

Privacy Policy

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1. Introduction

This policy explains how we handle and use your personal information in connection with your use of any taxi booking software application and related services powered by our technology (App) and your related data protection rights. Under data protection law, Riide Limited is the controller of the processing of your personal information by the application. Each taxi operator whose App you use is the controller of your personal information processed in connection with the transportation services you book using the App.

Riide Limited (**we, our or us**) is committed to protecting and respecting the privacy of users of each App (**you or Users**).

This Privacy Policy explains why and how we use the personal information obtained about you from the App, with whom we share it and the rights you have in connection with the information we use. This includes details our information-sharing activities with the particular taxi operator that has published the App you use (**Operator**), their licensed private hire vehicle drivers (**Drivers**) as well as others, in connection with your use of the App. Please read the following carefully.

This policy applies to your use of any taxi booking software application and related services powered by our technology. A full list of those Apps is available on our website at www.riide.co. Please also check the Terms of Use or End User Licence Agreement (EULA) of the relevant App for further details.

For the purposes of data protection law, Riide Limited is the controller in relation to the processing activities described below. This means that Riide Limited decides why and how your personal information is processed in connection with those activities. Please see the section at the end of this policy for our contact and legal information.

Each Operator whose App you use is a separate controller of your personal information. Please check its privacy policy which will apply to the transportation services you book using the App. Riide Limited is not responsible for publishing the App on the relevant App store nor for providing the App to you. If you have any issues regarding the App unrelated to your data protection rights (e.g. in relation to technical or customer support including refunds or booking cancellation or amendments), please contact the relevant Operator in the first instance.

The App is intended for use by individuals aged 18 and over. We do not knowingly collect personal information about children. If you are under the age of 18, please do not use the App.

2. Information we collect about you

We receive personal information about you when you create an account on the App, (i.e. your name and contact details), that we collect when you use the App (i.e. payment details and location data) and that we obtain from other sources (i.e. account verification). We only collect personal information that we need and that is relevant for the purposes for which we intend to use it.

Personal Information you give to us

This is information about you that you give by creating an account on the App, using the App or when you communicate with us, and is provided by you entirely voluntarily.

When you create an account on the App, or update your account, we collect the following information:

- **account data:** name, email address, telephone number, account login details, profile picture (if you choose to add one), payment information;
- **booking data:** details of the journey you wish to book any rating you provide about a Driver; and
- **communication data:** information sent when you contact us, the date and time that you contact a Driver through a telephone call or text message.

If you do not provide this information you may be unable to make a taxi booking or otherwise use the services available through the App. If you do not provide us with contact details, we may be unable to contact you and/or resolve your data protection queries effectively.

Information we collect about you from your use of the App

Each time you use the App we automatically collect the following information:

- **usage data:** location data, transaction information related to your use of the App including the Operator and Driver relating to your booking, your user rating, access times, pages viewed, technical difficulties you experience with the App (e.g. if the App crashes); and
- **technical data:** the internet protocol (IP) address and unique identification number relating to your device, hardware type and model, App version and operating system type and version.

If you do not provide this information, you may be unable to access some or all of the App or the services available through it.

Information we collect about you from other sources

We obtain certain personal information about you from publically available sources in order to perform verification checks of your account on the App (where permitted by law), in order to prevent fraud and the use of the App by unsafe Users.

3. Use of your personal information

We use your personal information for a variety of reasons. We rely on different legal grounds to process your personal information, depending on the purposes of our use and the risks to your privacy.

We use your personal information in the following ways:

3.1 To perform the CONTRACT between you and the Operator/Driver and to perform any related PRE-CONTRACT steps you request

We will use your personal information where this is necessary to provide you with the services available through the App (as described in the Terms of Use with the relevant Operator) and to allow you to make a booking for transportation services with a Driver.

3.2 Where required to comply with our LEGAL OBLIGATIONS

We will use your personal information to comply with our legal obligations e.g. where we are required under a court order to disclose your personal information or to fulfil a request by you when you are exercising your legal rights.

We will also keep a record of the rights you exercise in connection with our processing of your personal information.

3.3 **Where processing is necessary for us to pursue a LEGITIMATE INTEREST**

We may use and process your personal information where it is necessary for us to pursue our **legitimate interests** as a business for the following purposes:

Processing necessary for us to promote our business

- to create a profile of you and analyse this to obtain insight about market or industry trends, User behaviours which inform our marketing strategy, and to enhance and personalise your experience;

Processing necessary for us to support Users with enquiries

- to correspond and communicate with you in connection with your data protection rights;
- to monitor Drivers; and
- to identify ways of improving your experience using the App.

Processing necessary for us to respond to changing market conditions and our Users' needs

- for market research, insight and intelligence in order to improve our understanding of our market and industry and, as a result, the App.

