

# Data Protection Policy - 2025



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## 1. Introduction

This policy outlines how [Your Company Name] handles personal data, ensuring compliance with the UK GDPR and the DPA 2018. We are committed to protecting the privacy and security of the personal data we process, including that of our customers, drivers, and employees.

## 2. Scope

This policy applies to all employees, contractors, and agents of [Your Company Name] and to all personal data we process. The policy covers all systems, activities, and data sets where personal data is handled.

## 3. Data protection principles

We adhere to the UK GDPR's six principles for processing personal data, ensuring that data is:

- **Lawful, fair, and transparent:** Processed legally, fairly, and with full transparency for the data subject.
- **Purpose limited:** Collected for specified, explicit, and legitimate purposes.
- **Data minimised:** Adequate, relevant, and limited to what is necessary.
- **Accurate:** Kept accurate and up-to-date, with inaccurate data rectified without delay.
- **Storage limited:** Retained no longer than necessary.
- **Confidential and secure:** Processed securely, with appropriate technical and organisational measures in place.

## 4. The legal basis for processing data

We process personal data on the following legal bases:

- **Legal obligation (Article 6(1)(c)):** For compliance with licensing conditions set by Bury Council under the Local Government (Miscellaneous Provisions) Act 1976 and other legal requirements.
- **Contractual necessity (Article 6(1)(b)):** For fulfilling our contractual obligations to customers and contracted drivers.
- **Recognised legitimate interests (DUAA 2025):** For specific purposes such as fraud prevention, business operations, and public security, as now recognised under the Data (Use and Access) Act 2025.

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## 5. Personal data we process

To operate our private hire service and meet our licensing obligations, we process the following types of personal data:

- **Customer data:** Names, phone numbers, pick-up and destination addresses, booking times, and special requirements.
- **Driver and vehicle data:** Names, addresses, contact details, driver and vehicle licence numbers, insurance details, and DBS check information.
- **Employee data:** Names, addresses, contact details, DBS check information, and start/finish dates for staff taking bookings and dispatching vehicles.
- **Booking records:** Detailed electronic records of all bookings, including pick-up and drop-off points, timestamps, and driver/vehicle identifiers, are kept for a minimum of 12 months as per Bury Council conditions.
- **Vehicle tracking data:** GPS data is recorded and retained for a minimum of 12 months for inspection by authorised officers.
- **CCTV and audio recordings:** Where used, CCTV and audio recordings are processed for safety, crime prevention, and dispute resolution.

## 6. Data retention

Personal data is retained only for as long as necessary to fulfil the purposes for which it was collected, and to meet our legal obligations under Bury Council's licensing conditions.

- **Booking and GPS records:** Retained for a minimum of 12 months as required by Bury Council.
- **Financial records:** Retained for a minimum of six years to satisfy accounting and legal requirements.
- **Licensing and employment records:** Retained in line with licensing requirements and our legal obligations.

## 7. Data security

We implement robust technical and organisational measures to protect personal data against unauthorised or unlawful processing, as well as against accidental loss, destruction, or damage. These measures include:

- Access controls to prevent unauthorised access to booking and dispatch systems.
- Password protection and encryption for electronic records.

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- Secure storage for hard-copy documents containing personal data.
- A procedure for dealing with suspected data breaches, including notifying the Information Commissioner's Office (ICO) within 72 hours where required.

## 8. Data subjects' rights

Under UK GDPR and the DUAA 2025, individuals have enhanced rights concerning their personal data. We are committed to upholding these rights:

- **The right to be informed:** We provide clear and transparent privacy notices to explain how personal data is used.
- **The right of access (Subject Access Requests):** Individuals have the right to request a copy of their personal data. We will respond within one month, and our searches will be reasonable and proportionate.
- **The right to rectification:** Individuals can have inaccurate data corrected.
- **The right to erasure:** Individuals can request the deletion of their personal data under certain circumstances.
- **The right to restrict processing:** Individuals can request a restriction on processing their data under certain circumstances.
- **The right to data portability:** Individuals can request to receive their personal data in a portable format.
- **The right to object:** Individuals can object to the processing of their personal data.
- **The right not to be subject to solely automated decision-making (ADM):** Individuals have the right to request human intervention and challenge significant decisions made solely through ADM.

## 9. Sharing of personal data

We will not disclose personal data to third parties unless required by law or necessary for our business operations. This includes:

- **Bury Council:** Sharing information as required for our licensing obligations.
- **Third-party providers:** Sharing data with service providers who process data on our behalf, such as booking software or accounting services. We ensure these providers are also compliant with data protection laws.

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- **Law enforcement and regulatory bodies:** Disclosing information to the police or other authorities when legally required, such as under the Taxis and Private Hire Vehicles (Safeguarding and Road Safety) Act 2022.



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## 10. Staff training and accountability

All staff, paid or unpaid, who handle personal data, receive training on this policy and their data protection obligations. We maintain records of this training. Compliance is overseen by our designated Data Protection Lead. We will have an internal complaints procedure for data protection matters as required by the DUAA 2025.

## 11. Complaints and contact

If you have a data protection concern, you can contact our Data Protection Lead:

**Name:** Frances Dutton - Protection Lead

**Position:** Director

**Email:** [CEC-hire@pm.me](mailto:CEC-hire@pm.me)

You also have the right to lodge a complaint directly with the Information Commissioner's Office (ICO) at [ico.org.uk](https://ico.org.uk).