

# Privacy Policy

# Lake District DIRECT TRANSFERS

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## Privacy Policy and data protection

Lake District Direct Transfers (LDDT) are committed to safeguarding your data security. We adhere to the standards and legislation set forth by the General Data Protection Regulation (GDPR) 2016/679, building on our historical compliance with the Data Protection Act 1998 and aligning with the Data Protection Act 2018. This Privacy Policy outlines how and why we obtain, store, and process data that can identify you. We regularly review this policy and publish any changes on our website: [www.lakedistrictdirect.co.uk](http://www.lakedistrictdirect.co.uk).

## How we use your information

LDDT provides a range of services to both the general public and businesses. To effectively deliver and administer these services, we collect certain information from you, which includes details such as your name, contact information, and travel preferences, as detailed in this policy. As part of the booking process, we offer the option to opt-in to email/text communications from us, which are related to the services you are requesting. Should you choose to subscribe and later decide to stop receiving non-transactional emails, you can easily unsubscribe using the link provided in the footer of these emails. Please note that transactional emails related to your bookings and services will continue to be sent as they are essential for the service provision.

## Enquiries by telephone or in person at booking offices

We may collect information such as names, pick-up addresses, destinations, contact numbers, details of disabilities, children's ages, and pet details during telephone or in-person enquiries at our booking offices. Additionally, we provide an 'opt-in' option for marketing purposes, ensuring your consent is explicitly obtained in compliance with GDPR. If a booking is not made immediately, this information is securely held for 24 hours, adhering to data minimization principles, and then disposed of.

Confirmed bookings are securely recorded using Autocab ([www.autocab.com](http://www.autocab.com)), a third-party online booking and dispatch system with robust data security measures. We also use and analyse aggregate information, which includes collective data about services or customers with individual identities removed, to improve our business.

For payment processing, we employ reputable services like SumUp, CabCard, Judopay, Stripe, and Barclaycard. Each of these services is known for their stringent security measures, ensuring the safety and confidentiality of your transactions. They comply with industry-standard security protocols, including encryption and PCI DSS compliance, to safeguard your financial data. Transactions can be carried out using secure card readers or through protected online payments via hyperlinks. Any credit/debit card details collected are handled with the highest level of security and privacy, in strict compliance with data protection regulations like GDPR. We use this information solely for the purpose of processing your requested services.

## Enquiries online via website or email

### Online Enquiry

Customers can make enquiries through the contact form on our website: [www.lakedistrictdirect.co.uk](http://www.lakedistrictdirect.co.uk). We collect necessary personal details through this form. Such details are processed in line with this policy.

### Email Enquiry

Personal information provided in emails is recorded and used as per this policy. Emails are part of our regular data backup process and are retained in accordance with our data retention policy, ensuring data security.

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## Booking Online

To book our services online, customers must register on our website, providing personal details. This information is securely held on the AutoCab booking and dispatch system, adhering to strict data security standards.

## Booking via Mobile App

Customers can book our services via our mobile app, available on Android and Apple devices. While registering, be aware that the respective platforms may collect information about you. We recommend reviewing their policies for details on their data usage and opt-out options. By downloading our app, you 'opt-in' to receiving automated, real-time text notifications about your taxi's status (including dispatch and arrival) using the mobile number stored in the application. Personal information collected via the app is securely stored on the AutoCab system.

In all instances, we prioritize the security and confidentiality of your personal information, adhering to GDPR standards and our commitment to data protection.

## Accountability

At LDDT, we are committed to protecting your personal data. We do not share your data with third parties, except as strictly necessary to fulfil the services you have requested. This might include sharing booking data with our drivers or partner agencies directly involved in your service provision. Your booking data is used by our operational staff, who are trained in GDPR compliance and data protection best practices. They are also closely supervised to ensure the utmost security of your personal data. Additionally, we conduct regular audits and reviews of our data handling practices to maintain our standards of data privacy and security.

