



## Privacy Policy

### Introduction

Hatters AutoDrive is a Driving School based in Canterbury, Kent and run by Jason Mellor. Throughout this policy where any reference is made to the business it is for the purpose of providing driving lessons as a Sole Trader.

This policy sets out the basis on which any personal data is collected from you, or that you provide to us to be processed. Please read this policy carefully so you understand how your data is used, what it is used for, how long this information is stored and what rights you have for it to be removed.

Complete details on each type of personal data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the data collection.

Personal data may be freely provided by the user, or, in case of usage data, collected automatically when using this application.

Unless specified otherwise, all data requested is required and if you choose not to provide this data we may be unable to provide our services. In cases where it specifically states that some data is not mandatory, users are free not to communicate this data without impact to the availability or the functioning of the service.

Users who are uncertain about which personal data is mandatory are welcome to contact the owner.

Any use of cookies – or of other tracking tools – by this application or by the owners of third-party services used by this application serves the purpose of providing the service required by the user, in addition to any other purposes described in the present document and in the cookie policy, if available.

Users are responsible for any third-party personal data obtained, published or shared through this application and confirm that they have the third party's consent to provide the data to the owner.

### 1. Why do we collect information?

We collect such Non-personal and Personal Information for the following purposes:

- To provide and operate the services and information as advertised and requested
- To book and manage driving tests / lessons
- To arrange our service at specific times
- To cover our terms and conditions
- To manage our income and expenditure
- To publish information on social media, our website and other marketing channels
- To evaluate our service provision

## **Legal basis of processing**

The owner may process personal data relating to users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the owner may be allowed to process personal data until the user objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of personal data is subject to European data protection law;
- provision of data is necessary for the performance of an agreement with the user and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the owner;
- processing is necessary for the purposes of the legitimate interests pursued by the owner or by a third party.

In any case, the owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

## **2. Where do we store this information?**

The owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the owner, in some cases, the data may be accessible to certain types of persons in charge, involved with the operation of this application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as data processors by the owner. The data is processed at the owner's operating offices and in any other places where the parties involved in the processing are located. The updated list of these parties may be requested from the owner at any time.

Some information is held by our Pupil Management System (Total Drive) and processed via our Wix.com web-based platform. Please see below for details.

## **3. What data capture tools do we use and what information do we collect?**

### **Online Enquiry form**

By filling in the Enquiry form on the website, the user authorizes this application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header. Personal Data processed: first name; last name; phone number; address; post code; city; county; date of birth; email address; field of activity; availability for lessons; various types of other driving / licence-related Data. Other personal data may be later requested and stored in the pupil management system by the business to ensure that an effective service is provided to the user.

### **Total Drive – Pupil Management System / App**

At Hatters AutoDrive we use a Pupil Management System and App called Total Drive. When you complete the Enquiry Form on the [hattersautodrive.com](http://hattersautodrive.com) website, the data is stored in the Total Drive Pupil Management system to enable the team at Hatters AutoDrive to engage with you and follow up your enquiry. If you subsequently choose to learn to drive with Hatters AutoDrive, you will be required to register with the Total Drive App to enable us to access your personal data for bookings, lesson management, and progression tracking.

### ***Total Drive Terms of Use***

By using the [totaldrive.co.uk](http://totaldrive.co.uk) (“Service”) and all services of Total Drive, Users are agreeing to be bound by the Apps terms and conditions (“Terms of Service”). You can review the most current version of the Terms of Service at any time at: [www.totaldrive.co.uk/terms-of-service/](http://www.totaldrive.co.uk/terms-of-service/)

Any questions about these Terms of Service, the application, assistance or if you just want to talk to us, please contact us at [hello@totaldrive.co.uk](mailto:hello@totaldrive.co.uk) or via post 7 Dartington Space, Totnes, Devon, TQ96EN.

### ***Total Drive Privacy Policy***

Total Drive (“us”, “we”, or “our”) operates the [www.totaldrive.co.uk](http://www.totaldrive.co.uk) website (the “Service”).

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. We use your data to provide and improve the Service.

By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from [www.totaldrive.co.uk/privacy-policy](http://www.totaldrive.co.uk/privacy-policy)

### ***Total Drive Security of Data***

Total Drive use dedicated UK servers that back up all your content daily. With our expertise in websites, we have the skill set and knowledge to make sure your data is encrypted, secure and available 24/7. Our servers are physically manned and often tweaked to make sure they are working to maximum performance. We DO NOT use any data for marketing purposes. It is not passed to any third parties.

