



INTRODUCTION

This privacy policy describes how HEATHROW PREMIUM CARS LTD (HEATHROW PREMIUM CARS LTD, “we”, “us” or “our”) collects and processes personal information about you when you visit our website and use our mobile app. It also explains how we use and protect your information, along with your rights.

Personal information is information, or a combination of pieces of information that could reasonably allow you to be identified.

1. PERSONAL INFORMATION WE USE

We will collect your personal information from our direct interactions with you, including using automated processes. We also collect additional information from chauffeurs, as described below.

INFORMATION WE COLLECT DIRECTLY FROM YOU

You may provide us with personal information through our website, mobile app or by corresponding with us via phone, email or otherwise. This includes personal information you provide when you:

- create an account on our website or through our mobile apps;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- contact us about working as a chauffeur-partner; or
- provide feedback or, in case you have a business account, request our sales team to get in touch with you.

The categories of information that we collect directly from you are:

- Identity Data — including first name and last name. You can also choose to add your photo to your profile, but this is not mandatory for the use of our services.
- Passenger Location Data — when you turn on location permissions, this removes the requirement for inserting the address where you are located at. This allows us to provide you with more relevant and accurate search results.
- Chauffeur Location Data — location data provided by chauffeurs allows us to match the available chauffeur or the journey and calculate, using proximity, information such as the chauffeur’s time to the pick-up location, the journey’s distance and the anticipated price for the passenger. Chauffeur location data also allows us to inform you, via push notifications, that the chauffeur has arrived.
- Contact Data — including your email address, telephone numbers and postal code. When using the “Book for another passenger” feature and picking the passenger that you are booking the ride for, you may also give us permission to access the contact details of such person, but we do not save this person's details after the end of the journey.

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- Financial Data — bank account and payment card details (including the expiration date and CVV) in order to process payments. Note that we only use the expiration date and the CVV to confirm the validity of the payment card details, and we do not save the CVV after the payment is confirmed.
- Transaction Data — details about payments to and from you, and other details of products and services you have purchased from us such as location data, pickup and drop-off address, dates, times, distances travelled, amount charged, calls or texts and other related transaction details. We use this information to bill you for our services and to alert you if a payment order has been declined. Note that the sending of these alerts cannot be disabled.
- Technical Data — includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device information such as device ID, device IDFA and other technology on the devices you use to access our website or app.
- Preference Data — including your preferences, feedback and survey responses.
- Usage Data — including information about how you use our website, app, services and products such as information about app downloads, app and web page histories.
- Marketing and Communications Data — including your preferences in receiving marketing from us, as well as your communication preferences.
- Chauffeur Data — including information provided by any chauffeur or prospective chauffeur, information from a chauffeur's CV, ID documents, driving licence, the name and contact details of any company through which a chauffeur provides their services, information from any lawful background checks, car information and registration.
- Journey Ratings — passengers may rate the chauffeur's performance and provide us with additional feedback. We are deactivating chauffeurs with low ratings.

We may also need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

INFORMATION WE COLLECT USING AUTOMATED TECHNOLOGIES

As you interact with our website or app, we may automatically collect the data described above, as well as information about your device, browsing activity and patterns. We may collect this personal information by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites deploying our cookies as further described in our cookie statement.

INFORMATION COLLECTED FROM CHAUFFEURS

In addition to the general information provided to us as described above, our chauffeurs are required to undergo a vetting process before being engaged by HEATHROW PREMIUM CARS

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LTD. In addition to a background check conducted by our representatives (which can be in person or by other means), we require each chauffeur to provide us with:

- A verification of driver license, additional identification and confirmation of such chauffeur's eligibility to work under the applicable law.
- Criminal history record (or lack thereof).
- Personal address and date of birth for anti-money laundering purposes.

We request the chauffeurs to provide this information in order to protect the security of our users, fulfil our legal obligations towards our users and comply with the applicable laws.

INFORMATION WE COLLECT FROM OTHER SOURCES

We may receive personal information about a chauffeur in order to satisfy our background check.

When a person wishes to apply for a business account, we may collect such person's or business's credit score.

