

## Brunel – Privacy and Cookies Policy

Brunel Carriage Ltd (“**Brunel**”, “**we**”, “**our**”, or “**us**”) operates its online platform via the website [www.brunel.com](http://www.brunel.com) which allows drivers to hire vehicles for use in a private hire vehicle business from a fleet provider (the “**Brunel platform**”).

We are committed to ensuring that your privacy is protected. Set out below is how we use the personal data we collect through the Brunel platform and how you can tell us if you would prefer us not to use the personal data, or to limit its use.

### ABOUT US

We are Brunel Ltd, a company registered in England and Wales with a registered office and main trading address at 5 Twelve Trees Business Park, Twelvetimes Crescent, Bow, London, E3 3JQ.

Brunel Limited is the data controller of any personal data you provide to us and is subject to applicable data protection laws.

#### Contacting Us

If you have any questions about this policy or your personal data, or to exercise any of your rights as described in this policy or under applicable data protection laws, you can contact us at:

**Michael Smith/ Head of Driver Management**

By email: [rental@brunel.com](mailto:rental@brunel.com)  
By telephone: **0207 068 5275**

### DATA PROTECTION PRINCIPLES

Anyone processing personal data must comply with the principles of processing personal data as follows:

- Lawfulness, fairness and transparency – data must be processed lawfully, fairly and in a transparent manner.
- Purpose limitation - data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Data minimization - data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accuracy - data must be accurate and, where necessary, kept up to date.
- Storage limitation - data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Integrity and confidentiality - data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage by using appropriate technical or organisational measures.

This policy describes the personal data that we collect, and explains how we comply with these principles.

### PERSONAL DATA WE MAY COLLECT

When you access the Brunel platform we collect the following personal data from you: Name, date of birth, telephone, date of birth, telephone, email, drivers license number, PCO license number, DBS information & Postal address.

In addition, you may choose to provide us with personal data about yourself by corresponding with us by phone, email, or otherwise. For example your name, email address, postal address, and telephone number.

We may also automatically collect, store and use information about your visits to the Brunel platform and about your computer, tablet, mobile or other device through which you access the Brunel platform. This includes the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and

geographical location; and

- information about your visit and use of the Brunel platform, including the full Uniform Resource Locators (URL), clickstream to, through and from the Brunel platform (including date and time), pages you viewed and searched for, page response times, download errors, and length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouse-overs), and website navigation and search terms used.

## **WHAT WE DO WITH YOUR PERSONAL DATA**

Your personal data will be used by us in order to:

- provide you with access to the Brunel platform;
- enable you to hire vehicles from Brunel;
- carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- provide additional insurance related services, route optimization and driver related improvement offers

Where it is in our legitimate interest to do so, your personal data will be used by us in order to:

- to administer the Brunel platform including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- as part of our efforts to keep the Brunel platform safe and secure;
- notify you about changes to our service;
- ensure that content from the Brunel platform is presented in the most effective manner for you and for your computer, mobile device or other item of hardware through which you access the Brunel platform.

Where you have given us consent, we shall provide you with information about news, publications, and special offers which we think will be of interest to you. You can withdraw your consent at any time, but without affecting the lawfulness of processing based on consent before its withdrawal. You can update your details or change your privacy preferences at any time by contacting us as given in "Contacting us" above.

## **SHARING YOUR PERSONAL DATA WITH THIRD PARTIES**

We may share your personal data with fleet providers and third party software companies.

We may also disclose your personal data to third parties where there is a legitimate reason to do so including for the following reasons:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if all or substantially all of our assets are acquired by a third party, in which case personal data held by it about its employees will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

## **SECURITY OF YOUR PERSONAL DATA**

We store your personal data in electronic format. We use industry standard physical and procedural security measures to protect personal data from the point of collection to the point of destruction. We use, as appropriate, encryption, firewalls, access controls, policies and other procedures to protect personal data from unauthorised access.

Unfortunately, the transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted via the internet; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

Where data processing is carried out on our behalf by a third party, we will endeavour to ensure that appropriate security

measures are in place including to prevent unauthorised disclosure of personal data.

## **INTERNATIONAL TRANSFERS**

The personal data that we collect from you is stored on servers located within the European Economic Area (the “EEA”). We do not intend to transfer your personal data outside of the EEA, but if we do we will notify you before doing so and shall take all steps reasonably necessary to put in place appropriate safeguards to ensure that your personal data is treated securely and in accordance with this policy and applicable law.

## **HOW LONG WE KEEP YOUR PERSONAL DATA**

Personal data received by us will only be retained for as long as necessary to fulfil the purposes described in this policy or for the maximum period of time as required by law, after which time it will be destroyed in a secure manner.

## **YOUR RIGHTS**

### *Access to your personal data and updating your personal data*

You have the right to access personal data which we hold about you. If you so request, we shall provide you with a copy of your personal data which we are processing (“*subject access request*”);

You also have the right to receive your personal data in a structured and commonly used format so that it can be transferred to another data controller (“*data portability*”).

We want to make sure that your personal data is accurate and up to date. You may ask us to correct or remove personal data you think is inaccurate.

### *Right to object*

You have the right to object at any time to our processing of your personal data for direct marketing purposes.

### *Where we process your personal data based on our legitimate interests*

You also have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

### *Your other rights*

You also have the following rights under data protection laws to request that we rectify your personal data which is inaccurate or incomplete.

In certain circumstances, you have the right to:

- request the erasure of your personal data erasure (“*right to be forgotten*”);
- restrict the processing of your personal data to processing to which you have given your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of others.

Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply.

## **EXERCISING YOUR RIGHTS**

You can exercise any of your rights as described in this policy and under data protection laws by contacting us as given in “Contacting us” above.

Save as provided under applicable data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee (subject to any limits imposed by applicable law) taking into account the administrative costs of providing the personal data or taking the action requested; or (b) refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

## COOKIES

A cookie is a small amount of data which often includes a unique identifier that is sent to your computer or mobile phone (your “device”) from the Brunel platform and is stored on your device’s browser or hard drive.

By continuing to browse the Brunel platform, you are agreeing to our use of cookies.

If you do not want us to use cookies when you use the Brunel platform, you can set your internet browser not to accept cookies. However, if you block cookies some of the features on the Brunel platform may not function as a result.

You can find more information about how to manage cookies for all the commonly used internet browsers by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org). This website will also explain how you can delete cookies which are already stored on your device.

We currently set the following cookies:

Cookie	Purpose
AWSALB	AWSALB is a cookie generated by the Application load balancer in the Amazon Web Services. It works slightly different from AWSELB.
_ga	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site’s analytics report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors.
_gid	This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected including the number visitors, the source where they have come from, and the pages visited in an anonymous form.
_gat_gtag_UA_161093039_1	Google uses this cookie to distinguish users.

## LINKS

The Brunel platform may contain links to other websites from time to time. We do not endorse any websites that are linked from the Brunel platform and do not assume any responsibility for the content of any such website.

You may not link the homepage or any other parts of this website without our prior written consent.

## COMPLAINTS

You have the right to complain to the Information Commissioner’s Office (<https://ico.org.uk/>) about our data processing activities in relation to your personal data if you think they infringe applicable data protection laws (ICO helpline on 0303 123 1113).

## UPDATES TO THIS POLICY

We may review and, if appropriate, update this policy from time to time. We will place notice of any such amendments on the Brunel platform. Please visit the Brunel platform for the most recent version of this policy.

This policy was last reviewed and updated on **27th of May 2020**.