

Data protection and privacy policy

APCOA Parking Danmark A/S

Hjulmagervej 4B

7100 Vejle

Danmark

Company registration number: 19055108

1. **Introduction**

- 1.1 This data protection and privacy policy (the "**Policy**") describes how APCOA Parking Danmark A/S ("**us**", "**we**" or "**our**") processes personal data when you register and park your car via our sites and app, when you register as a "regular user" or otherwise use our ANPR parking and in connection with the use of the websites (www.apcoa.dk, www.europark.dk , www.apcoaflow.dk and parking.bl.dk) and/or other service, application, website or media controlled by us or APCOA PARKING Holdings GmbH. Your use of the before mentioned websites, applications, services etc. is subject to this data protection policy as well the terms and conditions of these websites.
- 1.2 The Policy is prepared and made available to comply with the general data protection regulation (2016/679 of 27 April 2016) (the "**GDPR**") and the rules included herein on information to be provided to you.

2. **Collecting personal data with cookies**

- 2.1 By visiting and using our website(s), cookies are collected and used on the basis of consent. Information in these cookies include browser type, IP address, search terms on our website(s), location at login. (hereinafter "**Cookiedata**").
- 2.2 Cookiedata is used for improvement of the website(s) and the user experience.
- 2.3 Use of cookies for the purpose of collecting personal data is in accordance with the Cookie Order (No. 1148 of 9 December 2011), section 3.
- 2.4 If you wish to limit or decline the cookies placed on your computer when visiting our website you can do so at any time by changing your browser settings. However, you should be aware that if you decline or reject cookies it will impact the functionality of the website which means that there are features on the website that you will not be able to see. Any browser allows that you delete cookies collectively or individually. How this is done depends on the used browser. Remember to delete the cookies in all browsers, if you use several different browsers.
- 2.5 We disclose and/or share Cookie Data with Google Analytics. The purpose of the disclosure is solely to improve the experience for our users. We only collect information about your use of the sites and app listed in section 1.1, and only to the extent permitted. We do not collect information about other activity on the Internet. Google Analytics collects information about your operating system, browser, IP address, previously visited website, and the date and time for your visits on our website.

3. **Types of personal data processed**

- 3.1 We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data include the following types of personal data: name, address, telephone number, email, invoicing and bookkeeping data and documentation, payment card details, username, password, purchasing history, account status (customer points,
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payments etc.) We also process your car's registration number in the following situations:

- In connection with carrying out our control of illegal parking
- When you enter the registration number when you register and park your car via our sites and apps
- When you register as a "regular user" or otherwise park at our ANPR sites
- When you contact us regarding a possible parking fine

3.2 We do not collect sensitive personal data (so-called "special categories of personal data"), and we therefore only process such data if you send them to us on your own initiative.

3.3 As a general rule, we only collect personal data about you from you. If specific circumstances allow or require us to collect personal data about you from someone else than you, we will inform you hereof, which may be done by updating this Policy.

3.4 If we need to collect more personal data than what is specified above, we will inform about this. Such information may be provided by our updating of this Policy.

4. **Purposes for processing the personal data**

4.1 We only process personal data for legitimate purposes in accordance with the GDPR. Depending on the circumstances, the personal data is processed for the following purposes:

- a) To send newsletters on e-mail.
- b) To improve our products, services or website.
- c) To store personal data to comply with applicable legislation requirements such as bookkeeping acts.
- d) To communicate and exchange data with public authorities when required by law.
- e) To facilitate a sales process.

In addition to the above, we also process your personal data for the following purposes:

- In order to be able to charge and receive payment for your parking
- In order to answer your inquiries/objections
- In order to give support and service announcements, including answering questions or inquiries/objections and sending updates on our products and services.
- In order to issue a parking fine
- In order to carry out control for illegal parking
- In order to manage rental/reservation of a parking spot
- In order to be able to register and issue digital parking registration/permission
- In order for you to be able to register your information on our sites or app, such as APCOAFLOW, or as a "regular user" or by your parking at our ANPR sites or when using parking.bll.dk.

5. **Legal basis for processing personal data**

5.1 We only process your personal data when we have a legal basis to do so in accordance

with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal basis:

- a) The processing is necessary for the performance of a contract to which the data subject is party, cf. the GDPR, article 6(1)(b), the first indent.
- b) The processing is necessary for the purposes of the legitimate interests where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, cf. the GDPR, article 6(1)(f).
- c) The processing is necessary for compliance with applicable legislation, cf. the GDPR, article 6(1)(c).

