

# I-GTM Privacy policy

## 1. Introduction

- 1.1. We are committed to safeguarding the privacy of our application users, website visitors, service users, individual customers and customer personnel.
- 1.2. This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3. We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4. In this policy, "we", "us" and "our" refers to I-GTM Ltd. For more information about us, see Section 20.
- 1.5. Our software is served via our website and web subdomains. The term 'website' in the context of this policy shall also refer to our software application known as 'I-GTM'.

## 2. The personal data that we collect

- 2.1. In this Section 2 we have set out the general categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.
- 2.2. We may process data enabling us to get in touch with you ("contact data"). The contact data may include your name, email address, telephone number, postal address and/or social media account identifiers. The source of the contact data is you and/or the school which you work for or your child or children (or child or children for which you act as legal guardian or contact with parental responsibility or named host or other party with responsibility, even if only temporary, for the child or children) attends. If you log into our website using a social media or other service provider account (known as SSO or Single Sign On), we may obtain elements of the contact data from the relevant social media or other account provider.
- 2.3. We may process information relating to our customer relationships ("customer relationship data"). The customer relationship data may include your name, the name of your business or employer, your job title or role, your contact details, your classification / categorisation within our customer relationship management system and information contained in or relating to communications between us and you, or between us and your employer. The source of the customer relationship data is you and/or your employer.
- 2.4. We may process personal data that are provided in the course of the use of our services and generated by our services in the course of such use ("service data"). The service data may include travel information including time and method of travel. The source of the service data is you and/or your employer and/or our services.
- 2.5. We may process information contained in or relating to any communication that you send to us or that we send to you ("communication data"). The communication data may include the communication content and metadata associated with the communication. Our website will

generate the metadata associated with communications made using the website contact forms.

- 2.6. We may process data about your use of our application, website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and application or website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.
- 2.7. Please do not supply any other person's personal data to us, unless we prompt you to do so.

### 3. Purposes of processing and legal bases

- 3.1. In this Section 3, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 3.2. Operations - We may process your personal data for the purposes of operating our application and website, providing our services, generating invoices, bills and other payment-related documentation, and credit control. The legal basis for this processing is our legitimate interests, namely the proper administration of our software, website, services and business.
- 3.3. Relationships and communications - We may process contact data, account data, customer relationship data, transaction data and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with our service users, individual customers and customer personnel, the maintenance of our relationships, enabling the use of our services, and the proper administration of our website, services and business.
- 3.4. Personalisation - We may process account data, service data and/or usage data for the purposes of personalising the content that you see on our website and through our services to ensure that you only see material that is relevant to you. The legal basis for this processing is our legitimate interests, namely offering the best possible experience for our website visitors and service users.
- 3.5. Direct marketing - We may process contact data, account data, profile data, customer relationship data and/or transaction data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and making contact by telephone for marketing-related purposes. The legal basis for this processing is our legitimate interests, namely promoting our business and communicating marketing messages and offers to our website visitors and service users.
- 3.6. Research and analysis - We may process usage data, service data and/or transaction data for the purposes of researching and analysing the use of our application, website and services, as well as researching and analysing other interactions with our business. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing our application, website, services and business generally.
- 3.7. Record keeping - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.

- 3.8. Security - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.
- 3.9. Insurance and risk management - We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.10. Legal claims - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.11. Legal compliance and vital interests - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

## 4. Automated decision-making

- 4.1. We will use your personal data for the purposes of automated decision-making in relation to the allocation of transport and sharing transport details with others where required for the operation of our services.
- 4.2. This automated decision-making will involve analysing the journey route booked including departure and arrival time.
- 4.3. The significance and possible consequences of this automated decision-making are that you may be allocated a journey share with another student where you have indicated that this is acceptable. You may also be offered a school coach if the software calculates this as making a material difference to your journey.

