

1 February 2022

Ted Linney

s7(2)(a)

Tēnā koe Ted,

**Request for Information – Local Government Official Information and Meetings Act 1987**

I refer to your official information request dated 13 December 2021 for information about use of vehicle number plates for on-street parking operated by Hutt City Council (HCC).

Specifically, you have asked the following questions:

1. How long will parking data identifying the car details and email addresses be stored until it is rendered irretrievably inaccessible?
2. If permanent deletion is event based, what is / are those events and how long after the event will data be erase?
3. Does HCC regard the data captured as a financial transaction and as such keep it for many years in a similar manner to other financial transaction data with the public?
4. Who will have access, for what reasons and what access audit trail is in place to record any access?
5. Would bulk access be possible where the specific registration or email address supplied could be retrieved?
6. What steps has HCC taken to ensure that the information is not inadvertently shared or used inappropriately?
7. What is the HCC policy in relation to providing parking related data to authorities such as the police, for example do you only release if a court order is provided?
8. Do you advise the vehicle owner their data has been shared or requested by authorities?
9. Has the Office of the Privacy Commissioner been consulted on the issues of privacy relating to the implementation of park by plate systems by HCC?
10. Prior to installing park by number plate systems did HCC obtain a legal opinion as to its legality? If so when, from which entity and at what cost?

Pay By Plate parking is a popular paperless system that works by using a vehicle's licence plate number to record parking time and payment. HCC offers a range of parking options throughout the city, and I refer you to the following parking map should you wish to choose an alternative option: [https://maps.huttcity.govt.nz/parking\\_map/](https://maps.huttcity.govt.nz/parking_map/).

The answers to your questions are provided below:

**How long will parking data identifying the car details and email addresses be stored until it is rendered irretrievably inaccessible?**

**If permanent deletion is event based, what is / are those events and how long after the event will data be erase?**

Parking Meter Transactional data may routinely be kept for 7 years. In some instances it may be kept for longer than this, if specified in the contract between the provider of the technology and the council.

HCC manages its records in accordance with the provisions of the Public Records Act, which includes the authorised destruction of records once they are no longer required to be kept for legislative compliance or business purposes.

**Does HCC regard the data captured as a financial transaction and as such keep it for many years in a similar manner to other financial transaction data with the public?**

Refer to the answer to the question above.

**Who will have access, for what reasons and what access audit trail is in place to record any access?**

Vehicle licence plate details and e-mail addresses, when entered into the parking meter, are stored securely and accessed for parking enforcement purposes only. It is not essential to provide an email address via eReceipt in order to obtain a receipt for parking, however a park user can register an email address for their convenience, for example, to receive top-up reminders or to have a receipt emailed next time they park. Please refer to the attachment for details of the eReceipt options or refer [here](#).

Should a carpark user provide an email address at the time of parking, they can delete it at any time. None of the secure application program interfaces (API) used in the Pay By Plate system allow email-sharing. The server uses them to send receipts but they don't show anywhere in the system.

HCC's Parking Services staff have access to the information collected. The level of access each individual has is specific to the requirements of their role. Examples include staff involved in resolutions, payments, technical support, parking communications and parking officers.

Each individual user has a unique log-in to the system, and this can be used for auditing access. A history is kept of users who make changes in the system and the time of the change.

Access logs to the system are also maintained, however this information is encrypted and only available to the provider of the technology.

The third-party provider of the Pay By Plate technology can obtain vehicle licence plate details and e-mail addresses entered, but this information cannot be tracked back to users. Vehicle licence plate details are only shared by them for enforcement purposes, while email addresses are never shared. All data handling is in accordance with its company policies.

**Would bulk access be possible where the specific registration or email address supplied could be retrieved?**

Enforcement records are forwarded onto the enforcement system at HCC either individually or in batches via secure APIs from the third-party provider.

Details of vehicle licence plates are only provided for enforcement purposes. Email addresses are not shared.