5.2 Our legitimate interests under article 6(1)(f) of the GDPR consists of being able to pursue a claim against you as a parking customer, for example, if you have parked in violation with the regulations at a parking area, and have been issued a parking fine.

6. **Disclosure and transfer of personal data**

6.1 We only pass on personal data to others when the law allows it or requires it, including when relevant and asked to do so by you or a data controller.

6.2 We transfer personal data to the following recipients from the EU/EEA:

- a) Banks (for example in connection with payments etc.).
- b) Data processors.
- c) Suppliers.

6.3 APCOA PARKING Danmark A/S is a part of the APCOA PARKING Group which has parking companies in 13 European countries, which share name, values, knowledge and expertise, with each company being an independent judicial unit, with local management.

As a part of the cooperation within the group, personal data can be transferred to countries within the EU/EØS, which provide specific protection of personal data. We share data with our parent company and our owners, when necessary for administrative purposes, and to provide professional services to our customers, or when the parent company performs revisions of transactions.

Furthermore, information can be disclosed to the following recipients:

- In case of a restructuring, or a complete or partial sale, of the company.
- To the police in the case of any police investigation.
- To public authorities
- To debt collection agencies in the case of passing a case to the debt collection agency
- To parking board of appeal in the case of passing the case to the parking board of appeal
- To EasyPark in the case where the app EasyPark has been used for payment of parking
- To other parking companies in case another parking company is to take over management, in order for the parking customers not to have any inconveniences because of the switch in management
- To private parking site owners in connection with parking inspection and on the basis

of a legitimate interest

- To Brobizz A/S when you use Brobizz to park in parking areas administered by and/or controlled by APCOA PARKING

- 6.4 From time to time we use external companies as suppliers to deliver assist us in delivering our services. The external suppliers will not receive or process personal data unless the applicable law allows for such transfer and processing. Where the external parties are data processors, the processing is always performed on the basis of a data processor agreement in accordance with the requirements hereto under GDPR. Where the external parties are data controllers, the processing of personal data will be performed based on said external parties' own data privacy policy and legal basis which the external parties are obligated to inform about unless the applicable legislation allows otherwise.
- 6.5 We do not transfer personal data to countries or international organisations outside the EU/EEA.

7. **Erasure and retention of personal data**

- 7.1 We ensure that the personal data is deleted when it is no longer relevant for the processing purposes as described above. We also retain personal data to the extent that it is an obligation from applicable law, as is the case with for example accounting and bookkeeping materials and records. As a general rule, we delete or anonymize information related to your parking for four months after you have parked at our parking sites or a case regarding your parking has been closed, but we retain transaction information in order to comply with the Bookkeeping Act. If you have any questions about our retention of personal data, please contact the email mentioned at the bottom of this Policy.

8. **Data subject rights**

- 8.1 Data subjects have a number of rights that we can assist with. If a data subject wants to make use of his or her rights, he or she can contact us. The rights include the following:
- 8.1.1 The right of access: Data subjects have a right to ask for copies of the information that we process about them, including relevant additional information.
- 8.1.2 The right to rectification: Data subjects have a right to ask for rectification of inaccurate personal data concerning him or her.
- 8.1.3 The right to erasure: In certain circumstances data subjects have a right to obtain the erasure of personal data concerning him or her before the time when erasure would normally occur.
- 8.1.4 The right to restrict processing: Data subjects have, in certain situations, a right to have the processing of his or her personal data restricted. If a data subject
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has the right to have the processing of his or her personal data restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest in the European Union or of a European member state.

8.1.5 The right to object: Data subjects have, in certain situations, a right to object to the legal processing of his or her personal data. Objection can also be to the processing of personal data for the purpose of direct marketing.

8.1.6 The right to data portability: Data subjects have, in certain situations, a right to receive his or her personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the data controller to which the personal data has been provided.

8.2 More information about data subject rights can be found in the guidelines of the national data protection authorities.

If a data subject wishes to make use of his or her rights as described above, the data subject is asked to use the contact details provided at the end of this Policy.

We strive to do everything to meet wishes regarding our processing of personal data and the rights of data subjects. If you or others despite our endeavours wish to file a complaint, this can be done by contacting the national data protection authorities.

9. **Changes to this Policy**

9.1 We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the bottom of this Policy. In case of significant changes, we will provide notification in the form of a visible notice, for example on our website or by direct message.

10. **Contact**

10.1 If you have questions or comments to this Policy or if you would like to invoke one or more data subject rights, please contact us at gdpr@apcoa.dk or +4570231331.

This is version 3, last updated 05.03.2020 16:02.

Yours sincerely,

APCOA Parking Danmark A/S