Privacy Policy



1.The Policy

This privacy policy sets out how we gather, use, hold and protect ("process") any personal information that you give to us when you use Driiveme whether accessed via the website at <u>www.Driiveme.com</u> or using our App. By continuing to use Driiveme you are accepting this policy.

Some personal data information is essential to Driiveme functioning and us supplying a service to you. If you do not wish to allow us to process your data, then you will not be able to use our services.

Useful contact details and a summary of the control you have over your personal data can be found at the end of this policy.

2. Compliance

In processing personal data, we will comply with relevant legislation in force and as amended in England. We may change this policy by updating this document as we improve our service to you and as relevant Data Protection legislation comes into force. Your personal information will continue to be held in accordance with our policy as it develops. We will not reduce your rights under this policy without your explicit consent.

3. Age Limit

Please be aware that this website is for use or registration by those aged 18 years or older.

4. Data Controller and Processor

We gather data on three groups,

- I. the non-registered viewer of our website in which our services are described including those asking for vehicle alerts ("Viewer"),
- II. our users registering in order to book a vehicle ("Users")
- III. our providers registering in order to offer vehicles for hire through Driiveme ("Providers").

Accordingly, we are a Data Controller for the following types of data:

- Where you are merely reviewing our services, we will normally only gather data indirectly but might also do so directly if you i) request vehicle alerts or ii) engage with us on social media, for example.
- Where you are our User or Provider, we will gather data indirectly and directly.

Where you are a User, we will gather data only in so far as it is necessary to provide Services to our Providers and our Provider remains the Data Controller who is responsible for deciding how your data is used by us. Should you have any questions concerning your personal data held by one of our Providers you should contact our Provider, with whom you booked a vehicle, directly.

5. Legal Basis for Processing

We are required to process your personal data in a lawful, fair and transparent manner.

Consent – where you are a Viewer you will be accepting our cookie policy, in order to continue to view how our services operate. Detailed below is the extent of indirect use of data which is anonymised and is not designed to identify you individually.

Contract – where you are enquiring about entering into a contract with us including if you request vehicle alerts as a Viewer, or where you are a User sending us enquiries, or a Provider registering vehicles with us, we process data necessary to answer your enquiry and process your account in order to provide you with the service. Our service may include being in contact with you even after your journey has been completed, to ensure that all activities concerning your booking have been dealt with.

Legitimate Activities – where we are required to store information for legal purposes, for example where you have been a User or Provider and for insurance and contractual purposes, we do so as part of our legitimate activities as a lawful business.

6. Driiveme's Website Indirect/Anonymous Tracking

Some personal data may be processed by us when you are merely browsing Driiveme.

6.1 Cookies

You can choose to accept or decline cookies from our website.

A cookie is a small file which is placed on your device when you visit a website. The file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies help us provide you with a better experience by tailoring the website operations to your needs and to respond to you as an individual, user such as identifying which pages you find useful and which you do not.

Our cookie files in no way give us access to your computer or any information about you, other than the data you choose to share with us.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website, in order to tailor it to customer needs. We only use this information for statistical analysis purposes and does not identify you individually.

Merely by browsing our website, Driiveme tracks your use so that we can offer you a better user experience relating to your navigation habits. This helps us analyse data about social media traffic and improve Driiveme, in order to tailor it to the needs of our customers.

6.2 Google Analytics

Our website uses Google Analytics, an analysis service by Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA. Google Analytics allows us to analyse the use of our website application.

The information about your visit collected by Google Analytics is usually transferred to a Google server in the USA and saved there. Google will use the information collected on behalf of the application operator to evaluate the users' use of the application, to compile reports about the users' activities within this application, and to provide further services for the application operator related to the use of the application.

We will not gather any personally identifiable information about you through Google Analytics. You can find more information about what data can be collected via Google Mobile App Analytics at <u>http://support.google.com/analytics/bin/answer.py?</u> <u>hl=en&answer=2568871</u>.

By using the website, the user explicitly consents that his or her information is collected via Google Analytics.

