

VEEZU ASSIST LIMITED – DRIVER PRIVACY POLICY

1. INTRODUCTION

- 1.1. This privacy policy ("**Policy**") relates to the "Veezu Assist" services we provide to our drivers and those who may deal with us when there has been an accident involving one of our drivers (the "**Services**").
- 1.2. You should read this Policy carefully as it contains important information about how we will use your Information (as defined below in clause 4.1).
- 1.3. We may update this Policy from time to time in accordance with clause 14 below. This Policy was last updated on 30 June 2018.

2. ABOUT

- 2.1. The terms "**Veezu Assist**" or "**us**" or "**we**" refer to Veezu Assist Limited, the provider of the Services. We are a company registered in England and Wales under company number 09215592 whose registered office is at Livingstone House Langstone Business Village, Langstone Park, Langstone, Newport, Gwent, NP18 2LH. The term "**you**" refers to the individual accessing and/or submitting Information to us for the use of our Services.
- 2.2. We, as the Data Controller, can be contacted via the Veezu compliance team via email on compliance@veezu.co.uk or by calling 01633 415710.

3. DATA PROTECTION

- 3.1. References in this Policy to:
 - 3.1.1. "**Privacy and Data Protection Requirements**" means: the Data Protection Act 1998 (until repealed) ("**DPA**"), the Data Protection Directive (95/46/EC) (until repealed) and, from 25 May 2018, the General Data Protection Regulation 2016/679 ("**GDPR**") or any equivalent provision which may replace the GDPR following the formal political separation of the United Kingdom from the European Union; the Regulation of Investigatory Powers Act 2000; the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (SI 2000/2699); the Electronic Communications Data Protection Directive (2002/58/EC); the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2426/2003); and all applicable laws and regulations which may be in force from time to time relating to the processing of Personal Data and privacy, including where applicable the guidance and codes of practice issued by the Information Commissioner or any other supervisory authority, and the equivalent of any of the foregoing in any relevant jurisdiction; and
 - 3.1.2. "**Personal Data**", "**Data Controller**" and "**Data Processor**" and "**processing**" shall have the meanings given to them in the DPA or, from 25 May 2018, the GDPR.
- 3.2. As a Data Controller we are responsible for, and control the processing of your Personal Data in accordance with applicable Privacy and Data Protection Requirements. "Personal Data" has a legal definition but, in brief, it refers to information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. Such information must be protected in accordance with applicable Privacy and Data Protection Requirements.

4. INFORMATION WE MAY COLLECT ABOUT YOU

- 4.1. When you use the Services and/or when you otherwise deal with us as a driver we may collect the following information about you ("**Information**");
 - 4.1.1. personal information including first and last name, date of birth, NI number;

- 4.1.2. contact information including current residential address, primary email address and/or primary phone number;
 - 4.1.3. driver documents, including but not limited to, driving licence details (including photograph), insurance details, driving history, as well as display registration and App Name for health and safety and Council ID and relevant medical information;
 - 4.1.4. details of any medical conditions that may be relevant to the accident or your driving history;
 - 4.1.5. details of any enquiries made by you to us, together with details relating to subsequent correspondence (if applicable).
- 4.2. We may receive information about you from a subsidiary company part of the Veezu Holdings Group, a list of which can be found www.veezu.co.uk or other sources such as third parties reporting an accident. If so, we will add this information to the Information we already hold about you in order to help us carry out the activities listed below.

5. HOW LONG WE KEEP YOUR INFORMATION

- 5.1. We keep the Information for a period of 7 years unless we are required to keep it for longer (for example due to a court order or other legal obligation).

6. LEGAL BASIS FOR PROCESSING YOUR INFORMATION

- 6.1. From 25 May 2018, under applicable Privacy and Data Protection Requirements we may only process your Information if we have a "legal basis" (i.e. a legally permitted reason) for doing so. For the purposes of this Policy, our legal basis for processing your Information is set out in the table below.

