

## Shield Executive Car Service (SECS): PRIVACY POLICY

We are committed to protecting and respecting your privacy.

This privacy policy (together with any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### Who we are

We are Shield Executive Limited (UK company number 04748994) with our registered address at Dalton House, 60 Windsor Avenue, London, SW19 2RR.

We are the data controller with respect to any personal data collected from or provided by you directly. Our data protection registration number is ZA210361.

This policy applies only to our processing of your personal data. It does not apply with respect to any data collected by, or provided by you to, any third party, including any personal data you provide via any third party website. We have no control over third party websites or the policies they may apply. You are responsible for checking the acceptability of any third party websites and/or policies before you access or use those sites.

### What information do we collect?

We may collect and process the following kinds of personal data:

- a) information about your computer and about your visits to and use of this site (including without limitation your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and site navigation, traffic data, weblogs, browser usage and other communication data and the resources that you access);
- b) information that you provide to us for the purpose of registering with us (including your name, job title, address, telephone number, email address, demographic information (such as postcode, preferences and interests) and (if applicable) any payment details, such as bank account details or similar information you provide by filling in forms on our site or subscribing to any services, including any subscription for email notifications or newsletters; **We do not store credit card details nor do we share customer credit card details with any 3<sup>rd</sup> parties.**
- c) We collect personal information when you register online or update your account, log-in, place an order, communicate online with our customer service representatives, opt-in to receive our emails, order taxi/private hire online, request advance taxi/private hire, participate (where permitted by law) in a contest, promotion or survey, join our social networking sites' pages, or apply for one of our customer loyalty programs. We may also collect personal information from you through our online surveys and/or other marketing material;
- d) If you use our "refer a friend" functionality found on all our social networking pages, or if you choose to send an email from our site to a friend, we will also collect your friend's name and email address. Please ensure that you have the permission of your friend before using this functionality. Your friend's information is only used to send the forwarding email and is not saved in our customer or marketing databases;
- e) information provided if or when you report a problem or require support;

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- f) if you contact us, we will keep a record of that correspondence;
- g) any information you choose to provide in responding to surveys that we use for research purposes (although there is no obligation to provide any such information); and/or
- h) any other information that you choose to send to us.

Providing your personal information to us is voluntary, however, if you do not provide some or all of the information we request, we may not be able to provide you with certain products, services, or information.

### IP Addresses & Cookies

We may collect information about your computer or your mobile device, including where available your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns and does not identify any individual and we will not collect personal information in this way.

However, if the address is a "static" or fixed IP address, we could in certain circumstances theoretically be able to identify you. However, we only collect this type of information to compile usage statistics on an anonymous basis; we do not collect IP address data to identify you.

We may obtain information about your general internet usage by using a cookie file which is stored on your computer or mobile device. Cookies contain information that is transferred to your computer or mobile device. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- a) To estimate our audience size and usage pattern;
- b) To store information about your preferences, and so allow us to customise our site and/or our software according to your individual interests;
- c) To improve or streamline our services or our software;
- d) To speed up your searches; and/or
- e) To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site or use certain features of our software. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site or our software.

Most internet browsers automatically accept cookies, but if you do not wish to have cookies on your system, you can set your browser preferences to refuse them or to alert you when cookies are being sent. In order to disable cookies, please consult your browser's "help" section for instructions. Additionally, if you have an Adobe Flash player installed on your computer, your Flash player can be set to reject or delete Flash cookies. If you choose to decline cookies, you may not be able to fully experience the features of our websites.

For further information please refer to our Cookie Policy

<https://secure.toolkitfiles.co.uk/clients/35141/sitedata/files/CookiesPolicy.pdf>

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### Where we store your personal data

The data that we collect from you is stored and processed in the UK. However, we may need to transfer data to our agents, suppliers and others within the European Economic Area ("EEA") in connection with the provision of services to you, including (without limitation) the processing of payments. By submitting your personal data, you agree to this transfer, storing or processing of your personal data within the EEA should it be required for the said purposes.

### Uses made of the information

We use information held about you in the following ways:

- a) To ensure that content is presented to you in the most effective manner;
- b) To provide you with information, products or services that you request from us or which we feel may interest you;
- c) To carry out our obligations arising from any contracts entered into between you and us, including the provision of services;
- d) To allow you to participate in interactive features of our service, when you choose to do so;
- e) To notify you about changes to our site or services;
- f) To administer the site and/or services, to keep them secure and prevent fraud;
- g) To send you general (non-marketing) commercial communications;
- h) To send you email notifications which you have specifically requested;
- i) To deal with enquiries and complaints made by or about you; and/or
- j) To verify compliance with any applicable terms of use and other legal requirements relating to the use of our site or services.

