



This privacy notice (the “Notice”) covers the use of your personal information by National Car Parks Limited (Company number **00253240**) and any other operating company in the National Car Parks limited group (“NCP”, “we” or “us”) with its registered office at The Bailey, 16 Old Bailey, London, EC4M 7EG.

We are registered as a data controller with the Information Commissioner’s Office (“ICO”) under registration number **Z7510045**.

In our operations, we make every effort to keep all personal information safe and secure and comply with all applicable data privacy laws in all jurisdictions within which we operate.

This Notice describes what personal information (or "personal data") we collect from our customers and prospective customers (“You”) in the course of our business, how we handle Your personal data and Your rights as an individual when You use our products and services.

It further provides information on any other sources from which we may obtain Your data, the legal basis for collection and in what circumstances we may share Your data with 3rd parties, including the description of the mechanisms we use in order to ensure the security of Your data, in line with our legal and regulatory obligations.

This Policy should be read together with NCP’s terms and conditions which deal with the commercial terms applicable to the use of our products and services by You.

Our Services

NCP provides car parking solutions nationally across the United Kingdom to individual and business customers.

Our products/services include:

- Our network of 500+ NCP car parks in the UK;
- Season Tickets, Pre-Book Services;
- Flexible Business Parking (for business customers); and,
- Pay By Mobile.

Our services allow You, as a customer, to pay for parking through various channels such as NCP mobile application, NCP website, payment machines and by phone.

The above list is non-exhaustive and new products and services may be developed and made available to customers in the future. This privacy notice applies to all, current and future, NCP products and services. For a full list of NCP services please visit our website (www.ncp.co.uk)

The Information We Collect

In order for NCP to offer You parking products and services, we need to collect certain information about You to ensure that You have a seamless parking experience, to facilitate Your parking and parking transactions, to manage our relationship with You and for use in our business generally.

We collect Your personal information when You subscribe for any of the services offered by NCP, either via the NCP app, our website or other means relevant to the requested services.



In order to register as a customer of NCP, as minimum, we collect the following information:

- Name;
- Date of birth;
- Address;
- Email Address;
- Mobile telephone number;
- Identity documentation (V5C or other document);
- Vehicle Identification Number (VIN);
- Vehicle Registration Mark (VRM); and
- Payment information and payment card details.

These data are required for administration of Your NCP account and to facilitate any communications with You as NCP customer.

In addition to the above data, we may also collect the following information when You interact with NCP, either by using our products in order to use our services or if You communicate with us in relation to the services.

- User name and password;
- Account preferences;
- IP address, time stamp and device information;
- Location Data;
- Transaction history;
- Webchat interactions/transcripts;
- Details of any complaints, legal claims or accidents related to Your use of our goods or services;
- Health information (in relation to incidents that occur at our car parks and to administer the use of blue badges); and
- Other information You provide voluntarily to us.

In addition to the above, if You transact with NCP as a business customer, we may collect the following additional data:

- Details of Your employer (if relevant, for business accounts); and
- Business address (if relevant, for business accounts).

When You use our car parks, we will process Camera Monitoring Data (as defined below); the time and duration of Your parking session and make and model of Your vehicle. If You use our car parks without registering an account, in addition to the data specified in the above paragraph, we also collect Your payment card information. We may process further details about You, including data collected from 3rd parties, for the purposes of pursuing and collecting outstanding monies owed to NCP in respect of Penalty Charge Notices (PCN).

Camera Monitoring

NCP currently uses closed circuit television (CCTV) cameras and other camera related surveillance systems such as automatic number plate recognition (ANPR) systems and body



worn cameras (together “Camera Monitoring”) to view and record individuals and vehicles on and around our premises and the areas we have agreed to manage for our clients.

We currently use Camera Monitoring in and around our premises and areas we have agreed to manage for our clients for the following reasons:

- To enforce our rights and to improve our services;
- To prevent crime and protect buildings and assets from damage, disruption and vandalism and other malicious acts;
- For the personal safety of staff, visitors and other members of the public and to act as a deterrent against crime;
- To support law enforcement bodies in the prevention, detection and prosecution of crime; and
- To assist in ensuring health and safety of staff and others.

The above list is non-exhaustive and other purposes may be, or may become, relevant.

We may process the following data through the use of Camera Monitoring:

- static and moving images of individuals;
- vehicle registration information; and
- in the context of body-worn cameras, audio recordings.

We do not deliberately set out to capture any special category data. However, cameras (including body-worn devices) may incidentally record information which falls within these categories.

The images collected through the use of Camera Monitoring are only viewed by authorized personnel. All staff using Camera Monitoring are given appropriate training to ensure they understand and observe the legal requirements related to the processing of the data that have been collected.

In order to ensure that the rights of individuals recorded by our Camera Monitoring are protected, we ensure that the collected data are stored in a way that maintains their integrity and security.

Given the large amount of data generated through Camera Monitoring, we may store video footage using cloud computing systems. These may be managed by 3rd parties. We take all reasonable steps to ensure that any cloud services provider maintains the security of information in accordance with industry standards.