The reason we process your Information	Our legal basis for doing so
<p>To provide you with accident management and advice services. This may include the provision of a replacement vehicle for your use</p> <p>To keep you updated about changes to the Services and the progress of any claim</p> <p>To take statements from you and obtain information from you that we need to be able to progress the claim</p> <p>To keep you updated about the work we are doing for you</p> <p>To liaise with third parties such as insurance brokers, police, third party witnesses in respect of the claim.</p>	<p>This is necessary for the performance of the contract between us, and Information is processed to enable us to provide services to you.</p> <p>Outside of this, this processing is necessary for the legitimate interests that we pursue, subject to your rights in clause 13.</p> <p>Please note that where we need to process information regarding your medical conditions or history we are doing so with your explicit consent and because it is necessary for the establishment or defence of legal claims.</p>
<p>To investigate and address any comments, queries or complaints made by you regarding our Services, and any similar or related comments, queries or complaints from other user.</p>	<p>This is necessary for the legitimate business interests we pursue subject to your right under clause 13.</p>

Where required by (but not limited to) any request or order from law enforcement agencies and/or HMRC in connection with any investigation to help prevent unlawful activity.	This is necessary to comply with our legal obligations, including obligations relating to the protection of Personal Data.
To contact you for marketing purposes;	<p>Unless you have told us not to, as you are using or have previously used our services, we will send you marketing information by email, phone, SMS and/or post relating to products and services that we think will be of interest to you.</p> <p>We send out marketing communications based on our legitimate interests of providing a professional services business and keeping people informed about the services we offer.</p> <p>When we collect your data we will give you the opportunity to let us know that you do not want us to send you marketing information.</p> <p>If were originally happy to receive this information but have since changed your mind then you can unsubscribe at any time by contacting compliance@veezu.co.uk</p>
To disclose your information to selected third parties as permitted by this Policy (see clause 7 below).	This is necessary for the legitimate business interests we pursue subject to your rights under clause 12.

7. DISCLOSURE OF YOUR INFORMATION

- 7.1. We may disclose your Information (including Personal Data):
- 7.1.1. to other companies within our group of companies (which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006);
 - 7.1.2. to our business partners, service providers or third-party contractors to enable them to undertake services for us and/or on our behalf (and we will ensure they have appropriate measures in place to protect your Information);
 - 7.1.3. to any prospective buyer or seller (and their representatives) in the event that we sell or buy any business or assets;
 - 7.1.4. if we are under a duty to disclose or share Personal Data in order to comply with any legal obligation, including (but not limited to) any request or order from law enforcement agencies and/or HMRC in connection with any investigation to help prevent unlawful activity and/or any request from solicitors in relation to the claim; and
 - 7.1.5. to other third parties if you have specifically consented to us doing so.
- 7.2. We may disclose aggregated, anonymous information (i.e. information from which you cannot be personally identified), or insights based on such anonymous information, to selected third parties. In such circumstances we do not disclose any information which can identify you personally.
- 7.3. If our whole business is sold or integrated with another business your Information may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

8. KEEPING YOUR INFORMATION SECURE

- 8.1. We will use technical and organisational measures in accordance with BS EN ISO/IEC 27001 Information Security Management to safeguard your Information, including the use of data encryption to transmit data securely.
- 8.2. While we will use all reasonable efforts to safeguard your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any Information that is transferred from you or to you via the internet.

9. MONITORING

- 9.1 We may monitor and record communications with you (such as telephone conversations and emails) for the purposes of provision of services, quality assurance, training, fraud prevention and compliance purposes. Any information that we receive through such monitoring and communication will be added to the information we already hold about you and may also be used for the purposes listed in clause 6 above.

10. OVERSEAS TRANSFERS

- 10.1. From time to time we may need to transfer your Information to countries outside the European Economic Area, which comprises the EU member states plus Norway, Iceland and Liechtenstein ("EEA").
- 10.2. Such countries may not have similar protections in place regarding protection and use of your data as those set out in this Policy. Therefore, if we do transfer your Information to countries outside the EEA we will take reasonable steps in accordance with applicable Privacy and Data Protection Requirements to ensure adequate protections are in place to ensure the security of your Information.
- 10.3. By submitting your Information to us in accordance with this Policy you consent to these transfers for the purposes specified in this Policy.

