

# **333Cars Limited Passenger Privacy Policy**

At 333Cars Limited, we are focused on bringing to you the safest journey possible. To do this, we gathered the best crew and fleet of Hackney Carriage and Private Hire vehicles that has been on business for over a decade. Your safety is our priority and this includes the safety of your personal data that we process when you use the 333Cars Limited services.

**Date when this Privacy Notice was last updated: 01 November 2025**

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## 1. About this Privacy Notice

This Privacy Notice (“Notice”) describes how **333Cars LIMITED** (“333Cars”, “We” or “Us”) and its group companies and third party partners collect and use the personal data of persons arranging passenger/client transport services via the 333Cars App - each known as a “Passenger”. More information about 333Cars Limited can be obtained by email request at [help@333cars.co.uk](mailto:help@333cars.co.uk)

The term “you” or “your” refers to a Passenger/Client. This Notice lets you know how we promise to look after your personal data and tells you about your privacy rights and the choices and controls available to you. This Notice applies to all individuals globally who use the 333Cars Limited Platform to request and receive transportation based on contracts or App booking.

## 2. How do you contact us?

**333Cars limited** is the data controller of your personal data processed under this Notice. The Data Protection Team that deals with all the enquiries can be contacted by email at [help@333cars.co.uk](mailto:help@333cars.co.uk) in which you can also raise any privacy-related questions you might have.

## 3. What personal data do we process?

We collect and process personal data:

Provided by you to 333Cars

When you use the 333Cars App

From other sources such as authorized third parties who administer services on behalf of 333Cars.

The table below sets out the different categories of personal data we process about you:

### **Personal data provided by you to 333Cars**

<b>Category of personal data</b>	<b>Description of personal data</b>
Profile Data	We collect personal data about you when you register to access the 333Cars App including: <ul style="list-style-type: none"><li>- Full Name</li><li>- Email address</li><li>- Login name and password</li><li>- Phone number</li><li>- Profile photo (optional)</li><li>- Home or work address (optional)</li><li>- Saved favorites locations (optional)</li><li>- Date of birth (optional)</li><li>- Preferences and settings related to the account, such as communication preferences and notification settings</li></ul>
Payment Data	We collect details of your payment methods including payment card type, bank name, bank account number, bank account sort code, and related payment verification information and transaction history on the
Identification / Verification Data	333Cars. collect identification documents (such as a selfie) you submit yourself.
Demographic Data	We collect demographic data such as your age and gender.
Survey / Interview Data	We collect the content of replies or attachments you may send us, during the course of surveys and interviews that we conduct.

### **Personal data we collect about you when you use the 333Cars App**

<b>Category of personal data</b>	<b>Description of personal data</b>
Geolocation Data	We collect data about your precise and/or approximate geolocation (including GPS, and IP address) from your mobile device depending on your app settings and device permissions, when you open and use the 333Cars App. You may use the 333Cars App without enabling collection of Geolocation Data from your mobile device. This may affect some features on the

	333Cars App and you may have, for example, to enter your pickup address manually.
333Cars App Usage Data	We collect personal data via the 333Cars App about your use of the 333Cars services. This includes: details of journeys (date and time, pick-up and drop-off addresses, journey distances and routes), payment history (including whether you used any coupons or promotional codes), cancellation history, dates and times you log-in and log-off the 333Cars App and app features or pages viewed, browser type, app crashes and other system activity.
Communication Data	We collect communication and correspondence data when you engage with our Customer Support Team, report an incident, communicate via emails, web forms, or speak with our Customer Support agents, or communicate with Drivers via the 333Cars App using the in-app chat function or via internet calls (where available). We record the date and time of the communications and its content and your phone number (where you use the call feature). We will record calls, only where you are notified in advance that the call may be recorded. In the markets where we facilitate phone calls and text messages between Drivers and Passengers without sharing either party's actual phone number with the other, we protect your personal data by using a masked numbers application.
User Generated Data	We collect personal data by Video Recording the all duration of the trip when you use our vehicles as part of a Portsmouth City Council passenger or driver safety regulation in case complaints are made during the trip by the driver, passenger or any other third parties which 333Cars carries contracts with.
Warning and Suspension Data	We collect details of warnings and suspensions that have been issued to a Passenger. This includes: the date(s) on which warnings or suspensions have been issued and the date of expiry of a warning or suspension.
Device Data	We collect data about the devices you use to access the 333Cars App, including the hardware model, device IP address and other unique device identifiers (such as your UUID and advertising identifiers), device operating system, browser version, device vendor name, app version, identity of carrier and manufacturer and preferred languages.
Calendar Data	If you set your device permissions or choose to give

	333Cars access to your chosen calendar, we will collect information available in your calendar such as event details to use in providing you certain optional features. For example, to remind you of scheduled trips and get alerts to order a journey for your upcoming trip.
Cookies, SDKs, Analytics, and Third-Party Technologies Data	We collect information through the use of cookies, tracking pixels, data analytics tools, SDKs, and other third-party technologies like advertising IDs to understand how you navigate through the 333Cars App, to make your experience safer.