## Collection of website data

### Log Files

When visitors access our websites, we collect standard internet log information to enhance user experience and website functionality. This includes data such as IP Address, Date and Time of visit, Pages Visited, Referrer, User-Agent, and HTTP status codes, along with visitor behaviour patterns. We analyse this data to understand metrics like visitor numbers to different parts of our site, assess website performance, and identify potential issues or areas for improvement. Importantly, all this information is collected and processed in a manner that ensures individual visitors are not identifiable. We do not attempt to determine the identities of our website visitors using these logs. Additionally, this data is not associated with any personally identifiable information from other sources and is not shared with third parties unless necessary for analytical purposes under strict confidentiality agreements.

### Comment and enquiry forms

Our websites allow visitors to leave comments and contact us via an online form. We collect the following information: Contact details such as name, email address, phone and fax number, web address, company name, and IP address, along with your comment or enquiry. LDDT requires this information for several reasons:

- To improve our products and services.
- To screen for the validity and integrity of visitors interacting with us, our company's websites, and staff.
- To encourage visitor interaction and discussion on our website.
- To be more able to respond effectively to visitor enquiries.

For promotional communications, we will only send you emails about new products, special offers, or other information we believe may be of interest if you have explicitly consented to receive such

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communications. At the time of collection, you will have the opportunity to opt into this service. Your information is kept secure and confidential, in compliance with data protection laws, and we respect your privacy in managing personal data.

## Cookies

Cookies are small text files placed on your computer by websites that you visit. They are widely used to make websites work efficiently and provide information to the site owners. On our websites, cookies are necessary to provide and improve our products and services and to maintain competitiveness. We use various types of cookies, including essential cookies for website functionality and analytical cookies to understand how our site is used.

You can manage your cookie preferences through our website by adjusting your browser settings to control cookie use. Our cookies are not shared with any third parties.

The following cookies will be set.

**Google Analytics:** We use Google Analytics to gather statistics such as the number of visitors, search phrases used to find us, pages visited, and time spent on our site. This data helps us to provide and improve our services and stay competitive. Google Analytics cookies collect information in an anonymous form, including the number of site visitors, their origin, and the pages they visit. This data is anonymized by Google, ensuring that no personal identification is made. For more details on Google's privacy practices, visit their policy here: <https://policies.google.com/privacy>.

You have the option to consent to or opt out of Google Analytics tracking. Web browsers allow control over cookies through browser settings. For more information on cookies, including how to manage and delete them, visit: <https://www.allaboutcookies.org/>. To opt out of being tracked by Google Analytics across all websites, not just those of LDDT, you can use the *Google Analytics Opt-Out* browser Add-on, available here: <https://tools.google.com/dlpage/gaoptout>. This add-on is developed by Google, and LDDT has no control over its functionality. Please be aware that installing any third-party software or browser add-ons is done so at your own risk, and we recommend reviewing their individual terms and privacy policies.

## Third Party Cookies

Our websites include features from other websites, such as social media sharing buttons or embedded media, which may set a cookie on your device. These are known as third-party cookies. While we cannot block these cookies without removing the features, you can manage them through your browser settings. For specific information about these cookies, please refer to the originating website's cookie and privacy policies.

## Security

LDDT are committed to ensuring the security of your information. To prevent unauthorized access or disclosure, we have implemented physical, electronic, and managerial procedures, such as SSL encryption, secure server facilities, and staff training. Our security measures are designed to safeguard the information we collect online and are in full compliance with data protection laws.

## Links to other websites

The websites of LDDT contain links to other websites that may be of interest or relevance, including third-party advertisers. However, once you use these links to leave our site, it's important to note that we have no control over these external websites. As such, we cannot be held responsible for the protection and privacy of any information you provide whilst visiting such sites, as they are not governed by our Privacy Policy. External websites may have different privacy practices, which may not provide the same level of protection. We strongly advise you to exercise caution and review the Privacy Policy of any

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external website you visit. These links are provided for your convenience and to offer additional information; their inclusion does not signify our endorsement of the websites or their policies.