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

- to administer the App and for internal operations, including troubleshooting, testing and statistical reporting purposes;
- for the detection or prevention of fraud and other criminal activities;
- to verify the accuracy of information we hold about you and create a better understanding of you as registered User;
- for network and information security purposes in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- for the purposes of a corporate restructure or reorganisation or sale of our business or assets;
- for efficiency, accuracy or other improvements of our databases and systems e.g. by combining systems or consolidating records we hold about you, including from Apps you use provided by different Operators;
- to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings; and

- for general administration including managing your general queries, complaints, or claims, to send service messages and to provide you with important information about our business.

Automated Decision Making: We use your personal information to make some automated decisions relating to the App, including:

- enabling dynamic pricing – this calculates the price of a journey in conjunction with factors including the estimated time and distance of the journey, predicted route to be taken by a Driver, estimated traffic and number of Users and Drivers using the App at a given time;
- matching available Drivers to Users to fulfil your booking. Users are matched to Drivers based on availability and proximity;
- deactivating Users that have been identified as having engaged in fraud or activities that may otherwise harm Operators or Drivers; and
- authenticating Users each time they open the App, including remembering user preferences and settings.

4. Disclosure of your personal information by us

*We only disclose your personal information outside our business in limited circumstances. If we do, we will put in place a contract that **requires** recipients to protect your personal information, unless we are legally required to share that information. Any suppliers or other recipients that work for us will be obliged to follow our instructions.*

We disclose your personal information to the Operator whose App you download and use, as well as that Operator’s Drivers who fulfil the bookings you make using the App.

We also disclose your information to our third party service providers, agents, subcontractors and other suppliers for the purposes of providing the App and its related services to you, including the operation and maintenance of the App. Please see the table below in this section for further details regarding the personal information we disclose and our reasons for doing so.

When we use suppliers, we only disclose to them any personal information that is necessary for them to provide their services and only where we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

We disclose your personal information to the following third parties for the purposes listed below:

Category of personal information	Recipient	Purpose of disclosure
Your name, registered phone number, payment type, pick-up location, drop-off location, any applicable rating of your User account	Drivers	For the Driver to locate you and provide you with the transportation services to your chosen destination.
Your name, registered phone number, IP address, operating system and App version,	Operators	For the Operator to hold details of the location of their Drivers, the journeys their Drivers have

device/platform type pick-up location, drop-off location, duration and other booking data and transaction data		completed and the price and status of those journeys.
Your payment details	Payment processors	In order to facilitate the payments you make using the App.
All personal information collected	Hosting providers and other IT (including cloud-based) service providers	To support and maintain the App, including the software and hardware infrastructure required for it to operate/be accessible and to keep a backup of your personal information.
App traffic data, IP address and device details.	Data analytics services	To assist with statistics and provide us with basic analytical tools optimisation and marketing purposes in order to improve the App.
All personal information collected	Our legal, accountancy and other professional advisers	To provide us with advice in relation to our business, including our legal, financial and other obligations and claims

We may disclose your personal information to other third parties in order to comply with any legal or regulatory obligations or police, court or government request.

5. Transfers of your personal information outside the UK and European Economic Area

We may transfer your personal information outside the UK and European Economic Area (EEA). We take measures to protect your personal information when it is transferred to a country which does not have similar data protection laws to the UK.

All the personal information collected about you by us or on our behalf may be transferred to countries outside the UK and EEA. By way of example, this may happen if any of our servers or those of our third party service providers are from time to time located in a country outside of the EEA. These countries may not have similar data protection laws to the UK and so they may not protect the use of your personal information to the same extent.

If we transfer your information outside the UK and EEA, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include imposing contractual obligations on the recipients of your personal information or ensuring that the recipients are subscribed to 'international frameworks'

that aim to ensure adequate protection. For example, those of our third party service providers who receive your personal information in the USA may subscribe to the “Privacy Shield” framework. Where they do not, we ensure that we impose contractual obligations on them that are broadly equivalent as required by UK data protection law. Please contact us using the details at the end of this policy for more information about the protections that we put in place and to obtain a copy of the relevant information.

If you use the App whilst you are outside the UK or EEA, your information may be transferred outside the UK and EEA.

6. Security and links to third parties

We take the security of your personal information seriously and use a variety of measures based on good industry practice to keep it secure. Nonetheless, transmissions to and from the App may not always be completely secure, so please exercise caution. Once your personal information is provided to the Operator and their Drivers, their security will apply to the use of your personal information, not ours.

We employ security measures to protect the information you provide to us, to prevent access by unauthorised persons and unlawful processing, accidental loss, destruction and damage. When you have chosen a password to log into the App, you are responsible for safeguarding it and keeping it confidential and you promise not to allow it to be used by third parties.