### **Personal data we collect about you from other sources**

<b>Category of personal data</b>	<b>Description of personal data</b>
Contact Data	<p>We collect contact data about you: when you connect to the 333Cars App when another Passenger/Driver/Contractor refers you through our referral campaigns or orders you a trip, or if you use the 333Cars App through your employer's 333Cars Business account. This includes your:</p> <ul style="list-style-type: none"> <li>- Full name</li> <li>- Email address</li> <li>- Phone number</li> </ul>
Rider Rating Data	<p>We collect ratings and feedback via comments about you from Drivers after each trip. Drivers are required to rate a Passenger from 1 to 5 stars, based on their trip experience and where a Driver assigns a low score to a Passenger (1-3 Stars), the Driver will be required to provide mandatory feedback for that Passenger or even hold a short brief interview with a board member of 333Cars Your average Customer Rating is calculated based on the total sum of your ratings divided by the total number of journeys over a 365 day period and is accessible to you in the 333Cars App. The rating will be linked to your account and only your average Customer Rating will be visible to Drivers in the 333Cars App when they accept a journey. If we find out the rating or comment is not given in good faith, this rating or comment may not be included in the calculation of your rating</p>

#### **4. What purposes do we use your personal data for and what is our legal basis for processing?**

The table below sets out:

- Our purpose for processing your personal data;
- Our legal grounds (known as a 'legal basis') under data protection law, for each purpose; and
- The categories of personal data we use for each purpose. Learn more about what personal data these categories include in Section 3 “What personal data do we process?” above.

Here is a general explanation of each 'legal basis' that 333Cars relies on to process your personal data to help you understand the table below:

**Performance of a Contract:** When it is necessary for 333Cars limited (or a third party) to process your personal data to provide you with 333Cars services we promised you and meet our obligations under the Terms and Conditions for Passengers. Where the legal basis for processing your personal data is performance of a contract, and you choose not to provide the information it might result on you being unable to use the 333Cars services.

**Legitimate Interests:** When we process your personal data relying on legitimate interest grounds. This includes our commercial and non-commercial interests in providing an innovative, personalised and safe service to you, other Passengers, and other third parties (including Drivers).

**Consent:** When we ask you to actively indicate your agreement to our use of your personal data for a certain purpose of which you have been informed of. Where we rely on consent to process your personal data, you can withdraw your consent to such activities at any time. Withdrawal of the consent does not affect the lawfulness of any processing which took place prior to you giving your consent to us.

**Compliance with Legal Obligations:** When we must process your personal data to comply with a law or regulation in the markets we operate in, such as to comply with our licensing conditions and our obligations under tax and accounting laws. Where the legal basis for processing your personal data is compliance with legal obligations, and you choose not to provide the information, you may be unable to use the 333Cars services.

**Vital Interests:** When we process your personal data where it is necessary to protect your vital interests or those of others, for example in the event of an emergency or an imminent threat to life.