**What steps has HCC taken to ensure that the information is not inadvertently shared or used inappropriately?**

Third-party suppliers have contractual agreements with HCC, and their systems work together under a secure API. Details of vehicle licence plates are only provided for enforcement purposes, and only to the HCC staff that require the information. These staff must adhere to HCC's code of conduct relating to privacy of information. Email addresses are not shared.

**What is the HCC policy in relation to providing parking related data to authorities such as the police, for example do you only release if a court order is provided?**

HCC has policies for handling requests for any information it holds from third parties. Privacy of individuals is a key consideration prior to making any information available to other parties.

HCC's Privacy Policy is available [here](#).

**Do you advise the vehicle owner their data has been shared or requested by authorities?**

The only information collected is the vehicle licence plate and, if the user of the meter has provided it, his/her email address. It is highly unusual that HCC would need to obtain additional vehicle information from other agencies. However, if necessary, HCC may obtain more details of a registered vehicle securely from NZTA.

Details about information sharing are provided elsewhere in this letter.

**Has the Office of the Privacy Commissioner been consulted on the issues of privacy relating to the implementation of park by plate systems by HCC?**

You have advised in your letter that this question relates to Automatic Number Plate Recognition (ANPR). HCC does not use ANPR technology in its carparks.

I can advise that the Privacy Commissioner's website [here](#) advises that a car's number plate would not be personal information on its own, as it does not disclose personal information. All that is known from a number plate is the number itself, and the make and model of the car it's attached to. The Pay By Plate system therefore does not breach any privacy considerations.

**Prior to installing park by number plate systems did HCC obtain a legal opinion as to its legality? If so when, from which entity and at what cost?**

You have advised in your letter that this question relates to Automatic Number Plate Recognition (ANPR). HCC does not use ANPR technology in its car parks.

HCC will seek legal advice on its decisions, where necessary. However HCC maintains high security of all information it holds about its customers, with privacy principles and legislation being key components of data collection, storage and disclosure.

The information that HCC obtains from the Pay By Plate technology is collected, stored securely and is accessed for parking enforcement purposes only. The provider of the Pay By Plate technology also maintains a strong commitment to its privacy policy and to legislation.

You have the right to seek an investigation and review by the Ombudsman of this response. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

Please note that this letter may be published on the Council's website.

Nāku noa, nā

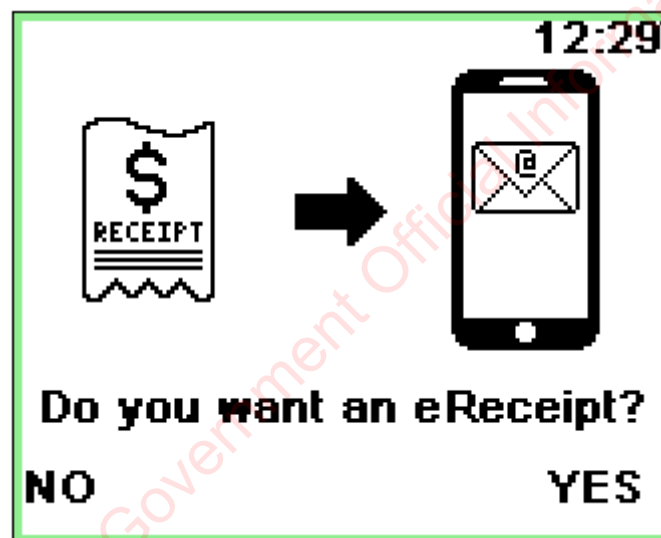


Susan Sales  
**Senior Advisor, Official Information and Privacy**  
**Hutt City Council**