6.3 What We Might Collect

Driiveme collects the following types of information:

- Identification of your past and current use of Driiveme.
- Technical information from your device to enable it to interact with our system.
- Information about your visits including page response time, pages visited, methods of browsing and other similar information.

7. Direct Information Gathering

Some personal data may be processed by us when you have requested a product or service from us, whether as part of an agreement to purchase from us or merely requesting further contact from Driiveme such as vehicle alerts.

7.1 Risk and Personal Data

Please note that sending information over the internet is not completely secure and we cannot guarantee the security of your data while it is in transit. *Any data you send*

is at your own risk. Please do not include sensitive personal data sent over the internet.

7.2 What We Might Collect

- Name.
- Contact information including postal address, email address and telephone contact details.
- Demographic information such as location and destination.
- Status of your permission to drive a vehicle in the European Union.
- Other information relevant to your journey needs, price and vehicle preferences.
- Interest in customer surveys and/or offers we have made.
- Location information, contact details and personal information relating to your driving and journey needs on particular dates where you have asked for vehicle alerts.

7.3 Compilation of Data

In order for the online store to function and be optimised, it is essential that we hold on to and connect data together to identify you and how your business, vehicles or journey or any other needs operate including ownership and legal status relevant to vehicle rental. Where you are an individual, whether as Provider or User this will constitute your personal data. This will include vehicle profile data, your name and similar information, demographic information, price points, legal status and othe similar items.

7.4 Testimonials

We would be delighted if you would provide us with testimonials of your great experiences with us. We will review these before placing them on our marketing literature including our website and will only use your first name or an assumed name if you so wish. Should you wish for your testimonial to be removed please let us know using the contact details provided below.

7.5 Customer Experiences

We may also keep data to record the appreciation shown by Users and their experiences. This is for internal purposes to enable us to check that we continue to provide an excellent service. If the record is initiated by us then we will anonymise it, using only first names.

Should the record be initiated as a result of a request or complaint by you as a User or a Provider against the party you have contracted with, then only essential information relating to the issue will be kept and in that event for no longer than 1 year unless you request otherwise. After 1 year we may retain information showing the fact of the request or complaint for training purposes, but the information will be anonymised.

8. What We Do with The Information We Gather

We take different types of information from you. Processing of anonymous data is either stored on your device and not accessed by us (eg cookies) or informs our statistical analysis on website and page use (eg traffic cookies, Google Analytics).

Processing of your personal information involves a number of different actions depending on why you have supplied us with information:

8.1 Storage

The information we hold about you may be stored outside the European Economic Area in order to process your data.

Initially your personal information is held securely by Driiveme or our third party supplier. They would not normally view or use your personal information unless there is an issue with the use or security of holding your data. They may be involved in sending newsletters or information relating to a completed vehicle booking to you, which originates from Driiveme.

We hold your data securely. In normal circumstances, information relating to enquiries or contracts with use is held for a maximum of 6 years.

8.2 Anonymous Tracking

The purpose of this is:

- To customise Driiveme according to your preferences and tastes.
- To improve how we display information on our products and services on our website for your benefit and in keeping with your device.
- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To allow you to participate in interactive features of our service when you choose to do so.
- As part of our efforts to keep our site safe and secure.
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- To make suggestions and recommendations to you and other users of our site about services that may interest you or them.

8.3 Initial Response

We require your personal information to make our initial response that you have asked for.

8.4 Further Processing

Once information is received by us, it is stored centrally. The personal information enables us:

- To operate the Driiveme service and respond to your enquiry.
- To keep internal records, to follow up your enquiry at times convenient to you. This may mean that your vehicle Provider i) attempts multiple contacts with you to fulfil your requests for contact ii) holds your data for up to 3 months to answer any follow up discussed with you.
- To keep statutory records where further processing is limited to holding data securely.

8.5 Supplying Your Data to Third Parties

Where we must share your data for the purposes of providing you with the services you have requested, we will put in place contractual and practical systems to protect your personal information. We will also notify them of any preferences you have indicated concerning use of your personal data.