**For the provision of the services**

<b>Purpose of processing</b>	<b>Legal Basis</b>	<b>Categories of Personal Data</b>
To create, update and maintain you're 333Cars account	Performance of a Contract	<ul style="list-style-type: none"> <li>■ Profile Data</li> <li>- Device Data</li> </ul>
<p>To authenticate your account and verify your identity.</p> <p>We collect information to verify who you say you are and in certain circumstances to verify your age and eligibility for a 333Cars account, when required by local law. If we ask you to verify your identity (either upon registration or as a result of unusual activity being detected on you're 333Cars account) and you are not able to verify, the 333Cars services will be suspended to prevent fraud until the verification process is completed. As part of the verification process, you may be asked to submit a selfie and/or ID document to prove your identity.</p>	<ul style="list-style-type: none"> <li>- Performance of a Contract</li> <li>- Compliance with Legal Obligations</li> <li>- Legitimate Interests</li> </ul> <p>It is in our interest and in the interest of our Drivers to prevent and address unauthorised uses of 333Cars accounts and violations of our Terms and Conditions which increases Drivers' safety.</p> <ul style="list-style-type: none"> <li>- Consent</li> </ul> <p>Your opt-in consent will be required in order for us to proceed with biometric verification checks if it will be needed.</p>	<ul style="list-style-type: none"> <li>- Profile Data</li> <li>- Identification / Verification Data</li> <li>- Device Data</li> <li>- Geolocation Data</li> <li>- App Usage Data</li> </ul>
<p>To enable, improve and customise the transportation services and other services/features by connecting Passengers with Drivers</p> <p>We help get you to where you want to go. We use Geolocation Data to navigate Passenger pick-ups and drop-offs, calculate estimated time, and track the progress of rides. We match available Drivers with Passengers</p>	<ul style="list-style-type: none"> <li>- Performance of a Contract</li> <li>- Consent</li> </ul> <p>333Cars will require your consent when you use certain features of the App. For example, if you choose to upload a profile photo on the App (viewable to Driver's during pick-up).</p>	<ul style="list-style-type: none"> <li>- Profile Data</li> <li>- Geolocation Data</li> <li>- App Usage Data</li> <li>- Device Data</li> <li>- Communication Data</li> </ul>

<p>based on their Geolocation Data to enable efficient pick-up and drop-off, and make the journey and route transparent.</p> <p>Refusing to share Geolocation Data via the 333Cars App prevents us from fulfilling the contract with you and means we cannot direct a Driver to your location for pick-up.</p> <p>The Passenger's Profile Data is displayed to the Driver as part of the matching process so that they know how to locate the Passenger at their pick-up destination. Communication Data may be processed if the Driver and Passenger need to contact each other to coordinate the pick-up.</p>		
<p>To make sure that your journey goes smoothly</p> <p>We use Geolocation Data to make sure you get to your destination and data on the routes taken during the journey to analyse geographic coverage. This lets us improve recommendations to Drivers about the most efficient routes and facilitate your journey in the best possible way. We also collect App Usage Data to resolve quality issues related to your use of the App.</p>	<ul style="list-style-type: none"> <li>- Legitimate Interests</li> <li>- It is in our legitimate interests and in the interests of our Passengers to offer you the most convenient journey.</li> </ul>	<ul style="list-style-type: none"> <li>- Geolocation Data</li> <li>- App Usage Data</li> </ul>
<p>To make sure the App works optimally</p> <p>We use your Profile Data to</p>	<ul style="list-style-type: none"> <li>- Performance of a Contract</li> <li>- Consent</li> </ul> <p>Your opt-in consent is</p>	<ul style="list-style-type: none"> <li>- Profile Data</li> <li>- Device data</li> <li>- App Usage</li> </ul>



<p>notify you of updates to the App so you can keep using the 333Cars services. We also use Device Data and App Usage Data to ensure you can connect to the App and to help keep your account safe through authentication and verification checks.</p>	<p>required for the use of Cookies, SDKs, Analytics, and Third-Party Technologies Data.</p>	<p>Data</p> <ul style="list-style-type: none"> <li>- Identification / Verification data</li> <li>- Cookies, SDKs, Analytics, and Third-Party Technologies Data</li> </ul>
<p>To suggest new Journeys and destinations and to schedule journeys based on your upcoming events</p> <p>We use your previous journey history, your saved favourite locations (such as home or work addresses) and real time Geolocation Data (even when the App is closed provided you have consented to 'enable location services in the background') to provide suggestions on new journeys. You can always disable these specific notifications, without disabling all App notifications.</p> <p>In addition, after you schedule a journey with 333Cars, we will provide integration with your phone's native calendar app, allowing you to add your scheduled ride to your calendar of choice seamlessly. The App will be able to detect and extract calendar events from your native calendar app and this includes retrieving event titles, start and end times, and location details. Based on your calendar events, the App will provide you with</p>	<ul style="list-style-type: none"> <li>- Consent Your opt-in consent is required to use real time Geolocation Data and to allow access to your calendar.</li> <li>- Legitimate Interests It is in our legitimate interests and in the interests of our Passengers to further enrich your journey experience and suggest new features and services we might offer.</li> </ul>	<ul style="list-style-type: none"> <li>- Profile Data</li> <li>- App Usage Data</li> <li>- Geolocation Data</li> <li>- Calendar Data</li> </ul>