11. INFORMATION ABOUT OTHER INDIVIDUALS

- 11.1. If you give us information on behalf of a third party, you confirm that the third party has appointed you to act on his/her/their behalf and has agreed that you can: give consent on his/her/their behalf to the processing of his/her/their Information; receive on his/her/their behalf any data protection notices; and give consent to the transfer of his/her/their Information abroad (if applicable).

12. YOUR RIGHTS

- 12.1. If you are an individual, this section sets out your legal rights in respect of any of your Personal Data that we are holding and/or processing. If you wish to exercise any of your legal rights you should put your request in writing to us (using our contact details in clause 16 below) giving us enough information to identify you and respond to your request.
- 12.2. You have the right to request access to information about Personal Data that we may hold and/or process about you, including: whether or not we are holding and/or processing your Personal Information; the extent of the Personal Data we are holding; and the purposes and extent of the processing.
- 12.3. You have the right to have any inaccurate information we hold about you be corrected and/or updated. If any of the Information that you have provided changes, or if you become aware of any inaccuracies in such Information, please let us know in writing giving us enough information deal with the change or correction.

- 12.4. You have the right in certain circumstances to request that we delete all Personal Data we hold about you (the 'right of erasure'). Please note that this right of erasure is not available in all circumstances, for example where we need to retain the Personal Data for legal compliance purposes. If this is the case, we will let you know.
- 12.5. You have the right in certain circumstances to request that we restrict the processing of your Personal Data, for example where the Personal Data is inaccurate or where you have objected to the processing (see clause 12.7 below).
- 12.6. You have the right to request a copy of the Personal Data we hold about you and to have it provided in a structured format suitable for you to be able to transfer it to a different data controller (the 'right to data portability'). Please note that the right to data portability is only available in some circumstances, for example where the processing is carried out by automated means. If you request the right to data portability and it is not available to you, we will let you know.
- 12.7. You have the right in certain circumstances to object to the processing of your Personal Data. If so, we shall stop processing your Personal Data unless we can demonstrate sufficient and compelling legitimate grounds for continuing the processing which override your own interests. If, as a result of your circumstances, you do not have the right to object to such processing then we will let you know.
- 12.8. You have the right in certain circumstances not to be subject to a decision based solely on automated processing, for example where a computer algorithm (rather than a person) makes decisions which affect your contractual rights. Please note that this right is not available in all circumstances. If you request this right and it is not available to you, we will let you know.
- 12.9. You have the right to object to direct marketing, for which see clause 6 above.

13. COMPLAINTS

- 13.1. If you have any concerns about how we collect or process your Information then you have the right to lodge a complaint with a supervisory authority, which for the UK is the UK Information Commissioner's Office ("ICO"). Complaints can be submitted to the ICO through the ICO helpline by calling 0303 123 1113. Further information about reporting concerns to the ICO is available at <https://ico.org.uk/concerns/>

14. CHANGES TO THIS POLICY

- 14.1. We keep this Policy under regular review and may change it from time to time. If we change this Policy we will post the changes on this page, and place notices on other pages of the Website as applicable, so that you may be aware of the Information we collect and how we use it at all times. You are responsible for ensuring that you are aware of the most recent version this Policy as it will apply each time you use our Services.

15. ACCESSIBILITY

- 15.1. This Policy aims to provide you with all relevant details about how we process your Information in a concise, transparent, intelligible and easily accessible form, using clear and plain language. If you have any difficulty in reading or understanding this Policy, or if you would like this Policy in another format (for example audio, large print or braille), please get in touch with us.

16. CONTACT

- 16.1. We welcome your feedback and questions on this Policy. If you wish to contact us, please email us at compliance@veezu.co.uk or call on 01633 415710.