## Managing Staff Records and Recruitment

### Holding Staff Information and Records

Staff information, including names, addresses, telephone numbers, email addresses, and mobile numbers, is confidential and securely held. Additional information, such as sickness records, health/medical details, absence data, criminal records, work performance, training, education and qualifications, employment terms and conditions, and references, are also securely stored. This information is managed within the SharePoint/Office365 account of LDDT, controlled by Microsoft with robust security measures like AES 256-bit encryption. It's additionally stored within Workforce, an all-in-one HR and Workforce Management package (<https://www.tanda.co/about>), adhering to SOC2 compliance standards (details at <https://soc2.co.uk/soc-2>) and GDPR regulations.

Access to all these files is strictly limited to Directors and designated staff members, based on their role requirements and responsibilities for data management. This access is closely monitored and regularly reviewed to ensure its appropriateness. Every employee can access their own personal data held within Workforce using an app installed on their mobile device, allowing them to update or correct information as needed. Managerial access to Workforce is role-based and limited in scope, depending on the individual's position within LDDT.

We are fully committed to handling all staff data in accordance with data protection laws, including the GDPR and the Data Protection Act 2018, and regularly review our practices to ensure the highest standards of privacy and data security.

### Staff Financial Details

All bank details of staff for wage payments via BACS Transfer are transferred to the Company Bank, Barclays Bank, Barrow in Furness, Cumbria LA14 1JH. Banking details are securely held within the Workforce Management package, with access strictly controlled, limited to authorised roles only. All LDDT staff have the right to request a copy of the information the company holds about them, including data related to grievance and disciplinary issues. In compliance with GDPR's Subject Access Request process, the company will respond to any such request within a maximum of 31 days. Employee files for those no longer employed or whose contracts have been terminated are held securely, in accordance with data protection regulations.

As recommended by the Data Protection Act 2018, which aligns with GDPR standards, personal information of employees, such as contact details, appraisals, and reviews, are retained for at least 6 years following an employee's departure. LDDT typically retains employees' financial records for at least 3 years, as per HMRC requirements. In general, we keep employee records for 6 years after their departure from the organisation, ensuring compliance with legal obligations and data protection standards.

## Accessing and Updating your Personal Information

We will not sell, distribute, or lease your personal information to third parties unless we have your explicit permission or are required to do so by law, such as in response to a legal process. If you opt-in, we may use your personal information to send you promotional information about third parties that we think you may find interesting. You have the right to request details of the personal information we hold about you under the Data Protection Act 2018, and we will usually provide this service free of charge. If you wish to access your information, please contact our Data Protection Officer, Chris Graves at [Hello@Lakedistrictdirect.co.uk](mailto:Hello@Lakedistrictdirect.co.uk).

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Should you find any information we hold on you to be incorrect or incomplete, we urge you to contact us promptly. We are committed to correcting any inaccuracies swiftly to ensure your data is accurate and up to date.

## Integration with Tick-it Application

LDDT works in close association with the Tick-it application ([www.tick-it.co.uk](http://www.tick-it.co.uk)), a dynamic, real-time, and automated compliance management tool. Tick-it monitors the expiration dates of various licenses and certifications held by LDDT, its drivers, and staff. This monitoring includes vehicle, driving, operational licenses, various insurances and certifications, MOTs, and council-issued licenses and tests, ensuring all remain up to date.

Tick-it is directly integrated with Autocab and leverages its bidirectional API for both sending and receiving information. This integration enables Tick-it to automatically send notifications, suspend drivers, or issue warnings and reminders based on the predetermined lead times and expiration dates of various credentials, certifications, and licenses.

Developed, maintained, and operated by HalGlobal ([www.Halglobal.co.uk](http://www.Halglobal.co.uk)), Tick-it plays a significant role in enhancing LDDT's operational efficiency and customer service. Robust security measures protect the data within Tick-it, ensuring both confidentiality and integrity.

