Go-Coach Hire Limited Privacy Policy

Go-Coach ("We") are committed to protecting and respecting your privacy.

We're serious about protecting your personal data, and we commit to comply at all times with the latest General Data Protection Regulations. This Privacy Notice explains:

- From where we secured your personal data;
- The personal data that we collect;
- Your personal data rights;
- Your right to object to our processing your personal data and withdrawing consent;
- How and when we use that personal data;
- Whether we share your personal data with anyone else;
- For how long will we keep your personal data;
- How you can access your personal data
- Information about our use of cookies

For the purpose of Data Protection Legislation, the data controller is **Go Coach Hire** Limited, Block 10, Vestry Trading Estate, Vestry Road, Otford, Kent TN14 5EL.

What personal data do we collect?

Information provided by you.

You may give us information about you by filling in forms on our site <u>www.go2now.co.uk</u>, by filling in forms on our parent site www.go-coach.co.uk, within the app "Go2" or corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our sites, download our app, subscribe to our services, purchase tickets, register to receive email updates, register with us to use our vehicle wi-fi service, enter a competition, promotion or survey and when you report a problem with our sites or make a complaint.

The information you give us may include, but is not limited to:

- your name
- e-mail address
- phone number
- credit/debit card information

Information we collect about you.

Each of your visits to our sites or when you register to use our on-bus wi-fi services we may automatically collect the following information:

- Geographical location, IP or MAC address or details regarding your use of your mobile device or PC (specifically when launch and use the Go2 app, or you register to use our on-bus wi-fi service).
- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our sites (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

Information we receive from other sources.

We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

Sensitive personal data.

We will not intentionally or systematically seek to collect, store or otherwise use information about you classed as 'special categories of data' or 'sensitive data' (for example, information relating to any trade union membership, ethnic origin or health).

Cookies

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our sites. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy click <u>here</u>.

How do we use your personal data and what is the legal basis for such processing?

The collection of the personal data described above is usually mandatory and, if such personal data is not provided, we will not be able to provide the information, products and services to you. Where the collection of any personal data is not mandatory, we will inform you of this prior to collection, as well as the consequences of failing to provide the relevant personal data.

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally process your personal information only:

- where we have your consent to do so;
- where the processing is necessary to perform our contract with you; or
- where the processing is in our legitimate interests or those of a third party and such interests are not overridden by your data protection interests or fundamental rights and freedoms; and
- where we have a legal obligation to process your personal information.

Information provided by you. We use your personal information as follows:

Purpose of processing	Legal basis for processing
For purchase in app for rides or passes	Performance of a contract
In app messages regarding your journey	Performance of a contract
Marketing relating to Go2	Consent
For contact purposes	Performance of a contract

Information we collect about you. We use your personal information as follows:

Purpose of processing	Legal basis for processing
 Provision of Services • Customer service •	• Necessary for the purposes of our
Internal operations (including troubleshooting, data	contract so we can arrange for Rides and
analysis, testing, research, statistical and survey	payment and in our legitimate interests in
purposes) • Improve service functionality and	understanding and improving our
efficiency • Prevention of fraud/ integrity of systems	technology and Services. • For analysis

Purpose of processing	Legal basis for processing
and manage accounts • To optimise and personalise your experience of the Services	and report generation purposes (including developing new features, support service improvements on payments, pricing, routing, algorithmic dispatching efficiencies, for quality of Service review and fraud detection).
• Provision of Services • Internal operations (including troubleshooting, data analysis, testing, research, statistical and survey purposes) • For analysis and report generation purposes (including developing new features, support service improvements on payments, pricing, routing, algorithmic dispatching efficiencies, for quality of Service review and fraud detection) • Improve service functionality and efficiency • Prevention of fraud/integrity of systems and manage accounts.	• Our legitimate interests
 To optimize and personalize the user experience on the App In relation to passengers, customer service 	Our legitimate interests
Provision of Services • Internal operations (including troubleshooting, data analysis, testing, research, statistical and survey purposes) • Improve service functionality and efficiency • Prevention of fraud/ integrity of systems and manage accounts • To optimise and personalise the user experience on the App • In relation to, Customer service	• Necessary for the purpose of the contract between us

Information we receive from other sources.

