

## **Our GDPR Privacy Statement.**

### **1. Explaining the legal bases we are relying on.**

**4 Hire Services** (otherwise known throughout this Privacy statement document as 4 Hire) and The GDPR law on data protection sets out a number of different reasons our company may collect and process your personal data, including:

#### **Consent**

We only specifically ask for consent on our website and to place cookies in your browser to enable functionality of the **4 Hire** site to work in all situations, we do not collect data for marketing purposes or have an Email list for marketing or send email marketing ever! When collecting your personal data, we'll always make clear to you which data is necessary. We won't ask what you are wearing because that's just weird!

#### **Our contractual obligations**

In some instances, we need your personal data to comply with our contractual obligations. For example, if you book a journey with us, we need your address or pick up/port/airport/rail flight and time details to action your journey and we also may need to pass your details to an employee to action your journey.

#### **Our Legal compliance**

We may be legally bound to collect and process your data. For example and specifically under **The Local Government (miscellaneous provisions) Act 1976, Part II – Section 45, The Town Police Clauses Act – Section 68 and The Public Health Act 1875 – Section 171** or if someone is involved in any criminal activity or fraud affecting you and 4 Hire we will need to pass details to law enforcement.

#### **Our Legitimate interest**

We will require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we may use your journey history and billing preferences to offer an account or alternative ways to pay.

## **2. How and where we collect your personal data.**

There are a number of ways in which we may collect information about you:

When you visit our website [www.4hiretaxi.com](http://www.4hiretaxi.com) to buy our public transportation products.

When you book additional or return journeys in our vehicles or book via our website or over the phone or email.

When you call our staff we hand copy your details into our day sheet or diary or fill in a website contact form.

When you call our main number **01822 618440** we currently don't record calls, however we may update at any time and record all calls and access them online only to reconfirm important journey details that may have been misconstrued. Or to access important journey information we couldn't write down due a vehicle being in motion. We wouldn't use the recordings for training purposes because it's not rocket science! If we start recording calls, we will delete all recordings after six months. Within that time, upon request, we can delete any recorded call, you will need to provide proof of that you are the originator of the call.

When you comment about or review our products on Facebook or Twitter or any other websites that generalise our services as a block area or as a list of suppliers such as Google or Bing or other search aggregate engines.

When you fill in any forms online.

When you engage with us on social media

When you have given a third party permission to share information they hold about you with 4 Hire.

When you ride in one of our vehicles which may have Dashcam systems that may record your image or voice.

## **3. The types of personal data we collect from you.**

The personal data we collect will include your name, billing preference/pick up and drop off address, Time, email address, telephone number, notes from conversations we have with you, your IP address, which websites you came from when visiting ours, which of our web pages you visit, any search terms you entered on our website, information gathered by cookies in your web browser, any comments or pleasant journey reviews (hopefully!) any information that you may have told us that suggests your preferences (e.g. you may have told us that you are not a good traveller or save a child seat for reinstallation for a return journey in

the future) and your social media username if you communicate with us.

As some of our vehicles have Dashcams installed, your image may be captured from outside of the vehicle only. There is no internal image capture technology inside our vehicles.

When you book a journey and pay by card, we do not hold your card details, it is collected by Stripe, our third party payment processors, via our Taxi Hub system, who use secure online capture and processing methods.

Taxi Hub the dashboard we use or the mobile apps we use or card machines we use do not capture or save card information. Therefore we will always re-enter the card details you provide us with as if it's the first time everytime.

#### **4. The how and the why we use your personal data.**

When you engage with us, we want to give you the best possible experience. By collecting data about you, it allows us to offer a great and tailored service.

We use your data so we can fulfil our contractual obligations to you to enable us to complete your journeys to your satisfaction. The data privacy law allows this as part of our contractual obligations and legitimate business interest in understanding our customers and providing the highest levels of service. We will hold your data in our systems for as long as is necessary for each relevant activity or as long as is set out in any contract we have with you.

If you ever wish to change how we use your data, you can do so. Please refer to your rights over your data below.

If you choose not to share your personal data with us, or refuse certain contact permissions, we may not be able to provide our services you've booked us for.