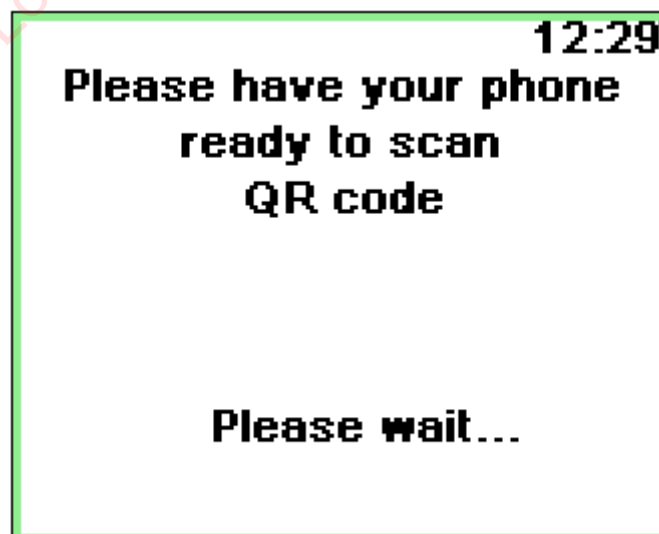
## eReceipt Process

The GPS eReceipt is a solution is environmentally friendly as we do not print any receipts, allowing the user to download their receipt to any device.

1. After a user has performed a transaction at the meter, they are presented an option to obtain an eReceipt.



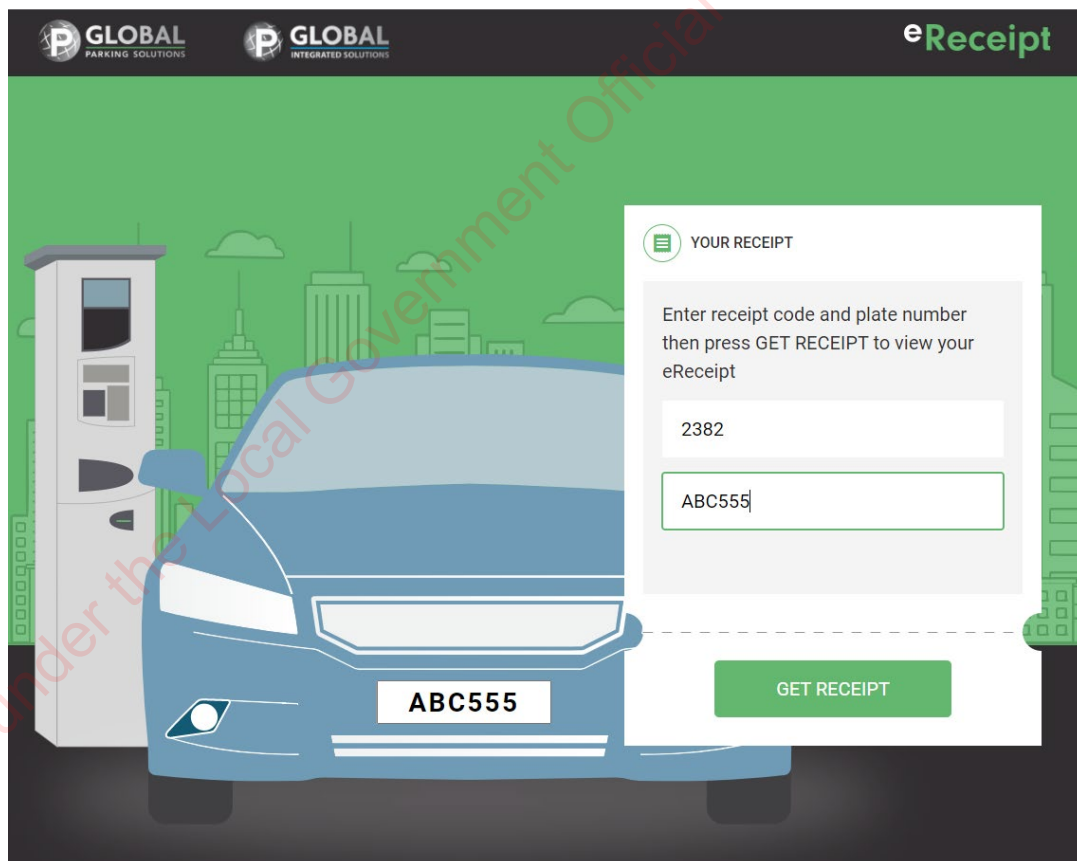
2. If the user selects YES, they are asked to have their phone ready to scan a QR code.



