



# PRIVACY NOTICE

AS OF 4 JULY 2020

## Identity And Contact Details

Ultimate Driving is a sole trader based in Newbury, UK. We can be contacted by email at [ultimatedrivingnewbury@gmail.com](mailto:ultimatedrivingnewbury@gmail.com), by phone on 01635 49974 and by post to Ultimate Driving, 9 Caunter Road, Newbury, RG14 1QZ.

Ultimate Driving has Franchisee Instructors working under the name of Ultimate Driving in the Newbury area.

## Purpose And Legal Basis For Processing

Ultimate Driving uses Customer and Pupil data for the purposes of engaging with and carrying out the contract to provide driving lessons. We use contract as the legal basis to process this data.

A "Customer" is a person who arranges lessons and makes payment for lessons. A "Pupil" is the person being instructed.

Ultimate Driving occasionally uploads video footage with audio from driving lessons to the Internet for educational purposes and we use consent as the legal basis for processing this data.

Ultimate Driving takes photographs of Pupils who have passed driving tests along with notes of achievements and publishes these on the internet. We use consent as the legal basis to process the photographs and commentary.

Ultimate Driving collects information from pupils on their website for the purposes of logging in to a page where Terms And Conditions can be read and agreed to along with other preferences including signing up to consent for WhatsApp Broadcast List Cancellation updates and for photographic purposes after passing their driving test so a picture can be posted on Ultimate Driving's Facebook Page. Ultimate Driving also collects information on whether a pupil can read a number plate at 20.5m as per legal requirements to drive along with whether there are any medical conditions that affect a persons ability to drive.

## Categories Of Personal Data

We collect Pupil and Customer information from the contact form on our website, on the pupil login page on our website and via email or text/WhatsApp message correspondence. We collect audio recording during lessons from dashcams and photographs after driving tests have been passed.

We do collect special category information as we sometimes collect health information on areas which may affect how we instruct a Pupil and how we deal with a Pupil's capabilities. We only collect this information for this specific purpose. We keep this data secure using the Dropbox servers and security described in this document. The Pupil can see the data on request.

We do not use tracking cookies on our website with the exception of those required for Google Analytics so we can analyse which of our web pages are being used and how they are being used. There is no personally identifiable information collected through the Google Analytics Service.

## Any Recipient Or Categories Of Recipients Of The Personal Data

Ultimate Driving does not sell your information to third parties or use any of your information except to enable contact between Ultimate Driving and their Pupils and Customers.

## Details Of Transfers To Third Country And Safeguards

Ultimate Driving uses various cloud applications to maintain and backup information on Pupils.

These include:

- Dropbox (which uses Binding Corporate Rules as a compliant framework to transfer data to third countries)

The Pupil has secure access to the notes data during the period while they are taking driving lessons. Other Ultimate Driving instructors would have access to these notes in case they needed to provide cover for another Ultimate Driving instructor. The link sent to the Pupil where their notes are kept would never be shared with any other person except the Pupil.

The link can be disabled at any time by their Ultimate Driving Instructor and a new one generated if the Pupil believes that access to the link has been compromised.

## Retention Period & Criteria Used To Determine The Retention Period

The Pupil's name and finance information (how much has been paid) would be recorded in their Instructor's diary for booking purposes and this would have to be kept for a 7-year period for accounting purposes.

The Ultimate Driving Instructor will delete the Pupil's notes within a year of passing their driving test or finishing driving lessons with Ultimate Driving. If the Pupil wishes to have their notes retained for longer than this then they must inform their instructor.

The Pupil's notes would also be deleted from the Dropbox server within a year and 30 days of passing the driving test.

Before a Pupil starts driving lessons both Pupil and their Ultimate Driving Instructor would agree to Ultimate Driving Terms and Conditions and this would be emailed to the Pupil after logging into the website before their first driving lesson. This information maybe retained by Ultimate Driving for up to 7 years after passing a driving test.

Any email correspondence will be kept for up 7 years after the Pupil or Customer has corresponded with Ultimate Driving.

We will keep consent records for the length of time we retain the data that the consent relates to.

## The Existence Of Each Of The Data Subject's Rights

Ultimate Driving recognises the rights of data subjects as defined in the General Data Protection Regulation (GDPR).

We will always seek to uphold those rights, where relevant. Please contact us if you wish to exercise your rights as outlined below:

- Your right to be informed (which we facilitate through this page and further information in communications we might send to you)
- Your right of access to your data
- Your right to rectification
- Your right of erasure (right to be forgotten)
- Your right of restriction of processing
- Your right to data portability

## The Right To Lodge A Complaint With A Supervisory Body

Ultimate Driving recognises your right to lodge a complaint with a supervisory authority. You can access the ICO's website here [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

## Automated Profiling And Decision Making

Ultimate Driving does not conduct automated decision making or profiling on data