



**Data Protection Policy for new and existing Customers.**

**ANGELA COACHES LTD**

**May 2018**

# Contents

<b>1. Overview .....</b>	<b>3</b>
<b>2. Data Protection Principles .....</b>	<b>3</b>
<b>3. How we define Personal Data.....</b>	<b>4</b>
<b>4. How we define processing .....</b>	<b>4</b>
<b>5. How will we process your data? .....</b>	<b>4</b>
<b>6. Examples of when we might process your data .....</b>	<b>5</b>
<b>7. Access to your personal data .....</b>	<b>5</b>
<b>8. Sharing your personal data .....</b>	<b>5</b>
<b>9. How we deal with data breaches.....</b>	<b>5</b>
<b>10. Your data Subject rights .....</b>	<b>6</b>
<b>11. How long will we keep your data? .....</b>	<b>6</b>

## Data Protection Policy for new and existing Customers.

### 1. Overview

- 1.1. Angela Coaches Ltd takes the security and privacy of your data seriously. We need to gather and use information or 'data' about you as part of our services to provide private coach hire and manage our relationship. We intend to comply with our legal obligations under the **Data Protection Act 2018**(the '2018 Act') and the **EU General Data Protection Regulation** ('GDPR') in respect of data privacy and security. We have a duty to notify you of the information contained in this policy.
- 1.2. This policy applies to Angela Coaches Ltd new and existing customers. If you fall into these categories then you are a 'data subject' for the purpose of this policy. You should read this policy alongside your booking contract and terms and conditions of hire.
- 1.3. Angela Coaches Ltd will hold data in accordance with the GDPR law and will hold this data for as long as necessary for the purpose of which it was collected or until consent is removed.
- 1.4. This policy explains how Angela Coaches Ltd will hold and process your information. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing or storing personal data while booking with us.
- 1.5. This policy can be amended by Angela Coaches Ltd at any time and intends this policy is fully compliant with the 2018 Act and the GDPR. If any conflict arises between those laws and this policy, Angela Coaches Ltd intends to comply with the 2018 Act and the GDPR.

### 2. Data Protection Principles

Personal Data must be processed in accordance with six **Data Protection Principles**. It must:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- not be kept for longer than is necessary for the purposes for which it is processed; and
- be processed securely.

We are accountable for these principles and must be able to show that we are compliant.

### **3. How we define Personal Data.**

3.1 'Personal Data' means information which relates to a living person who can be identified from that data on its own, or when taken together with other information which is likely to come into our possession. It does not include anonymised data.

3.2 This policy applies to all personal data whether it is stored electronically, on paper or on other materials.

3.3 This personal data will be provided by yourself or someone booking on your behalf. It will be provided during the quotation and booking process when consent is required.

3.4 We will collect and use the following types of personal data about you:

Contact information that includes;

- Name
- Phone numbers
- Email address
- Home address
- Payment details

### **4. How we define processing**

4.1 Processing means any operation which is performed on personal data such as:

- collection, recording, organisation, structuring or storage;
- adaption or alteration;
- retrieval, consultation or use;
- alignment or combination; and
- restriction, destruction or erasure.

This includes processing personal data which forms part of a filing system.

### **5. How will we process your data?**

5.1 Angela Coaches Ltd will process your personal data in accordance with the obligations under the 2018 Act.

5.2 We will use your personal data for:

- Performing quotations and booking contracts

- Complying with any legal obligations
- Payment of booking contracts

We will process your personal data for these purposes with your consent confirmed within the initial communication of a booking. We will not use your data for any unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

Payment details are requested per booking and will not be stored on any system written or electronic once payment has been completed.

If you choose not to provide us with certain data you should be aware that we may not be able to provide our services for example if you do not provide an invoice address we cannot complete the booking contract.

## **6. Examples of when we might process your data**

6.1. We have to process your personal data in various situations during the quotation and booking process and even repeat business.

6.2. For example:

- Confirming booking information (prior and on the date of booking)
- "On the day" contact information given to the driver on worksheets
- Storing your contact information for future business

We will only process your personal data (see above) in certain situations in accordance with the law. For example we can do so if we have your explicit consent. If asked for your consent we will explain the reason for the request. You do not need to consent but non consent may terminate the booking (see 5.2) and you can withdraw consent later if you chose by contacting Angela Coaches Ltd.

## **7. Access to your personal data**

7.1 Authorised members of staff will have access to some or all of your data in order to complete bookings and provide services.

## **8. Sharing your personal data**

8.1 We do not share your personal data with any other companies or third parties. If this changes you will be notified and consent will be required.

## **9. How we deal with data breaches**

9.1 We have robust measures in place to minimise and prevent data breaches from taking place. Should a break of personal data occur (whether in respect of you or someone else) then we must take notes and keep evidence of that breach. If the breach is likely to result

in a risk to the rights and freedoms of individuals then we must also notify the Information Commissioner's Office within 72 hours.

9.2 If you are aware of a data breach you must contact Angela Coaches Ltd and keep evidence you have in relation to the breach.

## **10. Your data Subject rights**

10.1 You have the right to information about what personal data we process, how and on what basis as set out in this policy

10.2 You have the right to access your own personal data at any time by contacting Angela Coaches Ltd.

10.3 You can correct any inaccuracies in your personal data. To do so you should contact Angela Coaches Ltd.

10.4 You have the right to request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected. To do so contact Angela Coaches Ltd.

10.5 You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will aim to do this within one month.

10.6 You have the right to be notified of a data breach concerning your personal data.

10.7 We will ask for consent in the initial stages of the booking process which will cover the processes in this policy. You have the right to withdraw you consent at any time, you should contact Angela Coaches Ltd to do so.

10.8 You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk)). This website has further information on your rights and our obligations.

## **11. How long will we keep your data?**

11.1 Once consent is confirmed, Angela Coaches Ltd will keep your personal data for 5 years from your last booking, unless consent is withdrawn.

11.2 Your personal data is retained for ease of future bookings.