#### **Here are some ways that we'll use your personal data and why:**

To process any journeys you make in person or via a call to 4 Hire on **01822 618440** or on our website. If we don't collect your personal data during a call or enquiry re a journey or service we provide, we won't be able to process and provide the service you have contacted 4 Hire about and to comply with our legal obligations e.g. your details are passed to our drivers or a trusted third party or company so that your Journey can be actioned. We

will keep your details for a reasonable period afterwards in order to fulfil any contractual obligation such as a refund or reroute or changes to any schedule.

Our Staff need to be able to respond to your queries, complaints or process a card refund (we cannot store card information) so we need your contact information in order to respond. We will keep a record of your information including notes on how we communicated with you and what was discussed. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with excellent customer service and it helps us improve this service to you.

We keep your personal data to maintain, update and safeguard your account and to protect our business and your account from fraud or other illegal activities. We'll also monitor your browsing activity in order to identify and resolve any problems and protect the integrity of our website. We'll do all of this as part of our legitimate interest.

When you place an order with us, your card details are collected by our third party payment processors Taxi hub / Stripe who use secure online capture and processing methods. This helps to protect you from fraud. We do this on the basis of our contractual and legitimate business interests.

In our vehicles we currently do not use CCTV this may change in the future however due to local legislative changes not under our control to protect our customers. We do operate CCTV at our premises to offer protection and security to staff and customers and to deter or capture criminal activity. We do this on the basis of our legitimate business interests.

If we discover any criminal activity or alleged criminal activity through our use of \*CCTV (currently not in use in our vehicles but forward facing dashcams are), fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim to protect our Rather Lovely customers we interact with from criminal shenanigans.

With your consent, we will use your personal data, preferences and details of your transactions to keep you informed about relevant products and tailored special offers, discounts, promotions, by email. Currently we do not market any promotions or marketing by email, but you can always opt out of hearing from us at any time.

To comply with our legal obligations, we will send you communications required by law or which are legally necessary e.g. significant updates to this Privacy Notice, legally required information relating to your Journeys. These messages are to inform you about changes to the service we provide you and will not include any promotional content and so do not require prior consent when sent by email or phone.

We may use your data to develop, test and improve our systems and products. We'll do this on the basis of our legitimate business interests. e.g. customer research to improve our service range, etc. To comply with our contractual or legal obligations to share data with law enforcement.

## **5. The importance of protection of your personal data**

The security of your personal data is very important to 4 Hire and we take a lot of care to handle and store it as best we can and in line with new legislation as we know it is important to you as well as us.

### **Here are some ways we secure your data:**

We recently upgraded and now use encrypted https links between our web server and your browser which means that all data passed between you and us cannot be intercepted.

We do not store your card details ourselves, but instead utilise Stripe who are a PCI compliant payment processing provider for all your journeys specifically over the phone or in one of our vehicles. All personal data is stored and encrypted in Secure Data Centres in the United Kingdom by Taxi Hub and password protected computers within our head office.

## **6. How long we assume your consent for mail shots etc will be.**

We do not send mailshots or anything by Mail postal delivery systems, if you do receive anything it is because you left something in one of our cars! We will assume if we ever get big and smart enough to use direct email or mail shot marketing it will be forever unless you tell us to stop in which case we will deny ever knowing you and delete you from our lives forever. (we might invoke the cake rule and offer that first though!)

## **7. The length of time we keep your personal data.**

We only keep your data for as long as is necessary for the purpose it was collected. After that period, your data, account and voice recordings are deleted or for example aggregated with other data to be used for business planning and analysis.

For instance, if you placed a Booking with us, we keep your details for no less than six months from the date of last entry under our legal obligations of **The Local Government (miscellaneous Provisions) Act 1976, Part II-Section 52 (2)** these records can at any time be perused by an authorised officer of our Licencing authority which is West Devon Borough Council under their powers of the 1976 act.

We however keep historical name and telephone numbers 'Hello John/Jane' is better than 'hello who's that?') We also keep account details and invoices for the purpose of legal accounting to enable our legitimate right to run as a business and provide our services.

## **8. Who we are sharing your personal data with and why**

At times we need to share your personal data with trusted third parties e.g. our Insurance companies in lieu of any transport accident, IT companies, and credit card processing services and so on. We only provide what they need and they cannot use your data for anything other than the purposes that they have your data for. Your data or account details are deleted if we stop services to you or secured by you for the purposes of transport by us.

