



PRIVACY POLICY

INTRODUCTION

Veezu Holdings Limited and its subsidiaries "Veezu" takes your privacy seriously. This Privacy Policy ("Policy") contains important information about how we use your Personal Information.

It is important that you read this Policy (as amended from time to time), so that you are aware of how and why we are using your Personal Information.

DEFINITIONS... WHAT SOME WORDS MEAN

Data Controller means Veezu and we are responsible for deciding how we hold and use Personal Information about you. We are required under Data Protection Legislation to notify you of the information contained in this Policy.

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 require a higher level of protection.

We/Us/our means Veezu.

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.

WHEN DO WE COLLECT YOUR PERSONAL INFORMATION?

When you use our website, web booking portal, mobile device booking application, telephone us, sign up to our newsletters or alerts, or create an account with us when using our services.

WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

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

- Personal Information, including your name, current residential address, pickup address, destination address, email address or, your phone number;

- your bank details, including bank account details, credit card details, banking address and account name;

- information that you provide to us regarding your health so that we can provide you with a suitable vehicle; and

- details of any enquiries made by you through the website or by phone. We may 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 may also be used for the purposes listed above.

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.

INFORMATION ABOUT OTHER INDIVIDUALS

If you give us information on behalf of a 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; receive on his/her/their behalf any data protection notices; and give consent to the transfer of his/her/their Personal Information abroad (if applicable).

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 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");
- ensure we provide a vehicle suitable for your needs (where you have specifically asked us for this) and you have provided details about your health which are necessary for us to ensure a suitable vehicle (i.e. given us your consent to this information);
- research into usage and behaviour for improving and changing our services, including personalisation to your needs, such as listing previously used addresses/destinations, operate, administer, maintain, provide, analyse and improve the website and the services available to you through the website or by phone;
- investigate and address any comments, queries or complaints made by you regarding the website and/or our services, and any similar or related comments, queries; and

- ensure that content from the website is presented in the most effective manner for you and for your device.

(b) The processing is necessary to protect Veezu's legitimate interests so that we can:

- Comply with a request for information (where legally permissible) from law enforcement agencies and/or government bodies for the purposes of prevention or detection of crime or the apprehension or prosecution of offender. This enables us to comply with legal obligations that we are subject to. Further information can be found under 'Disclosure of your Information' below.
- Contact you for direct marketing purposes (and you are given the option to opt-out at any time). We send out marketing communications based on our legitimate interests of running a licensed taxi/ private hire service and keeping people informed about the services we offer. The method of communication may vary as set out below:
 - we may send you information via post or, if you are dealing with us on behalf of a limited company or LLP, to your corporate email address;
 - we will only contact you via your personal email address 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 let us know that you no longer wish to receive marketing communications from us.

(c) The processing is necessary to enable us to ensure the smooth running of and, provision of our services to our users and we do this by:

- monitoring 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;
- allowing you to participate in interactive features of the website and electronic booking applications, including inputting information and providing feedback; and
- notifying you about changes to the website.

(d) Disclose your Personal Information to selected third parties as permitted by this Policy.

- we may share your Personal Information with others to assist us to deliver services with you. We do this to provide you with the services requested. Further information can be found under 'Disclosure of your Information' below.

DISCLOSURE OF YOUR INFORMATION

We may disclose your Personal Information to:

- other companies within our group of companies;
- our business partners, service providers, such as our partner-drivers, or third-party contractors to enable them to undertake services for us and/or on our behalf (and we will ensure they have

appropriate security, compliance and data protection measures in place to protect your Personal Information);

- our third party payment providers (for more information please see below under 'Payments');
- any prospective buyer or seller (and their representatives) in the event that we sell or buy any business or assets;
- the paying entity at the time of invoicing, if you are a passenger using our service via a business account;
- comply with any legal obligation, if we are under a duty to disclose or share Personal Information in order to, including (but not limited to) any request or order from law enforcement agencies and/or HMRC in connection with any investigation to help prevent unlawful activity;
- protect vital interests e.g. in the rare instance of saving someone's life;
- the extent necessary for the interests of other persons or the general public. This includes sharing information in connection with legal or insurance claims to protect the rights and safety of others;
- disclose aggregated/anonymous information i.e. information from which you cannot be personally identified, or insights based on such anonymous information, to 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 your Information may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

PAYMENTS

Veezu may use approved third-party payment providers to manage payments from your credit and/or debit card account for journeys booked with the mobile application over the phone or on our web portal. The processing of payments or credits in connection with the use of the mobile application or other electronic and services will be subject to the terms and conditions and privacy policy of our third-party payment processor and your issuing card authority in addition to this Policy.

Adding a card to our service runs a pre-authorisation check on that card for the amount of £1.01 which is a temporary transaction of 'held' funds. This is to ensure the card and the account have valid funds and are genuine, it is for your and our company's security and fraud prevention. You will be able to see these pre-authorisation transactions credited back to your account on your statement.

All journey charges will be shown on your receipt emailed to the address used to sign up for credit and debit card bookings. These charges are subject to change at any time and you will notified within the platform and in your vehicle.