## 5. Providing your personal data to others

- 5.1. We partner with third-party service providers who are certified under PCI DSS v4.0 to handle all payment-related transactions. These providers include Stripe, PayPal, Xero, and Tide Bank, and they are responsible for processing, transmitting, and securing cardholder data on our behalf, in compliance with PCI DSS SAQ-A standards.
- 5.2. We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.
- 5.3. Non-personally identifying ID numbers which, when associated with the matching ID number held in the database and/or systems of our clients will identify your name and/or address, date of birth, address, phone number and/or other non-specified personal data, will be stored on the servers of our hosting services providers, Google Cloud Services.
- 5.4. We may disclose name, age, contact details and travel plans to our suppliers or subcontractors insofar as reasonably necessary to arrange and supervise safe travel for you and/or your child(ren) or children attending your school or in your care.

- 5.5. Financial transactions relating to our services are handled by our payment services providers, Royal Bank of Scotland, Stripe, Xero and Tide Bank. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://www.xero.com/uk/about/legal/privacy/>, <https://www.rbs.co.uk/privacy-policy.html>, <https://stripe.com/en-gb/privacy-center/legal>, <https://www.paypal.com/uk/legalhub/privacy-full> and <https://www.tidebank.co.uk/privacy-policy/>.
- 5.6. In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## 6. International transfers of your personal data

- 6.1. In this Section 6, we provide information about the circumstances in which your personal data may be transferred to a third country under UK data protection law.
- 6.2. We may transfer your personal data from the European Economic Area (EEA) to the UK and process that personal data in the UK for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which the UK is not treated as a third country under EU data protection law or benefits from an adequacy decision under EU data protection law; and we may transfer your personal data from the UK to the EEA and process that personal data in the EEA for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which EEA states are not treated as third countries under UK data protection law or benefit from adequacy regulations under UK data protection law.
- 6.3. The hosting facilities for our website are situated in the United Kingdom or the European Union. The competent data protection authorities have made an adequacy determination with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the competent data protection authorities, a copy of which you can obtain from [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).
- 6.4. You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## 7. Retaining and deleting personal data

- 7.1. This Section 7 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.



- 7.2. We do not retain any cardholder data on our systems. All payment card information is securely managed by third-party providers, compliant with PCI DSS SAQ-A requirements, ensuring that cardholder data is only retained as necessary for legal or business purposes by our payment processors, including Stripe, PayPal, Xero, and Tide Bank.
- 7.3. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.4. We will retain your personal data as follows:
  - 7.4.1. contact data will be retained for a minimum period of one year following the date of the most recent contact between you and us, and for a maximum period of five years following that date;
  - 7.4.2. account data will be retained for a minimum period of 24 hours following the date of closure of the relevant account, and for a maximum period of one year following that date;
  - 7.4.3. profile data will be retained for a minimum period of 24 hours following the date of deletion of the profile by you, and for a maximum period of one year following that date;
  - 7.4.4. customer relationship data will be retained for a minimum period of 24 hours following the date of termination of the relevant customer relationship and for a maximum period of one year following that date;
  - 7.4.5. service data will be retained for a minimum period of One year following the date of termination of the relevant contract, and for a maximum period of five years following that date;
  - 7.4.6. transaction data will be retained for a minimum period of one year following the date of the transaction, and for a maximum period of five years following that date;
  - 7.4.7. communication data will be retained for a minimum period of one year following the date of the communication in question, and for a maximum period of five years following that date];
  - 7.4.8. usage data will be retained for one year following the date of collection.
- 7.5. Notwithstanding the other provisions of this Section 7, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 8. Security of personal data

- 8.1. We do not store, process, or transmit cardholder data directly. All payment transactions are handled by third-party payment providers who comply with Payment Card Industry Data Security Standard (PCI DSS) v4.0. Our partners, including Stripe, PayPal, Xero, and Tide Bank, ensure that cardholder data is encrypted and protected during transmission and processing.
- 8.2. We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.
- 8.3. We will store your personal data on secure servers, personal computers and mobile devices.

- 8.4. The following personal data will be stored by us in encrypted form: your travel plans and any address and contact information you have manually entered into our system.
- 8.5. Data relating to your enquiries and financial transactions that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.
- 8.6. You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 8.7. You should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing our website, either directly or via Single Sign-On, confidential and we will not ask you for your password.

