



## Privacy Policy

Car Park Services Limited (NI019831) is a parking management and enforcement company. Cosmo Airport car park is owned and operated by Car Park Services Limited. Handy Park is a trading name of Car Park Services Limited.

This policy explains how we collect, use and protect personal data in connection with our parking services, websites, customer contact, camera systems, payments, bookings, parking charges, penalties and recruitment. It should be read together with our parking and payment terms, which can be found on our car park signage and our websites.

Car Park Services Limited (CPS) of 36 Great Patrick Street, Belfast, BT1 2LT is registered with the Information Commissioner's Office under registration number Z6761646. Depending on the service we provide, CPS may act as a data controller, joint controller or data processor. Where we decide how and why personal data is used, we act as a data controller. Where we process personal data on behalf of a client, we act as a data processor and process that data in line with our contract with that client. This policy explains how we comply with data protection law, including the UK General Data Protection Regulation, the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

### What personal data do we collect?

We may collect, process and retain personal data when you use, enter or remain in a location where CPS provides parking, monitoring, enforcement or related services, whether for itself or on behalf of a client. We may also collect personal data when you use our services, websites or booking systems, contact us, make an appeal or complaint, ask for support, or apply for a role with us.

We may collect information including:

- Your vehicle registration plate, captured or recorded through ANPR (Automatic Number Plate Recognition) camera technology, other camera systems, parking payment equipment, or records made at the location.
- Other details recorded, including photographs, notes and observations relating to parking use, compliance, incidents or enquiries.
- Payment information via payment terminals and associated payment service providers. We do not store or have direct access to credit or debit card details, as payments are processed by our payment gateways.
- Your name, email address, vehicle details and telephone number if you make a booking with us. Your name, address and vehicle registration where we obtain registered keeper details from the Driver and Vehicle Licensing Agency (DVLA).
- Information you provide when contacting us, making an appeal, making a complaint, asking for support, or contacting us in writing, by email or by telephone.
- Information you provide as part of a job application or recruitment process, including your contact details, employment history, qualifications, CV, application details, interview notes, right to work information, references and related recruitment records.
- Health, disability, vulnerability or other sensitive information where you choose to provide it as part of an appeal, complaint, request for support, request for reasonable adjustments, or recruitment process.
- Any other information you provide to us, or that we receive from relevant third parties, in connection with our parking services or when you contact us in writing, by email or by telephone.



## Camera Monitoring

We may use ANPR, CCTV, body worn cameras and other camera systems at locations where we provide parking, monitoring, enforcement or related services, whether for ourselves or on behalf of a client.

Images, footage and related records are only accessed by authorised personnel where there is a lawful reason to do so.

## Why do we process your personal data?

We obtain, use, retain and, where necessary, share personal information in a proportionate way and in accordance with data protection law. Our purposes are:

- To provide parking, monitoring, enforcement, payment, permit, booking and related services, whether for ourselves or on behalf of a client.
- To manage bookings, payments, customer accounts, enquiries, appeals, complaints and requests for support.
- To assess parking use and compliance with the relevant parking terms, and to pursue any party who may be liable for parking charges, penalties, unpaid tariffs or other sums due.
- To assist with the prevention and detection of crime, and to support safety and security at parking areas, sites and locations where we provide services.
- To manage recruitment, assess applications, carry out right to work checks, obtain references and keep appropriate recruitment records.
- To improve our services, systems, websites and customer experience.

## What is our lawful basis for processing?

Our lawful bases for processing your personal data are:

**Contract:** where processing is necessary for the performance of a contract, or to take steps before entering into a contract. This includes the parking contract formed when you use, enter or remain in a parking area, site or location where we provide services, bookings made with us, and steps taken during recruitment before entering into an employment contract.

**Legitimate interests:** where processing is necessary for our legitimate interests, or those of our clients, in providing parking, monitoring, enforcement, payment, permit, booking and related services; assessing parking use and compliance; pursuing unpaid parking charges, penalties, tariffs or other sums due; managing appeals, complaints and enquiries; improving our services; keeping appropriate records; and supporting safety and security.

**Legal obligation:** where processing is necessary to comply with a legal obligation. This may include right to work checks, tax or employment law duties, responding to lawful requests from law enforcement, and other legal or regulatory requirements.

## Who do we share your data with and why?

We only share personal data where it is necessary, proportionate and lawful. Where we share data, we take steps to keep it secure. We may share personal data with:

- The DVLA, to obtain registered keeper details where needed for a parking charge, penalty, unpaid tariff or other parking matter.
- Vehicle hire or lease companies, or another person who confirms they hired, leased or authorised use of the vehicle.
- Clients, landowners, managing agents, tenants or other parties for whom we provide parking, monitoring, enforcement, payment, permit, booking or related services.



