
SHUTTLEID PRIVACY POLICY

BACKGROUND:

ShuttleID understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, shuttleid.uk and all subdomains, including client.shuttleid.uk, scan.shuttleid.uk, passenger.shuttleid.uk and ticket.shuttleid.uk (“Our Platform”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Platform. If you do not accept and agree with this Privacy Policy, you must stop using Our Platform immediately.

1. Definitions and Interpretation

1.1. In this Policy the following terms shall have the following meanings:

| | |
|-----------------------------|---|
| “Account” | means an account required to access and/or use certain areas and features of Our Platform. |
| “Cookie” | means a small text file placed on your computer or device by Our Platform when you visit certain parts of Our Platform and/or when you use certain features of Our Platform. Details of the Cookies used by Our Platform are set out in Part 14, below. |
| “Cookie Law” | means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003. |
| “User” | means a user of Our Platform. |
| “User Content” | means any content submitted to Our Platform by Users including, but not limited to, passenger information. |
| “We/Us/Our” | means ShuttleID, a trading name of Cevenco Ltd, a company registered in England under number 11901852, whose registered office is at and whose main trading address is 138 Wensley Drive, Leeds, LS7 2LT. |
| “Purchaser” | means a User of ShuttleID who purchases a ticket on behalf of a Passenger. |
| “Passenger” | means a single user identified at the time of purchase for whom the ticket has been purchased. |
| “Transport Operator” | means the company providing the tickets and services to which the ticket relates. |
| “Payment Processor” | means the company processing payment for the tickets purchased from the Transport Operator. The |

current Payment Processors are Stripe, whose contact details are available at <https://stripe.com/gb> and GoCardless, whose contact details are available at <https://gocardless.com/>

2. Information About Us

- 2.1. Our Platform is owned and operated by Cevenco Ltd, a limited company registered in England under company number 11901852.
Registered address: 138 Wensley Drive, Leeds, LS7 2LT
Main trading address: 138 Wensley Drive, Leeds, LS7 2LT
Data Protection Officer: Chris Bell
Email address: chris.bell@shuttleid.uk
Telephone number: 0333 344 9868
Postal address: 138 Wensley Drive, Leeds, LS7 2LT

3. What Does This Policy Cover?

- 3.1. This Privacy Policy applies only to your use of Our Platform. Our Platform may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. What Is Personal Data?

- 4.1. Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.
- 4.2. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

- 5.1. Under the Data Protection Legislation, you have the following rights, which We will always work to uphold:
- 5.1.1. The right to be informed about Our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the details in Part 15.
 - 5.1.2. The right to access the personal data We hold about you. Part 13 will tell you how to do this.
 - 5.1.3. The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete. Please contact Us using the details in Part 15 to find out more.
 - 5.1.4. The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that We hold. Please contact Us using the details in Part 15 to find out more.
 - 5.1.5. The right to restrict (i.e. prevent) the processing of your personal data.
 - 5.1.6. The right to object to Us using your personal data for a particular purpose or purposes.

- 5.1.7. The right to withdraw consent. This means that, if We are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- 5.1.8. The right to data portability. This means that, if you have provided personal data to Us directly, We are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.
- 5.1.9. Rights relating to automated decision-making and profiling. We do not use your personal data in this way.
- 5.2. For more information about Our use of your personal data or exercising your rights as outlined above, please contact Us using the details provided in Part 15.
- 5.3. It is important that your personal data is kept accurate and up-to-date. If any of the personal data We hold about you changes, please keep Us informed as long as We have that data.
- 5.4. Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.
- 5.5. If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact Us first, using the details in Part 15.

6. What Data Do You Collect and How?

- 6.1. Depending upon your use of Our Platform, We may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about Our use of Cookies and similar technologies.

| Data Collected | How we Collect the Data |
|--|--|
| Identity Information including email address | Provided by Purchaser and/or Transport Operator |
| Contact information including including email address and telephone number | Provided by Purchaser and/or Transport Operator |
| Business information including business name and business services | Provided by Transport Operator |
| Purchase information | Provided by Purchaser |
| Ticket profile information including photographic images, passenger name, | Provided by Purchaser and/or Transport Operator |
| Ticket usage information, including location, services and time tickets are used | Scan logs provided by Transport Operator |
| Technical information including IP address, browser type and version, operating system | Information is automatically collected and available on an access log when the user makes a request to Our web servers |

7. How Do You Use My Personal Data?

7.1. Under the Data Protection Legislation, We must always have a lawful basis for using personal data. The following table describes how We may use your personal data, and Our lawful bases for doing so:

| What we Do | What Data we Use | Our Lawful Basis |
|---|---|---|
| Registering you on Our Platform | Email address and telephone number provided by the Purchaser and/or Transport Operator | Facilitating the contract to purchase and/or distribute tickets from the Transport Operator |
| Providing and managing your Account | Contact information for the Purchaser and the Passenger. This data will be provided to the Transport Operator | Facilitating the contract to purchase and/or distribute tickets from the Transport Operator |
| Supplying products and services to you | Contact information for the Purchaser and the Passenger | Facilitating the contract to purchase and/or distribute tickets from the Transport Operator |
| Managing payments for products and services | Payment details are transferred directly from the Purchaser to the Payment Processor. We receive an anonymised payment source token to create a charge with the Payment Processor against the Transport Operator’s account. | Facilitating the contract to purchase tickets from the Transport Operator |
| Communicating with you | Email address and telephone number of the Purchaser and Transport Operator | Legitimate Interest - In the event of service issues We may contact you to notify you accordingly |

7.2. With your permission and/or where permitted by law, We may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on Our products or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

7.3. Third Parties (including the Transport Operators) whose content appears on

Our Platform may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that We do not control the activities of such third parties, nor the data that they collect and use themselves, and We advise you to check the privacy policies of any such third parties.