You will make payment to the third party payment provider via our third-party payment provider gateway and the money will in turn be passed on to the partner-driver who completed your journey.

Your credit and/or debit card details will be securely tokenised and held by our third-party payment processor under PCI level 1 compliance.



We do not have access to your personal credit and/or debit card information and cannot share that information. Employees, sub-contractors (e.g. partner-drivers) or other individuals will at no point have access to your electronic payment information.

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 GDPR, the DPA 2018 and the ISO 27001 Information Security Standard. 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 with us changes during your relationship with us.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

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

- request access to the Personal Information which we process about you, including the extent and purpose of the Personal Information we hold about you;
- have any inaccurate Personal Information corrected and/or updated. If any of the Personal Information that you have provided changes, or if you become aware of any inaccuracies in such Information, please let us know in writing giving us enough information deal with the change or correction;

- request that we delete all Personal Information we hold about you (the 'right of erasure'). Please note that this right of erasure is not available in all circumstances, for example where we need to retain the Personal Information for legal compliance purposes. If this is the case, we will let you know;
- request that we restrict the processing of your Personal Information, for example where your Personal Information is inaccurate or where you have objected to us processing your Personal Information;
- request a copy of the Personal Information we hold about you and to have it provided in a structured format suitable for you to be able to transfer it to a different data controller (the 'right to data portability'). Please note that the right to data portability is only available in some circumstances, for example where the processing is carried out by automated means. If you request the right to data portability and it is not available to you, we will let you know;
- object to the processing of your Personal Information. If so, we shall stop processing your Personal Information unless we can demonstrate sufficient and compelling legitimate grounds for continuing the processing which override your own interests. If, as a result of your circumstances, you do not have the right to object to such processing then we will let you know;
- not be subject to a decision based solely on automated processing, for example where a computer algorithm (rather than a person) makes decisions which affect your contractual rights. Please note that this right is not available in all circumstances. If you request this right and it is not available to you, we will let you know; and
- object to direct marketing.

If you wish to exercise any of your legal rights, you should email compliance@veezu.co.uk giving us enough information to identify you and respond to your request.

YOUR CONSENT TO PROCESSING

You will be required to give consent to certain processing activities before we can process your Personal Information as set out in this Policy.

Where applicable, we will seek this consent from you when you first provide us with Personal Information whether via our App, via our telephone system or through our website.

If you have previously given consent you may freely withdraw such consent at any time. You can do this through your account on our website and completing the Withdrawal of Consent Form available here.

Where you are dealing with us on behalf of a limited company or LLP, for business purposes, then we may contact you by email to your corporate email address about similar or related products that we offer.

If you withdraw your consent and if we do not have another legal basis for processing your Personal Information then we will stop processing it, however, if we do have another legal basis for processing your Personal Information, then we may continue to do so, subject to your legal rights.

Please note that if we need to process your Personal Information to operate our website, web booking portal, mobile device booking application and/or provide our services and you object, or, do not consent to us processing your Personal Information then those services may not be available to you.

TELLING YOU ABOUT OUR SERVICES

Communicating with our passengers is an essential part of providing a reliable and trustworthy licensed taxi/private hire service. We will therefore contact you by telephone, text, via the app, email or by post to:

- To update you on the progress of your booking;
- To ask for feedback on your journey; and
- To tell you about any other services, promotions and/or special offers in your area.

You have the right at any time to ask us, or any third party, to stop processing your information for direct marketing purposes. If you wish to exercise this right, you should complete our Withdrawal Consent Form available on our website (www.veezu.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.

COOKIES AND RELATED SOFTWARE

Our software may issue 'cookies' (small text files) to your device when you access and use the website and you will be asked to consent to this at the time (e.g. when you first visit our website). Cookies do not affect your privacy and security since a cookie cannot read data off your system or read cookie files created by other sites.

Our websites use cookies and other tracking and monitoring software to: distinguish our users from one another; collect standard Internet log information; and to collect visitor behaviour information. This information is used to track user interactions with the website and allows us to provide you with a good experience when you access the website, helps us to improve our website, and allows us to compile statistical reports on website visitors and website activity.

You can set your system not to accept cookies if you wish (for example by changing your browser settings so cookies are not accepted), however please note that some of our website features may not function if you remove cookies from your system. For further general information about cookies please visit www.aboutcookies.org or www.allaboutcookies.org.

OVERSEAS TRANSFERS

From time to time we may need to transfer your Personal Information to countries outside the European Economic Area, which comprises the EU member states plus Norway, Iceland and Liechtenstein ("EEA").

Such countries may not have similar protections in place regarding protection and use of your data as those set out in this Policy. Therefore, if we do transfer your Personal Information to countries outside the EEA we will ensure that adequate procedures are put in place for the security of your Personal Information.

By submitting your Personal Information to us in accordance with this Policy you consent to these transfers for the purposes specified in this Policy.

CONTACT INFORMATION

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 get in touch with us.



The Veezu Compliance Team will oversee compliance with this Policy. If you have any questions about this Policy 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.