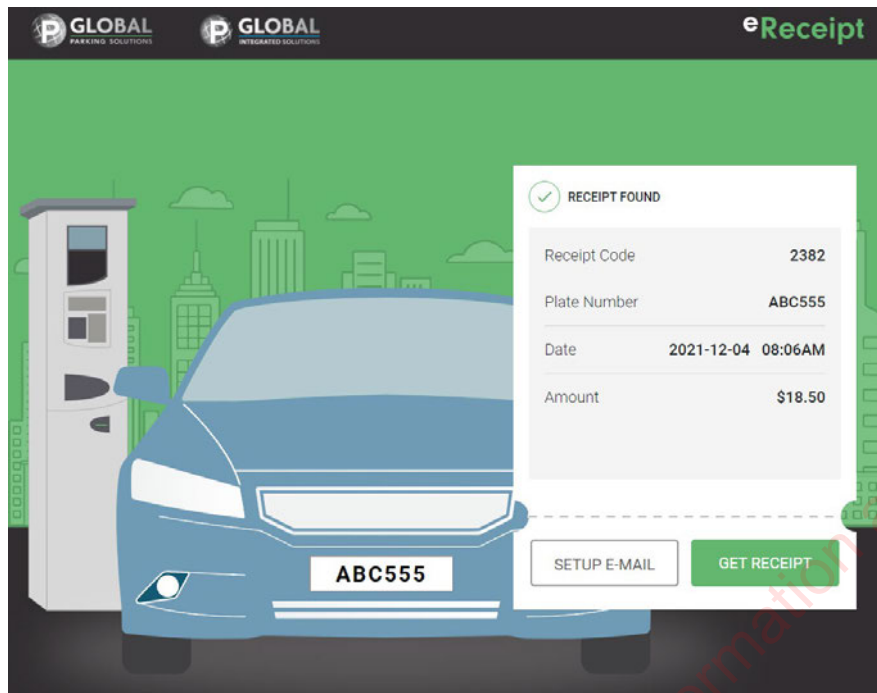
3. Scanning the QR code will open the eReceipt website allowing them to continue the next steps online, alternatively they can go to [my-receipt.com](http://my-receipt.com) and enter the code shown on the meter display.



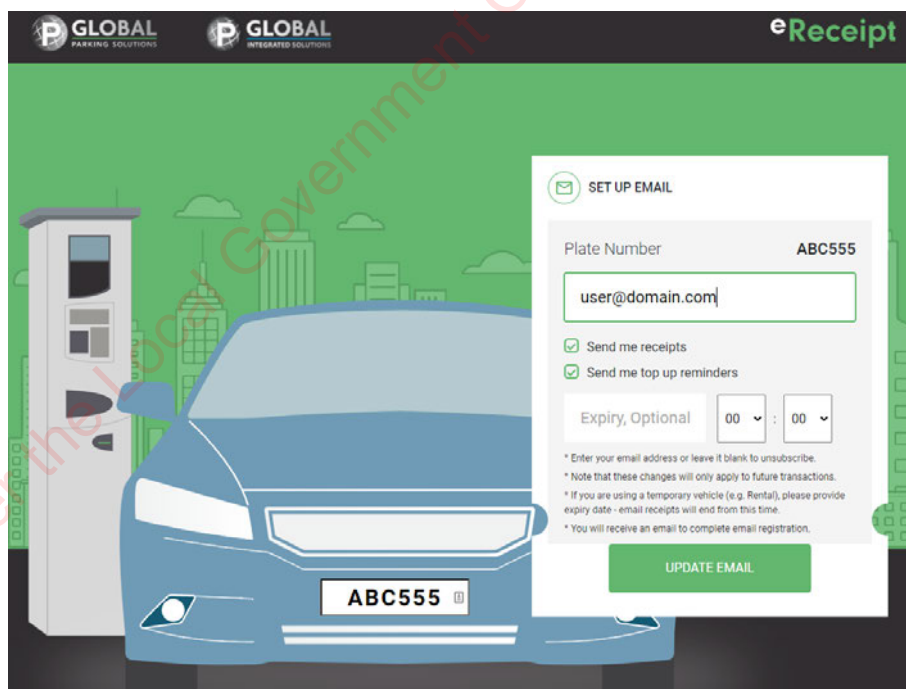
4. Entering the eReceipt code and plate information, the user is able to obtain their receipt.