We may combine information you provide with demographic information, information that is publicly available, and information about your order and taxi/private hire company preferences and interests in order to improve our site design and enhance user experience.

We will not disclose your personal information to third parties for their own marketing purposes without your opt-in consent. We do not collect or process any "sensitive" data about you such as data about health or similarly sensitive matters until it is required to provide you the taxi/private hire service meeting your physical needs.

### Your online account

When setting up an online account at our website/mobile application, you will be prompted to select a password. The retrieval of personal information relating to you and your order history is only available to you if you provide the correct password that you have created, and all profile information, including your address book, is only available while you are logged in to your account. After providing your password, you can edit or delete your information at any time through the "Login" page.

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If you forget your password, a new password will be assigned to you and will be emailed to your email address. We will not give passwords out over the phone, nor will we email them to a different address than the one used to register.

Your address book, located in the "Login" page of our website, is your personal storage space. You may also view and, if you wish, change information you submitted as part of the online account registration process, while navigating the site, and using your online account. You also have the right to ask us what information we hold about you and to ask us to remove or correct any inaccurate information. You may also object to the processing of your personal information and revoke the consent provided to us (or make any inquiries concerning this privacy policy or lodge a complaint) by contacting us using one of the methods provided above.

### **Disclosure of your information**

We may disclose your personal information to any of our employees, officers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this privacy policy.

We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this privacy policy.

In addition, we may disclose your personal information:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any ongoing or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- (d) to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
- (e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this privacy policy, we will not provide your information to third parties.

### **Customized advertising (behavioural marketing)**

Advertisements displayed to you on our websites and elsewhere on the Web may be customized to your interests and preferences, based on information learned about you as you use our website and the Web in general. By accepting this Privacy Policy you consent to the use of your information as described in this section.

### **How we work with third-party service providers**

We work with reputable third parties who perform services on our behalf. Sometimes these service providers need information about our customers in order to do their jobs, such as fulfil orders and

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promotions, maintain and manage our customer database and report on customer preferences. When we allow these service providers access to your information, we require them to maintain your information in the strictest confidence, and we do not permit them to use it in any way other than to help us provide you with better service. Please note that these third-party service providers may be established in countries that might not offer a level of protection for your personal information that is equivalent to the one offered in your country of residence. However, we will endeavour to protect all personal information we collect from you in accordance with strict data protection standards. In particular, we allow our e-commerce partners in the UK to obtain personal information for the purposes of facilitating order processing.

We currently use the services of a few carefully selected companies to help manage and optimize our Internet business and communications. These companies help us measure the effectiveness of our advertising and better understand how visitors use our sites. To do this, cookies are placed on computer browsers and web beacons are placed on our websites on our behalf. The type of information collected in this manner includes pages visited, taxi/private hire companies viewed and orders placed through our website and mobile applications. By supplementing our records, this information helps us to identify what pages are most attractive to our visitors, which of our services most interest our customers and what kinds of offers our customers like to see.

### **Security of your personal information**

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on secure (password- and firewall-protected) servers.

You are responsible for keeping your password and other login details confidential. We will not ask you for your password (except when you log in).

We use Secure Socket Layer (SSL) technology to protect the security of your online order information. SSL technology encrypts your order information to protect it from being decoded by anyone other than us.

Once you enter the checkout page, your computer will begin communicating with our server in secure mode. You can tell that you are in secure mode by the following:

- The "http" in the web address will be replaced by "https"
- Depending on the browser, you will see either a padlock (Microsoft Internet Explorer, AOL, Netscape Communicator) or a solid key (Netscape Navigator) in the lower section of the browser window.

Only browsers that use the 256-bit Secure Socket Layer technology are able to order through our website. If your browser does not support SSL, you can get an upgrade at Microsoft's or Netscape's home page. While we implement these and other security measures on our sites, please note that 100% security is not always possible. You play a role in protecting your information as well. Because your password permits access to your personal information, please keep your password secret and do not disclose it to others.

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Unfortunately, the transmission of information via the internet and/or via mobile networks is not completely secure. We cannot guarantee the security of your data transmitted via those methods and any such transmission is at your own risk.

### **Your rights**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes. You can exercise your right to prevent such processing at any time by contacting us at [support@secs.london](mailto:support@secs.london).

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **Access to Information**

The Data Protection Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act.

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be subject to:

- (a) the payment of a fee (currently fixed at GBP£10.00; and
- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

We may withhold such personal information to the extent permitted by law.

### **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. However, we advise that you check this page regularly to keep up to date with any necessary changes.

### **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [support@secs.london](mailto:support@secs.london).