



General Data Protection Regulation (GDPR) Notice– Customers

Introduction

We collect and process personal information, or personal data, relating to you to fulfil the duty requested by you. This personal information may be held by us on paper or in electronic format.

We at Astons Coaches are committed to being transparent about how we handle your personal information, to protecting the privacy and security of your personal information and to meeting our data protection obligations under the General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018. The purpose of this privacy notice is to make you, as the Customer, aware of how and why we will collect and use the personal information both during and after the working relationship together. Astons Coaches is required under the GDPR to notify you of the information contained in this privacy notice.

Data protection principles

Under the GDPR, there are six data protection principles that we must comply with. These provide that the personal information we hold about you must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

Astons Coaches is responsible for, and must be able to demonstrate compliance with, these principles. This is called accountability.

What types of personal information do we collect about you?

Personal information is any information about an individual from which that person can be directly or indirectly identified. It doesn't include anonymised data, i.e. where all identifying particulars have been removed.



We collect, use and process a range of personal information about you. This includes:

- Your contact details, including your name, address, telephone number and personal e-mail address
- Your date of birth, gender, passport details (only required if the Customer is booking a coach for continental travel across Europe where these details are required for Ferry travel)

How do we collect your personal information?

We may collect personal information about you in a variety of ways that are reasonable to the purpose of requiring the personal data. It is collected during the quotation process of a booking where the you would provide contact details of your preference in order to proceed with a quotation or booking. We may also collect personal information from other external third parties, such as an external tour provider that you had originally booked with who require our services to complete your job.

Your personal information will be stored in different places, including the quotation and booking files and in other IT systems, such as the e-mail system. These storage locations are secure in locked filing cabinets and under secure electronic measures.

Why and how do we use your personal information?

We will only use your personal information when the law allows us to. These are known as the legal bases for processing. We will use your personal information in one or more of the following circumstances:

- Where we need to do so to perform a contract for services we have entered into with the you
- Where we need to do so to comply with a legal obligation

Aston's Coaches needs all the types of personal information listed under "*What types of personal information do we collect about you?*" primarily to enable us to perform our contract you and to enable us to comply with their legal obligations.

The purpose for which we are processing, or will process, your personal information is to:

- Administer the contract we have entered into with you
- Comply with statutory and/or regulatory requirements and obligations (for example, passenger lists for continental travel where relevant)
- Enable us to establish, exercise or defend possible legal claims
- Meet our obligations under health and safety laws

Please note that we may process your personal information without your consent, in compliance with these rules where this is required to by law.

What if you fail to provide personal information?

If you fail to provide certain personal information when requested or required, we may not be able to perform the contract we have entered into with you.



Change of purpose

We will only use your personal information for the purposes for which we collected it. If we need to use your personal information for a purpose other than that for which it was collected, we will provide you, prior to that further processing, with information about the new purpose, we will explain the legal basis which allows us to process your personal information for the new purpose and we will provide you with any relevant further information. We may also issue a new privacy notice to you.

Who has access to your personal information?

Your personal information will be shared internally within the Company to members of the organisation that require it to complete the service of contract engaged with yourself and Astons Coaches. Such as:

- Staff within the operations and sales departments
- Driver of the coach completing your hire
- Staff in the accounts department

The Company may also share your personal information with other third parties in the context of a potential sale or restructuring of some or all of its business. In those circumstances, your personal information will be subject to confidentiality undertakings.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

We may share your personal information with third parties where it is necessary to administer the contract we have entered into with you, where we need to comply with a legal obligation, or where it is necessary for our legitimate interests (or those of a third party).

How does the Company protect your personal information?

Astons Coaches has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to try and prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities.

Where your personal information is shared with third-party service providers, we require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

The Company also has in place procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.



For how long does the Company keep your personal information?

We will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, tax, health and safety, reporting or accounting requirements.

Aston's Coaches will hold your personal information for no longer than 4 years after booking, unless you frequently book with us and request the retention period to be extended for ease of booking.

Some exceptions to the 4 year retention period are:

- Any personal information taken in relation to Lost Property will be erased within 3 months
- Any personal information taken in relation to a quotation for coach hire, but that quotation doesn't accumulate to a booking, will be erased within 18 months