



## **Strathclyde Partnership for Transport**

### **Privacy Notice – Subway Car Parking and Automatic Number Plate Recognition (ANPR)**

#### **Who we are/the service**

Strathclyde Partnership for Transport (“**SPT**”) is, in terms of the Transport (Scotland) Act 2005, the Regional Transport Partnership (“**RTP**”) for the west of Scotland, covering 12 local council areas and has its main office at 131 St Vincent Street, Glasgow, G2 5JF.

SPT provides car parks at Bridge Street, Kelvinbridge and Shields Road Subway stations for Subway park-and-ride customers. The car parks may also be used for ‘parking only’ (with no Subway travel). The car park entry and exit barriers use Automatic Number Plate Recognition (ANPR) technology to identify vehicles and ensure that customers pay the appropriate amount for car parking.

This Privacy Notice explains how and why SPT collects and uses your personal data in relation to Subway Car Parking.

#### **Personal data we hold**

- Car number plate (also known as VRN – vehicle registration number).
- Name

#### **How we obtain your personal data**

We collect your data via the ANPR (Automatic Number Plate Recognition) cameras at the Subway car park entry and exit barrier, specifically your car number plate.

If you purchased a Park-and-Ride ticket for 7 days or longer at the Subway ticket office, you also provided us with your name.

#### **The purpose of processing your personal data**

This data enables SPT to ensure customers are charged the appropriate amount for car parking, provides evidence of movements in and out of our car parks and enables SPT to support customers in the delivery of longer-term Park-and-Ride service for example when dealing with queries, complaints or refunds.

#### **The legal basis for using your personal data**

We process your personal data lawfully and fairly in accordance with data protection legislation.

Specifically, we use the following legal basis for the processing of the data you have provided / we have collected:

- Contract.

#### **How we store your personal data/keep it secure**

SPT is committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data we collect from you.

### **The length of time we keep your personal data**

SPT will retain your data for as long as it is necessary, reasonable and proportionate to do so to provide you with this service, and in line with our retention policies. Your personal data will be securely destroyed when no longer required by SPT.

All photographic images of car number plates are automatically deleted after 30 days.

For single day car parking customers, the car number plate detail is extracted from the image and held in the car park database with a date stamp and entry/exit barrier information and will be kept permanently for data analysis and reporting purposes.

For Park and Ride customers that have valid season tickets your details (car number plate and name) will be stored in the car park database and will be kept permanently for data analysis and reporting purposes.

### **Sharing your personal data**

Hub Parking Ltd are the supplier of the Subway car park equipment. In the course of carrying out system maintenance and customer support, Hub Parking Ltd have access to customer data on the system.

SPT will not require to share your personal data with any other third party in relation to this service.

### **Overseas processing**

Data associated with the Subway car park system is held securely on servers located on SPT premises.

In the course of car park maintenance and analysis, system logs may be transferred to Hub Parking Ltd in Italy. Such processing will be subject to appropriate contractual safeguards and carried out in accordance with UK and EU privacy and data protection legislation.

### **Your information rights**

Your information rights include:

- Your right of access
- Your right to rectification
- Your right to erasure, in certain circumstances
- your right to withdraw consent [if applicable]
- Your right to restriction of processing, in certain circumstances
- Your right to data portability, in certain circumstances
- Your right to object to processing, in certain circumstances
- Your right relating to automated decision making

If you make a request, we have one month to respond to you.

If you wish to exercise any of your information rights, please contact [infogov@spt.co.uk](mailto:infogov@spt.co.uk) or see SPT's Data Protection page (see [www.spt.co.uk/dataprotection](http://www.spt.co.uk/dataprotection)) for more information on how to do this.

## How to contact us

The Data Protection Officer for SPT:

Valerie Davidson  
Chief Executive  
Strathclyde Partnership for Transport  
131 St Vincent Street  
Glasgow  
G2 5JF

Telephone: 0141 333 3298

E-mail: [info.gov@spt.co.uk](mailto:info.gov@spt.co.uk)

## Complaints to the Information Commissioner

You can complain to the ICO if you are unhappy with how we have used your data. The ICO's contact details are:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Web site: <https://ico.org.uk/>

## Changes to this notice

SPT may update this Privacy Notice from time to time and will publish an up to date copy of the Privacy Notice here. This Notice is effective from October 2024.