

Privacy Notice for Customers

This document sets out to help you understand the main elements of the data we collect about you as a customer, why we collect it and what we do with it.

Under the General Data Protection Regulation (GDPR) there is a requirement for data to be processed only for the purposes intended and not to be kept any longer than is necessary for that particular purpose. When you use our services, we want you to feel assured that we manage your data appropriately, confidentially, safely and securely.

Parental Guidance is advised to help you read and understand this notice if you are under 16 years of age.

Appendix 1 provides key definitions to help you understand some of the terminology used in this Notice.

As a customer, you are advised that personal and sensitive data about you may be collected, transferred, processed, stored, and retained in a manual and/or computerised form in a fair and lawful manner by the Company and/or by its third-party representatives. This is necessary for lawful purposes, for the performance of the contract / legitimate business interests so we can deliver our services to you.

You are advised that for reasons other than set out above, we are required to seek your consent to collect, hold, process and retain other data. If this applies you will be informed and you may opt not to consent. In any such circumstances, we will work out how we may best work with to you/deliver those services to you.

We may also use the information we collect to enable us to provide, maintain, protect and improve our services to you, as well as enabling us to develop new services and solutions to meet your needs.

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The Data We Collect and Why We Collect It

We collect certain data to enable us to provide our services to you, such as meeting your journey requirements, delivering value and provide excellent customer service, as well as meeting out legal obligations. This relates to either information you provide to us or data we collect from you.

When we collect personal information every time you use a product enquiry, registration form or contact us to book your taxi either through our call centre or one of our Applications (App). This includes job information pertinent to making it a successful journey/service such as; your name, telephone number, email address, date and time of the booking, pick up and drop off address and time completed. If you first sign in to use one of our Applications, your email address will be requested, along with payment details which will be stored on the App for ease when repeat bookings. You are advised that we do not have access to your full card details that are stored in the App. We never store your card details on our booking system when they are taken over the phone. Your details are also used to send booking confirmation, driver dispatch/arrival and any receipts to you via SMS / WhatsApp Business and/or your email address.

Our Apps are provided in collaboration with other partner organisations, so when you register with any of our Apps, your transactions will be subject to their terms and conditions and associated privacy notices. Data on such Apps is ordinarily encrypted when in transit.

When you use our services, we collect data relating to when, where and how you use our services. Our dispatch systems and Apps have built-in functionality to capture certain data that is required to ensure the systems work effectively.

This functionality automatically logs details in relation to previous journeys pick up and collection details, costs, times, your location and routes taken, as well as your customer IP address in relation to when you visit our site. When making a booking this enables you or us to select from a pre-existing list or create a new location to ease the booking process.

The Customer Data Schedule outlined later in this Notice provides further information on the types of data we collect, why we process it and what we do with it.

Data Security

We confirm that we have appropriate security measures in place to manage and restrict access to your personal information. This data is only available to authorised personnel who need to know that information in order to process it for us. These individuals are subject to strict contractual confidentiality obligations and may be subject to disciplinary and other action including termination of their contract/employment if they fail to meet these obligations.

We wish to reassure you that we also have processes in place to protect against your journey data being shared with someone who is not authorised, such as: someone who may endeavour to misrepresent themselves as having been the customer when they were not to try to access your information. Your confidentiality, safety and security are a priority for us.

Data Disclosures

The Company may also be required to disclose certain data/information to other persons. These kinds of disclosures will only be made when strictly necessary and for the purpose required. You are advised that for lawful purposes there are circumstances whereby we are required by law to share data (including sensitive data) including with other government agencies without the Individual's consent. This includes our lawful requirement to provide sensitive information to external government bodies.

You are advised that we may share data within the fonaCAB Group of Companies, and with other associated partners such as the Riide Group, and/or third-party platforms who host some of our information systems and backup systems and/ or trusted third-party agents who are engaged to provide outsourced services directly on our behalf worldwide. This is sharing it considered to be reasonably necessary for legal reasons and / or the performance of the contract/delivery of our services/legitimate business interests. Such third-parties who are located in the UK or Europe are required to confirm compliance with our privacy policy, ensure confidentiality, take reasonable security measures, to notify us immediately of any breach, process the data only for our purposes and only as instructed by us. Whereby a third-party recipient is located outside the European Economic Area, we will take reasonable and appropriate steps to ensure that the transfer of personal data is protected by appropriate safeguards, and it is compliant with GDPR equivalent regulations within the recipient country.

