

PASSENGER PRIVACY POLICY

INTRODUCTION

Welcome to Techxi Limited, our company number is 11205106 and our registered office is at: G1, Ty Cynon, Navigation Park, Abercynon, CF45 4SN, United Kingdom. Techxi Limited is the controller of your personal information and is responsible for your personal information. All references in this policy to "Techxi", "our", "us", or "we" refer to Techxi Limited.

This privacy policy sets out how we process your personal information as a passenger using our booking services.

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

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YOUR RIGHT TO OBJECT

You have various rights in respect of our use of your personal information as set out below. Two of the fundamental rights to be aware of are that:

1. you may ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
2. you may ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's legitimate interest.

INFORMATION ABOUT OTHER INDIVIDUALS

If you give us information on behalf of a third party, and we are satisfied that you have demonstrated that you have sufficient authority to act on behalf of that third party, you confirm that the third party has appointed you to act on his/her/their behalf and has agreed that you can: give consent on his/her/their behalf to the processing of his/her/their Personal Information; that you will make them aware of this data protection notice; and give consent to the transfer of his/her/their Personal Information abroad (if applicable).

WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

We process the following categories of personal information about you:

- Personal information, including your name, current residential address, pickup address, destination address, email address and/or your phone number;
- Any payment related information that you provide, including bank account details, credit card details, banking address and account name;
- Information that you provide to us regarding your health/mobility so that we can provide you with a suitable vehicle;
- Your GPS location; and
- Details of any enquiries made by you through the website or by phone. We will monitor and record communications with you (such as telephone conversations and emails) for the purposes of provision of services, quality assurance, complaint investigation, training, fraud prevention and compliance purposes. Any information that we receive through such monitoring and communication will be added to the information we already hold about you and will also be used for the purposes listed above.

Please note that in compliance with data protection legislation, we will 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 use our website, web booker, mobile device booking application, telephone us, sign up to our newsletters or alerts, or create an account with us when using our services.

WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

Under data protection legislation we may only process your personal information if we have a legal basis (i.e. a legally permitted reason) for doing so. For the purposes of this Policy, our legal basis for processing your Information is set out below:

- a) The processing of the information listed below is necessary for the performance of the contract between us, enabling us to:**
 - Provide or procure the provision of services to you and the administration related to those services such as arranging billing, taking payments (for more information please see below), chasing payments, issuing email receipts, sending you alert notifications about the service you have ordered and received via SMS, push notification or telephone (see further information below under "Telling you about our services"; investigate and address any comments, queries or complaints made by you regarding the website and/or our services, acting as an intermediary between you and subcontracted drivers and any similar or related comments or queries;
 - Ensure that content from the website is presented in the most effective manner for you and for your device;
 - Monitor the frequency and length of time you use our services to ensure the smooth running of the services we provide to you, in accordance with 'Your Rights as set out in this Policy'; and
 - Allow you to participate in interactive features of the website and electronic booking applications, including inputting information and providing feedback.
- b) You have provided your consent to the processing, enabling us to:**
 - Process your personal information for marketing purposes where we are required to obtain your consent by law (which you may withdraw at any time after giving it, as described in the Telling You About Our Services' section below. and

- Process your sensitive personal information where we need to arrange a vehicle suitable for your needs (where you have specifically asked us for this) and you have provided details about your health/mobility which are necessary for us to ensure a suitable vehicle.
- c) The processing is necessary for Techxi's legitimate interests so that we can:**
- Contact you for marketing purposes (and you are given the option to opt-out at any time) pursuant to our legitimate interest to promote and develop our business. Please see the 'Telling You About Our Services' section below for further information;
 - Research into usage and behaviour pursuant to our legitimate interest in improving and changing our services, including personalisation to your needs, such as listing previously used addresses/destinations, operating, administering, maintaining, providing, analysing and improving the website and the services available to you through the website or by phone;
 - Notify you about changes to the website pursuant to our legitimate interest in communicating changes which may impact our users' use of our services.
 - Support the UK government with rapid contact-tracing to identify passengers and drivers involved in a public health concern associated with a pandemic.
- d) The processing is necessary to protect vital interests, for example:**
- In the rare instance where we process personal information to save someone's life.
- e) The processing is necessary to comply with a legal obligation Techxi is under, for example:**
- Any request or order from law enforcement agencies and/or HMRC in connection with any investigation to help prevent unlawful activity.

