
PRIVACY POLICY

BACKGROUND:

Edinburgh City Private Hire understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our website, www.allthefives.taxi (**Our Site**) and downloads and uses our App, All The Fives (**Our App**) (together **Our Platforms**) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested before you register on Our Platforms.

1. Information About Us

Our Platforms are owned and operated by Edinburgh City Private Hire Ltd, a company registered in Scotland under company number SC322832.

Registered address: 7 Bankhead Avenue, Edinburgh, EH11 4BT.

Trading Address: 7 Bankhead Avenue, Edinburgh, EH11 4BT.

Data Protection Manager: Kenny McLeod

Email address: KMcLeod@ecph.co.uk

Telephone number: 0131 555 5555

Postal address: 7 Bankhead Avenue, Edinburgh, EH11 4BT

2. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Platforms.

Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4. What Are Your Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 12.

5. **What Data Do We Collect and How?**

Depending upon your use of Our Platforms, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table.

We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children or data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information: Your name	Registration via Our Site and/or Our App and/or by telephone
Contact information: Your Email address and mobile telephone number; your location(s)	Registration via Our Site and/or Our App and/or by telephone
Business information for corporate accounts: business name, business address	Registration via Our Site or by telephone

Payment information: Your card details	By telephone
Any additional information you choose to share with us	Via 'driver notes' on Our Site
Feedback/comments	Via Our App or Our Site
Profile information including login details, favourite pick up locations.	Via Our App and Our Site
Technical information including but not limited to the type of device you use, a unique device identifier	Via Our App or Our Site.
Transaction information relating to your use of Our services, including your order details, delivery information, date and time Our services were provided, amount charged, distance travelled, payment method and any cancellations.	Via Our App or Our Site.

6. How Do We Use Your Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis(es)
Registering you on Our Platforms	Name, email address and mobile telephone number.	Contract: it is necessary for the performance of the contract between Us and You – in this context “contract” arises when you choose to register on Our Platforms or call us to make a booking. We can then provide access to Our Platforms.
Administering Our Platforms.	Name, email address and mobile telephone number.	Legitimate Interest: it is necessary for the purpose of our legitimate interests to collect and process the personal data for the purposes of improving and monitoring Our Platforms and their efficiency and enhancing your use of Our Platforms, and to respond to any queries or requests relating to Our Platforms.
Administering our business.	Name, email	Legitimate Interest: it is

	address and mobile telephone number.	necessary for the purpose of our legitimate interests to collect and process the personal data for the purposes of improving and monitoring Our Platforms and their efficiency and enhancing your use of Our Platforms, and to respond to any queries or requests relating to Our Platforms.
Supplying Our services to you via Our Platforms and EAL Taxi Booking Website	Name, email address and mobile telephone number.	Contract: it is necessary for the performance of the contract between Us and You – for Us to provide access to Our Platforms. Legitimate Interest: it is necessary for the purpose of our legitimate interests to collect and process the personal data for the purposes of improving and monitoring Our Platforms and their efficiency.
Managing payments	Name, email address, mobile telephone number, Business name, business address, business telephone number, card details	Contract: it is necessary for the performance of the contract between Us and You – for Us to provide access to Our Platforms. Legitimate Interest: it is necessary for the purpose of our legitimate interests to collect and process the personal data for the purposes of delivering Our services.
Communicating with you.	Email address and mobile telephone number.	Legitimate Interest: it is necessary for the purpose of our legitimate interests to collect and process the personal data for the purposes of providing and improving Our services delivered via Our Platforms.
Supplying you with information by email or text that you have opted-in-to (you may opt-out at any time by emailing us, details can be found at Part 12).	Email address and mobile telephone number.	Legitimate Interest: it is necessary for the purpose of our legitimate interests to collect and process the personal data for the

		purposes of improving your experience of Our Platforms.
Resolving Complaints	Email address and mobile telephone number.	<p>Contract: it is necessary for the performance of the contract between Us and You which includes resolving any issues with the contract.</p> <p>Legitimate Interest: it is necessary for the purpose of our legitimate interests to collect and process the personal data for the purposes of resolving any issues or complaints.</p>

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message with information, news, and offers on Our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 12.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will We Keep Your Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information: Your name	5 years from the date you (i) last called to make a booking, (ii) deleted your account on our Site or (iii) deleted your account on our App or (iv) last made a booking via EAL Taxi Booking Website.

Contact information: Your email address and mobile telephone number	5 years from the date you (i) last called to make a booking, (ii) deleted your account on our Site or (iii) deleted your account on our App or (iv) last made a booking via EAL Taxi Booking Website.
Business information: business name and business address	5 years from the date you delete your account on our Site assuming any outstanding sums due under the account have been paid in full.
Payment information: card details	We do not keep your payment information, All payments are processed via third party service providers (see Part 9)
Profile information including login details, favourite pick up locations.	5 years from the date you (i) last called to make a booking, (ii) deleted your account on our Site or (iii) deleted your account on our App or (iv) last made a booking via EAL Taxi Booking Website.
Technical information including but not limited to the type of device you use, a unique device identifier	5 years from the date you (i) last called to make a booking, (ii) deleted your account on our Site or (iii) deleted your account on our App or (iv) last made a booking via EAL Taxi Booking Website.
Transaction information relating to your use of Our services, including your order details, delivery information, date and time services were provided, amount charged, distance travelled, payment method and any cancellations.	5 years from the date you (i) last called to make a booking, (ii) deleted your account on our Site or (iii) deleted your account on our App or (iv) last made a booking via EAL Taxi Booking Website.

8. How and Where Do We Store or Transfer Your Personal Data?

We will store or transfer some of your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

We share your data with external third parties, as detailed below in Part 9 that are based outside of the EEA. The following safeguards is applied to such transfers: Where we transfer your data to a third party based in the US, the data may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission](#).

Please contact us using the details below in Part 12 for further information about the particular data protection mechanisms used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take

a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

9. **Do We Share Your Personal Data?**

We may share your personal data with other companies in our group for the purpose of administering our business. This includes subsidiaries and our holding company.

We may sometimes contract with the following third parties to supply certain products or services.

Recipient	Activity Carried Out	Sector	Location
Coolnagour Ltd t/a iCabbi (data processor) https://www.icabbi.com/privacy-statement/	Cloud based taxi dispatch system.	Technology & transport.	HQ at 2nd Floor Offices, Sutton Cross, Co. Dublin, D13 A7X4, Ireland UK office: 1 Melton Way Mansfield Nottinghamshire, NG18 5FU
Edinburgh Airport Limited (EAL) https://www.edinburghairport.com/help/policies/privacy-notice	EAL Taxi Booking Website	Transport	Edinburgh Airport, Scotland
Stripe https://stripe.com/gb/privacy	Payment processing platform	Technology	San Francisco, USA
Curb Mobility Systems (previously Verifone) https://gocurb.co.uk/privacy-notice/	Payment processing platform	Technology	London, UK
Daisy Group https://daisygroup.com/privacy/	Communications Provider	Technology	Lancashire, UK

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. **Can You Withhold Information?**

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Platforms you may be required to submit or allow for the collection of certain data.

11. **How Can You Access Your Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

12. **How Do You Contact Us?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: admin@ecph.co.uk.

Telephone number: 0131 555 5555.

Postal Address: 7 Bankhead Avenue, Edinburgh, EH11 4BT.

13. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Platforms and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Platforms following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 24 May 2019.