

Parking Privacy Notice

The following statement explains how personal data is managed for the purposes of managing car parking services. The University is committed to being transparent about how it collects and uses data and to meeting its data protection obligations. Full details can be found on the <u>data protection page</u> of the University's website.

Data Controller

Robert Gordon University
Garthdee House
Garthdee Road
ABERDEEN
AB10 7QB

Data Protection Officer

Mr Ian Croft
Policy & Information Governance Manager
Garthdee House
Garthdee Road
ABERDEEN
AB10 7QB
dp@rgu.ac.uk

What Information does the University Collect and Why?

The University collects the following personal data

- Name
- Staff/Student ID
- Address / Term Address for students
- Phone number
- Email address
- Car registration, make and model

In addition to the above, and only in situations where exceptional circumstance parking permits are being applied for, the University will also collect and process the following data:

Medical Diagnosis

The University collects this data from

Applications for parking permits

The University uses your information for the following purposes

- Processing applications for parking permits
- Managing parking in university car parks

The University does not use automated decision making or profiling whilst processing your data.

How the University stores your data

- Data will be collected and stored in the parking company's portal, GroupNexus, and will be stored under RGU's instructions as the Data Controller.
- All data held by GroupNexus is secured, stored and processed within the UK and your data will not be transferred out with the UK.
- Any data stored by the University will be done so in line with our Information Governance Policy.

Legal Basis for using your information

The legal basis which we rely upon to process your personal data will include at least one of the following:

- That it is necessary for the purpose of entering into a contract with you –
 Article 6(1)(b)
- Where we, or a third party, have a legitimate interest in processing the data
 Article 6(1)(f)

The University requires to process data which is Special Category Data, only in situations where exceptional circumstance parking permits are applied for, this may include health data. The University relies on the following legal basis to process this data:

• Explicit consent – Article 9(a)

Who has access to your data?

- Your personal data will only be shared with staff in the University's schools
 or departments where it is appropriate to do so. Your data will be kept
 secure and only accessed by those who have a need to. Your data may be
 shared with appropriate members of University staff where there is a need
 to do so for health, safety and security reasons.
- Your personal data may also be shared with the following third-party organisations:
 - o Car parking management company, GroupNexus
- Special category data collected for exceptional circumstances permits, will
 only be shared with the appropriate staff in the HR or Inclusion teams. It
 will not be shared with Estates or the car parking management company.

How does the University protect data?

The University takes the security of your data seriously. The University 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
its employees in the performance of their duties.

- Where the University engages third parties to process personal data on its behalf, they do so on the basis of contractual agreements, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.
- The University continues to be the data controller and any third parties act upon the instructions of the University.

For how long does the University keep data?

 Your data will be retained only for as long as necessary and in accordance with our data retention schedule.

What are your rights?

- As a data subject you have a number of rights, further details of these rights can be found here.
 - Your right of access You have the right to ask us for copies of your personal information.
 - Your right to rectification You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
 - Your right to erasure You have the right to ask us to erase your personal information in certain circumstances.
 - Your right to restriction of processing You have the right to ask us to restrict the processing of your information in certain circumstances.
 - Your right to object to processing You have the the right to object to the processing of your personal data in certain circumstances.
 - Your right to data portability You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

- If you would like to exercise any of these rights, please contact Mr Ian Croft, Information Governance & Complaints Officer, Garthdee House, Aberdeen, AB10 7QB or at dp@rgu.ac.uk.
- If you believe that the university has not complied with your data protection rights, you can complain to the Information Commissioner.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

email: casework@ico.org.uk; telephone: 0303 123 1113