

General Data Protection Regulation Policy

Introduction

Promotive Chauffeurs Ltd is fully committed to protecting the personal data of customers, employees, suppliers and other stakeholders in accordance with the requirements of the European Union Data Protection Regulations 2016.

Whose Data we hold

At Promotive Chauffeurs Ltd, to enable our company to carry out the processes required to trade, we hold personal data.

Through our secure systems, we may hold data on the following individuals

- ❖ Clients
- ❖ Prospects
- ❖ Staff
- ❖ Suppliers

The above list is not exhaustive and may be amended to during the review process. A detailed list can be found within our Data Flow Chart

What Data we hold

In order for us to provide our services and to manage those services we will ask prospective and existing customers to share personal information with us. The circumstances in which we use the information, the reasons why we ask for it and details of how we will use it are explained within this policy. The information we collect about customers varies depending on particular circumstances and requirements and may include, for example:

- ❖ general information about the customer as name, address, contact and details
- ❖ financial details, such as bank account and card details;
- ❖ sensitive personal information, such as staff health conditions
- ❖ information about the customers website such as the IP address, which is a unique number identifying the computer.
- ❖ If our customers have provided information to us about someone else, we will confirm to them that that they have the consent of these individuals to share their personal information with us.

Where the data is stored

All data is stored within a locked filing cabinet within a secure building or in a password controlled portable computer.

- ❖ The personal information we and our carefully selected third parties collect will not be transferred to, stored and processed outside the European Economic Area (EEA).

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What the data is used for and who is it shared with

We and/or our carefully selected third parties may collect and use personal information under the following circumstances or for the following reasons:

a) To provide services relating to executive Chauffeur Services such as

- ❖ When we report a road traffic accident to our insurance company
- ❖ The collection and use of information such as the customers name & address,

b) Where we have a justifiable reason, such as:

- ❖ keeping records about the customer and our correspondence with them as well as the current and past Journeys. This is so that we can appropriately and effectively manage our relationship with the customer as well as satisfy any legal and regulatory obligations we may have to keep such records.
- ❖ preventing and detecting fraud, financial crime and anti money-laundering. We may use the personal information to prevent fraud and in doing so may:
- ❖ collect personal information about the customers from databases as described within our Privacy Notice and from publicly available sources (such as social media and networking sites);
- ❖ (for Motor Insurance only) share it with the Motor Insurance Database (MID) which may be used to establish whether a driver is insured to drive a vehicle and/or for preventing or detecting crime. If involved in an accident in the UK or abroad, the MID may be searched to obtain relevant policy information. Further information can be found out at www.mib.org.uk;
- ❖ The Police in connection with any motor accident or other enquiry
- ❖ Transport for London in connection with licencing and other related enquires.
- ❖ we may anonymise and combine the information the customer has given us to understand more about them, create new products and services as well as helping us with our marketing.

c) Where we have been given permission:

- ❖ to use customer's sensitive personal information in order to provide a customer with a quotation, price and meet their travel needs.
- ❖ We may share information with third parties in order to carry out the above activities.

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The Legal Bases for Processing

All data that is processed within Promotive Chauffeurs London Ltd is done so on a necessary basis in order to service customer requests.

We will legally process the data on a **Legitimate Interest Basis** for the sole purpose of providing the customer with details of the executive chauffeur services that we provide on their behalf.

We will contact them in order to communicate our services which we believe may be of interest to them and which relate to customer's general needs. This activity is only applicable to Promotive Chauffeurs London Ltd.

There may be times when we will require the permission to provide information about such services as:

- ❖ where the service is not similar to those that we currently provide to the customer but we believe they may be interested in it; or
- ❖ when the customer has opted out of us sending details of or contacting them in relation to the services we offer.

We may communicate with them by post, email, SMS, telephone and/or digital methods such as social media and online advertising unless they have told us a customer do not want us to.

We may look to develop and enhance the information we hold about customers with the aim of improving our service offerings and how we communicate these to them, where they have given us permission or where we believe that our products and service may be of interest. We may collect personal information about them or share the information with carefully selected third party databases which, when combined with the personal information a customer has given us, helps us to target and tailor communications which we believe may be more relevant. Details of these Third Parties can be found on our Data Flow Chart within this policy.