- 7.4. We will only use your personal data for the purpose(s) for which it was originally collected unless We reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If We do use your personal data in this way and you wish Us to explain how the new purpose is compatible with the original, please contact Us using the details in Part 15.
- 7.5. If We need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, We will inform you and explain the legal basis which allows Us to do so.
- 7.6. In some circumstances, where permitted or required by law, We may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How Long Will You Keep My Personal Data?

- 8.1. We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

| Type of Data | How Long we Keep It |
|---|---|
| Identity Information including email address and telephone number | Six years from the date of the last transaction |
| Contact information including including email address | Six years from the date of the last transaction |
| Business information including business name and business services | Six years from the date of the last transaction |
| Identity and contact information within the Waiting List feature | Twelve months from the date the information was provided, unless removed earlier by the Transport Operator. |
| Purchase information | Six years from the date of the last transaction |
| Ticket profile information including photographic images, passenger name, | Six years from the date of the last transaction |
| Ticket usage information, including location, services and time tickets are used | Six years from the date of the last transaction |
| Technical information including IP address, browser type and version, operating system. | Three months. |

9. How and Where Do You Store or Transfer My Personal Data?

- 9.1. We will only store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.
- 9.2. Please contact Us using the details below in Part 15 for further information about the particular data protection mechanism used by Us when transferring your personal data to a third country.
- 9.3. The security of your personal data is essential to us, and to protect your data, We take a number of important measures, including the following:
 - 9.3.1. limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
 - 9.3.2. procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where We are legally required to do so.

10. Do You Share My Personal Data?

- 10.1. We will share your personal data with the Transport Operator you are purchasing tickets from in order to fulfill your contract with them.
- 10.2. We will share your personal data with the Payment Processor to facilitate payment for the services purchased.
- 10.3. Aside from clauses 10.1 and 10.2, We will not share any of your personal data with any third parties for any purposes, subject to the following exception:
 - 10.3.1. In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
- 10.4. If any of your personal data is shared with a third party, as described above, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party’s obligations under the law, as described above in Part 9.
- 10.5. If We sell, transfer, or merge parts of Our business or assets, your personal data may be transferred to a third party. Any new owner of Our business may continue to use your personal data in the same way(s) that We have used it, as specified in this Privacy Policy.

11. How Can I Control My Personal Data?

- 11.1. In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Platform, you may be given options to restrict Our use of your personal data. In particular, we aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails or at the point of providing your details and by managing your Account).
- 11.2. You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing

Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. Can I Withhold Information?

- 12.1. You may access certain areas of Our Platform without providing any personal data at all. However, to use all features and functions available on Our Platform you may be required to submit or allow for the collection of certain data.
- 12.2. You may restrict Our use of Cookies. For more information, see Part 14.

13. How Can I Access My Personal Data?

- 13.1. If you want to know what personal data We have about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.
- 13.2. All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.
- 13.3. There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.
- 13.4. We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of Our progress.

14. How Do You Use Cookies?

- 14.1. Our Platform may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Platform and to provide and improve Our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 14.2. By using Our Platform, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than Us. Third-party Cookies are used on Our Platform for analytics. For more details, please refer to the table below. These Cookies are not integral to the functioning of Our Platform and your use and experience of Our Platform will not be impaired by refusing consent to them.
- 14.3. All Cookies used by and on Our Platform are used in accordance with current Cookie Law.
- 14.4. Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Platform may not function fully or as intended. You will be given the opportunity to allow only first-party Cookies and block third-party Cookies.
- 14.5. Certain features of Our Platform depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in

the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings as detailed below, but please be aware that Our Platform may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

14.6. The following first-party Cookies may be placed on your computer or device:

| Name of Cookie | Purpose | Strictly Necessary |
|----------------|-----------------------|--------------------|
| __stripe_mid | To facilitate payment | yes |
| __stripe_sid | To facilitate payment | yes |

14.7. In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

14.8. You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Platform more quickly and efficiently including, but not limited to, login and personalisation settings.

14.9. It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. How Do I Contact You?

To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Chris Bell):

Officer: Chris Bell

Email address: chris.bell@shuttleid.uk

Telephone number: 0333 344 9868

Postal address: 138 Wensley Drive, Leeds, LS7 2LT.

16. Changes to this Privacy Policy

16.1. We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection.

16.2. Any changes will be immediately posted on Our Platform and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Platform following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 10th July 2019.