park from March 2019. These cameras focus on your vehicle's number plate but may also capture images of the driver, and any pedestrians walking in front of the camera.

2.3 The personal data of registered users of the Stagecoach Staff bus pass scheme from Stagecoach and the University HR system The personal data of staff signing up to the bus pass will be processed in accordance with the Stagecoach Privacy Notice

3. The purposes for which we process your personal data and the legal basis for that processing

The University has a legitimate interest in processing your personal data to ensure that the Regulations for the Management of Traffic at the University of Kent are adhered to, and to fairly manage these regulations on the campuses. To verify compliance with the terms of this agreement and use of Stagecoach staff bus pass services. This includes, but is not limited to: passenger name, journey origin, date and time of travel, nature of journey (single, return or period), and any other personal data required to verify passenger identity. Any information we receive from the DVLA or Stagecoach will be only used for the purpose it was issued to the University for.

4. Automatic processing

Parking permits are charged in price brackets according to a user's salary for University of Kent Staff, Kent Union Staff & GK Union staff <u>http://www.kent.ac.uk/transport/byroad/</u> The process through which a price bracket is determined is a purely automated one using the information gathered as described above, (section 2.1.2 refers).

5. Who might we share your data with?

As described above, the University may contact the DVLA.

The personal data captured through enforcement is maintained by the University on systems called ICES 360 (section 6 refers) for enforcement and SAGOSS for ANPR access to car parks.

If we issue you with a Parking Charge Notice which is not paid within 56 days we may allow a third party debt recovery service to access your personal data on ICES 360. If the Parking

Charge Notice remains unpaid the University may allow a firm of solicitors to access your personal data on ICES 360 in order to take legal action against you.

Your personal data will not be shared with any other third parties or any outside the EU.

The University may contact permit holders to advise them of disruptions to access to the University car parks and roads which may include disruptions of other travel to the University Campuses

Staff will be subject to the terms and conditions of the contract that the University has with Stagecoach to offer discounted bus tickets to staff for the purpose of travelling to work. Stagecoach and the University of Kent will share personal data about you to facilitate the service provided to you and verify compliance with the terms of this agreement and use of ticket services.

6. Data Storage

The University maintains a database of all staff and students registered users of its car parks on a system called Permitsmarti; this is hosted on a secure server by Imperial Civil Enforcement Solutions (ICES). All of your personal data processed as a result of enforcement will be stored on the ICES 360 system. There is a Data Processing Agreement in place which governs how ICES can process your personal data on behalf of the University.

The University maintains a database for all associates with the university who are registered users of its car parks on an internal university system; this is hosted on a secure server by the University. All of your personal data processed as a result of enforcement will be stored on the ICES 360 system. There is a Data Processing Agreement in place which governs how ICES can process your personal data on behalf of the University

SAGOSS system will only store Vehicle Registration Numbers of registered vehicles for the purpose of providing access to the car park, it will not hold any personal details.

Stagecoach The personal data of staff signing up to the bus pass will be processed in accordance with the Stagecoach Privacy Notice. Should the University terminate the agreement with Stagecoach for any reason, personal data that Stagecoach hold on university

staff members who signed up to a bus pass through this scheme will continue to be retained by Stagecoach to facilitate them in continuing to provide the service to you

7. Retention periods

All of your personal data processed as a result of enforcement will be stored on the ICES 360 system. If enforcement action has been taken your personal data will be safely destroyed 2 years & 6 months after the contravention took place, or longer if there is outstanding sums due, ongoing proceedings or Country Court Judgments.

Personal data will stay on the University's Permitsmarti database unless an individual advises the University that they no longer wish to be a registered user of the car park.

8. Your rights as a data subject

You have the right to:

- access your personal data;
- request the rectification or deletion of your personal data;
- request the restriction of the processing of your personal data;
- object to the processing of your personal data;
- receive your personal data in a structured, commonly used format;
- to object to any automated decision making and to;
- complain to the regulator (the Information Commissioner's Office).

If you wish to exercise any of the rights detailed above, please contact our data protection officer or write to us using the address provided below. Under Data Protection Law we will need to verify your identity before carrying out your request or supplying you with any information or provide an explanation as to why we will not action your request. Once your identity has been confirmed, we will respond to your request within one calendar month.

9. Concerns and contact details

If you have any concerns with regard to the way your personal data is being processed or have a query with regard to this Notice please contact, in the first instance, the Director of Estates (<u>estatesdirectorateoffice@kent.ac.uk</u>) or the University's Data Protection Officer, at <u>dataprotection@kent.ac.uk</u>.

Our general postal address is Security & Transport Centre University of Kent, Canterbury Kent CT2 7NQ, UK.

Our postal address for data protection issues is Information Compliance University of Kent, Darwin College, University of Kent, Canterbury, CT2 7NY.

Our telephone number is +44 (0)1227 764000.

Our data controller registration number provided by the Information Commissioner's Office is Z6847902

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

This policy was last updated on 04/08/2020