Privacy Notices

A customer can request a paper copy of this from our office by contacting our Data Controller.

A copy should be read together with this GDPR policy.

Data Retention

We will keep customer's information only for as long as is reasonably necessary for the purposes set out in our privacy notice and to fulfil our legal and regulatory obligations. For further information about how long we will keep customer's information, please contact the Data Controller using the contact details outlined in section 1 of this notice.

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Subject Access Requests, Amendments to Data and Data Deletion

Subject Access Requests

We will review that data that we hold for customers on an annual basis.

Should a customer require access to the information that we hold, customers must contact our data controller, Giles Horn. All requests must be made in writing or by email to giles@pro-motive.com

We are unable to release information to which would lead to a data breach of another individual.

The release of information will be processed without charge. However, should we find that the request for information is manifestly, unfounded or excessive we reserve the right to issue a charge for this information or refuse to provide the information requested.

Amendments to Data

The data that we hold will come from information we have obtained directly from the customer with their consent or available in the public domain. The companies that we contact for information are shown on our data flow chart within this policy. The customer can amend the information that has been given by them to Promotive Chauffeurs London Ltd by speaking to our employees.

Should they wish to amend the information that we have obtained from the sources detailed our data flow chart, they would need to contact these companies directly to amend their data. For example, if our Credit Checking source has an incorrect address, we would be unable to amend this and the request to amend the data should be directed to them.

Data Deletion

The information that we hold within our client files can be deleted, at their request, by contacting our Data Controller.

This request should be made in writing either by letter or email. All personal information will be removed from the paperwork and it will be scanned to our system. The contents of the file will be deleted completely from our systems. The deletion letter will sit within customer's file, which notes only the insured name. This will allow us to keep a note of the deletion however no personal information will be sorted.

With regards to documentation, in certain circumstances we may be required to retain information to allow Promotive Chauffeurs London Ltd to be able to fulfil our legal requirements. In this instance we will notify the customer of the information that we may require to retain and why this is required.

All request for data access, amendment or deletion will be dealt with within 28 days as required by the ICO (Information Commissioners Office).

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Data Controller

Our Data Controller is Giles Horne and can be contacted on the details below;

By Post: Giles Horne
Pro-Motive Chauffeurs London Ltd
Unit 604 Depna House
2 Portal Way
London
W3 6RT

Email: giles@pro-motive.com

Telephone: 020 8965 0800

Data Breaches

A Data Breach, as defined by the Information Commissioners Office (ICO), is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Any Data Breach will be reported to Giles Horne, Data Controller, upon discovery. Steps will then be taken to establish the below;

- ❖ The categories of data that have been breached
- ❖ The individuals that may have been affected
- ❖ A description of how the breach may affect the individuals
- ❖ The details of our Data Controller
- ❖ Details on how the breach has been rectified or the steps that we plan to take to rectify.

Promotive Chauffeurs London Ltd will report any breach to the ICO where as a result of the above any actions could lead to an individual's rights and/or freedoms being affected. All breaches will be reported to the ICO within 72 hours of the discovery of the breach.

A log is kept internally of any data breaches, reportable to the ICO or otherwise, which will be made available to the ICO on request for audit purposes. Where we have not reported a breach, an explanation will be kept as to why this decision has been made.

Where a breach is considered 'high risk' to a person's rights and freedoms, we will notify the individuals concerned without undue delay.

Comments and Feedback

Promotive Chauffeurs London Ltd welcomes comments and feedback with regards to their policies from employees. Please direct any comments to giles@pro-motive.com

