

Flowbird Group UK Privacy Policy

Flowbird Group UK (Incorporating Parkeon LTD & Cale Access UK LTD). Flowbird Group UK is committed to protecting and respecting your privacy. This Privacy Policy forms part of and is incorporated by reference into Flowbird Group UK's standard Terms and Conditions. This Policy governs the data which we collect from you in the course of our business and the way in which we protect and process such information. Please read this carefully to understand how we will treat your personal data.

Data Controller/ Processor

A data controller is a person who controls how personal information is processed and used. A data processor is a person who processes and uses personal information in accordance with the instructions of a third party, i.e. the data controller.

This distinction is important. You have certain rights in relation to your personal information, for example the right to be provided with the personal information held about you and details of its use and the right to have certain of your personal information either erased or anonymised, commonly referred to as the right to be forgotten (*see below to see what rights you have*). These rights can generally only be exercised against a data controller of your information.

In most cases we will not be a data controller of your personal information. In any case where we are not a data controller this means that you cannot exercise these rights against us directly (i.e. where we only act as a data processor), but you can do so against the data controller (i.e. the person who controls how we process the personal information). In these cases we will endeavour to inform you who is the data controller of your personal information so that you can direct any such requests to them.

It is only a data controller that will provide you with a privacy notice about your personal information, so where we process your personal information as a data controller we will provide you with a privacy notice. Where we process your personal information as a data processor for a third party, that third party should provide you with a privacy notice which will set out details regarding the processing of your personal information, which should also include the processing to be carried out by us on their behalf.

Information we may collect about you

Data regarding you and/ or your business is collected, retained and processed subject to and in accordance with the requirements of the GDPR. We may collect personal data, that includes: name, title, contact information including email address and mailing address, telephone number, demographic information such as postcode, employer/ employee details, pay data/information, IP address, other information relevant to surveys and/or offers. We may collect and process the following data about you:

(a) Information you provide when you use our websites www.parkeon.co.uk and www.cale.se (the "websites"). This includes information provided by you at the time you place an order for any of our services. We may also ask you for information if you report a problem with our website.

(b) If you contact us by email, through our contact form, by telephone or in writing. We may keep a copy of that correspondence or communication.

(c) Details of any transactions you carry out with us through the payment terminals, website or by any other means, including those contained in an order form, and of fulfilment of your orders.

(d) Details of your visits to the websites and the resources that you access.

If you have provided us with the personal data of another person, you confirm that he/she consents to the processing of his/her personal data and that you have informed him/her of our identity as a data controller and provided him/her with a copy of our Terms and Conditions and this policy.

We also monitor visitors to and content on our message board and blog sites to meet our obligations to ensure that rules as to content are being followed. We will review and, if appropriate, edit content on these sites.

IP addresses and cookies

We may collect information about your mobile phone, computer or other device from which you access the website. Such information may include your domain name and IP address, details of your computer operating system and browser, the website you visited prior to visiting our website and unique number identifiers that are automatically generated by our systems when you visit our website. This will include details of the choices you make on our website indicating whether you wish to receive information on the company, our products and services.

Some of this information is retained in "cookie" files on your computer. These files retain useful information that can speed your navigation through frequently visited sites. They can also retain records that track site usage, preferences and passwords. These cookies can be disabled or deleted by activating the setting on your browser if you do not wish them to be used. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log in to our website.

Legal basis for data processing

We can process personal data on various legal bases.

For processing operations for which we obtain consent for a specific processing purpose, Article 6(1)(a) of the GDPR is our legal basis.

If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as for example when processing operations necessary to provide our service, the processing is based on Article 6(1)(b) of the GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services.

If our company is subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, our processing is based on Article 6(1)(c) of the GDPR.

Finally, we can base our processing operations on Article 6(1)(f) of the GDPR: this legal basis is used for processing operations which are not covered by the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

Uses made of your information

We use the information collected about you for the following purposes:

- To ensure the products and services you have chosen are delivered to you in the most effective way, and to assist with the performance of our internal contract, accounting and administrative functions.
- To carry out our obligations arising from any contracts entered into between you and us.
- To assist us in developing new and improved products as indicated by user practice and preferences, based on our analysis of patterns of usage.
- To provide you with details of changes to our company, products and events which we believe may be of interest to you from Flowbird Group UK.
- We will not share your data with third parties for marketing purposes unless we have procured your express consent to do so.

Profiling or other automated individual decision making

Automated individual decision making refers to a decision made solely on the basis of automated processing of your personal data, without human involvement. For instance, this means processing using an algorithm or a software code. Profiling is defined as automated processing of personal data to evaluate certain things about an individual: profiling can be part of an automated decision-making process.

We sometimes automate our decisions or profile as part of the process to ensure efficiency and accuracy. This may include

Retention of your information

We take appropriate measures to ensure that any information collected from you is kept only for so long as is necessary for the purpose for which such information is used.