The App may require you to download and activate certain third party software in order to use the App (for example updates to the operating system of your device). This policy does not apply to those third party services or applications, so we encourage you to read their privacy policies. We are not responsible for the privacy policies and practices of other third party services or applications (even if you access them using links that we provide) and we provide links to those third parties, solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy, content or thoroughness. Your disclosure of personal information to third parties is at your own risk.

7. The periods for which we retain your personal information

We will not hold your personal information in an identifiable format for any longer than is necessary for the purposes for which we collected it. The periods for which we hold your personal information will depend on the type of personal information. These periods also apply where we share your information with suppliers who process your personal information on our behalf.

We (and the suppliers we instruct) retain your personal information for the following periods for the purposes of establishing, defending or bringing legal claims or complying with our legal and regulatory record-keeping obligations:

Type of personal information	How long we keep your personal information after we receive it
Name, email address, contact details, payment information and transaction details	7 years after the date you delete your account
Location data, device details and your usage data	7 years from the date the data is created

Correspondence and call recordings	7 years after the date of the correspondence
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The only exceptions to the periods mentioned above are where:

- we identify there is no longer a business purpose for keeping your personal information (e.g. where the underlying circumstances change) in which case we will selectively delete or anonymise your personal information sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further Your rights over your personal information);
- you exercise your right to require us to retain your personal information for a period longer than our stated retention period (see further Your rights over your personal information);
- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible;
- an outstanding credit or amount remains on your account on the App;
- your account is subject to an investigation of criminal or fraudulent activity; or
- in limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

We also retain an anonymised version of the submitted personal information for as long as we require it for reporting and other statistical and analytical purposes. Such anonymised information will not identify you and may be derived from personal information that was contained within accounts that have subsequently been deleted.

Different retention periods may apply to personal information we share with Operators and their Drivers. This information is usually held in the relevant Operator's system. Please consult the privacy policy of the relevant Operator for information regarding the data retention periods that it applies to personal information about you that it processes and stores.

8. Your rights over your personal information

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to verify your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month after we have received this information or, where no such information is required, after we have received full details of your request.

You have the following rights, some of which may only apply in certain circumstances:

- to **be informed** about the processing of your personal information (this is what this policy sets out to do);
- to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**;

The accuracy of your information is important to us. You can change any of your account information by selecting the relevant options on the App. If discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us using any of the details described at the end of this policy.

- to **object to processing** of your personal information;

Where we rely on our legitimate interests as the lawful basis for processing your personal information for particular purposes, you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.

You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please click on the unsubscribe message on our emails.

- to **withdraw your consent** to processing your personal information;

Where we rely on your consent as the lawful basis for processing your personal information, you may withdraw your consent at any time by contacting us, using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can also do so using our unsubscribe tool. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

- to **restrict processing** of your personal information;

You may ask us to restrict the processing of your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings.

In these situations, we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

- to have your personal information **erased**;

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

- to **request access** to your personal information and information about **how we process it**;

You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information, if this concerns other individuals or we have another lawful reason to withhold that information.

- to **electronically move, copy or transfer** your personal information in a standard form (*data portability*); and

Where we rely on your consent as the legal basis for processing your personal information, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file.

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

- rights relating to **automated decision making**, including profiling.

Whilst the App will make decisions about you using purely automated means as described above, none of these are likely to have a legal or other significant effect on you. Nonetheless, if you would like any of the automated decisions described above in this policy to be verified manually, please contact the Operator for the relevant App who will do so.

To exercise these rights, please contact us using the details at the end of this policy.

You have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office (ICO), the data protection regulator in the UK, are available on the ICO website, where your personal information has or is being used in a way that you believe does not comply with data, however, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

9. **Changes to our Privacy Policy**

Please check this page regularly for changes to this policy. We will notify you of changes via your account and/or by email (if we hold a valid email address for you).

We may review this policy from time to time and any changes will be notified to you by posting an updated version on our website and App, and/or by contacting you by email where appropriate. Any changes will take effect 7 days after we post the modified terms on our website and App, or after the date we notify by email. We recommend you regularly check for changes and review this policy when you visit the App. If you do not agree with any aspect of the updated policy, you must promptly notify us and cease using the App.

10. **Contact and legal information**

You can contact us with your queries in relation to this policy or for any other reason at any time.

To contact us for any reason, including to exercise any of your rights in relation to your personal information, please write to the address below or email us at contactus@riide.co.

Riide Limited is a company incorporated in England under company registration 09925218, and registered office address Dsa Prospect The Old Chapel, Union Way, Witney, Oxfordshire, United Kingdom, OX28 6HD.