Where we engage data processors, we ensure that appropriate contractual arrangements are in place in order to preserve the confidentiality, security and integrity of the collected data. All our data processors are subject to strict contractual obligations to process the data in accordance with the obligations under the data protection legislation and are subject to regular audits to ensure that their processes meet the high standards expected of NCP.

We may share the data with our group companies and other associated companies or organisations, for example our clients where we manage their parking solutions, and/or shared services partners where we consider this reasonably necessary for any other legitimate purposes set out above.



No images from our Camera Monitoring will be disclosed to 3rd parties without NCP having been satisfied with the legitimacy of the request and subject to appropriate guarantees from the requesting parties that the data will be used only for the legitimate purposes in line with the requirements of the data protection legislation. Data will not normally be released until sufficient evidence is provided that it is required for legal proceedings, under a court order or pursuant to any other valid and legitimate request in accordance with the data protection legislation. In appropriate circumstances, we may allow law enforcements agencies to view a copy or remove the data where this is required in the detection or prosecution of crime.

We maintain a record of all disclosure of such data.

No images from our Camera Monitoring will ever be posted online or disclosed to the media.

How we collect information

We collect personal information about You in the course of running our business and providing our services to You. This includes collecting personal data directly from You when You use or register to use our services, including the NCP app or via our website. We may collect further data relating to you from 3rd parties, as further described below.

In addition to the collection of data relating to the administration of Your account and provision of products and services, as described above (**The Information We Collect**), we may collect further information directly from You when You complete surveys or enquire about our products and/or services. These data are collected directly from You and provision of the data is voluntary unless strictly required otherwise to respond to Your enquiries. The data collected through surveys may be used by NCP for the purposes of improving our services with a view of delivering better value for our customers.

When You interact with our website, we also collect the following information to deliver the services to You:

- information about Your computer, including (where available) Your IP address, operating system and browser type, for system administration, to filter traffic, to look up user domains and to report on statistics; and
- details of Your visits to our website, the pages You view and resources You access or download, including but not limited to, traffic data and location data.

When You use our website, we will collect cookies in order to personalise content and ads, to provide social media features and to analyse our traffic. Cookies are small text files that can be used by websites to make user's experience more efficient. For more information on cookies in general, what cookies we collect and how we use them, please see our Cookie Policy .

In addition to the collection of data directly from You, we may also collect data from third parties and in particular:

- from our business partners where we provide You with our products or services on their behalf;
- from service providers where they provide You with services or products on our behalf or where we use them to help us provide our products or services to You; and,
- from governmental agencies such as the DVLA where lawfully allowed or required.



How we use your information

We use personal information for the purposes for which it has been provided or obtained.

We use Your personal information on one or more of the following legal basis:

- to perform a contract or an agreement with You;
- to comply with our legal and/or regulatory obligations;
- for our legitimate business purposes; and,
- with Your express consent.

This enables us to use Your personal information:

- to provide the services or products You've requested or purchased;
- to ensure compliance with the terms and conditions of parking at our car parks;
- to manage our relationships with You, and with our business partners;
- to contact You if any issues arise in our premises, with your vehicle or with Your booking;
- to understand the way people use our services and products so we can improve them;
- to pursue and collect outstanding monies owed to NCP (for more information on how we process Your data in this regard, please see our PCN Data Processing Notice);
- for the apprehension and prosecution of offenders;
- for the prevention or detection of crime; and
- to comply with our legal obligations.

We may also use Your information for marketing purposes and to analyse and profile Your purchasing preferences (e.g. market, customer and product analysis) in order to enable us to provide You with a personalised customer service experience. This may involve making decisions about You using computerised or automated technology. For example, automatically selecting products and/or services which we think will interest You from the information we have.

In addition, we may use the data we collect in order to improve our products and services and to enhance and modernise the customer experience. This could involve use of Your data with AI models to improve the efficiency and quality of our systems and technology used in the management of our car parks and for the purposes of providing You with the products and services. The data used in this way are subject to appropriate measures to minimise and mitigate the exposure to our customers, including the use of anonymisation and pseudonymisation. We will never use personal data from which You can be directly identified for this purpose. Users with access to the data adhere to the highest standards of confidentiality and NCP have in place appropriate internal policies and training to ensure compliance. Only NCP group companies and, where applicable, our processors who are authorised to do so, will have access to Your data.

We may supplement the information that You provide to us with information that we receive from 3rd parties. In particular, we will carry out searches with credit reference agencies and any



information provided to us may be passed to these credit reference agencies for the purposes of confirming credit worthiness.

It is our policy to use information that cannot directly identify an individual wherever possible.

Telephone calls

We may record telephone and intercom calls to verify content which may then be used together with other customer records we hold for regulatory compliance, quality control and staff training, preventing or detecting criminal activity and for complaint resolution.

Who we disclose personal information to

In order to enforce the parking contract and/or to support the legitimate interest detailed in this notice, we may process Your personal data and share the same with the following 3rd parties:

- with other companies in the NCP group;
- with third party service providers/companies that provide services to NCP or for us on our behalf including IT services and mailing services e.g. website host, auditors, event organisers an individual has registered for; and/or
- with our business partners who may use Your information to provide You with the services You request, analyse and assess their market, customers, products and services.