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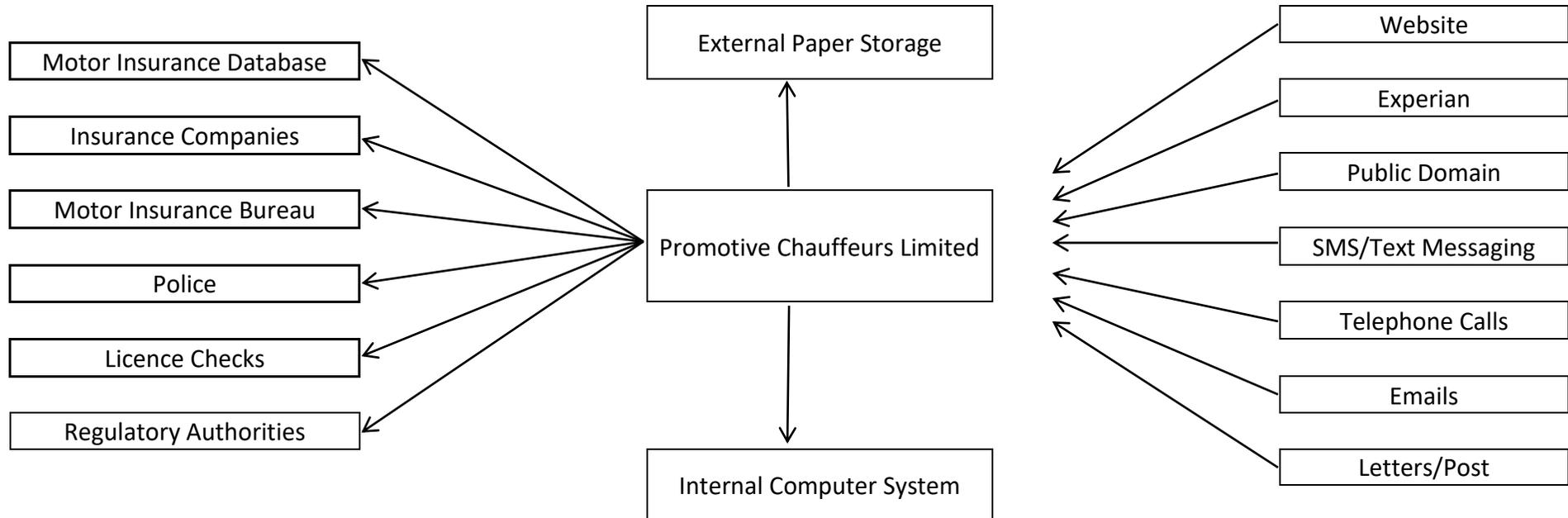
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Data Flow Map



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Privacy Notice

By submitting any information about a customer and/or others (in which case a customer will obtain express consent from those individuals affected and will inform them of how their information is being used) within this Website, a customer and they consent to its use as set out in this Privacy Policy.

This privacy policy covers all websites operated by Promotive Chauffeurs London Ltd . Any other websites that may be linked to or by our website(s) will be subject to their own policies which may differ from ours. A customer should carefully read the privacy policies of these websites before submitting any personal information.

1. Who we are and our approach to customer's privacy

If a customer wants to know more about Promotive Chauffeurs London Ltd go to www.pro-motive.com

The privacy and security of customer's personal information is very important to us so we want to assure a customer that customer's information will be properly managed and protected whilst in our hands. Please read this notice carefully as it explains how we and/or carefully selected third parties we work with, collect and use customer's personal information.

A customer can ask for further information about our use of customer's personal information or complain about its use, by contacting our Data Controller at: Promotive Chauffeurs London Ltd, Unit 604 Dephna House, 2 Portal Way, Ealing, London W3 6RT

2. What information do we collect and where do we get it from?

In order for us to provide our services to a customer and to manage those services we will ask a customer to share customer's personal information with us. The circumstances in which we use customer's information, the reasons why we ask for it and details of how we will use it are explained in section 3 of this notice. The information we collect about a customer varies depending on customer's particular circumstances and requirements and may include, for example:

- general information about a customer such as customer's name, address & contact details
- information about what travel details and companions;
- financial details, such as bank account and card details;
- sensitive personal information, such as customer's health or specific travel requirements.
- information about customer's use of our website such as customer's IP address, which is a unique number identifying customer's computer.

We may collect personal information from the following sources:

- publicly available sources of information, such as social media and networking sites;

If a customer has provided information to us about someone else, a customer would have confirmed that a customer has the consent of these individuals to share their personal information with us. A customer should share this privacy notice with all individuals whose personal information a customer has shared with us as it may also apply to them.

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3. Why do we collect this information and how will we use it?