Outside of the conditions set out above, we will obtain your consent before sharing the data.

Contacting You: We will only contact you in relation to following up on client satisfaction and/or dealing with complaints or lost property or to share information with you if you have signed up for our newsletter or to update you in relation to any service change associated with any of our Apps or other terms of service. If you have signed up for any of our Apps, we remind you that this will be subject to the terms and conditions and privacy notice associated with that App including their terms for making contacting with you to fulfil the services.

Your Rights

Subject to certain exceptions, you have the following rights:

1. To be informed through a Privacy Notice to ensure there is transparency over how we use personal data.
2. To access your own personal data and supplementary data that we hold. It allows you to be aware of and verify the lawfulness of the processing.

3. To rectification of your personal data if it is inaccurate or incomplete.
4. To erasure/ 'the right to be forgotten' by requesting the deletion or removal of personal data where there is no compelling reason for its continued processing.
5. To restrict processing by requesting a 'block' or suppression of the processing of your personal data. When processing is restricted, we are still permitted to store the personal data, but not to further process it. We can retain just enough information about the individual to ensure that the restriction is respected in future.
6. To data portability which allows you to obtain and reuse your personal data for your own purposes. This only applies in the following circumstances:
 - that the information pertains to personal data that you have provided to us;
 - where the processing is based on your consent or for the performance of a contract; and
 - when processing is carried out by automated means.
7. To object to the processing of data based on legitimate interests or the performance of a task in the public interest/exercise of official authority; direct marketing; and processing for purposes of scientific/historical research and statistics.

Data Subject Access Request (DSAR)

You have a right to access information we may hold on you to confirm the accuracy of data and check the lawfulness of its processing or to allow you to exercise your rights including to correct or object if necessary.

If you wish to make a request for information we hold on you, this should be made in writing addressed to the Data Co-ordinator, Neil Wilson, Email: dataprotection@fonacab.com, including the following details:

- Your full name, address and contact details
- Any information used by us to identify you (such as customer account number)
- Details of the specific information required and any relevant dates

We will normally respond to your request within one month. However, this may be extended by a further two months whereby a request is complex or numerous. If this applies, we will write to you within one month of the receipt of the request and explain to you and explain why the extension is necessary.

The information will normally be provided to you free of charge. However, we reserve the right to charge a reasonable fee when a request is considered to be 'manifestly unfounded', 'excessive' or 'repetitive.' In such cases the fee will be based on the administrative cost of providing the information. In exceptional circumstances, we may refuse to respond to the request. If this applies, we will explain to you why and inform you of your right to complain.

Making a Complaint

You have a right to complain to the ICO if you think there is a problem with the way we are handling your data.

Customer Data Schedule

In line with our GDPR policy, we have outlined the main types of personal and sensitive data that we may collect, process, manage, store and retain about you as a customer. We have also outlined in summary, the main categories and reasons for why we collect and process this information and what we do with it. This information is not exhaustive but is intended to be reflective of the typical categories of data we collect, process, store and retain. The retention periods outlined are based on statutory and non-statutory recommended retention schedules as well as those deemed necessary for the performance of our contract / service and to ensure we can meet our legal obligations.

Data Storage: The information we hold in relation to our customers is stored securely on company software and hardware systems (Company Databases, computers, PDA's/mobile devices, Driver and Customer devices), hosted platforms/third party applications/Cloud based servers. You are advised that some of these platforms may backup data to locations outside the UK and/or Europe in line with our data sharing agreement as referred to above.

Please note: Any personal and sensitive data we hold is only accessible by appropriate and authorised personnel.

Legal Basis for Processing: A summary the main conditions that are most likely to apply in relation to data pertaining to your employment is outlined below.

