### ENTERPRISE PRIVATE HIRE LTD - PRIVACY POLICY

Enterprise Private Hire Ltd (also referred to as "we" or "us" in this policy) is a company registered in England and Wales that provides Private Hire services to customers primarily based in or travelling in the United Kingdom.

Maintaining the security of your data is important to us, and we are committed to respecting your privacy. Please read this notice carefully so that you understand your rights in relation to your personal data.

This policy provides you with information about:

- what personal data we collect
- how we use your data
- how we ensure your privacy is maintained
- your legal rights relating to your personal data

We act as a Data Controller for the purposes of the General Data Protection Regulation (GDPR) and this privacy policy sets out the basis on which we will manage any personal data that you provide to us. This data may be provided:

- in person
- by telephone
- online at www.enterpriseprivatehire.com & www.bookenterprise.co.uk
- via our mobile apps on IOS and Android platforms

## What personal data do we collect?

Personal data means any information that can be used to identify directly or indirectly a specific individual. Enterprise Private Hire Ltd collects the following data:

- 1. Data provided by users:
  - o user profile data such as first name, last name, email, mobile number, physical address, payment and bank account details, driving license data, user vehicle data, user photographs. A photograph may need to be provided in order to verifying your identity
  - o additional data such as driving licence data, photographs and usernames in order to verify the authenticity of documents and to verify a driver's identity
  - o data provided when users request technical support this may include bank details, user device information, user app information, recordings of telephone calls, journey data (date and time, physical addresses and flight information)
- 2. Data created by users when using our App services
  - Geo-positioning data we track geo-position of drivers and passengers in order to organise a ride, provide maximum comfort and service level, provide safety and identify and prevent any fraudulent activity Geo-positioning is

- collected from mobile devices and only if users allow. Users can disable geopositioning, but this may result in a poorer service
- Transaction data we collect data on transactions made due to using our services, this includes type of transaction, amount, date and time of transaction, card holder name
- App usage data we gather data on how users interact with our app and services. This data includes data and time of logging in and logging out, app functionality, app failures and system data needed to improve app quality and performance
- Device data we may collect data about the device which is used for access to our services, such as device model, IP address, unique device id, geo data and connection quality data

### 3. Data collected from other sources

- Data from business partners this is used to provide additional services such as payment provision, or for interaction with other apps and websites which use our API or whose API is used by our app
- Data from other private hire companies engaged by us, such as travel data or information about passengers or drivers
- Data collected in accordance with national or local government laws or policies

We may also record telephone conversations for training and quality purposes.

All the personal data that we collect is stored in a secure data centre within the FU.

## How do we use your data?

We collect, process and disclose your personal data only for specific and limited purposes. These include:

- to provide you with private hire services in a safe and secure manner
- to develop and improve our services and communication methods
- to communicate information to you.
- to manage your registration and usage of our online platforms and apps
- to authenticate the identity of individuals contacting us
- to process debit and credit card payments
- to assess and handle any complaints
- for internal training and quality assurance purposes
- to understand and assess the interests and needs of our customers
- to improve our current products and services, and develop new ones
- to improve our business automation
- to comply with national and local government requirements

#### 1. Service Provision

Enterprise Private Hire uses your data for verification and testing, personalising, support and improving of its services, including:

- Creating accounts and changing data
- Providing private hire journeys (geo-positioning data for service improvement), data exchange (calculation of arrival time, security provision, route calculation, linking to flight information, tracking and sending information about a journey)
- Payment processing and other financial data
- Performing operations which are needed to improve service and customer support, testing, analysis and also monitoring of services used

#### 2. Security and Protection

Enterprise Private Hire Ltd uses data for providing security and protection of users and for our services in the following ways:

- to comply with national or local government requirements by collecting driver photographs (which may be passed on to service users)
- using data from drivers' and passengers' devices to evaluate journey safety and to improve driving safety for subcontractors.
- using data from drivers' and passengers' devices to identify and prevent any fraudulent activity. For example, we detect fraudulent accounts and cases when our services are used for illegal purposes, and prevent unauthorised access to those accounts
- using a rating system for evaluation of drivers and passengers to prevent the potentially high risk of conflict
- sending information about serious violations to third parties such as police authorities - in accordance with legislative requirements

#### 3. Customer Support

 Enterprise Private Hire Ltd uses personal data, application data, systems, and devices to provide technical support and improve quality of its services

#### 4. Research and Development

 Enterprise Private Hire Ltd uses personal data to perform testing, research, analysis, development, and improvement of its services. This helps us to make our services better and more secure and develop new functionality

### 5. Sending non-marketing Messages

- We can use personal data to inform our users about changing of terms and rules, and for sending non-marketing messages which are needed to provide services
- 6. Fulfilling Legislative Requirements and Court orders

 We can use personal data to settle litigation and court orders associated with the use of our services and for fulfilling court orders in cases when data is required by public authorities, including the police

#### 7. Automation of Business Processes

Enterprise Private Hire Ltd uses personal data for automation of business processes, such as:

- o providing eligible drivers. Drivers can be found on the basis or availability, nearest position, and other factors, as well as based on statistical user data
- investigation of users who are suspected of committing or being involved with fraudulent activity or any other activity which may cause harm to Enterprise Private Hire Ltd. In cases when users provide false information or fake license details this may lead to disabling user accounts
- use of drivers' data (geo-positions, ratings) and passengers' data (departure locations, ratings) to eliminate collisions of users with high risk of conflict

Where appropriate, we will ask for your consent to process your personal data. Where you have given consent for processing activities, you have the right to withdraw your consent at any time.