There may also be instances when we disclose Your information:

- to the DVLA or equivalent government agency to obtain Registered Keeper details. This includes sharing data for audit purposes;
- to other statutory and industry associations, such as (but not limited to) the British Parking Association (BPA) and the Parking on Private Land Appeals (POPLA) Services;
- if we have a duty pursuant to the law to do so, or if the law allows us to do so, to Law Enforcement Agencies and other statutory bodies with the authority to request data, to prevent and detect crime, enhance public safety and assist with investigations;
- In certain cases we are obliged to undertake a 'trace' or 'search' for Your up to date address and other contact details in order to contact You and/or service proceedings on You. In order to do so, we will share Your data with credit reference agencies and trace providers, who in turn may share further personal data about You; and/or
- to verify or enforce compliance with the policies and terms governing our services.

We may share your information with the relevant company that your car parking booking relates to. For example, customer data for bookings made with airports whose car parks are managed by NCP are sent securely to those airports to fulfil the services You have requested and for marketing purposes.

We will disclose Your information if we are required to by law. We may disclose Your personal data to enforcement authorities if they ask us to, or to a third party in the context of actual or threatened legal proceedings or insurance claims, provided we can do so without breaching data protection laws.



If You are a business customer, we may disclose data to Your employer for the purposes of internal investigations or similar matters, provided we are satisfied with the legitimacy of the request.

We may disclose Your personal data to our business partners for the purposes of procuring products and services requested by You and to facilitate the contract.

In limited circumstances, we may disclose Your personal data to the companies within the wider Park24 Group in order to improve our services and/or jointly develop and market products and services under the NCP brand. In such situations, NCP and Park24 Group companies may act as joint controllers for the purposes of the data protection legislation. This means that both businesses work together to decide why and how Your personal information is processed. It also means that we are jointly responsible to You under the law for that processing. NCP is the business that has primary responsibility for the day-to-day handling of Your personal information as it collects these data and has direct contact with You, due to our contractual relationship, and shall remain Your primary contact for any enquiries relating to processing operations as described in this paragraph.

Transfers outside of the United Kingdom (UK) and the European Economic Area (EEA)

We may transfer Your personal data outside the UK/EEA for the purposes of provision of the services to You and for our internal business purposes, including to the wider Park24 Group companies. We ensure that all such transfers are compliant with the requirements of the data protection legislation and that the companies to whom we disclose Your data are either based in countries which guarantee sufficient protection to your data, or that they are subject to appropriate transfer mechanisms, including the UK International Data Transfer Agreement and, where applicable, EU Standard Contractual Clauses. In addition, we have in place appropriate contractual arrangements to ensure the safety of your data at all stages of processing.

We conduct regular reviews and audits of our partners based outside the UK/EEA to ensure the security of Your data and to ascertain their compliance with the data processing obligations.

How we keep Your information secure

We'll treat Your information in strict confidence and we'll endeavour to take all reasonable steps to keep Your personal information secure once it's been collected by us or transferred to our systems.

Personal data submitted through our service(s) are stored securely and protected by multiple anti-malware firewalls. However, the internet is not a secure medium and we can't guarantee the security of any information you disclose online.

We use Direct Payment Gateways to process your card payments. These Direct Payment Gateways adhere to the standards set by the Payment Card Industry Data Security Standard (PCI-DSS) as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover.



PCI-DSS requirements, help ensure the secure handling of credit card information by our Service and its service providers. Your payment data are stored only if necessary to complete Your purchase transaction.

How long we keep your information

If we are providing services to You, we will retain Your personal information for the duration of the services, unless otherwise agreed.

We retain:

- Phone calls/ intercom calls, which are recorded, for 12 months;
- Webchat transcripts for 12 months;
- CCTV recordings for up to 30 days; and
- Parking Charge Notice (PCN) records for 3 years.

Unless otherwise set out in this privacy policy, any other information we process about You will be retained by us until we no longer need it for the purposes for which it was collected, in line with our data retention policy. We will base that decision on a number of criteria, including whether we are required by law to keep the information for a certain period of time, whether You have withdrawn consent to the processing (provided the processing was based on Your consent), whether a contract has been performed and the likelihood of us needing to retain the information in the event of a claim arising, whether the data are still up to date and whether there are exceptions set out in the applicable data protection legislation that allow us to retain the personal data for a longer period.

Your rights

You have the right to ask for a copy, transfer, update, erase, correct, stop the processing or be informed about the processing of any information we hold about You.

If You wish to do this, please contact us at:

The Data Protection Officer
National Car Parks Limited
The Bailey
16 Old Bailey
London
EC4M 7EG

You may also contact us by email on DataProtection@ncp.co.uk

Some of these rights are qualifying rights (not absolute rights). Therefore, can only be applied in certain circumstances.

Our services are not intended for audiences under 16 years of age. It is the sole responsibility of parents and guardians to monitor their children's use of our services.



Changes to this Privacy Notice

We keep this notice under regular review and place any updates on our website. This policy was last updated in October 2024.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Policy are effective when they are posted on this page. Continued use of our service(s) will signify that you agree to any such changes.