

UNIVERSITY OF BRIGHTON

ESTATE AND FACILITIES MANAGEMENT

PRIVACY NOTICE – CAR PARKING AND PERMIT APPLICATION POLICY AND PARKING FACILITY LOCKER APPLICATIONS

Version 5

Document control

Version	Date	Changes
1	May 2020	NA Original copy
2	March 2023	Replacement of references to Parking and Transport Office with Estate and Facilities Management. Appeals process information updated. Links updated.
3	May 2023	Parking Facility Locker application details added.
4	August 2023	Update to use of email address
5	July 2024	Change of data retention periods, details of SIPPI app added and sharing with authorities.

Contents

1. Introduction	2
2. Data Controller	2
3. Data Protection Officer	2
4. What information does the university Collect?	2
5. Why do we collect your data?	2
6. How your data is held	3
7. Who has access to data?	3
8. How does the university protect data?	4
9. Where is your data held?	4
10. How long we will keep your data?	4
11. The right to complain to the ICO	5
12. Changes to this privacy notice.....	5
13. Other privacy notices	5

1. Introduction

As part of the car parking e-permit application process, Estate and Facilities Management (EFM) collects and processes personal data relating to University Car Park users.

As part of the process for allocating lockers to students and staff in the Moulsecoomb Parking Facility, EFM also collects personal data relating to users of the lockers,

The university is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

2. Data Controller

The University of Brighton is a 'data controller'. This means that we are responsible for deciding how we hold and use personal information about you.

The Data Controller is University of Brighton, Mithras House, Lewes Road. If you would like information about how the University uses your personal data please contact dataprotection@brighton.ac.uk, 01273 642010.

3. Data Protection Officer

The Data Protection Officer is responsible for advising the university on compliance with Data Protection legislation and monitoring its performance against it. If you have any concerns regarding the way in which the university is processing your personal data, please contact the Data Protection Officer: Rachel Page, Head of Data Compliance and Records management, 01273 642010, dataprotection@brighton.ac.uk.

4. What information does the university collect?

Estate and Facilities Management collects a range of information about you. This includes:

- Your name, username, address and contact details, unicond number, emergency contact details, email address, additional email, campus applied for/location, course, course start and end date and telephone number, study & work pattern.
- Criteria that you have applied under: Blue badge Holder, short-term & long-term health issues, carers responsibilities, essential car user, other.
- Whether or not you have a disability for which the organisation needs to make reasonable adjustments during the application process.
- The University uses Vehicle Registration Mark (VRM) and ANPR technology to register car registrations coming into and out of university car parks.

Estate and Facilities Management (EFM) collects this information through the e-permit application portal supplied by UK Car Park Management (UK CPM) and subsequent email exchanges if required. Guests and visitors to the University will have parking booked on their behalf by a member of staff using the Estate and Facilities Management (EFM) Helpdesk.

Information is also cross checked with student ID numbers and University email address using the University contacts database or student information record system (SITS).

EFM also collects information through the Moulsecoomb Facility Locker Application MS form to administer use and allocation of the lockers in the Moulsecoomb Cycle Store.

5. Why do we collect your data?

Estate and Facilities Management needs to process data collected from the e-permit application form, to establish whether you meet the criteria for a parking e-permit, and to contact you regarding your application and e-permit. Data from the locker application form is used to allocate a locker, manage access and usage of the lockers, such as contacting users when lockers need accessing.

Processing data from an E-Permit application form allows Estate and Facilities Management to manage the number of permits issued due to the limited amount of car parking spaces that the university has available. We assess and confirm an applicant's suitability for an E-permit based on the criteria set out on the E-Permit application form. Further information is available at [Parking at the university \(brighton.ac.uk\)](https://www.brighton.ac.uk/parking).

Estate and Facilities Management may also use the data to respond to and defend against legal claims.

Estate and Facilities Management may process medical information for those who have a disability, this is used only to confirm (yes or no) eligibility with Occupational Health (for staff) and the Disability and Dyslexia Team (for students).

Estate and Facilities Management may process data for complaints and appeals and any issues relating to parking notices and e-permit approval appeals. E-permit approval appeals will be reviewed by colleagues within the University of Brighton, and data shared securely for this purpose.

The Estates and Facilities Management will not use your data for any purpose other than detailed above.

The lawful basis for processing your data is Contract – for which you enter when you agree to the terms and conditions.

