

# **DRIVER PARTNER PRIVACY NOTICE**

# INTRODUCTION

Veezu Holdings Limited and its subsidiaries listed below 'Veezu' are committed to protecting the privacy and security of your Personal Information.

- A2B Radio Cars Limited
- Dragon Taxis Limited
- Pennock & Ivory Limited (t/a Amber Cars)
- V Cars Limited
- Veezu Limited (t/a Dragon Taxis Newport & Dragon Taxis Bridgend)
- Veezu Assist Limited

This privacy notice sets out how we process your Personal Information, as part of our business to business relationship with you as a self-employed Veezu Driver Partner.

It is important that you read this privacy notice so that you are aware of how and why we are using such information.

# DEFINITIONS

'Data Controller' means Veezu and we are responsible for deciding how we hold and use your Personal Information. We are required under Data Protection legislation to notify you of the information contained in this privacy notice.

'Data Protection Legislation' means General Data Protection Regulation (GDPR) 2018 and the Data Protection Act 2018 (DPA 2018) or any successor legislation.

'Personal Information' means any information about an individual from which that person can be identified.

'Process or Processing' means any activity that involves the use of your Personal Information. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Information to Third Parties whether in the European Union or not.

'Special Categories' means sensitive Personal Information which requires a higher level of protection.

'Third Party or Third Parties' the DVLA, HMRC, the Home Office, Motor Insurers Database (MID) and local licensing authorities.

'You or Your' means all licensed drivers who currently operate or have previously operated as a Driver Partner engaged by Veezu either as a private-hire or a hackney carriage driver. This notice does not form part of any contract to provide services or other contract that we may have with you.

# OBLIGATIONS

In accordance with Data Protection Legislation your Personal Information will be;

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely

# PERSONAL INFORMATION



What personal information do we collect about you?

We'll only use your Personal Information for the purposes it was collected, unless we reasonably feel that we need to use it for another reason and that reason is compatible with the original purpose.

We may process the following categories of Personal Information about you:

- personal Information we receive from you via our website, apps or by email, telephone, social media or otherwise, or by signing up to our newsletters or alerts, or by creating an account and then using our services;
- driver and vehicle details (e.g. your driving license, your local authority private-hire driver licence, MOT etc.);
- bank account details and payment history;
- passenger complaint records;
- information provided to us by a Third Party and/or collected from public records in the case of fraud or suspected fraud. In the case of fraud or suspected fraud, we may obtain information from Third Parties and from public records to prevent and detect fraud;
- personal information and special category information such as information about your health as
  provided to us by the local authority in connection with your private-hire license application, or
  motoring convictions/endorsements;
- CCTV information, some vehicles are fitted with outward-looking dashboard cameras. These dashboard cameras do not film inside the vehicles and they do not record audio but your image may be picked up by them when you enter or exit the vehicle;
- information about your use of our communications and dispatch routing system(s);
- information located on social media accounts (only in limited circumstances to check for specific risks such as passenger complaints);

Please note that in compliance with Data Protection legislation, we may process your Personal Information without your knowledge or consent where this is required or permitted by law.

When do we collect your personal information?

- when you start your engagement with us;
- when you apply to be a driver-partner through the Veezu driver application and engagement process; and
- when we receive your Personal Information from Third Parties

Why do we collect your personal information?

Mainly, we collect your Personal Information so that we can allow you to partner with us. Specifically, we also collect your Personal Information to;

- comply with our legal and regulatory obligations imposed by the licensing authority where we provide services;
- prevent fraud and crime;
- comply with the terms and conditions of business between us and make decisions about your continued engagement;
- deal with legal disputes involving you, or other driver partners, contractors, or passengers transported by you when you operate as a driver partner with Veezu, including in relation to accidents that may occur while you are driving;
- meet service requirements such as complaint handling and feedback;
- monitor and assess the quality of our service; and
- ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution





We may process your Personal Information in other situations which are necessary for our legitimate interests (or those of a third party, however your interests and rights do not override those interests) e.g., provide third parties with statistical information about your personal interests (but those third parties will not be able to identify you from that information). In rare situations, it may also be necessary to process your Personal Information to protect vital interests e.g. in the rare instance of saving someone's life.