2. HOW WE USE YOUR INFORMATION AND THE BASIS ON WHICH WE USE IT

We use your personal information:

- to provide you with and personalise our services.
- to deal with your enquiries and requests and to provide customer support.
- to enable you to communicate with chauffeurs directly by either voice or chat. Note that we do not disclose your phone number to the chauffeur, or vice versa. In order to enable this feature, we receive the date, time and content of the communication. This information also allows us to resolve disputes and to improve the safety and security for our users and chauffeurs.
- to comply with legal obligations to which we are subject and cooperate with regulators and law enforcement bodies.
- to contact you via email or using push notifications with marketing and offers relating to products and services offered by us (unless you have opted out of marketing, or we are otherwise prevented by law from doing so).
- for advertising and marketing purposes, including interest-based advertising, in line with your preferences. We also use measurement tools to measure the effectiveness of our advertising campaigns. Note that you can opt-out by enabling "limit ad tracking" on your device.
- to personalise the marketing messages we send you to make them more relevant and interesting.
- to protect our rights or the rights of others.
- to ask you to participate in surveys. Whenever you participate in a survey that we send to you, our aim is to understand how you feel about our services and try to fit them to your specific needs.
- to analyse how our services are used, in order to help us improve our offering and fit it to our customer's needs.

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- for fraud prevention. We use automated technology to analyse interactions between our users and HEATHROW PREMIUM CARS LTD, in order to ensure that passengers are using our services legitimately. We may suspend accounts that we believe to be fraudulent.

We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- to fulfil our contractual obligations to you, for example to provide the services, to establish and maintain your account, to communicate with you about your booking and to make or receive payments.
- to comply with our legal obligations, regulatory and audit obligations. In particular, HEATHROW PREMIUM CARS LTD is subject to laws and regulations in the countries we operate which require us to collect and retain certain information about the use of our services, including obligations to carry out anti-money laundering checks on our chauffeurs.
- to meet our legitimate interests and those of third parties, for example to understand how you use our services and to enable us to derive knowledge that enables us to develop new services. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

We may obtain your consent to collect and use certain types of personal information when we are required to do so by law. If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this privacy policy.

We may be required by law to collect certain personal information about you, or as a consequence of any contractual relationship we have with you. Failure to provide this information may prevent or delay the fulfilment of these obligations but we will notify you if this is the case at the time.

3. OUR USE OF COOKIES

We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising. Where you have given your consent (where lawfully required), we use cookies, log files and other technologies to collect personal information from the device you use to access our website, app and services.

We may use “cookies”, “web beacons” or “pixel tags” (“Tags”) and mobile identifiers. Tags allow us to track receipt of an e-mail to you, to count users that have visited a webpage or opened an e-mail and collect other types of aggregated information. Once you click on an e-mail that contains a Tag, your contact information may subsequently be cross-referenced to the source e-mail and the relevant Tag. In some of our e-mail messages, we use a “click-through URL” linked to a certain website administered by us or on our behalf.

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You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. See our for more details.

4. HOW WE SHARE YOUR INFORMATION

We may share your personal information with third parties under the following circumstances:

- *Journey information shared between passengers and chauffeurs.* When you book a journey with us, we will provide you with certain information once a chauffeur is on their way to you, such as:
 - The chauffeur's first name, picture and rating.
 - The chauffeur location — commencing on the time where the trip has been accepted and ending on the time where the trip ends.
- Once a chauffeur accepts a journey, we will provide the chauffeur with:
 - Your first name (and, if provided by you, your picture).
 - Your pick-up address and desired destination.
- *Journey information shared with third parties.*
 - If you are paying using a business account, the owner of such account will have access to the journey's details.
 - If the ride is paid for by a person other than the passenger using the "Book for another passenger" feature, we may, at our discretion, provide such person with access to the journey's details.
 - If the chauffeur is working for a partner of HEATHROW PREMIUM CARS LTD, then the chauffeur's details will be available to the HEATHROW PREMIUM CARS LTD partner as well.
 - If you are using a complimentary journey offered to you by a third party and paid by it, we may provide the third party with the date and time of the journey, as well as the price and service level of such journey.
- *Information shared with service providers and business partners.* Other companies help us conduct the activities described in this privacy policy and so we may share your personal information with those service providers and business partners. They may be providing us with services such as technical infrastructure, marketing, analytics and survey tools. We also work with companies professional advisors including lawyers, bankers, auditors, insurers or accountants.
- *Information shared Between HEATHROW PREMIUM CARS LTD Group Companies.* We may share certain information within the HEATHROW PREMIUM CARS LTD Group Companies in order for us to provide services.
- *Information shared with Law enforcement agency, court, regulator, government authority or other third party.* We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.
- *Asset purchasers.* We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure

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that the entity to which we transfer your personal information uses it in a manner that is consistent with this Privacy Policy.