Key

	Consent required (for sensitive data Explicit is consent is required).
	Compliance with a legal obligation (for sensitive data to protect vital interests where consent cannot be given).
	Performance of a contract/ Protection of Legitimate business interests (for sensitive data to meet contract obligations) .
N/A	Not applicable - we are not the Data Processor/Controller.

Data Type	Accompanying Notes	Retention Timeframes	Reason
Internet Sites / Newsletters			
Cookies	When you visit our site, you will be asked to confirm your data preferences. You are advised that we use cookies or similar technologies to identify your browser or device IP address and to collect and store information about when and how you interact with services we offer. This helps us to manage and analyse the traffic to our website and apps. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. Cookies contain information that is transferred to your computer's hard drive. You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our site.	At least 2 years.	
Newsletters	If you have subscribed, we will keep you up-to-date as per the terms associated with this and you will remain on our marketing list until such times as you un-subscribe.	For so long as you remain a subscriber and / or as otherwise advised via partner privacy notices.	
Social Media	Data you may post on forums including Twitter and Facebook about us or individuals employed or engaged by us are classified as third-party sites. You are advised that we are not the Data Controller of such other party sites. You are advised that we are not the Data Controller of such other party sites.	N/A	N/A
Subscribers	This relates to subscribers on our website who consent to being contacted by us and / or via our third party Apps. You may unsubscribe at any time by clicking on the link in the information sent to you by us and as otherwise advised by the third party App under their privacy notice.	For so long as you remain a subscriber and / or as otherwise advised via partner privacy notices.	

Taxi / Business Transactions and Records

Driver and Vehicle Agency (DVA)

Booking information pertinent to making it a successful journey must be collected, processed and retained under our legal obligations with the DVA. Company and driver information is password protected and may be accessed both inside and outside company premises.

Telephone Bookings / Call Recordings

You may book your taxi by calling us. We record all in-coming and out-going calls. When you contact us, you will be advised that your call will be recorded for quality and training purposes. It may be accessed by us if there is an issue or complaint for the purpose of carrying out an investigation. Occasionally, we may be lawfully required to provide this data to law enforcement providers.

App Bookings

In addition, and as previously referred to, our Apps are provided in collaboration with other partner organisations, so when you register with any of our Apps, your transactions will be subject to their terms and conditions and associated privacy notices. Data on such Apps is ordinarily encrypted when in transit.

Job information pertinent to making it a successful journey (and to meet our legal requirements under DVLA) will be taken such as: your name, telephone number, date and time of the booking, pick up and drop off address and time completed. Your details are also used to send booking confirmation, driver dispatch/arrival and any receipts to you via SMS / WhatsApp Business and/or your email address.

Retention timeframe - Data from telephone calls and / or bookings will be for retained for 7 years. However, after 6 months from the time of booking you may request for your data to be redacted should you wish. Thereafter it will be overwritten. We cannot authorise requests for redaction sooner than 6 months due to our legal obligations to the DVA.

Our dispatch system automatically logs details in relation to previous journey history such as: pick up and collection details, costs, times, your location and routes taken, as well as your customer IP address in relation to when you visit our site. When making a booking this enables you or us to select from a pre-existing list or create a new location to ease the booking process.

Customer Journey Booking Devices

You may book your taxi by signing up for/downloading and using any one of our online or booking Applications. If you first sign in to use one of our Applications, certain details will be taken such as your name, telephone number, your email address and any payment details which will be stored on the App to ease of repeat bookings. You are advised that we do not have access to your full card details that are stored in the App.

Job information will be taken such as: your name, telephone number, date and time of the booking, pick up and drop off address and time completed. Your details are also used to send booking confirmation and any receipts to you via SMS / WhatsApp and/or your email address. Your details are also used to send booking confirmation, driver dispatch/arrival and any receipts to you via SMS / WhatsApp Business and/or your email address.

Certain job information is collected relating to the full journey details including route taken, date and time booked and completed, any payment details and customer IP address. This is required to ensure we make it a successful journey/service, as well as meeting our legal requirements for the DVLA.

The Applications have built-in functionality to capture certain data that is required to ensure the system works effectively. You are therefore advised such Apps automatically logs details in relation to previous journey history such as: pick up and collection details, costs, times, your location and routes taken, as well as your customer IP address in relation to when you visit our site. When making a booking this enables you or us to select from a pre-existing list or create a new location to ease the booking process.