We normally update your personal data within seven (7) working days of any new or updated personal data being provided to us, to ensure that the personal data we hold about you is as accurate as possible.

We protect your data by:

Offering you a secure transmission method to send us personal or company information.
Implementing security policies and technical measures to protect data from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

Disclosure of your information

We may disclose your personal information to third parties:

- a) If we are under a duty to disclose or share your personal data to comply with any legal obligation.
- b) To enforce or apply our Terms and Conditions and other agreements.
- c) If it is required to do so to deliver our services. We sometimes outsource certain functions of our business to service providers: some of these service providers may use cloud-based systems: in that case, your personal data would be hosted on their servers, but under our direction and control.
- d) To protect the rights, property or safety of Flowbird Group UK, our customers or others.
- e) Where we have received your permission for us to do so.

The third parties that may handle your personal data are listed below. They process car registration number plates or involved in payment processing.

PayThru Ltd,
JNeptune,
SimplePay Ltd,
3C Payments UK Ltd,
SIX Payment Services

Transfers outside the European economic Area

We will only transfer your personal data to countries which are considered as providing an adequate level of legal protection or where alternative arrangements are in place to protect your rights.

We may transfer your personal data outside the EEA in the unlikely event that we receive a legal request from a foreign law enforcement body. All requests for information we receive from these bodies will be carefully checked before personal data is transferred.

We may use remote website server hosts to provide and maintain some aspects of our service and website, which may be based outside the EEA (in "the cloud"). Transfers to service providers outside of the EEA will be protected by contractual commitments and, where appropriate, further assurances, such as certification schemes (including the EU-US Privacy Shield for the protection of personal data transferred from the EU to the US and accessed in the US).

You have the right to ask for more information about the safeguards we have put in place as mentioned above.

Your rights under the GDPR

- **Right of access**

The GDPR gives you the right to access information held about you. If you wish to exercise such right, please submit a request to us in writing at uk-dataprotection@flowbird.group. Any access request shall be subject to your providing acceptable proof of identification. If we are processing your personal data, we will provide you with a copy of that personal data.

- **Right of rectification**

You are entitled to have your personal data rectified if it is inaccurate or incomplete. You should instruct us to correct or update any personal data we hold about you (for instance, if you change your address or your name).

You can instruct us to do this at any time by contacting us at uk-dataprotection@flowbird.group

- **Right to erasure**

You have a right to have your personal data erased and to prevent processing in specific circumstances. If you wish to exercise such right, please submit a request to us in writing at uk-dataprotection@flowbird.group

- **Right to restrict processing**

In certain circumstances, you have the right to obtain from us restriction of processing (especially when the accuracy of the personal data is contested by you, for a period

enabling us to verify the accuracy of the personal data). If you wish to exercise such right, please submit a request to us in writing at uk-dataprotection@flowbird.group

- **Right to withdraw your consent**

In certain circumstances, we must have your consent before we contact you. You have the right to withdraw your consent to processing of your personal data at any time by contacting us at uk-dataprotection@flowbird.group

- **Right to data portability**

With effect from May 25, 2018, you have the right, in certain circumstances, to obtain personal data you have provided us with, in a structured, commonly used and machine-readable format, and to reuse it elsewhere or ask us to transfer this to a third party of your choice. If you wish to exercise such right, please submit a request to us in writing at uk-dataprotection@flowbird.group

- **Right to object**

You have the right to object to:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).
- Direct marketing (including profiling).
- Processing for purposes of scientific/historical research and statistics.

If you wish to exercise such right, please submit a request to us in writing at uk-dataprotection@flowbird.group

- **Rights related to automated decision making and profiling**

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, as long as the decision is not necessary for entering into, or the performance of, a contract between you and us; or is not based on your explicit consent. If you wish to exercise such right, please submit a request to us in writing at uk-dataprotection@flowbird.group

- **Right to lodge a complaint with a supervisory authority**

You have a right to lodge a complaint with a supervisory authority, to enforce your rights, as specified above. You can find details about how to do this on the UK Information Commissioner's Office (ICO) website at <https://ico.org.uk/concerns/>.

[Links to other websites](#)

Our website may sometimes link to other third-party websites. We are not responsible for the accuracy or efficacy of the information or data policies or procedures of these third parties. If you access these sites using the links provided on our website, you should satisfy yourself as to the relevant data policies in effect on these sites.

Changes to our privacy policy

Any changes we may make to our Privacy Policy in the future will be posted on this page and on our website. Please check this page occasionally to ensure you are happy with any changes.

If you have any questions about our privacy policy, or if you want to request information about our privacy policy, please contact us at uk-dataprotection@flowbird.group or in writing at the address set out on the Contact Us page of the website.

Contact

If any of your personal data changes, or if you have any questions, comments or requests regarding the protection of your personal data or this policy, please contact us by email at uk-dataprotection@flowbird.group or in writing at the address Flowbird Group UK, Discovery Court, 551-553 Wallisdown Road, Bournemouth BH12 5AG.