#### Who do we share your Personal Information with?

Your Personal Information will be treated as strictly confidential and will be shared only with third parties we use to complete our business operations such as dispatch system provider(s), phone system provider(s), IT infrastructure providers, accountants, bankers, insurance services and other entities within our Group.

All our third-party service providers and other entities in the Group are required to take appropriate security measures to protect your Personal Information in line with our policies. We do not allow our third-party service providers to use your Personal Information for their own purposes. We only permit them to process your Personal Information for specified purposes and in accordance with our instructions.

In accordance with Data Protection legislation and applicable exemptions, we may be required to share certain information about you, including Personal Information, to third parties such as a local authority, the police and/or insurance companies. It may be necessary to disclose your Personal Information for reasons such as; to protect public safety, assist with claims/court proceedings, co-operate with a criminal investigation or resolve a complaint or dispute.

## **PASSENGER DATA**

To enable you to complete journey bookings, passenger information will be disclosed to you via your PDA (data head), this information may include personal data belonging to passengers.

Veezu deals with passenger personal data in accordance with its Privacy Policy available at www.veezu.co.uk. Veezu requires you to comply with its Privacy Policy and Data Protection Policy when dealing with any passenger data (copies are available on request).

Passenger personal data can only be used by you for the purpose of completing a journey booking or as otherwise instructed by us and must not be used for any other purpose or in any other way.

In accordance with your licensing conditions, you must take all necessary precautionary measures to protect passengers from harm; this also includes passenger data. You must take all reasonable steps to keep such information confidential and not allow it to be seen by others.

You must not take or keep copies of passenger personal data or store it otherwise than via the PDA and you must delete any such data when we ask you to do so.

Disclosing passenger data is not permitted unless you have the passenger's express written consent to do so or you are disclosing the information to the licensing authorities. You must not take or keep copies of passenger personal data and you must delete any such data when we ask you to do so.

How do we keep your personal data secure?

We have put in place measures to protect the security of your Personal Information both in accordance with the requirements of the GDPR 2018 the Data Protection Act 2018 and ISO 27001:2013 Information Security standards.

Third parties will only process your Personal Information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered and/or disclosed. In addition, we limit





access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How long do we keep your Personal Information for?

We will only retain your Personal Information for as long we need to. This includes satisfying any regulatory, legal, accounting and/or reporting requirements. To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means and the applicable legal requirements.

We will retain your information as follows:

- your account information (including your technical usage data), for 7 years, after you last use our services; and
- records of bookings, lost property and complaints for a minimum of 12 months (we are required to retain such data to comply with our regulatory requirements).

## DATA AMENDMENTS

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if the Personal Information changes during your working relationship with us.

### **YOUR RIGHTS**

You have the right to;

- request a copy of the Personal Information which we hold about you;
- request that we correct any Personal Information if it is found to be inaccurate or out of date;
- request your Personal Information is erased where it is no longer necessary to retain such data;
- request that we provide you with your Personal Information and where possible, to transmit that
  data directly to another Data Controller, (known as the right to data portability), where applicable
  (i.e. where the processing is based on consent or is necessary for the performance of a contract with
  the data subject and where the Data Controller processes the data by automated means);
- request a restriction to be placed on further processing of your Personal Information where there is a dispute in relation to the accuracy or processing of your Personal Information; and
- object to the processing of Personal Information, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics)

There are some exemptions, which may however apply (e.g. data collected and processed for the prevention, investigation, detection or prosecution of criminal offences).

If you want to exercise any of your data subject access rights, please contact: The Compliance Team at compliance@veezu.co.uk.

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You can also write to us at: Veezu Holdings Ltd, Raleigh House, Langstone Business Village, Langstone, Newport NP18 2LH.

### **CONSENT WITHDRAWAL**



In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your Personal Information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please complete our Withdrawal of Consent Form available on our website www.veezu.co.uk. You can also write to us at: Veezu Holdings Ltd, Raleigh House, Langstone Business Village, Langstone, Newport NP18 2LH.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to unless we have another legitimate basis for doing so in law.

# CONTACT

The Compliance Team will oversee compliance of this privacy notice. If you have any questions about this privacy notice or how we handle your Personal Information, please contact The Compliance Team at compliance@veezu.co.uk. You can also write to us at: Veezu Holdings Ltd, Raleigh House, Langstone Business Village, Langstone, Newport NP18 2LH.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

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