All such records are retained on our system and also on your own personal devices within your 'App'. Customers are advised that they are responsible for the security of the data on their own device.

Retention timeframe - Data from App bookings will be for retained for 7 years. However, after 6 months from the time of booking you may request for your data to be redacted (but no sooner, for the reasons as stated above). Thereafter it will be overwritten.

We are not the Data Processor; the Application Owner is.

Reason for retention:

- Performance of a contract/ Protection of Legitimate business interests (for sensitive data to meet contract obligations)
- Compliance with a legal obligation (for sensitive data to protect vital interests where consent cannot be given)

Driver Units

This information is considered necessary for the performance of the contact to ensure we can deliver our service to meet your journey requirements.

The driver can see current and historical information on their bookings via their handheld device. This includes pick up address, destination, pick up and drop off date and time, booking name, payment method and cost. They can also provide a receipt for your journey. We do not have access to data pertaining to transactions on driver units/devices. They cannot access your telephone details. Any calls are routed securely from our switch board. Access to all information on their device is restricted and can be withdrawn by us remotely as and when deemed necessary.

Retention Timeframe - Data from App bookings will be for retained for 7 years, however after 6 months from the time of booking you may request for your data to be redacted. Thereafter it will be overridden.

Reason for retention:

- Performance of a contract/ Protection of Legitimate business interests (for sensitive data to meet contract obligations)
- Compliance with a legal obligation (for sensitive data to protect vital interests where consent cannot be given)

Emails

Any emails you send to us may be used for the purpose of delivering our services and for investigation purposes. This information will be retained in line with our email retention policy.

Retention timeframe – This information will generally be retained for two years.

Reason for retention:

- Performance of a contract/ Protection of Legitimate business interests (for sensitive data to meet contract obligations)
- Compliance with a legal obligation (for sensitive data to protect vital interests where consent cannot be given)

CCTV in Depots and Taxi's

CCTV is in place in our depots to ensure your security. This data may also be used by us for the purposes of investigations. Any depot and/taxi that has either internal or external CCTV will display signage to advise you that this is in operation.

In-Car CCTV within a taxi is the responsibility of the Driver. They are the Data Controller and Processor and therefore the responsibility for any such data remains the sole responsibility of the Driver. fonaCAB cannot accept any liability whatsoever for any such data. This data will be collected, managed and stored by the driver (and it may be passed to us for investigation purposes) only for the purposes of managing both your safety/security and theirs.

This data may contain both personal and sensitive data.

On occasions, CCTV data may be required to be provided to law enforcement providers subject to a Form 81.

Retention Timeframe - Depot CCTV will not be retained for longer than 1 year.

Reason for retention:

- Performance of a contract/ Protection of Legitimate business interests (for sensitive data to meet contract obligations)
- Compliance with a legal obligation (for sensitive data to protect vital interests where consent cannot be given)

In-cab CCTV, we are not the Data Controller. The Driver is the Data Controller.

Financial Transactions Completed by fonaCAB

It is necessary to collect and process all financial records for the purpose of the assessment, collection or payment of any tax, duty, levy or other moneys owed or payable to HMRC.

We use a range of processing merchants to enable us to meet your needs in relation to your preference for processing your financial transactions.

A record of your financial transactions is retained on our finance system.

Business and Personal Accounts including the following data:

- Direct Debit/Bank Details
- Names, Addresses, Contact Telephone, Email
- Receipts and financial records

Retention Timeframe – This information is retained by law for a period of up to 7 years.

Financial Transactions Completed by the Driver

If you pay the taxi directly via credit card, this transaction remains between you and the Driver. This data will be collected, managed and stored by the driver (and not fonaCAB). The Driver is the Data Controller and Processor and therefore the responsibility for any such transaction and associated data remains the sole responsibility of the Driver. fonaCAB cannot accept any liability whatsoever for this.