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "Questions about this Privacy Notice" heading below.

Sharing Your Information

We may disclose your personal data to the following categories of recipient for the purposes described in this Privacy Notice:

- Our Technology provider to enable you to use our app's in the most seamless way possible
- Braintree payment services for the processing of fares for credit and debit purposes
- Via analytics through Tableau to understand ride data and build anonymised reporting for statistical purposes.

We may also disclose your personal data to any competent law enforcement body, regulator, government agency or other third party where we believe disclosure is necessary:

- I. as a matter of applicable law or regulation
- 2. to exercise, establish or defend or legal rights; or
- 3. to protect your vital interests or those of any other person

We may also transfer your personal data to a buyer or potential buyer (and its agents and advisers) in connection with any reorganisation, restructuring, merger or sale, or other transferring of assets provided that we inform any receiving party it must use your personal information only for the purposes disclosed in this Privacy Notice.

Finally, we may disclose your data to any other person to whom you request us to make disclosure or if you consent to such disclosure.

Data Retention

We will not retain your personal data for longer than is necessary to fulfil the purposes for which we collected that personal information, unless the law permits or requires that we retain it for longer.

The table below explains in more detail how long Go Coach Hire Limited will store different types of information for:

Passenger Information	
Passenger details given within App: (i)	All rider information is kept for 6 years unless a request is
Passengers requested rides/finished	made to remove the data from the database. If the
rides/cancelled rides. (ii) Current	passenger services if commissioned data will be passed to
passengers (iii) Lapsed passengers	the incoming provider should that be required under the

Passenger Information	
	service commission.
Passenger data	For the duration of the passenger's registration with the Customer and then for a period of 6 years following the end of the year in which the passenger last purchased the Customer's services. After a six-year period we will anonymise data and use only positioning data for statistical analysis and research purposes.
Passenger consents to Customer terms and conditions	For the duration of the processing of the Personal Data and up to 6 years thereafter.
Passenger service enquiries	3 years
Statistical reports/marketing data	Six (6) years
Register of complaints	Review after 10 years
Correspondence and papers including emails	Review after 6 years (or 10 years if the documents relate to a complaint or investigation)

Information Security

We apply appropriate administrative, technical and organisational security measures to protect your personal data that is under our control from unauthorised access, collection, use, disclosure, copying, modification or disposal. All information you provide to us is stored on secure servers. We are part of Go Coach Hire Limited, which trains its employees regarding our data privacy policies and procedures and permit authorised employees to access personal data on a need to know basis, as required for their role. We also take steps to ensure that any service provider that we engage to process personal data on our behalf takes appropriate technical and organisational measures to safeguard such personal data.

Transferring Information Internationally

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and in some cases, may not be as protective).

Specifically, we may use third party service providers located in the United States. This means that, when we collect your personal information, it may be processed in these countries. However, we have taken appropriate safeguards to require that your personal data will remain protected in accordance with this Privacy Notice. These safeguards include implementing the European Commission's Standard Contractual Clauses for transfers of

personal information to our third-party service providers and further details can be provided upon request.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

Your Data Protection Rights

You have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us at any time at info@go-coach.co.uk.
- In addition, you can object to the processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us at info@go-coach.co.uk.
- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Questions about this Privacy Notice

If you have any question, concerns or complaints about this Privacy notice or our handling of your personal data, you can contact us by email on info@go-coach.co.uk or by post to the following address:

Go Taxi Hire Limited, Block 10, Vestry Trading Estate, Vestry Road, Otford, Kent (TN14 5EL)

You have the right to complain to a data protection authority about our collection and use of your personal information. If you are based in the European Economic Area, please contact your local data protection authority.

The controller of your personal data is Go Coach Hire Limited.