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## **Privacy Policy**

In this Privacy Policy references to "we" and "us" are to ZZPS Limited and we are the data controller.

This Privacy Policy governs the way we collect, use, maintain and disclose information collected from users of our websites ([www.ipaymypcn.net](http://www.ipaymypcn.net) & [www.zzps.co.uk](http://www.zzps.co.uk)). This privacy policy applies to both websites and all products and services offered by ZZPS Limited.

### **Lawful bases for Processing**

ZZPS processing of your data could be any one of either 'Contract', 'Legal Obligation' or 'Legitimate interests' depending on the data in question.



#### **Contract**

For example, where you have entered into a contract for parking, and the debt needs to be enforced.



#### **Legal obligation**

For example, where there has been a violation of a byelaw.



#### **Legitimate interests**

For example, to assist with car park management and enforcement.

### **Data Classification**

ZZPS refers to two types of data within this policy:

Customer data - this includes any data passed to ZZPS by its clients and can include information pertaining to a breach of parking terms and conditions and/or trespass. The specific information can vary from client to client, however may include some or all of the following:



Registered Keeper details



Driver or motorist details



Hirer details



Owner details



These details may include:

Name

Address

VRM

Make/Model/Colour of vehicle

Location of the event

The reason

Date & time of the breach

Photographic evidence of the event

Email address

Telephone numbers

Comments and/or notes

Data is stored on our notice processing system which is provided and supported by Indigo Cloud Limited. For more information see below ('How we protect your information')

Client data – defined as firms who have retained the services of ZZPS under a Service Level Agreement

Third Party and Suppliers data

### **Personal identification information**

We may collect personal identification information for legitimate interests from users in a variety of ways, including, but not limited to, when users visit our site, fill out a form, and in connection with other activities, services, features or resources we make available on our site. Users may be asked for name, address, email address, telephone numbers and/or credit card information.



Users may visit our site anonymously too. We will collect personal identification information from users only if they voluntarily submit such information to us. Users can always refuse to supply personal identification information, except that it may prevent them from engaging in certain site related activities for example making payments or viewing photographic evidence.

### Non-personal identification information

We may collect non-personal identification information about users whenever they interact with our site. Non-personal identification information may include the browser name, the type of computer and technical information about user's means of connection to our site, such as the operating system and the internet service provider's utilised and other similar information. This may also include the users IP Address.










Personal information may be passed to us from a third party, for example, our clients, solicitors or suppliers.

### Web browser cookies

Our sites may use cookies to enhance user experience. User's web browsers places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. Users may choose to set their web browser to refuse cookies, or to alert them when cookies are being sent. If they do so, note that some parts of the site may not function properly. More information on our use of cookies can be located at <http://www.zzps.co.uk/cookies>

### How we use collected information

We may collect and use personal information for the following purposes:











-  To process payments  
 We may use the information users provide about themselves when paying only to service to that request. We do not share this information with outside parties except to the extent necessary to provide the service.
-  To send periodic emails  
 We may use the email address to send users information and updates pertaining to their account.
-  To send periodic text messages  
 We may use the mobile telephone number to send users information and updates pertaining to their account.
-  We may pass data onto third parties including our suppliers and solicitors  
 Our suppliers include a printing company and a data appending/tracing company  
 The solicitors could be either Wright Hassall LLP or their subsidiary QDR Solicitors Ltd.

### How long we may keep your personal data

We will store your personal data for no longer than necessary to support the purposes explained above. We keep the personal data we hold about you for up to a maximum of 6 years from the date of collection unless related correspondence or legal claims are on-going.

### Your data rights

In relation to the personal data which we may hold about you, you have the following rights, to:

-  Be informed how we process your data as explained above
-  Access the information we hold about you, you can do this by making a subject access request.
-  Ask us to:
  -  Rectify information about you that is incorrect or incomplete
  -  Delete (erase) information about you
  -  Restrict how we process your information
  -  Transfer your data in an accessible electronic format
  -  Object to our processing of your information
  -  Complain to us via our contact details below
  -  Complain to the data regulator the Information Commissioner's office (ICO) via [www.ICO.org.uk](http://www.ICO.org.uk)

Please contact us using the details below if you wish to assert your rights ensuring you provide proof of your identity with any request. Under data protection law we must verify your identity before carrying out your request or supplying any information and provide you with an explanation if we do not agree with your request. Once your identity has been confirmed we will respond to your request within one calendar month.

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### How we protect your information

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our systems.

All data is stored with apposite security in place and all suppliers used by ZZPS comply with the European Union General Data Protection Regulations.

Customer data is stored in the [Microsoft Azure Data Centre](#) in Amsterdam.

The supplier that provides this service and support is [Indigo Cloud Ltd](#).

Some data is stored outside the European Economic Area; these suppliers are based in America and are all covered by the [EU-US Privacy Shield](#). Suppliers used by ZZPS include:



-  DropBox Inc.
-  Microsoft Corporation
-  Salesforce
-  Google LLC

Sensitive and private data exchange between the site and its users happens over a SSL secured communication channel and is encrypted and protected with digital signatures.

### Sharing your personal information

We do not sell, trade, or rent users personal identification information to others.

We may share your data with:

-  Our suppliers, who include a printing company and a data appending/tracing company
-  Our solicitors: Wright Hassall LLP or their subsidiary QDR Solicitors Ltd.

### Third party websites

Users may find links to the sites and services of third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our site, is subject to that website's own terms and policies.

### Changes to this privacy policy

We have the discretion to update this privacy policy at any time, this policy was last updated on 28 June 2018. We encourage users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect.

### Your acceptance of these terms

By using this site, you signify you have read and understood this policy. If you do not agree to this policy, please do not use our site. Your continued use of the site following the posting of changes to this policy will be deemed your acceptance of those changes.

### Contacting us

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us at:

Data Protection Officer

ZZPS Limited | Bacchus House | 1 Station Road | Addlestone | Surrey | KT15 2AG  
[dataprotection@zzps.co.uk](mailto:dataprotection@zzps.co.uk)



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