

Gentle Route Ltd – Privacy & Data-Protection Notice

(Compliant with UK GDPR, DPA 2018 and Transport for London PHV operator requirements – Issue 1.0, 07 July 2025)

Who we are — Gentle Route Ltd, registered in England & Wales (16380916).

Registered office: Unimix House, Abbey Road, London NW10 7TR.

Data-controller registration: **ICO No. ZA999999**.

24-hour enquiries: **0203 433 1345** | privacy queries: **gdpr@gentleroute.co.uk**

1. What personal data we collect

Category	Examples	Where collected
Booking data	Name, pick-up & drop-off addresses, phone/e-mail, journey time, special requirements	Online form, phone, e-mail PO
Payment data	Last 4 digits of card, transaction ID	Worldpay/Stripe secure link
Driver & vehicle data	Driver name, PHV licence no., vehicle VRM	iCabbi dispatch system
Communications	Call recordings, e-mails, SMS	RingCentral VOIP, Gmail
CCTV & dash-cam	Video (inside vehicle)	Onboard camera (where fitted)
Website usage	IP address, cookies, device type	Analytics cookies (consent banner)

2. Lawful bases for processing

Purpose	Lawful basis
Accepting & fulfilling a booking	Contract – Art 6(1)(b)
Driver allocation & safety monitoring	Legitimate interest – Art 6(1)(f)
Invoicing & tax records	Legal obligation – Art 6(1)(c)
CCTV for crime prevention & safeguarding	Legitimate interest – Art 6(1)(f)
Marketing e-mails to existing customers	Soft opt-in – PECR Reg 22
Recruiting drivers & staff	Contract / Legitimate interest

We do **not** use automated decision-making or profiling that produces legal effects.

3. How we store & protect your data

- **Encryption at rest** in UK/EU data centres (iCabbi, RingCentral, Microsoft 365).
 - TLS encryption in transit.
 - Access limited to DBS-checked staff with unique log-ins.
 - Multi-factor authentication and quarterly password audits.
 - Annual penetration test and GDPR staff training.
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4. Retention schedule

Data type	Retention
Booking & dispatch records	12 months from journey date
Financial & invoicing data	7 years (HMRC requirement)
CCTV footage	28 days unless required for an incident
Call recordings	31 days (<i>RingCentral default</i>)
Driver personnel files	Duration of engagement + 6 years
Cookie/analytics logs	Up to 26 months

5. Sharing your data

We share data **only when necessary**:

- **Drivers** – to complete your journey (first name, phone masked, pick-up).
- **TfL Taxi & Private Hire** – compliance and weekly fleet uploads.
- **Payment providers** – Stripe/Worldpay for secure card processing.
- **Law-enforcement** – on valid request or safeguarding concern.
- **IT service firms** under contract with GDPR clauses (e.g. AWS EU, Microsoft 365).

We do not sell or rent personal data to third parties. No data is transferred outside the UK/EU unless adequate safeguards (UK IDTA or SCCs) are in place.

6. Your rights

Under UK GDPR you can:

1. **Access** – request a copy of your data.
2. **Rectify** inaccurate data.
3. **Erase** ('right to be forgotten') where applicable.
4. **Restrict** or object to processing in certain cases.

5. **Port** data you provided in a structured format.

6. **Complain** to the ICO (ico.org.uk) if you believe we have mishandled your data.

Requests: e-mail gdpr@gentleroute.co.uk; we respond within **30 days**.

7. Cookies

Our website uses essential cookies for security and a consent banner for optional analytics cookies (Google Analytics). You can change consent at any time via the banner link in the footer.

8. Changes to this notice

We review this notice annually or when data-protection law changes. Updates appear on this page; significant changes are flagged by e-mail (account holders) or pop-up banner (site visitors).

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