

## PRIVACY POLICY **FOR THE MOBILE PAYMENT SERVICE FOR PARKING**

The entities listed [here](#) are management entities for street parking and/or car parks (covered and/or open air) - (henceforth designated "Parking Company"), providing a new mode of payment for parking via mobile phone ("Service").

The use of the Service involves the collection and subsequent processing by the Parking Company of personal user data.

This Privacy Policy thus governs the collection and processing of personal data provided by the users within the scope of the Service, as well as the exercise of their rights with respect to such data, in accordance with Law of Personal Data Protection in force.

For more information about using this new method of payment, the user should consult the information displayed on parking meters and in the Terms of Use available [here](#), of which this Privacy Policy forms part.

If in doubt, the user should directly contact the Parking Company that manages parking in the location concerned.

### **1. Collection and Processing of Personal Data**

The Parking Company, whose service the user wishes to subscribe, is the entity responsible for collecting and processing personal data.

Personal data shall be processed by the Parking Company for the purposes of membership and providing of the Service, including the processing of parking payment, and they may use subcontracted entities for this purpose.

### **2. Registration**

The use of the service does not, by itself, require registration. However, to use certain features of the Service (such as access to the client area, creating a virtual wallet or purchasing additional services), the user must register and provide certain personal data.

The user is responsible for the truthfulness, accuracy, validity and authenticity of personal data within the registry on the Service and must keep them permanently updated.

This data shall be processed by the Parking Company in accordance with applicable law, for the purpose of providing the Service and its respective capabilities.

### **3. Retention of Personal Data**

Personal data will be kept for the period of [the statute of limitations for administrative offences].

**4. Transmission of data to third parties**

The Parking Company will not communicate personal data to third parties except for the purposes of complying with legal obligations or by court order.

**5. Right of access, rectification and deletion**

Under the terms of applicable legislation, the user is guaranteed the right to access, rectify and update his/her personal data by directly contacting the Parking Company which manages the parking location concerned.

**6. Security Measures**

The Parking Company is committed to protecting the security of personal data that the user provides and/or that of those who have access within the scope of the Service, and also to ensure that personal data is collected securely. Thus the Parking Company guarantees that personal data is securely processed, with the total security of operations carried out being guaranteed, using data protection technology, complemented by personal and non-transferable access codes.

However, with regard to personal data available in the client area, and despite all efforts made to protect personal data, the user should be aware that there is always some risk of his/her data being accessed by third parties given that it circulates in open networks.

Thus, for the data made available via the client area, he/she should take regular precautions to provide greater security while using the Internet. Firstly, the data assigned to the user to access the client area (username and password) should be handled confidentially by the user, so that the user should not provide, or make it accessible to third parties.

**7. Changes to **the** Privacy Policy**

The Parking Company may change this Privacy Policy at any time. These changes will be duly published in the client area.

Date of last update **29 December 2014**