

JOHN A. RAY & ASSOCIATES CHAUFFEUR DRIVE

Privacy Notice

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

INTRODUCTION

We understand that privacy is an important issue. We are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws. We are registered with the UK Information Commissioner's Office (ICO) as a data controller under registration number ZA004947.

This Privacy Notice describes how we use any personal data we collect from you over the telephone via our call centre, through our website (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 and our company number is 8472788, having a registered address of Suite 1, 22 Heatheridge Arcade, Camberley, Surrey GU15 1AX.

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 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 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 or use our services.

We reserve the right to change the contents of www.jracars.co.uk, including this Privacy Notice at any time, by posting such changes on 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. We will also make prior versions of our privacy policies available for review.

1. Your Personal Information – What We Collect

We may collect personal information from you in connection with your use of our services.

When creating a booking with us, we may collect the following:

- 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.
- optional customer feedback forms and 'rate your driver' reports back to us about your customer experience to improve our services and reward/penalise our drivers.

When creating an account with John A Ray & Associates Ltd, we may collect:

- 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;
- This information is necessary for the performance of the contract.

Other personal information we may collect:

- From our website, data sent from your browser to our server which may include:
 - the time, date and duration of your visit to www.jracars.co.uk;
 - the site from which you have come (the referral URL);
 - the pages visited on www.jracars.co.uk; and;
 - your IP address;
- 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.
- lost property information, and complaints
- This data is used for our legitimate interest for us to provide our service. All processing will be "fair, transparent and accountable".

2. Who We Share Your Personal Information With

We do not sell, rent or lease your personal information to others except as described in this Privacy Notice. We share your information with selected recipients. These categories of recipients include:

- Partner drivers to assist us with the delivery of services.
- 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, and
- Our insurance company and claims handling companies, for the purpose of investigating and settling any insurance claims.

We will share your information with law enforcement agencies, public authorities or other organisations if legally required to do so, or if we have a good faith belief that such use is reasonably 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).

We will also disclose your information to third parties:

- 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

3. How We Use Your Personal Information

We use your information 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;
- This information is necessary for the performance of the contract.

- Marketing of our services to you:
 - 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.
- This data is used for our legitimate interest for us to provide our service. All processing will be “fair, transparent and accountable”.

- Responding to your 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;

- This data is used for our legitimate interest for us to provide our service. All processing will be “fair, transparent and accountable”.

- Improving Our Services:
 - 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;
 - to allow us to customise the content which is presented to you based on your likely interests;
- This data is used for our legitimate interest for us to provide our service. All processing will be “fair, transparent and accountable”.

- 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;

4. In what circumstances do we deal with Special category data?

We do not generally collect special category data unless it is volunteered by you. We may use health data provided by you to serve you better and meet your particular needs (for example, the provision of a suitable vehicle to accommodate mobility needs or information to the driver to assist passengers with health issues). Where we collect special category data; we treat it in accordance with the additional protection it is given under data protection laws.

5. What is the Source of the Information We Collect?

Most of the personal information which we collect will have been voluntarily provided by you, however, we may also obtain your personal data from other sources including:

- other companies associated with John A Ray & Associates Limited;
- third parties including credit reference agencies, social networks (such as Facebook);
- Customers providing feedback, such as ratings or compliments;
- Publicly available sources such as social networks and search engines.

We may combine the information collected from these sources with other information in our possession.

6. The security of your personal data

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. 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.

7. 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 as follows:

- your customer profile and account information (including your technical usage data), for 7 years after you last use our services;
- if you contact us via email we will keep your data for 5 years;
- 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).

After you have terminated your use of our services, we will store your information in an aggregated and anonymised format.

8. Disclosure of Information

The information you provide to us will be held on our computers in the UK. 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 may also disclose your information to the third parties listed below for the following purposes:

- to drivers who need to know the information in order to provide you with the service required. The information given will be your name associated with the booking, date and time, collection point, destination point, and other stops along the journey, whether the booking is cash or account, special instructions volunteered by you such as mobility / health information to assist us and the driver to meet your transportation needs and provide the best possible customer service;

- law enforcement bodies and/or other regulatory entities in order to comply with any legal obligation or court order including the police, HMRC and local authorities;
- our advisers, for the purpose of assisting us to better manage, support or develop our business and comply with our legal and regulatory obligations;
- third parties as necessary in the event of a claim or dispute relating to the use of our services;

9. Marketing

The information you provide will be used to keep you informed about the services we provide and which we believe you may be interested in. Where we conduct marketing, we do so in accordance with applicable laws.

10. Third Party Websites

This privacy policy 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.

11. Security

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.

12. Your Rights

You can request details of your personal information we hold about you and how we use that information. If you think any of the personal information we hold about you is inaccurate, you may also request it is corrected or erased.

You also have a right to require us that we stop processing your personal information, unless we have a lawful basis for doing so.

If you have a complaint about how we have handled your personal information you may contact us using the details below and we will investigate your complaint.

13. Contact

If you have questions or comments about our Privacy Notice or if you wish to exercise your right to access, correction or erasure mentioned above, please contact our Data Protection Officer, via email to bookings@jracs.co.uk or write to us at John A Ray & Associates Ltd, Suite 1, 22 Heatheridge Arcade, Camberley, Surrey GU15 1AX

14. Complaints

If you have any concerns or complaints as to how we have handled your personal data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.