

# Privacy Notice

*Your data is important to us and we are committed to protecting your privacy*

## Introduction

At John A Ray & Associates, we understand that privacy is an important issue for our customers. Therefore, we are committed to keeping your information secure and managing it in accordance with data protection laws.

This Privacy Notice describes how we collect, retain and share any personal data we collect from you over the telephone via our call centre, through our website ([www.jracars.co.uk](http://www.jracars.co.uk)), or via any other methods you may communicate with us.

In this Privacy Notice the terms, 'we', 'us' and 'our' are references to John A Ray & Associates Ltd.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By accessing, browsing or otherwise using [www.jracars.co.uk](http://www.jracars.co.uk) you confirm that you have read and agree to this Privacy Notice. It is your responsibility to familiarise yourself with the Privacy Notice regularly to ensure that you are aware of any changes. Your continued use of [www.jracars.co.uk](http://www.jracars.co.uk) following the posting of any such changes will constitute your acceptance of the revised Privacy Notice.

If you do not agree with any part of this Privacy Notice, you should not use [www.jracars.co.uk](http://www.jracars.co.uk) or use our services.

We reserve the right to change the contents of [www.jracars.co.uk](http://www.jracars.co.uk), including this Privacy Notice at any time, by posting such changes on [www.jracars.co.uk](http://www.jracars.co.uk). To the extent permitted under applicable law, by using our services after such notice, you consent to our updates to this policy.

We encourage you to periodically review this policy for the latest information on our privacy practices.

## 1. Collecting Your Personal Information

We may collect personal information from you as follows. This is a necessity for the performance of our contract to provide our services to you.

### Booking a car & using our service:

- Name, phone number, special requirements such as accessibility/mobility information, collection and destination addresses, date and time and email address;
- Call recording for verifying booking details, training and monitoring purposes;
- Credit card or debit card details as part of payment for our services which can be made over the telephone, or via mobile card processing technology.
- Images of you - some vehicles are fitted with outward-looking dashboard cameras. These 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.
- Name and contact details relating to lost property.
- Name and contact details relating to complaints received.
- Customer feedback forms and 'rate your driver' reports.

### Creating an account:

- Information about your bank account number, sort code and other banking information
- Trading name, trading address, email address, company registered number and VAT number;
- Details of principal suppliers;
- Credit reference agencies;

### Using our service:

- Our service operates with the utmost discretion and recognises your need for privacy when travelling with us, particularly on business. As such, you can be assured that our drivers will act not only with the expected professionalism but are also contractually bound to strict confidentiality clauses.

## **2. Sharing Your Personal Information**

We share your information with selected recipients as follows:

- Employees, partner drivers and professional advisors to assist us with the delivery of services.
- Any third-party service providers who provide services to us which require the processing of personal data.
- IT, analytics and search engine providers located in the UK that assist us with the improvement and optimisation of the website.
- IT support service providers who support and maintain our booking platform.
- Any relevant authorities, where we are legally required do so, or if we have a reasonable belief that such use is necessary to:
  - comply with a legal obligation, process or request;
  - enforce our terms and conditions and other agreements, including investigation of any potential violation thereof;
  - detect, prevent or otherwise address security, fraud or technical issues; or
  - protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).
- In the event that we sell any business or assets, in which case we will disclose your data to the prospective buyer of such business or assets.

We do not sell, rent or lease your personal information to others.

## **3. Using Your Personal Information**

We use your information, as a necessity for the performance of our contract with you, to provide the following services:

- Transportation, including but not limited to:
  - providing quotations;
  - keeping you informed of the progress of your booking;
  - taking payment from you for the services which we provide;
  - processing receipts for the payments made;
  - having a better understanding of your requirements and provide you with services specific to your needs;
  - improving our services by analysing your personal information so we better understand how you use our services;
  - keeping our customer records up to date;

We also use your information as it is our legitimate interest to provide the following services:

