PRIVACY NOTICE

MOTORISTS

WHY WE PROCESS YOUR DATA

This privacy notice is for drivers or registered keepers of vehicles that have used a parking site that we manage.

In summary, we process personal data for the following purposes:

- To determine adherence with the parking site's terms and conditions.
- To issue a windscreen ticket.
- To issue a notice to keeper or notice to driver by post.
- To process the payment of a Parking Charge Notice (PCN).
- To pursue payment of an unpaid PCN.

OBLIGATIONS TO PROVIDE US WITH CERTAIN INFORMATION

If you are the driver, but not the registered keeper, of a vehicle for which a PCN was issued THEN you may elect to transfer the liability for the PCN from the keeper to you. In this situation we will require your name and address for the purpose of transferring the PCN liability to you. If you do not provide the required information, then we will not be able to transfer the liability to you and the liability for the PCN will remain with the vehicle's registered keeper.

If you intend to pay a PCN fee then you will be required to provide us with your address and payment card details for us to process the payment. If you do not provide the required information, then we will not be able to process the payment. We do not retain payment card details.

COLLECTION OF DATA

On parking sites we operate, your vehicle's details may be captured by one or more of the following methods:

- Mobile device (by warden, landowner/land occupier or a landowner/land occupier representative)
- Camera (Automatic Number Plate Recognition or CCTV)

- Warden operatives also operate body warn video equipment for safety and evidence purposes.

AUTOMATIC DECISION-MAKING AND ONLINE PROFILING

We do carry out automated processing of Vehicle Registration Marks at some of the sites that we manage through the use of cameras. However, decisions about whether to issue a notice to keeper or a contravention of the terms and conditions is not purely made by automated means.

We may use automated decision-making tools, including profiling, to assess or predict behaviour, interests, reliability, financial circumstances, or other personal characteristics for the purpose of recovering unpaid parking charges. Automated processing may be used to assist in identifying potential debt recovery actions; however, any final decision that may have a legal or similarly significant effect on an individual is subject to meaningful human review and intervention before action is taken.

ARTIFICAL INTELLIGENCE (AI)

We may use artificial intelligence ("AI") tools to assist our employees in responding to enquiries and providing customer support. Information contained within enquiries submitted through our website may be processed using these tools to help generate draft responses and improve the efficiency of our services. AI-generated content is reviewed by authorised employees before being used, and decisions are not made solely by automated means. Any personal data processed using AI-assisted services will be handled in the UK in accordance with this Privacy Notice.

Purpose	Data processed	Use of data	Retention Period
To respond to enquiries	*Name, Address, vehicle registration mark, other personal data relevant to the enquiries*	*To support any queries*	*30 days following response*

INFORMATION SOURCES

Where we do not issue a notice to a driver or where a PCN remains unpaid after it is due then we will obtain the following information.

Table 1 - Information sources

DATA TYPE	SOURCE
Registered vehicle keeper name and address	DVLA (Driver and Vehicle Licensing Agency)/Vehicle leasing/Fleet Providers
Make and model details	Motor industry database
Vehicle Registration Number (VRN), PCN issue number, date and time of contravention, location of offence (first four digits of the post code only) and information from the DVLA in relation to MOT and excise duty of VRNs.	National Persistent Evader Database

HOW WE USE PERSONAL DATA

Table 2 - How we use personal data

PURPOSE	DATA PROCESSED	USE OF DATA	LAWFUL BASIS FOR PROCESSING	DATA SHARING	RETENTION PERIOD
To verify authorised users of a parking site	Vehicle registration number	To check a vehicle against a list of authorised vehicles for that parking site	Legitimate interests	IT service providers	96 Days
Body Worn Cameras (BWC) a deterrent against threatening behaviour/ criminal activity	BWC footage	BWC footage may be used in situations where verbal and physical abuse may occur.	Public Interest	Law enforcement agencies, prosecution agencies, legal representatives.	30 days unless required for evidential purposes which will be held until the conclusion of any criminal proceedings.

To issue a Parking Charge	Vehicle registration number, vehicle make and model, location of parking site, date and time of Parking Charge, photographic evidence of the contravention	To issue a Notice to Driver	Legitimate interests	IT service providers, DVLA	731 days from the Parking Charge date (if paid in full)
	Keeper/driver name and address, vehicle registration number, vehicle make and model, location of parking site, date and time of Parking Charge, photographic evidence of the contravention	To issue a Notice to Driver or Notice to Keeper or both	Legitimate interests	IT service providers, DVLA	731 days from the Parking Charge date (if paid in full)
To issue a Parking Charge	CCTV Footage ANPR Footage	To issue a Notice to Driver or Notice to Keeper or both	Legitimate interests	IT service providers, DVLA	Maximum of 90 days unless required for evidential purposes which will be held until the conclusion of any legal proceedings.
To handle driver and keeper enquiries	Name, Address, vehicle registration number, Parking Charge reference	To confirm the identity of the caller and discuss the enquiry	Legitimate interests	IT service providers, DVLA	Two years from the Parking Charge date (if paid in full) or 6 years if unpaid

