

Privacy Policy

GAVIN HOUSE INSTRUCTOR PRIVACY POLICY

Effective: 25 May 2018

We value the trust that you place in us by sharing your personal data with us. GAVIN HOUSE INSTRUCTOR takes your privacy seriously and is committed to handling your personal data in a way that is fair and worthy of that trust. GAVIN HOUSE INSTRUCTOR will take all reasonable steps to protect your information from misuse and keep it secure. We believe it is important to inform you about how we will use your personal data. Therefore, we encourage you to read this privacy policy carefully.

SUMMARY

This privacy policy explains the types of personal data we collect and how we use and protect that information:

- [Scope](#)
- [Who We Are](#)
- [Personal Data We Collect](#)
- [What We Do With Your Personal Data](#)
- [How We Share Your Data](#)
- [Cookies, Analytics and Personalization](#)
- [Social Media](#)
- [If You are Under 16 Years of Age](#)
- [International Transfers of Data](#)
- [Security](#)
- [Data Retention](#)
- [Your Rights](#)
- [Other Websites](#)
- [Changes to the Policy](#)
- [Data Protection Officer - Contact and Queries](#)

SCOPE

This privacy policy applies to all personal data that is collected and used by us when you visit or use the websites, applications, online, mobile or interact with us through social media or otherwise. For purposes of this privacy policy, 'personal data' means any information through which we can identify you, as further described below.

WHO WE ARE

GAVIN HOUSE INSTRUCTOR is a driving school working in England to supply driver training and related products.

GAVIN HOUSE INSTRUCTOR will be referred to hereafter as '**GHI**' or '**we**'.

PERSONAL DATA WE COLLECT

The information we collect about you when you buy our products or use our Services may include the following (jointly referred to as: 'personal data').

General :

- *Your contact details.* Your name, postal address and other contact details, such as your telephone number and e-mail address.
- *Your purchases online.* The data we collect if you purchase a product or use a Service online, such as the amount and date of your purchase, the product you purchase or Service you use, the website or app through which you make your purchase, payment method, payment status, discount, delivery method and delivery address.
- *Your reviews.* The opinions, experiences, preferences and interests, and product or training reviews that you publish on our websites or share with us online or through social media, such as your experiences and tips regarding driving tests.
- *Your communication data.* Your requests, any complaints you may have and any other data that we receive if we communicate with you via e-mail, online or via social media.

Special categories of personal data :

We also collect information in relation to your driving test routes.

WHAT WE DO WITH YOUR PERSONAL DATA

GHI collects and uses your personal data for the purposes set out below. Please be informed that insofar GHI already holds information about you, GHI may use that information for the same purposes.

For the performance of our agreement with you:

In order to manage and handle your purchases (by whatever means) and to provide you with the Services you requested from us, including handling your requests, we use your contact details, your electronic identification data, information regarding your purchases and your communication data.

To comply with a legal obligation to which GHI is subject:

Any information referred to above in the section 'Personal Data We Collect' may be used to maintain appropriate business records, to comply with lawful requests by public authorities and to comply with applicable laws and regulations or as otherwise required by law.

For our legitimate commercial interests:

We may use your contact details to send you newsletters or general marketing materials as well as surveys about Products and Services you have purchased. At

any time, you may opt out of receiving such marketing materials by following the instructions in any communication you receive from us.

We will use the personal data referred to above in the section 'Personal Data We Collect' in order to improve our products and Services as well as to understand our customers both on an aggregated and on an individual basis. This means that we analyse your use of our products and Services and we use this information to improve our products and Services and to give you a better user experience (e.g., we analyse what web pages you visit, which products and Services you use and like, how you use these products and Services, which enables us to assess what may be interesting to you, which recommendations we can give you when you purchase our products or use our Services (such based for example on your previous purchases and use of our Services)).

The personal data referred to above in the section 'Personal Data We Collect' may also be used by GHI:

- to generate aggregated statistics about the users of our products and Services;
- to assist in security and fraud prevention and
- for other legitimate business purposes permitted by applicable law.

Use of information based on your consent:

We may use the personal data referred to above in the subsection 'Special Categories of Personal Data' (i.e. test routes) for the purposes set out in this GHI Privacy Policy but we will only do so after we have received your consent thereto.

We may use your personal data referred to above in the section 'Personal data we collect' for marketing purposes based on your profiles via email, SMS, other electronic means or otherwise, but we will only do so after we have received your consent to do so.

We also use your personal data referred to above in the section 'Personal data we collect' based on your consent, if you subscribe to receiving our newsletters or participating to our surveys.

You can withdraw your consent at any time; see the section Your Rights below.

HOW WE SHARE YOUR DATA

We may share your personal data with the following parties:

- *Data controllers within GHI.* Your personal data will be shared between the responsible GHI companies that may use your personal data as described in this Privacy Policy.

