



GDPR Data Protection and Privacy Policy

INTRODUCTION

Your privacy is of the utmost importance to us here at Tap2Park. We will only ever use your personal information to administer your account, provide the products and services which you have requested from us, and to keep you informed about our products and services. The protection, confidentiality, security and integrity of your personal data are our primary concerns. This privacy notice explains what personal information we collect from you when you interact with our products and services, and how and why we use this information. This policy will also inform you as to your rights under Data Protection Law and specifically the General Data Protection Regulations ("GDPR").

We will inform you of any future changes to our processing purposes or to our Privacy Policy.

OUR SERVICES

Tap2Park is a trading style of GoANPR Ltd and provides motorists with a solution to pay for parking sessions via multiple platforms including phone (Interactive voice response ("IVR") and SMS), website, and mobile applications. In addition, we also provide parking permit related services. This Privacy Notice applies to these services.

WHAT PERSONAL DATA DO WE COLLECT?

We need certain personal information to be able to offer you the best parking experience and to keep you informed of our products and services. You will provide the majority of this data directly, for instance when you create an account or enter your parking details into our mobile application. Additionally, we receive some of your personal data indirectly through your devices, by recording how you interact with our services (e.g. through cookies). This allows us to personalize and improve our products.

Furthermore, when you create a Tap2park account, start a parking session, or otherwise use our services, we process the following details:

- First and Last Name;
- Title (Mr, Mrs etc.);
- Your vehicle registration number;
- Your vehicle brand/type and colour;
- Email address;

- Your telephone number;
- Social media account information, if you use a social media plugin to register;
- Your address;
- Your location details when you park;
- IP address;
- Phone ID;
- Payment and billing information, e.g. bank account, payment card or PayPal details;
- Parking permit details (if applicable).
- Company name (if applicable);
- Business registration number (if applicable)

We may also receive some data from third parties which may include but not be limited to the following;

- Operators of parking equipment (i.e. manufacturers' of pay and display machines and ANPR license plate recognition systems) so that your parking session can be identified and registered. Please note that we will only obtain information from external sources if you have registered for these services.
- Car Park Operators, who if you have decided to use our services, may provide us with the details of your parking sessions to enable us to facilitate payments on their behalf. This information consists of your vehicle registration number, parking location, parking fee and the start and end time of your parking session.

Cookies and other similar technologies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about cookies we use, please see our cookie policy below.

HOW DO WE USE YOUR PERSONAL DATA?

We only use your data for the purposes for which it was collected and, where relevant, to meet local regulatory or legal obligations. We use your personal data for the following purposes:

Performance of agreements with users. To provide you with the parking related products and services of your choice, we process your information for example to complete parking transactions; facilitate payment of the relevant parking fees and communicate your parking status with the relevant parking control bodies.

Customer support. We use your information to support you in your use of our products and services. This includes the use of personal information to diagnose product problems, rectify erroneous transactions and provide other customer support related services.

Marketing. We would like to send you information which may be of interest to you, about our products and services and those of other companies (in so far as you have consented to this) that may be of interest to you. We communicate with you via email, SMS text or other electronic media. You have the right at any time to stop us from contacting you for marketing related purposes. Depending on your preferences, you can unsubscribe, change your settings on-line or contact our Customer Support team to do so.

Please note that we will obtain your explicit consent prior to sending you any direct marketing communications.

Legal obligations. We may process your information in relation to a legal obligation. This includes cases where we must comply with requests from competent authorities, administrative obligations and in cases involving legal disputes.

Improving and personalising our products and services. We use your personal information to improve our products and services. Browsing behaviour and search results on our website can for instance help us to prioritize or identify new product features.

Maintenance, development and incident management. If you experience issues with one of our products or services, we may need to process some of your personal information, such as your name, vehicle registration number and client ID, in order to resolve the issue. We may also use your personal information in relation to certain system development processes, for instance if we move customer data to a new database.

General business process execution, internal management and management reporting. To be able to run our business, we also use your personal information for general business processes. This includes processing your information for archiving, insurance and other administration related purposes, management reporting or processing in relation to audits.

WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We share your personal data with third parties such as car park operators, clients and other partners. Who we share your information with, depends on your location on the services you use. We share your information:

- To the extent necessary to operate our business, to provide you with our services, to complete any related transactions and collect related payments, to provide customer care and to communicate with you in connection with our services. For instance, to process payments and transactions.
- For parking enforcement purposes, whereby we communicate your parking status with the relevant parking control bodies, such as our Clients. In such instances your

vehicle registration number, location code, make, colour, and the start and end time of your parking transaction are shared;

- For services relating to the issuing of parking permits (if applicable). For that purpose we may also undertake address validation checks with third party agencies to confirm that you are eligible for a product.
- Where you gave us explicit consent to do so;
- If we are legitimately requested or obliged to do so pursuant to law enforcement, e.g. for investigation of illegal activities;
- To enforce our agreement with you, for instance in cases where you have not paid for your parking transactions, we may share your information with a debt collector;
- To enforce our rights towards third parties, or to defend ourselves against any third-party claims or allegations;
- To protect the security, integrity or safety of our Services.

We offer our services as part of the Solutionlabs Group. To be able to provide you with our services, we make use of some intra-company facilities, e.g. for database purposes, administration, marketing and fraud prevention. As such, we also share certain personal data with our affiliates. Such intra-company sharing of data will only occur for purposes of operating our business, performing your service contract and as has otherwise been outlined in this Privacy Notice.

WHERE IS YOUR PERSONAL DATA PROCESSED?

Your personal data is mainly processed by our staff in the United Kingdom. And is therefore governed by the Data Protection Act 1998 (“DPA”) and the General Data Protection Regulations (“GDPR”).

To the extent any other personal data will be transferred to a country outside the European Union or an international organisation, we will make sure that this only happens to such countries and international organisations that ensure an adequate level of protection, have put appropriate safeguards in place to protect your data and your rights in accordance with the EU privacy law (GDPR), or as is otherwise allowed under the GDPR.

If you wish to receive more information in respect of the safeguards we have implemented, please contact our Data Protection Officer.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will retain your personal information only for as long as is necessary for the purposes for which the information was collected, or as long as is required pursuant to law.

If you do not use your account for more than 12 months, we will mark it in our database as "inactive". We will then no longer actively use your account information, e.g. to inform you on our products and services, but will archive the account to be able to easily re-activate it should you wish to use our services again in the future.

In case you wish to close your account, please contact our Customer Support team. Upon closure, we will remove your personal information without undue delay except for information that we are obliged to keep pursuant to law. For instance in order to meet statutory administrative retention obligations, we need to keep some of your account related information (e.g. copies of invoices/receipts), for six years.

Data may be retained longer in certain cases where it is used in relation to a legal claim or is used in relation to a valid legal process.

YOUR RIGHTS AS THE DATA SUBJECT

GDPR grants Data Subjects (you) with certain rights;

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. note that this right only applies to automated information which you initially provided consent for us to use or where we used information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer at dpo@goanpr.com

Please note that you have the right to request the above, however, when we receive your requests we may object to your request if we do not agree with it. However, if you do make the request we will tell you if the request has been granted or not.

LAWFUL BASIS FOR DATA PROCESSING

We only collect and process your personal data when there is a lawful basis to do so. The lawful basis we rely on in this respect includes:

- **Contract:** the processing is necessary to perform your Service contract;
- **Legitimate interest:** for example, i) a legitimate commercial interest to process certain of your personal data, e.g. for running our business and the purposes of certain forms of direct marketing and profiling; ii) to archive certain account information to facilitate you to re-use your account in the future; or iii) if there is a legitimate interest from business or security perspective, e.g. to prevent fraud or abuse of our Services, or for purpose of network and information security of our IT systems;
- **Legal obligation:** the processing necessary to comply with a legal obligation, e.g. the legal requirement to keep administrative records for a certain period of time, or the legal obligation to share certain data on a police order for criminal investigation purposes;

- Public interest task: the processing necessary to assist in tasks in the public interest. For instance to aid enforcement agents in verifying the validity of a parking action or parking permit;
- Consent: where you gave us explicit consent to process the data concerned, for example - if applicable - to share your data with partners or other third parties for commercial purposes.

If you have given your consent to the processing, you have the right to withdraw your consent at any time, by informing us. We will discontinue the processing of your information upon receipt of your withdrawal. However, any processing performed prior to your withdrawal remains a legitimate processing based on a valid consent at the time. We will not be under the obligation to reverse the processing.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 17 May 2018 to reflect the General Data Protection Regulations ("GDPR") which came into effect in the UK on 25th May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

CONTACT DETAILS

Full name of legal entity: GoANPR Ltd PO Box 5419, Hove, BN52 9AN

Name and title of DPO: Colin Harris, Legal Services Manager

Email address: dpo@goanpr.com

Telephone number: 01273 789320

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.