Retention reason:

- Performance of a contract/ Protection of Legitimate business interests (for sensitive data to meet contract obligations)
- Compliance with a legal obligation (for sensitive data to protect vital interests where consent cannot be given)

Complaints and Accidents

Complaints / Incident Procedure

Any data relating to an incident or complaint is retained by us in line with our Operator requirements. Personal and/or sensitive data may be shared with government bodies or law enforcement including the PSNI for investigations/criminal proceedings.

Retention Timeframe – This information is required to be retained by us by law for a period of 6 years.

Retention reason:

- Performance of a contract/ Protection of Legitimate business interests (for sensitive data to meet contract obligations)
- Compliance with a legal obligation (for sensitive data to protect vital interests where consent cannot be given)

Accident Books / Records / Reports

If you are involved in an accident or suffer an injury when using one of our services, please notify us immediately. We have a legal requirement to record the details of injuries from accidents/incidents. We may also be required to report this data to government agencies, our insurance providers and / or law enforcement providers.

We are required to retain this data for purposes of ensuring we meet our legal obligations in relation to injury. Retention Timeframe - 6 years after the date of the last entry / date of incident or, if the accident involves a child/ young adult, then until that person reaches the age of 21.

Retention reason:

- Performance of a contract/ Protection of Legitimate business interests (for sensitive data to meet contract obligations)
- Compliance with a legal obligation (for sensitive data to protect vital interests where consent cannot be given)

Appendix 1: Key Definitions

Hosted Platforms/Third Party Applications: These are databases that are not controlled by us, but which are provided to us by third party organisations. We request all such third-party organisations who provide hosted platforms to confirm that they will adhere to the lawful requirements under GDPR.

Other Party Sites: These are sites that are provided by other parties such as Facebook and Twitter that we do not have control over. We are not the Data Controller. People may freely enter information onto this site about us, including posting information on our Page. In this event, you are advised that if you make any such posts their terms, conditions and privacy notices apply. However, if we note a cause for concern over a post, we may take steps to ask the site to remove it. If you have a concern in relation to a post, you should contact the appropriate site directly. However, ultimately the removal of any such post is at their discretion and subject to their terms.

The Data Controller and Data Protection Co-ordinator: The Data Controller determines why personal data is, or has been, collected, processed and the way in which it is dealt with and ensuring it is processed fairly and lawfully and only for legitimate purposes. All Data Controllers must provide a notification to the Information Commissioner's Office and be included on the register of data controllers as part of a registration process with the ICO.

The Data Processor: This relates to party who processes the personal / sensitive data on behalf of the Data Controller and they may be also regarded as a joint Data Controller. The Data Processor is responsible for processing data under the instruction of the Data Controller and only for the purposes intended.

Trusted Third Parties: This relates to trusted third party providers who act on behalf of the Company under contract to provide services on our behalf under our instruction and only for the purposes intended. They may be also regarded as a joint Data Controller and are required to have certain security measures in place and to notify us immediately if there has been any actual or potential data breach.

However, as stated in this privacy notice, data on hosted sites may be stored in other locations outside of the UK or Europe. Please refer to sections above on data sharing.

Our **Data Protection Co-ordinator** is Neil Wilson. The contact details are: dataprotection@fonacab.com

Data Subject: You are the data subject as you are the individuals whose personal information is being held or processed by us.

Authorised Personnel: This is data only accessible to authorised personnel. These individuals are subject to strict contractual confidentiality obligations and may be subject to disciplinary and other action including termination of their contract if they fail to meet these obligations.

Personal Data: Information that identifies and relates to a living individual and includes any expression of opinion or intention about the individual. Personal data could be contact details, date of birth, qualifications, or anything pertaining to an individual. It is something that affects that individual person's information and privacy.

Sensitive Personal Data: Sensitive personal data is defined as information relating to an individual's equality, health, criminal investigations/convictions, complaints or appeals or other information that may be considered to be particularly sensitive in nature.

Personal and sensitive personal data should not be processed unless at least one of the conditions is met:

- The explicit consent of the individual.
- There is a legal obligation in the context of employment or other legal proceedings/requirements.
- The protection of the vital interests of the individual.
- The processing is carried out in the course of the legitimate activities of the organisation
- The information has been made public by the individual.
- The information is required for medical purposes.
- For other lawful functions, e.g: for lawful monitoring or for other government statistical information.