Our partnership with HalGlobal ensures that Tick-it not only meets our operational requirements but also strictly adheres to all relevant data protection laws, maintaining the highest standards of data management and security.

## Data Usage by Tick-it

Tick-it plays an integral role in the operations of LDDT. For example, it processes, maintains, and monitors key driver-related data, including relevant licensing (Local and National Government), DBS certification, and vehicle readiness. One of the key features includes an automated check via an API to the DVLA for expired MOTs, ensuring that vehicle standards are compliant and up to date. This functionality is pivotal in maintaining operational integrity and compliance. Tick-it also oversees aspects such as buildings insurance, fire safety, and health and safety compliance, contributing significantly to the safety of both drivers and customers. This systematic management of data directly contributes to streamlining our operational processes and enhanced service delivery, as well as contributing significantly to driver and customer safety.

## Data Protection and Privacy

Tick-it adheres to the same stringent data protection standards as LDDT. Driver data used by Tick-it is managed in accordance with the principles of the GDPR and the Data Protection Act 2018, ensuring transparent, and secure processing of this information.

## Consent and Access

Drivers retain the right to access their personal data handled by Tick-it. Access is via a companion mobile application (available via Apple Store and Google Play). This application is the primary means by which the user uploads information requested by Tick-it. Requests for data access or inquiries regarding data usage can be directed to our Data Protection Officer, Chris Graves, at [Hello@Lakedistrictdirect.co.uk](mailto:Hello@Lakedistrictdirect.co.uk).

This Tick-it section aims to provide clear information about our association with Tick-it and its role in our service provision. For detailed insights into Tick-it's specific data handling practices, please visit the Tick-it website at [www.tick-it.co.uk](http://www.tick-it.co.uk).

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## CCTV and camera recordings.

LDDT utilises CCTV in and around our booking offices to record staff and the general public for security, staff safety, and crime deterrence. The CCTV systems, provided by ZipNVR (<https://www.zipnvr.com>), store recordings on site using an internal HDD, with enough storage for up to 30 days of looped footage. This continuous looping and overwriting of older footage, in line with our data minimisation and retention policies, ensures a balance between security and privacy. Recordings are accessible only by authorised personnel (based on role) through both remote and onsite access. Clear signage is placed at our booking offices' windows and reception areas, informing staff and the public about the use of CCTV. This practice is part of our commitment to transparency and privacy protection. Additionally, LDDT is registered with the Information Commissioner's Office (ICO) for the use of CCTV, affirming our adherence to GDPR and other relevant data protection regulations.

## Viewing CCTV Recordings

Under GDPR, individuals have the right to request access to personal data held about them, including images captured by our CCTV. Requests for CCTV footage should be directed to our Data Protection Officer at [Hello@Lakedistrictdirect.co.uk](mailto>Hello@Lakedistrictdirect.co.uk). We will endeavour to comply with such requests within one month, in line with GDPR, providing requested images while ensuring the privacy of others captured in the footage is protected. Please note, we are not permitted to charge for this service unless the request is manifestly unfounded or excessive.

## In-Car Recordings

Our vehicles are equipped with Verizon cameras, recording both internal and external footage (without audio), to ensure driver and passenger safety, security, and crime prevention, and in compliance with our insurance policy. The footage is continuously recorded onto an in-camera SD card, capable of storing about 70 hours of footage (recording only when the vehicle's engine is running). If the onboard AI detects an incident deemed significant, a 15-second clip is automatically uploaded to Verizon servers and a notification sent to the LDDT camera system administrator. This uploaded footage is securely held on Verizon servers for 90 days.

**FOR FURTHER DETAILS REGARDING OUR PRIVACY POLICY PLEASE CONTACT:**

**CHRIS GRAVES, DATA PROTECTION OFFICER.** Tel: 01539 239888 E-mail: [Hello@Lakedistrictdirect.co.uk](mailto:Hello@Lakedistrictdirect.co.uk)