8.6 Marketing

Based on your consent:

- We may periodically use your contact details to send you promotional emails or texts about new products, special offers or other information we think you may find interesting using the contact details which you have provided.
- We may use your contact details, for market research purposes.
- We may supply your contact details to third parties for use with related marketing messages.

Your contact details will be held by us.

8.7 Request for Deletion of Information

If you have provided your consent to receive future marketing messages, we will hold this information until you indicate that you no longer wish to receive messages from us.

If you contact us to indicate that you no longer wish to receive messages from us, we may store that indication centrally.

8.8 Contracts with you

We would not normally use information obtained via our website to finalise contracts with you. Such information will be held in separate records. In the event that such personal information is used to enter into contracts with you, it will be transferred and its accuracy checked during the transfer. Should such data be used to assist in purchases made with you, that information may be held as part of our accounting records for compliance purposes. Only data sufficient for these purposes will be held and this data will be held securely and kept separately and only for the purposes of compliance, either for tax reasons or for records relating to the movement of vehicles from one location to another.

8.9 Business Purchase or Sale

Please note that if the business were to be sold or transferred or we were to purchase another business, your data will be transferred with it but only as part of the business being sold or transferred. Your personal information may be disclosed to a prospective buyer or seller of such business.

9. External Sites and Social Media

When you connect to or from Driiveme using external websites, please be careful to check whether the external site is one controlled by us (usually our social media spaces on platforms such as Facebook, Twitter or LinkedIn) or those used by third parties. We cannot control the information practises of other companies and organisations that might advertise, display, link to, or offer to obtain our goods or services for you. We cannot take responsibility for, cannot control and this policy does not cover spaces on the internet not controlled by us.

9.1 Linking to Other Websites

Similarly, our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Please also note that third-party cookies might be downloaded onto your device as a result of your use of this website, for example if you were to send information to or from this website to your social media account, your account may require the use of cookies to enable this transfer to take place. These cookies are not under the control of Driiveme, and we disclaim any responsibility for the acts of third-party cookies.

9.2 Posting Comments & Social Media

Please note that if you choose to post comments on this website or via our social media accounts containing personal data, we cannot accept responsibility for the use or misuse of such data by others who have access to such posts. We recommend that you consider carefully before posting any such data. Please note that we may review tracking data generated by social media providers such as Facebook for measuring how useful our social media presence is to you.

9.3 Social Media Data Gathering

We employ technology to help us identify when you might have encountered us through social media or to send you targeted marketing messages relating to products we have to offer, during your social media experience. The use of this technology does result in us holding your personal contact details and likes and dislikes. We do not categorise this information, based on what the law describes, as "sensitive personal data".

9.4 Social Media integration

Driiveme integrates different connections to social networks such as Facebook. Data is managed differently by different social media platforms. As an example, Facebook uses personal data as set out below:

Facebook is based at 1601 South California Avenue, Palo Alto, CA 94304, USA. Data is used to share activities on Facebook and to get Facebook information about Driiveme users. An overview of Facebook integrations and social plugins can be found here: <u>http://developers.facebook.com/docs/plugins/.</u>

When users enable the Facebook connection in their settings, the Facebook integration establishes a connection between a user's device and the Facebook server. Thereby, Driiveme receives information about the user.

When users invite friends via Facebook, the Facebook integration establishes a connection between a user's device and the Facebook server. That allows the user to gain information about his or her friends via Driiveme as the provider of Driiveme does not receive any of this information.

When users share their information on Facebook and when they invite friends via Facebook, the Facebook integration establishes a connection between a user's device and the Facebook server. Thereby, the user links information on Driiveme to his or her Facebook account. That allows Facebook to correlate a user's usage of Driiveme with the corresponding user's Facebook account. Driiveme as the provider of Driiveme does not have any knowledge of the future data usage by Facebook. Users can find more information on that issue in the privacy policy of Facebook at http://www.facebook.com/about/privacy/.