We and/or our carefully selected third parties may collect and use customer's personal information under the following circumstances or for the following reasons:

a) To provide services relating to executive Chauffeur Services such as

- ❖ When we report a road traffic accident to our insurance company
- ❖ The collection and use of information such as the customers name & address,

b) Where we have a justifiable reason, such as:

- ❖ keeping records about the customer and our correspondence with them as well as the current and past Journeys. This is so that we can appropriately and effectively manage our relationship with the customer as well as satisfy any legal and regulatory obligations we may have to keep such records.
- ❖ preventing and detecting fraud, financial crime and anti money-laundering. We may use the personal information to prevent fraud and in doing so may:
- ❖ collect personal information about the customers from databases as described within our Privacy Notice and from publicly available sources (such as social media and networking sites);
- ❖ The Police in connection with any motor accident or other enquiry
- ❖ Transport for London in connection with licencing and other related enquires.
- ❖ we may anonymise and combine the information the customer has given us to understand more about them, create new products and services as well as helping us with our marketing.

c) A customer has given us customer's permission:

- to use customer's sensitive personal information in order to provide a customer with a price. Where a customer has provided sensitive personal information about someone connected to a customer, for example named drivers, a customer would have confirmed that a customer have their permission to share this information with us;

d) For details about how we use customer's information to communicate our similar services, customer's use of our websites and email communications, please refer to section 4 of this notice.

We may share customer's information with third parties in order to carry out the above activities. For further details about who we might share customer's information with, please refer to section 5 of this notice.

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4. How we communicate with a customer about our similar products and services and information about customer's use of our websites

We will contact a customer, in order to communicate our services to a customer which we believe may be of interest to a customer and which relate to customer's general transport needs. **This activity is only applicable to Pro-Motive Chauffeurs Ltd.**

There may be times when we will require customer's permission to provide information about services to a customer, such as:

- where the service is not similar to those that we currently provide to a customer but we believe a customer may be interested in it; or
- when a customer has opted out of us sending details of or contacting a customer in relation to the services we offer.

We may communicate with a customer by post, email, SMS, telephone and/or digital methods such as social media and online advertising, unless a customer has told us a customer do not want us to. Where a customer has used our services in the past, we will keep a customer informed about our products and services for a period of up to 3 years if contacting a customer by telephone or for up to 5 years if contacting a customer via other means.

We may look to develop and enhance the information we hold about a customer with the aim of improving our product and service offerings and how we communicate these to a customer, where a customer has given us permission or where we believe that our products and service may be of interest to a customer. We may collect personal information about a customer or share customer's information with carefully selected third party databases which, when combined with the personal information a customer has given us, helps us to target and tailor communications which we believe may be more relevant to a customer. For further information about the third party databases we use, please contact the Data Protection Officer using the details set out in section 1 of this notice.

We may also contact a customer if a customer fails to complete an online quotation to see if we can offer a customer any help with this. A customer can ask us to stop contacting a customer about our products and services by:

- email – Giles@pro-motive.com
- post – Promotive Chauffeurs Ltd Unit 604 Dephna House Portal Way London Ealing. W3 6RT

Use of customer's personal information when using our websites and email communications:

When a customer visit one of our websites we may collect information from a customer such as, customer's email address, IP address and other online identifiers. This helps us to track unique visits and monitor patterns of customer website traffic, such as who visits and why they visit. We use third parties to collate IP addresses to help us understand our Internet traffic data and data regarding customer's browser type and computer.

We may use cookies and/or pixel tags on some pages of our website. A cookie is a small text file sent to customer's computer. A pixel tag is an invisible tag placed on certain pages of our website but not on customer's computer. Pixel tags usually work together with cookies to assist us to provide a customer with a more tailored service. We also use cookies and pixel tags in our email communication to personalise the email and track whether the email has been opened and whether the recipient has used any website links contained in the email communication (**this is only applicable to Promotive's use of cookies and/or pixel tags**). This allows us to monitor and improve our email communications and website. Useful information about cookies, including how to remove them, can be found at: <http://allaboutcookies.org>.