	Date, time, and photographic evidence of the contravention	To discuss the enquiry/complaint	Legitimate interests	IT service providers, DVLA	Two years from the Parking Charge date (if paid in full) or 6 years if unpaid
To take payment for a Parking Charge	Payment card details	To process a payment	Legitimate interests	Card payment processor	We do not retain payment information
To cancel an unpaid Parking Charge	Name, Address, vehicle registration number, Parking Charge reference	To cancel a Parking Charge	Legitimate interests	IT service providers, DVLA	15 Days
To cancel a paid Parking Charge	Name, Address, vehicle registration number, Parking Charge reference	To cancel a Parking Charge	Legitimate interests	IT service providers, DVLA	731 Days
To pursue an unpaid Parking Charge	Keeper/driver name and address, vehicle registration mark, vehicle make and model, location of parking site, date and time of Parking Charge, photographic evidence of the contravention	To facilitate debt recovery, debt tracing, legal proceedings, and the enforcement of unpaid parking charges	Legitimate interests	IT service providers, DVLA, Credit Reference Agencies, Debt Recovery Agents, Solicitors	2190 days from the Event Date if the Parking Charge remains open
To handle requests under the GDPR	Name, Address, vehicle registration mark, Parking Charge, other personal data relevant to the request	To facilitate a Data Protection related request	Legal obligation	IT service providers, DVLA, ICO	24 months from the date of request completion.
To handle calls from the public	Name, Address, vehicle registration mark, other personal data relevant to the call	To facilitate any calls made to our office	Legal obligation	N/A	90 days from the date of the call

To handle a police request	Name, Address, vehicle registration mark, other personal data relevant to the request	To facilitate police enquiries	Legal obligation	N/A	24 months from the date of request completion
Handling of queries or complaints.	Name, Address, vehicle registration mark, other personal data relevant to the request	To support any queries	Legal obligation	N/A	36 months from the date of request completion

TRANSFERRING PERSONAL DATA OVERSEAS

For us to perform the normal functions of our company and in providing you with goods and services, in some instances we may send personal data outside the UK. Where this the case, we either transfer to a country that has been deemed "adequate" for personal data transfers by the UK government (such as one of the countries in the European Economic Area) or we put in place approved international data transfer contract clauses (such as the UK's International Data Transfer Agreement to the EU Commission Standard Contractual Clauses).

YOUR RIGHTS

Table 3 – Your Rights

Right	Detail
Marketing – You have a right to object to direct marketing.	You have a right to object to processing of your personal information for direct marketing purposes. However, we will not undertake direct marketing to you.
Access – You have a right to request a copy of the personal information we hold about you.	You have the right to request access a copy of your personal data. If we believe that your request is manifestly excessive, we then may refuse your request.
Rectification – You have a right to rectification of inaccurate personal information and to update incomplete personal information.	If you believe that any of the information that we hold about you is inaccurate, you have a right to request that we restrict the processing of that information and to rectify the inaccurate personal information.
Erasure – You have a right to request that we delete your personal information.	You may request that we delete your personal information if you believe that: • we no longer need to process your information for the purposes for which it was provided; • we have requested your permission to process your personal information, and you wish to withdraw your consent;

	• we are not using your information in a lawful manner; or • you have objected to your data being processed. Note: as it is lawful for us to process your personal data in connection with a PCN, we will not delete such personal data prior to its scheduled deletion date, which is specified as the Retention Period above.
Restriction – You have a right to request us to restrict the processing of your personal information.	You may request us to restrict processing your personal information if you believe that: • any of the information that we hold about you is inaccurate; • we no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise, or defend legal claims; or • we are not using your information in a lawful manner.
Objection – You have a right to object to the processing of your personal information.	You have a right to object to us processing your personal information, including the profiling of your information (and to request us to restrict processing). We may override this request where: • we determine that there is a compelling and legitimate ground for the processing; or • we need to process your information to investigate and protect us or others from legal claims. Note: as a contravention of parking terms and conditions allows us to pursue payment for a PCN, we have a compelling and legitimate basis for processing your personal data in connection with your PCN.
Portability – You have a right to data portability.	You may request us to transfer to a third-party your data in a machine-readable format where the: • personal information was provided on the basis of consent; • processing is by automated means; and • processing is based on the fulfilment of a contractual obligation.
Withdraw consent – You have a right to withdraw your consent.	Where we rely on your consent to process your personal information for a particular purpose, you have a right to withdraw your consent at any time for that purpose. Note: in processing your personal data in connection with a PCN we do not rely on your consent.
Exercising your rights – you may e-mail the following address to make your request	To exercise these rights please send an email to dataprotection@gx-s.uk.
Lodge complaints – You have a right to lodge a complaint with the regulator.	If you have a complaint, please send an email to complaints@gx-s.uk. We hope that we can address any concerns you may have, but you also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk

CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice was last updated on the 12 November 2026.