## **Automatic License Plate Recognition**

#### 27/03/2025

#### 1. What is this privacy policy about?

As part of the access control and management of the parking spaces made available via the ShareP platform, we use cameras for the automatic recognition of vehicle license plates.

This privacy policy provides information on what personal data we collect in this context, for what purposes and for how long we process it, and what rights you are entitled to.

#### 2. How does automatic license plate recognition work?

Automatic License Plate Recognition (ALPR) is a camera monitoring method that uses character recognition (OCR) to recognize and process vehicle license plates:

- The ALPR camera automatically scans a defined area for vehicle license plates in real time. This video feed is neither stored nor tracked live by our staff.
- If the camera detects a vehicle license plate, it takes photos of the vehicle and converts the license plate information into a numerical format.
- The numerical license plate information is transmitted to our servers for further processing together with a time stamp, the location of the camera, information on the direction of movement of the vehicle (arriving or departing) and any additional information (e.g. vehicle model, color).
- The photos taken remain in the camera memory for a limited time, particularly for troubleshooting purposes, and are then automatically deleted by the camera.

#### 3. Who is responsible for the data processing?

For the data processing described in this privacy policy, one of our two affiliated companies, ShareP AG (Switzerland) and ShareP Poland PSA (Poland), is responsible, usually in joint responsibility with the owner of the respective parking spaces.

You can contact us using the following contact details:

#### General contact for data protection issues

privacy@sharep.io

#### ShareP AG

(UID: CHE-458.596.730) Apfelbaumstrasse 45 8050 Zurich Switzerland

#### ShareP Poland PSA

(KRS: 0000933251, REGON: 520473552, NIP: 8943176679) ul. Hubska 52 50-502 Wroclaw Poland

ShareP Poland PSA is the EU representative for ShareP AG.

#### 4. Applicable law

This privacy policy is based on the provisions of the Switzerland Federal Act on Data Protection (FADP) and the EU General Data Protection Regulation (GDPR). Which of these laws applies in individual cases depends on the specific situation.

#### 5. What personal data do we process?

Personal data is information that relates to an identified or identifiable person. We collect the following personal data via our ALPR cameras:

- photos of the vehicle incl. license plate;
- numeric license plate information;
- direction of movement of the vehicle (arriving or departing);
- if applicable, further information on the vehicle (e.g. model, color);
- technical data (in particular time stamp, location).

#### 6. For what purposes and on what basis do we process personal data?

The collection and processing of personal data by the ALPR cameras is primarily for the purpose of access control (checking access rights, opening barriers, etc.) and the management of parking spaces made available via the ShareP platform. The primary basis for processing is therefore:

- if available, the contract between you and ShareP and between you and the landlord/owner of the parking spaces; or
- our legitimate interest in controlling and managing access to parking spaces.

In addition, we may also process your data on the basis of the following legitimate interests, to the extent permitted by law:

- for troubleshooting and operational checks of our systems;
- to ensure IT security and data protection;
- to enforce, defend or defend against legal claims;
- for non-personal, statistical evaluations.

Finally, we process your personal data if we have to do so in order to comply with legal obligations.

#### 7. To whom do we disclose personal data?

In order to fulfill the contract, to protect our interests or to fulfill legal obligations, it may be necessary for us to pass on your personal data to third parties. This includes in particular:

- our IT service providers;
- cases in which disclosure is necessary to (i) ensure IT security and data protection, (ii) enforce, defend or defend against legal claims.

We also transfer personal data abroad; in particular, we use IT service providers with data locations in the EU or the EEA. We limit the transfer of personal data to countries outside Switzerland, the EU and the EEA as far as possible, but it cannot always be completely avoided. If the countries concerned do not have a level of data protection recognized by Switzerland, we generally use standard contractual clauses to ensure adequate protection, supplemented where necessary and possible with additional security measures.

#### 8. How do we protect personal data?

We take appropriate technical and organizational measures to maintain the security of your personal data, to protect it against unauthorized or unlawful processing and to counteract the risk of loss, unintentional alteration, unwanted disclosure or unauthorized access.

These safety measures include, for example:

- automatic deletion of the data stored in the cameras;
- encryption of the camera firmware;
- encryption of the data transmitted to the servers in transit and at rest;

• access restrictions to the cameras.

#### 9. How long do we store your personal data?

We only store your personal data for as long and to the extent necessary for the purposes described or for legal reasons.

The photos stored in the cameras are automatically deleted within 7 days, unless there is a legal obligation or legitimate interest in longer storage in individual cases.

# 10. Which rights do you have in connection with the processing of your personal data?

Under the conditions of the applicable data protection law and to the extent provided therein, you have the following rights:

- the right to request information from us as to whether and which of your personal data we process;
- the right to have incorrect personal data corrected;
- the right to object to the processing of your personal data;
- the right to request the deletion of your personal data ("right to be forgotten");
- the right to demand that we hand over certain personal data in a commonly used electronic format or transfer it to another controller;
- the right to withdraw consent with effect for the future, insofar as processing is based on consent;
- the right to receive, upon request, further information that is helpful for the exercise of these rights.

Please note that exceptions apply to these rights. In particular, we may be obliged or entitled to continue processing your personal data in order to fulfill a contract, to protect our own legitimate interests such as the assertion, defense or defense of legal claims, or to comply with legal obligations. In these cases, we can or must therefore refuse certain requests or only comply with them to a limited extent.

You can contact us in accordance with section 2 if you wish to exercise your rights or if you have any questions about the processing of your personal data.

#### 11. Right of appeal

If you are not satisfied with the way in which we process your personal data, you have the right to lodge a complaint with the competent supervisory authority.

Please contact us first before submitting a complaint. This way we can try to resolve your concern directly. The easiest way to do this is to contact us at the email address in section 2.

### **12. Changes to the privacy policy**

We may change this privacy policy at any time. New versions will come into force for you as soon as we have communicated them by publishing them on our website.