5. Once Get Receipt is pressed, the receipt is displayed on their device.

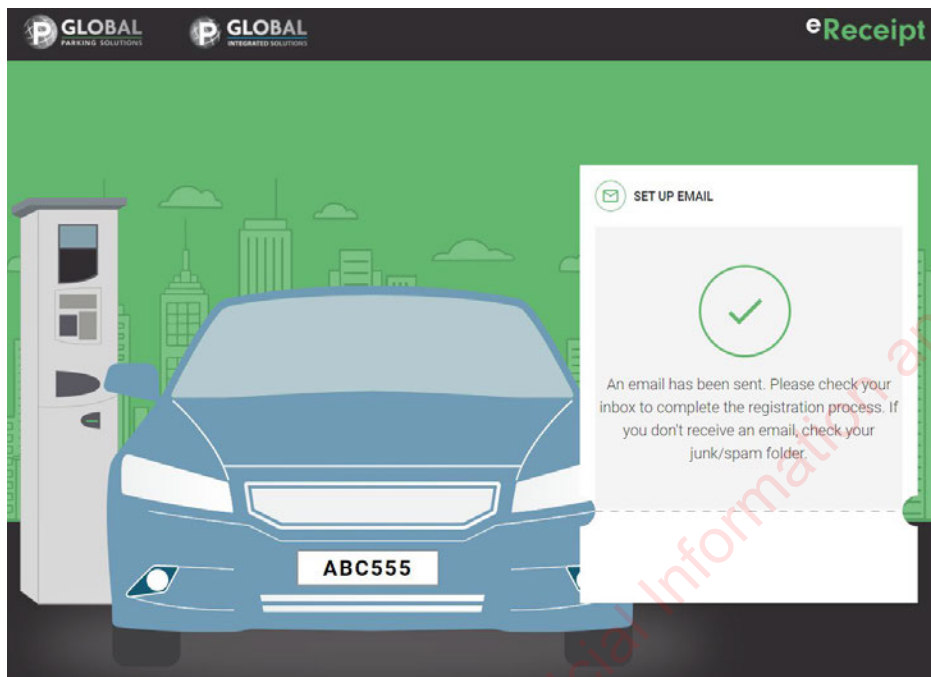


6. If the user presses Get Receipt, the receipt is downloaded as an Adobe .pdf file. Alternatively they can select to "Setup Email" which is an opt-in feature we offer users and not mandatory.



7. When setting up email, the user can:
  - Have receipts sent via email
  - Have top up reminders by email

-- Set an expiry which will disassociate their email address with this vehicle after a period of time which is suitable for users of rental vehicles or similar



8. After a user selects Update Email, they will receive a registration email to confirm they wish to opt in to this service. They are required to confirm their email to continue.