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Internet browsers normally accept cookies by default, although it is possible to set a browser to reject cookies. We will ask customer's permission before using any cookie that is not essential to the email or the use of the website. However, refusing to accept cookies may restrict customer's use of our website and/or delay or affect the way in which our website operates. [Further information about cookies.](#)

The open nature of the internet is such that data may flow over networks without security measures, and may be accessed and used by people other than those for whom the data is intended. Whilst this is outside of our control, we do take the protection of customer's information very seriously and aim to apply appropriate levels of security at all times.

5. Who might we share customer's information with?

We may share customer's personal information with:

- organisations that have a specific role laid out in law such as statutory bodies, regulatory authorities and other authorised bodies;
- other organisations where we have a duty to or are permitted to disclose customer's personal information by law (e.g. if we received a valid request from the police or other third party organisation in the interest of preventing and detecting crime);
- credit reference agencies to check customer's credit history. This check will be recorded on customer's credit reference file without affecting customer's ability to apply for credit or other financial products;
- third parties we use to recover money a customer may owe us or to whom we may sell customer's debt;
- another company, if our business or part of it is bought or taken over by that company to ensure customer's travel requirements can continue to be serviced or as part of preliminary discussions with that company about a possible sale or take over;
- other companies when we are trialling their products and services which we consider may improve our services to a customer or our business processes;
- other third parties if a customer have given us customer's permission to do so or there is sufficient reason to believe they are acting on customer's behalf.

Unless required by law, we would never share customer's personal data without the appropriate and necessary care and safeguards being in place.

6. How long will we keep customer's information?

We will keep customer's information only for as long as is reasonably necessary for the purposes set out in this privacy notice and to fulfil our legal and regulatory obligations. For further information about how long we will keep customer's information, please contact the Data Controller using the contact details outlined in section 1 of this notice.

7. Use and storage of customer's information overseas

The personal information we and our carefully selected third parties collect from a customer may be transferred to, stored and processed outside the European Economic Area (EEA). We or our service providers may use cloud based computer systems (i.e. network of remote servers hosted on the internet which process and store customer's information) to which foreign law enforcement agencies may have the power to require access. We will not transfer customer's information outside the EEA unless it was to a country our information regulator has assessed as having adequate data protection laws, or we had taken all reasonable steps to ensure the firm has the necessary privacy and security controls in place to protect customer's information as if it were in the EEA. Our contracts with these firms will detail the necessary requirements to ensure customer's information is protected. We will assess these firm's security arrangements from time to time ensuring that they are only using customer's information as agreed. Should a customer wish to obtain further information about the safeguards we have in place, please contact the Data Protection Officer whose contact details are outlined in section 1 of this notice.

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8. How will we deal with others acting on customer's behalf?

To help manage customer's transportation requirements we will deal with individuals a customer nominates, including third parties we reasonably believe to be acting on customer's behalf provided they are able to answer our security questions. However, for customer's protection, we will need to speak to a customer directly, customer's legal representative, someone a customer has nominated and given us permission to discuss customer's personal details, or power of attorney should a customer require changes to the services provided by Promotive.

9. Customer's rights

A customer has a number of rights concerning the personal information we use, these include the right to:

- ask for access to and a copy of customer's personal information;
- ask us to correct or delete the personal information;
- ask us to restrict or object to the use of customer's personal information at any time;
- where a customer has previously given us customer's permission to use customer's personal information, withdraw that permission. Where customer's permission is withdrawn, customer's previous consent will remain valid in respect of our use of customer's information prior to the date a customer withdrew it, or if any marketing material has been sent prior to a customer advising that a customer do not wish us to contact a customer again;
- complain to the Information Commissioner's Office at any time if a customer object to the way we use customer's personal information. For more information please go to www.ico.org.uk;
- object to an automated decision including profiling. For details about the profiling activity we undertake, please refer to section 3 of this notice.
- A right "to be forgotten". This means the customer can ask for the information we hold on them to be deleted from our records but this will mean we will be unable to continue the customer's travel arrangements.

To discuss customer's rights or make a request, please contact the Data Controller using the details outlined in section 1 of this notice.

Please note that in some cases even when a customer makes a request concerning customer's personal information, we may not be required, or may not be able, to honour it as this may result in us not being able to fulfil our legal and regulatory obligations or there is a minimum statutory period of time for which we have to keep a customer information. If this is the case, then we will let a customer know our reasons.

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