- The British Parking Association, Private Land Appeals service (POPLA), courts, tribunals, adjudicators, ombudsman services, regulators or other dispute resolution bodies, where needed for queries, complaints, appeals, disputes, legal claims or related proceedings.
- Service providers and authorised agents, including legal advisers, debt recovery agents, collection agents, IT providers, payment service providers, mail providers, subcontractors and other suppliers who support our services.
- Police services, security organisations, public authorities or other lawful bodies, where needed for crime prevention, detection, investigation, legal duties or other lawful purposes.
- Recruitment agencies, referees, background check providers, right to work check providers, HR service providers and professional advisers, where needed for recruitment.

We do not sell your personal data. Where personal data is processed outside the UK, we ensure appropriate safeguards are in place, such as UK Standard Contractual Clauses, a UK adequacy decision, or another lawful transfer mechanism under UK data protection law.

### **How long do we keep your personal data?**

We keep personal data only for as long as needed for the purposes described in this policy.

The retention period will depend on the type of data, the reason we hold it, whether a matter remains ongoing, and any legal, regulatory or client contract requirements.

Camera footage and related records are not kept indefinitely. They are kept only for as long as needed for the purpose for which they were recorded, unless they are needed for a parking matter, appeal, complaint, incident, investigation, legal claim or other lawful purpose.

If your job application is unsuccessful, we keep your recruitment information only for as long as needed for recruitment, record keeping, legal or regulatory purposes, unless you agree that we may keep it for future vacancies.

### **Cookies**

Our websites, including [carparkservices.com](http://carparkservices.com), [handypark.co.uk](http://handypark.co.uk) and [cosmoparking.com](http://cosmoparking.com), use cookies. A cookie is a small text file stored on your device by your browser.

We use essential or functional cookies to enable core website functions, such as session management, booking processes and account login. These cookies are necessary for the service to work and do not need your consent. We may also use analytics cookies, such as Google Analytics, to help us understand how visitors use our websites and to improve our services. Analytics cookies are only used where you have given consent through our cookie banner.

You can change or withdraw your cookie consent where our cookie banner allows this. You can also manage cookies through your browser settings. Declining analytics cookies will not affect your ability to use our websites. For more information about cookies, visit [ico.org.uk/your-data-matters/online/cookies/](http://ico.org.uk/your-data-matters/online/cookies/).

### **Security of your data**

We keep personal data secure and confidential. We use appropriate technical and organisational measures to protect personal data from unauthorised access, disclosure, alteration, loss or misuse. Where relevant, these measures include access controls, staff training, supplier checks, secure systems and information security controls aligned with recognised standards.

Data sent over the internet cannot be guaranteed to be completely secure. Once we receive your information, we apply our security safeguards.



## Your data rights

Under UK GDPR and the DPA 2018, you have rights in relation to your personal data. These include the right to:

- Be informed about how we use your personal data.
- Ask for a copy of the personal data we hold about you.
- Ask us to correct inaccurate or incomplete personal data.
- Ask us to delete personal data where there is no continuing lawful reason for us to keep it.
- Ask us to restrict how we use your personal data in certain circumstances.
- Receive certain personal data in a structured, commonly used electronic format.
- Object to our use of your personal data where we rely on legitimate interests.

We will usually respond to rights requests within one calendar month. If your request is broad or complex, we may ask you for more information to help us respond. The response time may be paused until we receive that information.

Some rights only apply in certain circumstances. We may also need to limit or refuse a request where the law allows or requires this, for example where data relates to another person, legal proceedings, crime prevention, a parking matter, or information received from a third party. We will explain this when we respond.

Where a request includes camera footage, images or audio, we may need to blur, mute, redact or withhold parts that relate to other people.

## Contact details

For data protection queries, Subject Access Requests, or to exercise any of your rights, contact us by:

- Email: [info@carparkservices.com](mailto:info@carparkservices.com)
- Post: Data Protection, Car Park Services Limited, 36 Great Patrick Street, Belfast, BT1 2LT

## Data protection complaints

If you believe we have handled your personal data in a way that does not comply with data protection law, you can make a data protection complaint to us. You can contact us by:

- Email: [info@carparkservices.com](mailto:info@carparkservices.com), marked "Data Protection Complaint".
- Post: Data Protection Complaints, Car Park Services Limited, 36 Great Patrick Street, Belfast BT1 2LT.

We will acknowledge your complaint within 30 days of receipt. We will investigate and respond as soon as possible and without undue delay. Our response will explain the outcome and your right to complain to the Information Commissioner's Office if you remain dissatisfied.

If your complaint relates to a Parking Charge, penalty, parking decision or the terms of your parking, please use our separate Complaints Procedure available on our websites. This process is for complaints about how we have handled personal data.

## Right to complain to the ICO

You have the right to complain to the Information Commissioner's Office (ICO) at any time. We would welcome the chance to deal with your concern first. You can contact the ICO at [ico.org.uk](http://ico.org.uk), by calling 0303 123 1113, or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

## Changes to this policy

We review this policy at least annually and when there is a significant change to our processing activities or applicable law. Updates will be posted on our websites. The date of the most recent update is shown at the bottom of this document. We encourage you to check back periodically.