

Privacy Notice: Safeguard Coaches October 2018

1. INTRODUCTION

This Privacy Notice sets out how Safeguard Coaches protects any personal information that you give to us when you use the website www.safeguardcoaches.co.uk, or connect with us directly.

Safeguard Coaches is committed to ensuring that your privacy is protected. When Safeguard Coaches ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this Privacy Notice.

Our Privacy Notice explains in detail the types of data we may collect about you or have access to and how we will use and store your personal data.

Safeguard Coaches may on occasion change this policy and this page will be updated. You should check this page from time to time to ensure that you are happy with any changes.

This policy is effective from 1 October 2018.

2. WHO ARE SAFEGUARD COACHES

Safeguard Coaches, a coach hire company based in Guildford. Our address is Safeguard House, Clay Lane, Guildford, Surrey GU4 7NZ.

3. WHEN DO WE COLLECT YOUR PERSONAL DATA?

We collect data directly from you when you:

- Fill in a contact form on the website
- Send us an email
- Call us directly
- Your image appears on CCTV footage onboard our coach
- When you ask us for a quote or make a booking
- Make a payment to us for our services
- Use our coach services as a passenger

4. WHAT PERSONAL DATA DO WE COLLECT?

The type of personal information that we may collect from you

- First & last name
- Gender
- Email
- Mobile
- Address
- Date of Birth
- Photo
- Business Name
- IP address
- Payment Information (please note credit card details will not be stored on our system)
- Passport details (only if required for a passenger manifest by ferry companies)
- Special requirements for travel

5. HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT?

	What We Use Your Personal Information For	How Do We Use Your Personal Information	What is the Legal Basis That We Use to Process Your Information
1	To respond to any comments or queries.	To provide information in answer to any questions, queries or comments that you have made to us, by phone or by email.	Consent, you have asked us a question for which you require an answer.
2	To create quotations for you as requested by you.	To provide the necessary information to allow you to make a decision to use our services based on the information we have given you.	Contract, you have asked us to provide this information to you.
3	To confirm bookings and invoice you for our services.	To supply you with the information needed by you to make use of our services and ensure everything runs smoothly. To give you the information necessary for you to be able to pay us for our services.	Contract, you have now entered into a contract with us to provide transport services to you.
4	To carry out our contract with you.	To provide transportation services, journey planning and travel advice. To notify you of any changes to our services, which may affect your journey.	Contract, necessary for the performance of our contract with you or to take steps to enter into that contract.
5	For marketing our products and services to you.	To provide you with information about goods and services we believe may be of interest to you, to allow you to make future bookings with us. To send you details of any special offers or services.	Legitimate interest.
6	To develop our services and to ensure that our services are up to date, relevant and appealing.	We use your personal information to determine your likes, dislikes and needs, this may come from the comments and requests that have appeared on the site. To ensure that you receive the benefits and services that are on offer and that they are of interest to you.	Legitimate interest. It is within our legitimate interests to both develop and enhance the products and services that we offer to you and to keep our website up to date with relevant information.
7	CCTV, To monitor on board the coach the behaviour of individuals on the bus	We use CCTV to prevent and deter crime, apprehend and or prosecute offenders and to provide a safer environment for our staff and individual travellers.	Legitimate interest

		We monitor operational and safety related incidents.	
8	To retain CCTV images for a reasonable period of time or as long as is required by law.	We would use this information to assist in the verification of any claims that are made.	Legal obligation We are legally obliged to keep the images until a case is resolved or up to 6 years if the case is ongoing.
9	To disclose CCTV images	We would use this information to assist in the verification of a claim, to aid in the apprehension or prosecution of an offender.	Legal obligation
10	Passenger Manifest	If travelling abroad by ferry we are required by the ferry operator to produce a passenger manifest details included would be name, gender, and special travel requirements, travel document type, passport or ID card, travel document number and travel document country of issue, travel document expiry date, date of birth and nationality.	Legal obligation
11	To ensure that the content on our site is presented in the most useful way.	We may use your personal information which could include your IP address to measure ways in which you use our website, we could analyse the effectiveness of our site. This can allow us to structure the content and the services we offer. We would normally use cookies for this purpose.	As appropriate we would ask for your consent to use these cookies before processing.

6. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

Your data is retained by Safeguard Coaches for as long as is necessary for the purpose that it was collected for. We will use your data to send you details of services and products that you may be interested in. If you tell us that you do not wish to receive emails from us by using the 'unsubscribe' link then marketing emails will cease. We will retain your details in a suppression list within our marketing platform 'MailChimp', their privacy policy is [here](#), this will ensure that you are not contacted by us again unless you request us to do so.

We are obliged to keep certain data to fulfil certain legal obligations and matters of record keeping e.g. financial records which we are required to keep for 6 years. Any data that is retained is minimised to ensure that we are only keeping that which is required. We will securely delete all data when it is no longer required.

7. SHARING YOUR PERSONAL DATA

Safeguard coaches do not share the personal information of individual passengers that has been given to us directly.

Safeguard Coaches will never pass on your personal details to other organisations for their use, except when we have your express permission to do so or when the law requires it. We do not sell your or swap your personal data. However where applicable we share your information with subcontractors and suppliers. Staff, consultants and service providers acting on our behalf may be allowed to access your personal data; we will only allow them to do this at our explicit instruction and for an exact purpose.

We may need to disclose your personal data upon request to regulatory and government bodies as well as law enforcement agencies.

8. YOUR RIGHTS

Under GDPR you have rights over your data.

1	The right to be informed, you have the right to know about the collection and use of your personal data.
2	Request access to your personal data that we hold on you; this will be free of charge unless the request is unreasonable or unduly difficult. If you want to access your personal data, please let us have details of the personal data you want to see and proof of your identity by email to: info@safeguardcoaches.co.uk
3	Request correction of your personal data if it is out of date, or is incorrect.
4	Request erasure of your personal data from our records, this can be done in certain circumstances.
5	Restrict processing of your personal data. You have a right to require us to stop processing your personal data in a particular way, this may only happen in certain circumstances.
6	Portability of your data, you may wish to request a copy of your data and take it elsewhere.
7	Object to the processing of your data in a certain way, you can stop your personal details being used for direct marketing.
8	Automated processing, individuals have the right to object to a decision based totally on automated processing.

If you wish to withdraw your consent to the collection and processing of your data, contact our **Data Manager on 01483 5611 03**

The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. You are responsible for the accuracy of your personal data, please let us know if needs to be updated.

If you feel that your data is not being managed in an appropriate manner you can raise a concern with the ICO. You can also find general information from the ICO <https://ico.org.uk/for-the-public>

9. MARKETING & COMMUNICATIONS

We could use your information to inform you about products or services that we offer, which we think you may find interesting and useful. We would contact you by post, telephone (unless you are registered with the TPS) or by email, we would do this as part of our legitimate interest. You are free to opt out or unsubscribe from any marketing communication at any time. We use MailChimp as our marketing platform; you can view their privacy policy [here](#).

10. COOKIES

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, e.g. remembering your preferences, recording what you have put in your shopping basket, analyse traffic to our website, to help with the security of our website, to allow you to log in to the site and to gain consent where appropriate.

Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Overall, cookies help us provide you with a better website service, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website. To find out more about cookies go to www.aboutcookies.com you can view our [Cookie Policy here](#)

11. SECURITY

We are committed to ensuring that your information is safe and secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect from you.

Payment for our services is made by you via our office either by bank transfer or by credit card. We use a third party, Worldpay, to process our card transactions, [Worldpay privacy policy](#). We do not store credit card details.

12. LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

13. CHILDREN

We do not store personal data from children. We do collect personal data from children if they are part of trip that is going to use a ferry service. We are required by the ferry company to complete a passenger manifest and for children aged 4 – 15 years we are required to collect

travel document type, passport or ID card, travel document number and travel document country of issue, travel document expiry date, date of birth and nationality. This data is passed to the ferry company.

14. HOW TO CONTACT US

If you have any questions or queries about how we collect and use your data, please feel free to contact us:

By email to: info@safeguardcoaches.co.uk

By mail to: The Data Manager, Safeguard Coaches, Safeguard House, Clay Lane, Guildford Surrey GU4 7NZ