9. User will receive an email with the following content:

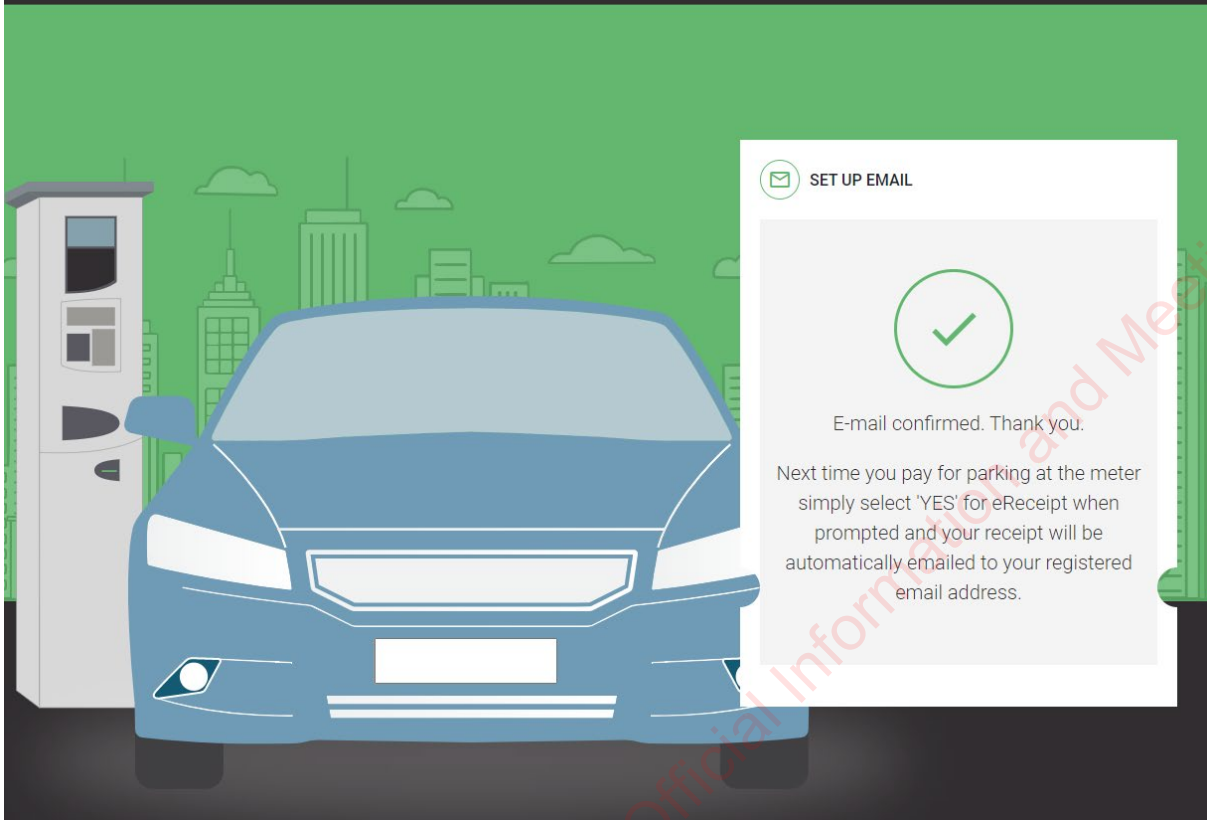
Subject: *Email registration at [www.my-receipt.com](http://www.my-receipt.com)*

Body: *You or someone else have registered this e-mail to receive receipts for parking transactions for plate ABC555. To complete this registration, please click on the following link: [Confirm e-mail](#).*

*Next time you pay for parking at the meter simply select 'YES' for eReceipt when prompted and your receipt will be automatically emailed to your registered email address.*

10. They will be presented with the following screen when they confirm their email.





 SET UP EMAIL



E-mail confirmed. Thank you.

Next time you pay for parking at the meter simply select 'YES' for eReceipt when prompted and your receipt will be automatically emailed to your registered email address.

Released under the Local Government Official Information and Meetings Act