We also process your personal data when we have a legal obligation to perform such processing, e.g., for tax purposes or to comply with national or local authority requirements.

### Use of Cookies

A cookie is a small piece of data which is sent by a web-service and stored on a user device (i.e., personal computer, mobile phone, tablet). Enterprise Private Hire Ltd uses Cookie files for the following purposes:

- to perform user authentication
- to save user settings
- to keep a history of journeys and other historical user data
- to display a specific language in our website interface according to your geographical position

## Transfer and Disclosure of User Data

Enterprise Private Hire Ltd provides data to other entities or provides data on demand in cases where it falls under the requirements of the law or when it is

required in order to satisfy claims or to settle disputes. Enterprise Private Hire Ltd can transfer user data in the following cases:

### 1. To Other Users

- to carry out a journey we may give to a driver your name, email, telephone, information about pickup location and destination location
- to carry out a journey we may give to a passenger a driver's name, photograph, license number, vehicle brand and model and vehicle registration number
- 2. To Suppliers and Business Partners
  - Enterprise Private Hire Ltd may transfer journey details to its partners via API integrations
  - we also transfer data to credit and debit card transaction providers
- 3. For legislative grounds or in dispute cases

Enterprise Private Hire Ltd may disclose personal data in cases when legislation requires to do so, in court disputes, or when public authorities, including the police, require this.

4. In cases when users allow sending of data

Enterprise Private Hire Ltd may send data to third parties in cases that go beyond this Agreement if we have informed you about our intention to send data and you have allowed this.

## Storage and removal of data

Enterprise Private Hire Ltd will only store personal data as long as is necessary to provide you with our services in accordance with our policies. Users can request removal of their data at any time by sending an email request to accounts@enterpriseprivatehire.com or by writing to us at the address below.

Enterprise Private Hire Ltd may store personal data even after performing a user request to meet legislative requirements.

Where we have no legitimate business need to retain your personal data, we will either delete or anonymise it.

### Data Access and Data Collection Refusal

Where we process your personal data, GDPR gives you some rights over how the data is processed. These include:

 the right to clear and transparent information about what data we collect and how it is used

- the right to access, correct or update your personal data at any time
- the right to move, copy or transmit your personal data elsewhere
- the right to request that we delete your data (under certain circumstances)
- the right to restrict processing of your personal data (under certain circumstances)
- the right to object to certain types of processing, including for direct marketing
- the right to withdraw consent to for us hold your personal data

You may review and manage our data collection settings via your device App (you can find App permissions in Device settings -> Apps -> Permissions -> Choose permissions) as follows:

- Confidentiality Settings Users may view and manage settings for the collection and transfer of geo-positioning data and for receiving notifications in the "Settings" > "Applications" > Enterprise Taxis > "Rights" and "Notifications"
- 2. Geo-positioning data Users may allow or not allow the collection of geo-positioning data for their mobile devices
- 3. Permission for camera use the camera is used to scan debit or credit card details at the point of payment for a booking. The payment process is provided through the financial service provider's API interface
- 4. Collecting data on telephone status Users can allow or disallow access to telephone functions on their device. If this function is disabled, this will result in failure of sending requests
- Enabling or disabling notifications Users can enable or disable notifications about journey status changes or account actions.
  Disabling notifications may result in a lower quality of user experience with Enterprise Private Hire Ltd
- Disabling Marketing Messages users can disable the sending of marketing messages by contacting accounts@enterpriseprivatehire.com

## Contacting Us

If you have any questions, comments, or concerns about this privacy policy, please contact <u>john.walker@enterpriseprivatehire.com</u> or write to us at:

Enterprise Private Hire Ltd Unit 11 Drayton Industrial Estate Taverham Road Drayton Norwich NR8 6RL Further information and advice about your rights can be obtained from the Information Commissioner's Office (ICO) at www.ico.org.uk

# Changes to this Privacy Policy

Enterprise Private Hire Ltd has a right to make changes to this Privacy Policy. If the changes are significant, we will notify you via the Enterprise Taxis App or in any other available way, for example, by email.

We may periodically update this privacy policy to continue to meet GDPR compliance or to comply with other legal or regulatory changes.

Use of our services after an update constitutes consent to the updated notice to the extent permitted by law.

You may view or download a copy of this policy in PDF format by clicking <a href="here.">here.</a>

This notice was last updated on 7th January 2022.