### ***Total Drive GDPR Statements***

The EU General Data Protection Regulation (GDPR) builds on existing data protection laws, strengthening the rights that EU individuals have over their personal data, and creating a single data protection approach across Europe. We are committed to the General Data Protection Regulations to ensure that the data we hold on clients is both accurate and only used with the explicit permission of the client.

We believe compliance is a shared responsibility, giving assurance and assistance to our customers. We have reviewed all our internal processes, procedures, data systems and documentation to ensure that we comply. Full details can be found at [www.totaldrive.co.uk/gdpr](http://www.totaldrive.co.uk/gdpr)

### **Our website**

Our company website is hosted by Wix.com. Wix.com provide us with the online platform that allows us to sell our products and services to visitors / users. The platform provide a range of tools to the owner – e.g. analytics, user registration, database management processing – that imply the collection and handling of personal data. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the personal data are stored.

Personal data processed: Cookies; usage data.

Place of processing: Israel – [Privacy Policy](#).

Wix.com use cookies to provide the services and features offered on our website, and to improve the user experience. Cookies are small pieces of data sent from a website and stored on a visitor's browser. They are typically used to keep track of settings selected and actions taken on a site. Upon logging onto hattersautodrive.com you will be notified that the website uses cookies to see how you interact with it. You are able to agree to the use of such cookies, to interrogate and change cookie setting data or to decline the use of all cookies if you wish. To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

### **Social Media / Google Reviews**

Once you pass your test, we will ask to take a photo of you standing next to the car with your pass certificate. You allow us to use this information for marketing purposes. We will send you a customer review form after your test. You allow us to use your comments and photo on our website, web-based business pages, social media and other marketing materials. If for any reason you need this to be removed, we will make every effort to do so within 72 hours of receiving the request. This request must be sent by email to the owner using the contact details at the end of this policy.

### **Driving Licence Checks**

Before you begin lessons with us, we are required to undertake a check of your driving licence details. You authorise us to use your personal information to undertake this check on the .gov.uk website.

## **4. How long do we keep this information for?**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal data collected for purposes related to the performance of a contract between the owner and the user shall be retained until such contract has been fully performed.
- Personal data collected for the purposes of the owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain personal data for a longer period whenever the user has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the owner may be obliged to retain personal data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, personal data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

By law, we are required to keep your details on file for 5 years for HMRC and tax purposes. This is in line with current HMRC guidelines which can be found at the Gov.uk website. After this time, your data will be destroyed. We will delete your contact details from our data systems and devices one year after you pass your test.

## **5. How can you request the removal of data we keep about you?**

You can at any time request what data is held by us and the removal of data that we hold. Please contact the owner using the information at the end of this policy. If you wish to remove cookies you should ask your internet service provider for help or information from your current browser.

## **6. How is your information shared?**

Your data is not shared with other third parties unless you give prior consent.

There may be connections to other third party organisations on our website and pupil management system eg booksellers, DVSA test booking site etc. 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.

## **7. How do we communicate with our customers?**

We use the most convenient means of contacting users which is available. This may include the use of email, text, other messaging services eg. WhatsApp, social media platforms and our pupil management system. Users are free to express a preference about a preferred means of contact or opt out of any contact point by emailing the owner (see contact details at end of policy).

In addition to contact for operational issues (eg lesson bookings / administration), we may contact users to offer additional business-related services, to troubleshoot problems with an account, to resolve a dispute, to collect fees or monies owed and to ask for an evaluation of our services.

## **8. How are financial transactions handled?**

All digital financial transactions are completed by bank transfer. The owner's account details will be shared to enable fees to be paid directly.

## **9. What else is there to know about Data collection and processing?**

### ***Legal action***

The user's personal data may be used for legal purposes by the owner in court or in the stages leading to possible legal action arising from improper use of this application or the related services. The user declares to be aware that the owner may be required to reveal personal data upon request of public authorities.

### ***Additional information about User's Personal Data***

In addition to the information contained in this privacy policy, this application may provide the user with additional and contextual information concerning particular services or the collection and processing of personal data upon request.

### ***System logs and maintenance***

For operation and maintenance purposes, this application and any third-party services may collect files that record interaction with this application (system logs) or use other personal data (such as the IP Address) for this purpose.

### ***Information not contained in this policy***

More details concerning the collection or processing of personal data may be requested from the owner at any time. Please see the contact information at the end of this document.

## **10. How is the Privacy Policy updated?**

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

**Last Updated 25<sup>th</sup> February 2023**

### **Owner and Data Controller**

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