DISCLOSURE OF YOUR INFORMATION

We will disclose your personal information to:

- Our business partners, service providers who are providing services under a separate contract with you, such as our Drivers, or our third-party contractors and advisors such as DiSC telephony and iCabbi dispatch providers to enable them to undertake services for us and/or on our behalf;
- Our third-party payment providers such as Javelin and Square;
- Any prospective buyer or seller (and their representatives) in the event that we sell or buy any business or assets;

- HMRC, other government departments and regulators, in order to comply with any legal obligation;
- Other lawyers, insurers or other advisers in respect of any claims brought by passengers / drivers / general public. This includes sharing information in connection with legal or insurance claims to protect the rights and safety of others;
- In the case of aggregated/anonymous information i.e. information from which you cannot be personally identified, or insights based on such anonymous information), selected third parties, including (without limitation) analytics and search engine providers to assist us in the improvement and optimisation of the website. In such circumstances we do not disclose any information which can identify you personally; and
- If our whole business is sold or integrated with another business our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.
- The NHS Test and Trace contact-tracing service.

TELLING YOU ABOUT OUR SERVICES

Communicating with passengers is an essential part of providing a reliable and trustworthy licensed private hire service. We will therefore contact you by telephone, text, via our app or by email in relation to non-marketing, service-related communications to:

- Update you on the progress of your booking;
- Remind you of any public health guidance applicable to your journey; and
- Ask for feedback on your journey.

We send out marketing communications based on our legitimate interests of running a licensed private hire booking service and keeping people informed about the services we and our Drivers and other service providers offer where:

- We send you information via post; or,
- If you are dealing with us on behalf of a business and we contact you via your corporate email address;

We will only contact consumer customers, sole traders and non-limited liability partnerships by personal email for marketing purposes if:

- you have given your consent; or
- you have previously bought goods and services from us and we are contacting you to let you know about similar goods and services that we offer.

You have the right at any time to ask us, or any third party, to stop processing your information for direct marketing purposes, please see 'Your Rights in Relation to Your Personal Information' below.

COOKIES AND RELATED SOFTWARE

Please see our separate Cookies Policy for further information about how we use cookies.

TRANSFERRING PERSONAL DATA OUTSIDE OF THE UK

We may transfer your Personal Data to countries outside of the UK and these countries may have data protection rules that are different from the UK. To ensure that any of your personal information that is transferred outside of the UK receives an adequate level of protection, appropriate measures are in place to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects UK law on data protection.

HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?

We have put in place measures to protect the security of your personal information both in accordance with the requirements of the UK GDPR and the DPA 2018. 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 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, or reporting requirements.

- We hold your personal information for up to a maximum of 7 years from when it was last used to comply with legislation and local authority rules that we are subject to; and/or
- Where we are processing on the basis of consent only, we hold the Information until consent is withdrawn.

If required, we will be entitled to hold personal information for longer periods to comply with our legal or regulatory obligations.

CHANGES TO YOUR PERSONAL INFORMATION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if the personal information you have given to us either when you downloaded our App or when you opened an account, changes during your relationship with us.

WHAT ARE OUR OBLIGATIONS?

Under data protection legislation, we are a Data Controller and therefore we are responsible for, and control the processing of, your personal information. Such information must be protected in accordance with data protection legislation.

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.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

If you are an individual, you have the right to:

- ask us to provide you with copies of personal information we hold about you;
- ask us to provide your personal information to a third-party provider of services. This right only applies where we use your personal information on the basis of your consent or performance of a contract and where our use of your information is carried out by automated means;
- ask that we correct any personal information if it is found to be inaccurate or out of date;
- ask that your personal information is erased where it is no longer necessary for us to keep it;
- 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;
- object on legitimate grounds to the processing of your 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) and processing for the purposes of scientific/historical research and statistics);
- ask us to stop using your personal information for direct marketing purposes. If you exercise this right, we will stop using your personal information for this purpose. If you wish to exercise this right, you should contact us via our website (<https://techxi.co.uk>) or contact the relevant third party using their given contact details, giving us or them enough information to identify you and deal with your request. Alternatively, you can follow the unsubscribe instructions in emails you receive from us or them.

There are some exemptions, which may apply, for example, information 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 us via our website.

CONTACT

If you have any difficulty in reading or understanding this Policy, or if you would like this Policy in another format (for example audio, large print or braille), please contact us.

If you have any questions about this privacy notice or how we handle your personal information, please contact us via the website.

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.

CHANGES TO OUR PRIVACY POLICY

We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by post or email. Please check back frequently to see any updates or changes to our privacy policy.