## 9. Your rights

- 9.1. In this Section 9, we have listed the rights that you have under data protection law.
- 9.2. Your principal rights under data protection law are:
  - 9.2.1. the right to access - you can ask for copies of your personal data;
  - 9.2.2. the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
  - 9.2.3. the right to erasure - you can ask us to erase your personal data;
  - 9.2.4. the right to restrict processing - you can ask us to restrict the processing of your personal data;
  - 9.2.5. the right to object to processing - you can object to the processing of your personal data;
  - 9.2.6. the right to data portability - you can ask that we transfer your personal data to another organisation or to you;
  - 9.2.7. the right to complain to a supervisory authority - you can complain about our processing of your personal data; and
  - 9.2.8. the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.
- 9.3. These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting [[https://edpb.europa.eu/our-work-tools/general-guidance/gdpr-guidelines-recommendations-best-practices\\_en](https://edpb.europa.eu/our-work-tools/general-guidance/gdpr-guidelines-recommendations-best-practices_en) and <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>].
- 9.4. You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below: [dw@i-gtm.com](mailto:dw@i-gtm.com).

## 10. Third party websites

- 10.1. Our website includes hyperlinks to, and details of, third party websites.
- 10.2. In general we have no control over, and are not responsible for, the privacy policies and practices of third parties.

## 11. Personal data of children

- 11.1. Our website and services are targeted at persons over the age of 8, however occasionally we may be requested to provide transport services to a child under this age.
- 11.2. If we have reason to believe that we unnecessarily hold personal data of a person under that age in our databases, we will delete that personal data.

## 12. Updating information

- 12.1. Please let us know if the personal information that we hold about you needs to be corrected or updated.

## 13. Acting as a data processor

- 13.1. In respect of data received via API from our clients' MIS systems, we do not act as a data controller; instead, we act as a data processor.
- 13.2. Insofar as we act as a data processor rather than a data controller, this policy shall not apply. Our legal obligations as a data processor are instead set out in the contract between us and the relevant data controller.

## 14. About cookies

- 14.1. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 14.2. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 14.3. Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

## 15. Cookies that we use

- 15.1. We use cookies for the following purposes:
  - 15.1.1. analysis - we use cookies to help us to analyse the use and performance of our website and services; and

- 15.1.2. cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

## 16. Cookies used by our service providers

- 16.1. Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 16.2. We use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>.

## 17. Managing cookies

- 17.1. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
  - 17.1.1. <https://support.google.com/chrome/answer/95647> (Chrome);
  - 17.1.2. <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop> (Firefox);
  - 17.1.3. <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
  - 17.1.4. <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
  - 17.1.5. <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari); and
  - 17.1.6. <https://support.microsoft.com/en-gb/help/4468242/microsoft->
- 17.2. Blocking all cookies will have a negative impact upon the usability of many websites.
- 17.3. If you block cookies, you will not be able to use all the features on our website.

## 18. Cookie preferences

- 18.1. Where available you can manage your preferences relating to the use of cookies on our website by clicking in the notice displayed.

## 19. Amendments

- 19.1. We may update this policy from time to time by publishing a new version on our website.
- 19.2. You should check this page occasionally to ensure you are happy with any changes to this policy.
- 19.3. We may notify you of significant changes to this policy by email.



## 20. Our details

- 20.1. This application and website is owned and operated by I-GTM Ltd.
- 20.2. We are registered in England and Wales under registration number 10961074, and our registered office is at Tite House, Wardington, Banbury OX17 1SP.
- 20.3. Our principal place of business is at the registered office.
- 20.4. You can contact us:
  - 20.4.1. by post, to the postal address given above;
  - 20.4.2. using our website contact form;
  - 20.4.3. by telephone, on the contact number published on our website; or
  - 20.4.4. by email, using the email address published on our website.

## 21. Data protection registration

- 21.1. We are registered as a data controller with the UK Information Commissioner's Office.
- 21.2. Our data protection registration number is ZB146793.

## 22. Data protection officer

- 22.1. Our data protection officer's contact details are: David Williams (dw@i-gtm.com).