6. How your data is held

Your personal data is held within the University email system, EFM Helpdesk (Plan On system) and University Sharepoint system (file storage) which is accessed by authorised staff within Estates and Facilities Management who manage the parking application process.

Your application, VRM and permit, and any ANPR camera data is held in the UK-CPM system which is accessible to staff from UK-CPM and University of Brighton.

Data reviewed for e-permit approval appeals is shared securely within the university using the Sharepoint system.

Locker application forms are held on the University's MS forms and Sharepoint systems.

7. Who has access to data?

Your information will be shared internally for the purposes of the application process. This includes members of Student Operations and support, the Disability and Dyslexia Department, Occupational Health and the Appeals Panel of university colleagues.

Estate and Facilities Management will not share your data with third parties, except for the following:

- UK CPM (read their [privacy notice](#)) manage the daily operations of the car parks as instructed by University of Brighton. This includes VRM& ANPR data, which is cross-referenced with car parking eligibility and payment. UK-CPM will use the data to issue PCN's where payment is not received and the Terms and conditions have been breached.
- The SIPPI cashless payment app and Parkeon on site payment machines will share VRM and payment with UK-CPM. The University of Brighton does not have access to this data.
- Disclosure of vehicle or permit details to the Police or other authorities, subject to correct authorisation procedures.

Data from the locker application forms will be used internally for administering and managing a locker will not be shared elsewhere.

8. How does the university protect data?

The university takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

9. Where is your data held?

Your data is stored on servers within and governed by the European Economic Area (EEA).

10. How long we will keep your data?

Emails, Sharepoint and Helpdesk System

Application emails and email correspondence regarding e-permits will be kept by Estate and Facilities Management for up to three years on the Outlook system.

Data saved on EFM Sharepoint and EFM Helpdesk Systems (Planon) will be kept for 3 year.

Data collected on locker application forms is help until the students or staff stops using their locker or leaves the institution, which will be confirmed annually with the user.

Database

The UK-CPM database collects information to assess eligibility for parking permits. Data will only be used to inform you on parking and transport issues and will be kept for the duration of your permit. If you no longer require a permit or leave your course or employment, data in the database will be kept for two years for reference to any possible PCN's that might have been issued, see [UK -CPM privacy notice](#).

If you pay on a daily rate via the SIPPI app, SIPPI will collect payment data and share with UK-CPM. By downloading the app you are consenting to the sharing of data: [SIPPI privacy notice](#). If you do not wish to download the app you can pay via the onsite machines.

11 Data subject's rights (access, rectification, erasure, restriction of processing, objection to processing, right to data portability)

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request, see <https://www.brighton.ac.uk/foi/requesting-information/index.aspx>
- require the university to change incorrect or incomplete data;
- require the university to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the university is relying on its legitimate interests as the legal ground for processing; and
- ask the university to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the university's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the university's Data Protection Officer, Rachel Page, Head of Data Compliance and Records Management, 01273 642010, dataprotection@brighton.ac.uk

12. Whether providing personal data is a statutory or contractual requirement and the consequences for failing to provide the data

We are processing your data when you enter a contractual relationship with the University as regards eligibility to park.

When you apply for a university locker, we are processing your data which is contractual requirement of using the facilities.

13. The existence of automated decision making, including profiling, information about the logic involved, including the significance and the envisaged consequences of such processing for the data subject

We will not use your personal data for automated decision making/or profiling about you as an individual.

UK CPM do conduct automated processing of Vehicle Registration Marks at some of the sites managed through the use of cameras. Decisions about whether to issue a notice to keeper for a contravention of the terms and conditions is not purely made by automated means. [Please see the UK CPM for further details.](#)

14. The right to complain to the ICO

If you are dissatisfied with the way the university has processed your personal data, or have any questions or concerns about your data please contact dataprotection@brighton.ac.uk If we are not able to resolve the issue to your satisfaction, you have the right to apply to the Information Commissioner's Office (ICO). They can be contacted at <https://ico.org.uk/>

15. Changes to this privacy notice

We keep our privacy notices under regular review.
This privacy notice was last updated on 22/07/2024.

16. Other privacy notices

We do our utmost to protect your privacy. Please be aware that other privacy notices exist within the university in respect of data held including, but not limited to, activities in relation to your enquiries, application, current students, alumni and use of [our website](#) . View the University's privacy notices online: www.brighton.ac.uk/privacy