Users have to actively enable the Facebook connection in their Settings in order to be able to share information on Facebook and invite friends via Facebook. If users do not want Facebook to gain information on their Driiveme usage or if they don't want Driiveme to gain information about them via Facebook, they should leave the Facebook integration disabled. Once enabled, users can disable the Facebook connection again in their Settings at any time.

By activating the Facebook connection in their settings, the user explicitly consents to the information exchange described in this section. Any data arising from the use of Facebook will be located outside the EEA and subject to transmissions between the EEA and elsewhere.

10. Controlling Your Personal Information

10.1 Your Rights

Data Protection legislation gives you certain rights to control of your personal data. These are:

- 1. The right to be informed.
- 2. The right of access.
- 3. The right to rectification.
- 4. The right to erasure.
- 5. The right to restrict processing.
- 6. The right to data portability.
- 7. The right to object.
- 8. Rights in relation to automated decision making and profiling.

Further information on these rights can obtained from the UK Information Commissioner whose website is at <u>www.ico.org.uk</u>.

We fulfil these rights in the ways set out below, however we do reserve the right to continue to process your data or refuse your requests as set out in relevant legislation.

10.2 Privacy Policy

By detailing the information we gather and process in this Privacy Policy:

10.2.1Cookies

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer.

10.2.2Consent

You have control over the information you supply to us whether by:

- i) Consent gained from your continuing to browse our site, or
- ii) Your explicit consent by completing a contact form whether for requesting to receive further information about our services, or
- iii) Your explicit consent to further processing to send you ongoing marketing material concerning our services, or
- iv) By you contacting us about your personal information as described below.

Consent for the direct purpose for which you supply your data will be inferred from the situation in which you give this information. If you choose to withdraw your consent to the processing of your personal information at any time, you should inform us in writing using our contact details below.

10.3 Data Requests

You may request details of personal information which we hold about you, under the relevant Data Protection legislation in force at the time (a "Data Subject Access Request"). If you would like a copy of the information held about you, please email us. We reserve the right to charge you a fee or refuse your request where a request is manifestly unfounded or excessive, particularly if it is repetitive.

10.4 Data Correction, Complaints & Deletions

If you believe that any information we are processing about you falls into the following categories, please email us as soon as possible. We will promptly correct or delete any information found to be incorrect or no longer necessary and deal with you or your complaint:

- Is incorrect or incomplete, (perhaps for example because you have seen you name spelt incorrectly or someone else has received a call meant for you), or
- Is being mis-used (perhaps for example a company you don't know has contacted you using information you supplied to us and you didn't agree to this), or
- Should no longer be processed by us (perhaps for example because you no longer wish to be contacted),

These rights to object are subject to our right to consider whether we are permitted or required to continue the processing, in which event we will inform you of our reasons. For example, where we are required to hold historical records for legal reasons.

We ask that if you have any concern you first approach us via our contact email address or telephone number as shown below.

Should you wish to take the matter further, we ask that you contact us in writing setting out you concerns in detail to enable us to provide you with an effective response.

10.5 The Right to be Forgotten

You should contact us with details of your data to be deleted, should you wish to be forgotten. The right is subject to our being able to continue with certain processing relating to compelling reasons, such as performing statutory obligations.

10.6 Automated Decisions

We do not carry our automated decision making using your personal data.

10.7 Lawful Disclosure by Us

Please note that you hereby provide your consent for us to, and in any case we may be required to, disclose your data to lawful authorities for the prevention of crime or regulatory purposes, or a court as such court requires. In some circumstances we may not be permitted to inform you that we have made such a disclosure.

11. Contact Details

Driiveme is the trading name of Driiveme Limited whose registered office is at:

Driiveme Limited Unit 11, Flamingo Court Crampton Street London SE17 3BF United Kingdom.

Our contact email address is hello@driiveme.co.uk. Our postal address for written correspondence is the same as the above-mentioned registered office address.

Any Data Subject Access Request should be made to hello@driiveme.co.uk.