

Privacy Policy/Notice for Drive 4 Life

1. INTRODUCTION

This privacy notice provides you with details of how Drive 4 Life collects and process your personal data.

Drive 4 Life is the data controller and Drive 4 Life is responsible for your personal data (Drive 4 Life will be referred to as **we** from hereon in the aforementioned document).

Our contact details are:

Drive 4 Life
4 Adlington Hall Mews
Mill Lane
Adlington
Macclesfield S10 4LF

If you're not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact Drive 4 Life first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by contacting us using any of the above contact methods.

Sensitive Data

We may collect some Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

However, purely for the purpose of driver training, the only sensitive data we may need to collect about you would be about your health such as diabetes for example. We do not collect any other data as mentioned in the above paragraph. We do not collect any information about criminal convictions and offences.

We require your explicit consent for processing sensitive data about your health and we will request your signature for this consent.

2. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract of services between us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity (where we use the word “identity” this covers data such as name, address, age, licence details, type of licence, contact number, email address, college/university, gender) (b) Contact	Performance of a contract of services with you
To process and deliver a service to you including: (a) Manage payments and fees (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract of services with you (b) Necessary for our legitimate interests to recover debts owed to us

<p>To manage our relationship with you which could include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) The possibility of asking you to take a survey or leave a review on our social media channels such as Facebook, YouTube, Instagram etc</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract of services with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c+d) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services and how they rate our service</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p>	<p>Necessary for our legitimate interests to develop our products/services and grow our business</p>

Marketing communications

You will not receive any marketing communications from us. However, if we want to include you in any of our marketing communications, then we will get your expressed opt-in consent.

Where we do have your opt-in consent, we will make it clear before you opt-in if we share your personal data with any third party for marketing purposes.

In such circumstances, you can ask us or third parties to stop sending you marketing messages at any time by contacting us or by choosing the opt out functionality on the message.

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase for example driving lessons.

3. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 2 above:

- HM Revenue & Customs, regulators and other authorities based in the United Kingdom such as the DVSA (online licence checker) and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

Third parties to whom we transfer, or merge parts of our business records too, such as a third-party application provider for business use and in connection with the trading of Drive 4 Life

- INSERT DETAILS OF ANY OTHER THIRD PARTIES, FOR EXAMPLE, MARKET RESEARCHERS, FRAUD PREVENTION AGENCIES, PRICE COMPARISON SITES ETC]

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

4. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those who are associated with Drive 4 Life and other third parties who may have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and we will notify you and any applicable regulator of a breach where we are legally required to do so.

5. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or delivery of services requirements mainly including driver training.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law, we have to keep basic information about our customers (including Contact, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) statistical purposes such as pass rates in which case we may use this information indefinitely without further notice to you.

6. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please contact us using any of the methods of contact at the top of this page.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

7. CONSENT

By consenting to this privacy policy notice you are giving Drive 4 Life permission to process your personal data specifically for the purposes identified. Consent is required for Drive 4 Life

to process both types of personal data but it must explicitly be given. Where [insert your driving school name here] is asking for personal sensitive data we will always tell you why and how the information will be used.

Disclaimer

This document is not the same as legal advice, where a solicitor guides you about the law to your specific circumstances, so we insist that you consult a solicitor if you'd like advice on interpretation of this information or its accuracy. In a nutshell, you may not rely on this document as legal advice, nor as a recommendation of any particular legal understanding but use the above information purely as a guide.