



XLR8 Wales Driving School Privacy Policy

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you. It applies to all services and instances where we collect your personal data.

This privacy notice applies to personal information processed by XLR8 Wales Driving School.

This document details the following:

- **Who are we and how do you contact us and our Data Protection Officer?**
- **What kinds of personal information about you do we process?**
- **What is the source of your personal information?**
- **What are the legal grounds for our processing of your personal information (including when we share it with others)?**
- **What should you do if your personal information changes?**
- **For how long is your personal information retained by us?**
- **What are your rights under data protection laws?**

Changes to this privacy notice

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website – <https://www.xlr8wales.com>.

XLR8 Wales Driving School and our Data Protection Officer

We are XLR8 Wales Driving School, 5 Bridge Street, Bargoed, CF81 9AA. We are a data controller of your personal data. Our dedicated data protection officer (“DPO”) is Alison Brooks. You can contact the DPO using the details above or by calling 0333 7720035.

What kinds of personal information about you do we process?

Personal information that we’ll process in connection with all of our products and services, if relevant, includes:

- **Personal and contact details**, such as title, full name, contact details and contact history
- **Your date of birth, gender and/or age**
- **Your nationality**, if needed for the service (usually to identify language support needs etc)
- **Family members** (usually for emergency contact or payment purposes only)
- **Records of your contact with us** such as conversations via email, social media or telephone in relation to our services or in the event of any complaint
- **Services** you utilise us for, as well as have been interested in historically
- **Driving Assessment**, including feedback and analysis of your instructor
- **Information about your health or if you are a vulnerable customer**

- **Your residency and/or citizenship status**, if relevant, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in UK. This information is only in relation to your legal right to drive in the UK and for no other purpose.
 - **Your marital status, family, lifestyle or social circumstances**, if relevant to the service (for example, school timetables or emergency contact details)
 - **Insights about you and our customers** gained from analysis or profiling of customers
 - **Third party transactions**; such as a parents contact details who purchase lessons as gifts for example
-

What is the source of your personal information?

We'll collect personal information from the following general sources:

- From you directly, and any information from family members directly involved in your driving lessons
 - Information generated about you when you use our services
 - From either via the telephone (calls made to us by you only), social media messaging services (messages received by you to us) and via our Website (messages received by you to us)
 - We do not have a practice involving unsolicited calls or contact marketing our services.
-

What do we use your personal data for?

We use your personal data, including any of the personal data listed above, for the following purposes:

- Managing the service you have with us or have enquired about
- Updating your records and recovering debt
- Managing any aspect of the service
- To improve the operation of our business and that of our business partners (including our franchised ADI's)
- To follow guidance and best practice under the change to rules of governmental and regulatory bodies
- For management and auditing of our business operations including accounting
- To monitor and to keep records of our communications with you and our instructors
- For market research and analysis and developing statistics
- To develop new products and services and to review and improve current products and services
- To comply with legal and regulatory obligations, requirements and guidance
- To provide insight and analysis of our customers both for our Directors and for the benefit of our instructors either as part of providing products or services, helping us improve products or services, or to assess or improve the operating of our businesses
- To share information, as needed, with business partners (for example, instructors) or as part of providing and administering our services or operating our business

What are the legal grounds for our processing of your personal information (including when we share it with others)?

We rely on the following legal bases to use your personal data:

- 1. Where it is needed to provide you with our products or services, such as:**
 - a) Managing services you hold with us, or have made an historical enquiry
 - b) Updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
 - c) Sharing your personal information with our franchised DVSA approved driving instructor who will be responsible for delivering our service to you
 - d) All stages and activities relevant to managing the service including enquiry, administration and management of accounts etc

- 2. Where it is in our legitimate interests to do so, such as:**
 - a) Managing your services relating to that, updating your records, tracing your whereabouts to contact you about the service we deliver or have delivered to you and doing this for recovering debt (where appropriate)
 - b) To perform and/or test the performance of, our products, services and internal processes
 - c) To follow guidance and recommended best practice of government and regulatory bodies
 - d) For management and audit of our business operations including accounting
 - e) To carry out monitoring and to keep records of our communications with you
 - f) For market research and analysis and developing statistics
 - g) Subject to the appropriate controls, to provide insight and analysis of our customers to our directors either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses
 - h) Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations

- 3. To comply with our legal obligations**

- 4. With your consent or explicit consent:**
 - a) For some direct marketing communications
 - b) For some of our processing of special categories of personal data such as about your health, if you are a vulnerable customer

- 5. For a public interest, such as:**
 - a) Processing of your special categories of personal data such as about your health, criminal activity information (including suspected driving related offences or license restrictions), or if you are a vulnerable customer

6. When do we share your personal information with other organisations?

We may share information with the following third parties for the purposes listed above:

- Governmental and regulatory bodies such as the DVSA

7. How and when can you withdraw your consent?

Where we are relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the details below.

8. Is your personal information transferred outside the UK or the EEA?

We are based in the UK and your personal information will not be transferred to any internal or external organisation outside of the UK

9. What should you do if your personal information changes?

You should tell us so that we can update our records using the details in the Contact Us section of our website. We will then update your records.

10. Do you have to provide your personal information to us?

We are unable to provide you with our services if you do not provide certain information to us. In cases where providing some personal information is optional, we will make this clear.

11. Do we do any monitoring involving processing of your personal information?

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

12. For how long is your personal information retained by us?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
- For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us; and/or
- Retention periods in line with legal and regulatory requirements or guidance.

13. What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- The right **to be informed** about the processing of your personal information
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**
- The right **to object** to processing of your personal information
- The right **to restrict processing** of your personal information
- The right **to have your personal information erased** (the "right to be forgotten")
- The right to **request access** to your personal information and to obtain information about how we process it
- The right to **move, copy or transfer your personal information** ("data portability")
- Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you**

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>. You can contact us using the details below.

14. Your right to object

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us by going to the Contact us page of our web site to exercise these rights.

15. Direct Marketing

We do not direct market to any of our customer via letter, email, social media messaging or via the telephone.

Contact Us

If you have any questions about this privacy notice, or if you wish to exercise your rights or contact the DPO, you can contact us by going to the Contact Us page of our website. Alternatively, you can write to DPO, XLR8 Wales Driving School, 5 Bridge Street, Bargoed, CF81 9AA