- Marketing our services :
  - to provide you with information which we reasonably believe may be relevant to you based on the services we are providing to you including information on promotional offers, discounts, and improved services;
  - to provide you with general updates in relation to booking a journey, in accordance with your preferences;
  - to carry out advertising to you on social media websites such as Facebook where you have already shown an interest in our services.
- Responding to queries:
  - to help us answer any questions which you have asked one of our members of staff;
  - to assist account holders who wish to determine who is using their account (we may provide them with call recordings/phone numbers- subject to verification)
  - to be able to answer a complaint or other issue;
- Improving our services:
  - of reporting internally;
  - to provide on-going training and development to staff;
  - to analyse cookie and website usage data to keep improving [www.jracars.co.uk](http://www.jracars.co.uk);
  - to allow us to customise the content which is presented to you based on your likely interests;
- Legal and Regulatory Obligations:
  - to comply with applicable laws where we are obliged to retain and/or disclose certain information;
  - to investigate or address claims or complaints relating to your use of our services;
  - for internal and external auditing purposes;

### **Information Collected from Our Website**

When you access [www.jracars.co.uk](http://www.jracars.co.uk), we will collect some data automatically. This information helps us to make improvements to the website content and navigation, and includes your IP address, the date, times and frequency with which you access the site and the way you use and interact with its content. We will collect this data automatically via cookies, in line with the cookie settings on your browser.

This Privacy Notice does not apply to third party websites which our websites link to or which advertise on our websites. These third-party websites operate their own privacy policy which we encourage you to read.

### **Cookies**

- A cookie is a small file that asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.
- We use 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 then the data is removed from the system.
- A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

#### **4. Securing Your Personal Information**

Once we have received your information, we will take appropriate technical and organisational measures to safeguard your personal data against loss, theft and unauthorised use, access or modification.

The information you provide to us will be held on our secure system in our UK office. This data may be accessed by our staff or technical support providers for the purposes set out in this Privacy Notice or for other purposes approved by you.

We employ security measures which aim to protect the information provided by you from access by unauthorised persons and against unlawful processing, accidental loss, destruction or damage.

Unfortunately, the transmission of information via the internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted through the Websites, Apps, over email or via our contact centres; any transmission is at your own risk.

#### **5. Data Retention**

To determine the retention period of your personal data, we consider several criteria to make sure that we do not keep your personal data for long than is necessary or appropriate. These criteria include:

- the purpose for which we hold your personal data;
- our legal and regulatory obligations in relation to that personal data, for example any financial reporting obligations and our regulatory obligations to Transport for London and other local licensing authorities;
- whether our relationship with you is ongoing, for example, you have an active account with one or more of our brands, you continue to receive marketing communications, or you regularly browse or purchase off our Websites/Apps);
- whether you are no longer actively participating or engaging with our brands, for example, you do not open our emails, visit our Websites, or share user generated content;
- any specific requests from you in relation to the deletion of your personal data; and our legitimate business interests in relation to managing our own rights, for example the defence of any claims.

We will retain your information for the following time periods:

- Customer Profile & Account Information (including your technical usage data) - 7 years following last booking date;
- Personal Contact Information - 5 years following last communication;
- Records of Bookings, Lost Property & Complaints - 12 months minimum (*we are required to retain such data to comply with regulatory requirements*).

Beyond these time periods, we will store your information in an aggregated and anonymised format.

#### **6. Your Rights**

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate or out of date.

If you no longer wish to receive updates, articles or marketing material from us, please email us confirming you wish to 'Unsubscribe'.

If you would like us to delete any or all of your information from our files, please email us stating which information you wish to be 'Deleted'.

You have a right to request a copy of the information that we hold about you. If you would like a copy of the personal information we hold on file for you, please email us to make this request. Identification will be requested for security.

## **7. Contact**

Telephone: 01276 67 88 69

Email: [bookings@jracs.co.uk](mailto:bookings@jracs.co.uk)

Address: John A Ray & Associates Ltd,  
Suite 1, 22 Heatheridge Arcade,  
Camberley,  
Surrey  
GU15 1AX

## **8. Amendments**

John A Ray & Associates Ltd reserve the right to amend this policy as we deem necessary from time to time or as required by law. Please ensure you check our website from time to time to ensure that you are familiar with any changes.

Latest Update: April 2020