We want your customer journey with 4 Hire physically and metaphysically a pleasant one, as such we use the following companies who will process your personal data as part of their contracts or terms and conditions with us:

**Google Analytics** - for monitoring the volume, details and actions of visitors to our websites

**Facebook** - for personalising ads into your news feeds (which you can opt out of on Facebook)

**Twitter** – For personalising and target you our services and journey offers (which you can opt out of on Twitter)

**Invoice2go** for invoicing and account set up and account management.

**Google Maps and Waze** software where we map your postcode to plan our vehicles route and to facilitate re routes to avoid delays to Journeys.

**TaxiHub & Stripe** - to send you transactional email messages and sms messages about your booked journeys card payment and confirmation. Customer records are stored primarily through Taxi Hub

**Apple & Microsoft** – We use secure hardware and software provided by Apple and Microsoft to store some contact details.

Our suppliers may change from time to time, we will endeavour to keep the list above accurate and as up-to-date as possible.

**Sharing your data with third parties for their own purposes:**

We will never sell or trade your contact details with any third parties, there are some instances where we may have to share your information based on our legal obligations.

If 4 Hire changes hands all personal data collected will remain as part of the changeover, if we sell as a going concern then your data will remain as part of the sale, if we cease trading your data will be disposed of correctly. We will not inform you directly of this however our website and social media pages would no doubt cover such an instance.

**for instance:**

Suspicious Fraudulent activity on our card payment online systems. If the police/government/local government ask us to disclose information we may be required to share your personal data with them, however we would assess this sort of request very carefully.

For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.

For further information please contact our Data Protection Officer Mr Christopher Panter

**9. Where your personal data may be processed.**

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA), such as Australia or the USA.

\*\*This is normally exclusive to visitors paying by cards from these countries

Protecting your data outside the EEA

\*\*The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA.

For example, this might be required in order to fulfil your order, process your payment details or provide support services. If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA by ensuring they are compliant with the EU-US Privacy Shield specification.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

## **10. Your rights over your personal data we hold.**

We do not market any of our services by email for the purposes of attracting new business through direct marketing, we may do local postcode business card drops and may use third party companies to facilitate this (we use our nans, wives and kids at the mo!)

### **What you can do you to stop the use of your personal data for direct marketing with 4 Hire?**

We do not direct market anything by email.  
Requesting access and making changes to your personal data  
You also have the right to access and rectify mistakes in the data we hold about you at any time.

These requests will be handled on a case by case basis and we estimate will be processed in no longer than two weeks depending on our legitimate business interests, legal and contractual obligations. Especially under the 1976 act mentioned above if we refuse your request we will explain to you the reason for our refusal.

You can also make any changes to your personal information eg; new address/email/telephone number we use to contact you to legitimise our services by emailing [info@4hiretaxi.com](mailto:info@4hiretaxi.com) or telephoning [01822618440](tel:01822618440)

In order to keep your information confidential, we will ask you to verify your identity before proceeding with any requests. If there is a third party acting on your behalf, we will check that they have your permission to act.

### **Our Legitimate Business Interests**

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

## **11. Contacting the Information Commissioners Office.**

If you are unhappy about our handling of your data and we have not actioned or responded to legitimate requests by you, we suggest sending a complaint to the Information Commissioner's Office by calling 0303 123 1113 or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

If you are based outside the UK, you have a right to lodge your complaint with the relevant data protection regulator in your country.

## **12. And Finally...**

We sincerely hope our Privacy Notice has been helpful in setting out the way we will handle your personal data and your rights to control it and our rights as a legitimate interest in using it to enable our business to function and supply the service we offer.

If you have any questions that haven't been covered, email us at:

**[info@4hiretaxi.com](mailto:info@4hiretaxi.com)**

Or write to us at **4 Hire Services** at Unit 15, Plymouth Road Industrial Estate, Tavistock, Devon. PL19 9QN. We **will** get better at this GDPR malarkey but assure you of our intent to try to be flipping good at it.

Statement Data Protection Officer for 4 Hire Services

Mr Christopher Panter

Last Updated : 4<sup>th</sup> June 2018

(thanks to TRECC Ltd)