Credit Reference and Consent

Any Hirer expressly consents and authorises Heathrow Premium Cars Ltd, to access, obtain, and review the Hirer's credit profile and related information from credit reference agencies at any time deemed necessary by the Company for the purposes of fraud prevention, assessment of creditworthiness, investigation of default, breach of contract, missed payment, or any other related purpose. The Company may share relevant information with credit reference agencies, fraud prevention agencies, and law enforcement authorities as required. Such access and sharing may occur both during the term of this Agreement and after its termination, where outstanding obligations remain. The Hirer acknowledges that this may result in a record of the search being placed on their credit file. This clause is governed by and shall be construed in accordance with English law.

Credit Reference Terms and Conditions

1. The Hirer consents to Heathrow Premium Cars Ltd conducting credit checks with one or more credit reference agencies at any time during the Agreement, including in the event of suspected fraud, default, breach of contract, or missed payment.
2. The Company may disclose information regarding the Hirer's payment history, contract performance, and any instances of default or breach to credit reference agencies and fraud prevention agencies.
3. The Hirer understands that information provided to credit reference agencies may be used by other organisations to assess credit applications, prevent fraud, and trace debtors.
4. The Company reserves the right to take appropriate action, including but not limited to reporting to credit reference agencies, in the event of non-payment, default, or breach of contract.
5. The Hirer acknowledges that failure to comply with the payment terms or other obligations under this Agreement may adversely affect their credit rating and ability to obtain credit in the future.
6. The Hirer has the right to request access to, rectification, or erasure of their personal data, to restrict or object to processing, and to lodge a complaint with the Information Commissioner's Office (ICO).
7. By entering into a Hire Agreement, the Hirer acknowledges and agrees to the processing of their personal data as described above.

Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See the section on "International Data Transfer" below for more information.

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5. INFORMATION SECURITY AND STORAGE

We implement technical and organisational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

We will keep your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- Maintain business records for analysis and/or audit purposes.
- Comply with record retention requirements under the law.
- Defend or bring any existing or potential legal claims.
- Deal with any complaints regarding the services.

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

6. INTERNATIONAL DATA TRANSFERS

HEATHROW PREMIUM CARS LTD services are offered from our United Kingdom headquarters. In addition, some of our service providers are located in these and other jurisdictions. Please therefore note that your personal information may be transferred to, stored, and processed in countries outside the European Union or United Kingdom that do not have similar data protection laws to the European Union or United Kingdom.

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

7. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

You may delete your user account at any time by proceeding to *Profile -> Terms & Privacy -> Delete Account*. You should note that you will not be able to delete your account in the event where you have any outstanding payment.

You can also ask us to stop sending you marketing communications at any time by logging into the website or app and checking or unchecking relevant boxes to adjust your marketing preferences, or by following the opt-out links on any marketing message sent to you.

You have certain rights regarding your personal information, subject to local law. These include the following rights to:



- access your personal information.
- rectify the information we hold about you.
- erase your personal information.
- restrict our use of your personal information.
- object to our use of your personal information.
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability).
- lodge a complaint with your local data protection authority.

You may also object only to the processing of your personal information for advertising and data analysis purposes at any time.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

We will contact you if we need additional information from you in order to honour your requests.

If you would like to discuss or exercise such rights, please contact us at the details below.

8. CONTACT US

Inder Pal Singh, Director HEATHROW PREMIUM CARS LTD is the controller responsible for the personal information we collect and process.

If you have questions or concerns regarding the way in which your personal information has been used, please contact us using the details provided below.

Email address: info@heathrowpremiumcars.co.uk

Postal address: 8 Croxley Court, 4 Garnet Place. West Drayton UB7 7GF

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the data protection authority of the United Kingdom, the Information Commissioner's Office using their website <https://ico.org.uk/> or the data protection authority applicable to you.

9. CHANGES TO THE POLICY

You may request a copy of this privacy policy from us using the contact details set out above. We may modify or update this privacy policy from time to time.

If we change this privacy policy, we will notify you of the changes. Where changes to this privacy policy will have a fundamental impact on the nature of the processing or otherwise

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have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).

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