- *Third parties in case of legal requirement.* We may also disclose your personal data if we believe we are required to do so by law, or that doing so is reasonably necessary to comply with legal processes; when we believe necessary or appropriate to disclose personal data to law enforcement authorities, such as to investigate actual or suspected fraud or violations of law, breaches of security, or breaches of this Privacy Policy; to respond to any claims against us; and, to protect the rights, property, or personal safety of GHI, our customers, or the public.
- *With Consent.* We may also disclose information about you, including personal data to any other third parties, where you have consented or requested that we do so.

Notwithstanding anything else in this Privacy Policy, we may share aggregate or de-identified information with third parties for research, marketing, analytics and other purposes, provided such information does not identify a particular individual.

Cookies, analytics and personalization

We and our third party providers use cookies, clear GIFs/pixel tags, JavaScript, local storage, log files, and other mechanisms to automatically collect and record information about your browsing activities, and use of the Services. We may combine this “activity information” with other personal data we collect about you. Generally, we use this activity information to understand how our Services are used, track bugs and errors, improve our Services, verify account credentials, allow logins, track sessions, prevent fraud, and protect our Services, as well as for targeted marketing and advertising, to personalize content and for analytics purposes.

Social media

When you participate in various social media forums like Facebook, Twitter, Yammer, Pinterest, Instagram, LinkedIn, etc., you should be familiar with and understand the tools provided by those sites that allow you to make choices about how you share the personal data in your social media profile(s).

GHI is bound by the privacy practices or policies of these third parties, so we encourage you to read the applicable privacy notices, terms of use and related information about how your personal data is used in these social media environments.

IF YOU ARE UNDER 16 YEARS OF AGE

Our online Services are not directed to children under 13 years of age. If you believe we have collected information about a child under the age of 13, please contact us (see ‘Data Protection Officer - Contact and Queries’ below) so that we may take appropriate steps to delete such information.

If you are at least 13 but under 16 years of age, please get the consent of your parent or legal guardian before you give us any personal data about yourself. Your parent or guardian should contact the GHI company responsible for using your personal data and provide us with their name, e-mail address and any other identifying information that we may request. GHI needs this information in order to verify that they have provided the necessary consent. We may follow up by phone or other means in some circumstances. If you are at least 13 but under 16 years of age, do not contact us or provide us with any personal data until after your parent or guardian has sent us an e-mail consenting to your contact and provision of such information.

INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

Please be informed that we do not transfer nor process any personal data you provide to us to countries other than your country of residence.

SECURITY

GHI will take reasonable steps to ensure that your personal data are properly secured using appropriate technical, physical, and organizational measures, so that they are protected against unauthorised or unlawful use, alteration, unauthorised access or disclosure, accidental or wrongful destruction, and loss. Your personal data will be retained for as long as required for the above purposes or in so far as such is necessary for compliance with statutory obligations and for solving any disputes.

DATA RETENTION

GHI retains your personal data for as long as required to satisfy the purpose for which they were collected and used (for example, for the time necessary for us to send you the newsletters you subscribed to, to provide you with customer service, answer queries or resolve technical problems, etc.), unless a longer period is necessary for our legal obligations or to defend a legal claim.

Also, if we need to store certain types of your personal data for a longer period due to legal requirements, we will store such data in accordance with the mandatory periods.

YOUR RIGHTS

You have the following rights concerning your personal data: right of access, right of rectification, right to erasure, right to restrict data processing, right to object against profiling and your right to data portability. If you would like to contact us regarding any of these rights please do so using the details in the contact page.

To the extent that we are relying on our legitimate interests to use your personal data, you also have the right to object to such use (unless we can either demonstrate

compelling legitimate grounds for the use that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defence of legal claims).

Without undue delay and not later than within a month, we will respond to your request to invoke your rights consistent with applicable law.

You may revoke your consent for receiving marketing communications at any time, free of charge by following the instructions in any marketing communication. GHI will then stop applying the research results to you at an individual level and will stop sending you marketing communications.

In case you may have a question or complaint about how we process your personal data, you can send an email to the GHI company responsible for using your personal data. Alternatively, you may consider lodging a complaint with a supervisory data protection authority.

OTHER WEBSITES

Our websites and mobile applications contain links to third-party websites; if you follow these links, you will exit our websites and mobile applications. While these third-party websites are selected with care, GHI cannot accept liability for the use of your personal data by these organizations. For more information, please consult the privacy statement of the website you are visiting (if such a statement is provided).

CHANGES TO THE POLICY

We may change this privacy policy from time to time by posting the updated version of the privacy policy on our websites and applications. We will give you reasonable notice on our websites of any material change. The “effective date” at the top of this policy indicates when such changes will take effect. We encourage you to visit frequently to stay informed about how we use your personal data.

Data protection officer - Contact and Queries

If you have any questions regarding the processing of your personal data or this privacy policy, please contact the GHI Data Protection Officer. An overview of all contact details can be found on our website contact page.