suggestions for journeys that align with your calendar schedule.		
<p>To calculate prices and process payments</p> <p>We collect Payment Data to process and enable Passenger payment on behalf of Drivers and Geolocation Data to calculate prices based on the pickup and drop-off location of the Passengers taking into account distance, duration and other factors.</p>	<ul style="list-style-type: none"> <li>- Performance of a Contract</li> </ul>	<ul style="list-style-type: none"> <li>- Payment Data</li> <li>- Geolocation Data</li> </ul>
<p>To administer the use of and payment for the 333Cars services you are offered by a 333Cars Business Client or another 333Cars account owner</p> <p>We collect your Contact Data if you use our services through your employer who is a 333Cars Business Client.</p> <p>In addition, if an organisation or another 333Cars account owner has ordered a journey for you using our Journey Booking service, we will collect from them your Contact Data and the pickup and drop-off location for your journey.</p>	<ul style="list-style-type: none"> <li>- Legitimate Interests</li> </ul> <p>It is in our interest and in the interest of our Business Clients, Customers and Passengers to facilitate the use of our services through 333Cars Business accounts and other 333Cars accounts and process your personal data for the provision and payment of these services.</p>	<ul style="list-style-type: none"> <li>- Contact Data</li> <li>- App Usage Data</li> </ul>
<p>To get your feedback on your level of satisfaction with 333Cars services through surveys and interviews</p> <p>These surveys and interviews are designed to understand</p>	<ul style="list-style-type: none"> <li>- Consent</li> <li>- Your opt-in consent will be required</li> <li>- Legitimate Interests</li> </ul> <p>It is in our interest and in the interest of our</p>	<ul style="list-style-type: none"> <li>- Profile Data</li> <li>- Demographic Data</li> <li>- Survey/ Interview Data</li> </ul>

your feedback on our services, to measure customer satisfaction and perception of safety and enable us to take actions to improve the experience. The Survey and Interview Data may be shared with research partners we use to understand your feedback so we can improve our services towards your requirements.	Passengers to provide a satisfying passenger experience.	
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### **For Customer Support**

<b>Purpose of processing</b>	<b>Legal Basis</b>	<b>Categories of Personal Data</b>
<p>To provide customer support services and receive and process feedback</p> <p>We process your personal data to investigate and address your queries including reported safety incidents/alleged criminal acts and complaints (including resolving disputes between Drivers and Passengers). We also use the data you share to address quality issues and to improve our services.</p> <p>For safety related incidents, your Warning and Suspension Data will only be reviewed by 333Cars Customer Support and/or Safety Teams when investigating a safety/criminal incident on the 333Cars Service involving you. The teams will also review Drivers'</p>	<ul style="list-style-type: none"> <li>- Performance of a Contract</li> <li>- Legitimate Interests</li> </ul> <p>It is in our interest and in the interest of our Passengers to support them throughout their use of the App and continuously improve and develop the customer support we provide. In addition it is in our interest and interest of our Passengers and Drivers to address threats and abuse and promote safety, integrity and security on the services we offer to ensure our services are used in accordance with the Terms and Conditions for Passengers.</p> <ul style="list-style-type: none"> <li>- Compliance with Legal Obligations</li> </ul> <p>We process personal data to</p>	<ul style="list-style-type: none"> <li>- Profile Data</li> <li>- Communication Data</li> <li>- User Generated Data</li> <li>- Warning and Suspension Data</li> <li>- Rating Data</li> </ul>

reasons for issuing low-ratings to Passengers, and the circumstances surrounding potential safety incidents.	comply with our legal obligation to cooperate with law enforcement when there is a safety incident.	
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### **For safety and security**

<b>Purpose of processing</b>	<b>Legal Basis</b>	<b>Categories of Personal Data</b>
<p>-To enable and provide safety features</p> <p>We use data to ensure 333Cars services are secure and have implemented a variety of safety features to enhance the safety of our Passengers, including:</p> <p>- Video Trip Recording</p> <p>Every car has Video trip recording so that all Passenger and Driver can feel safe. These recordings are encrypted and can only be seen by 333Cars upon request.</p> <p>- Passenger Emergency Assistance</p> <p>Enabling you to call the Police, the local authorities or emergency services via our App.</p> <p>To prevent, detect and investigate fraudulent accounts, fraudulent payments or other unlawful use of 333Cars services and apply suspensions and blocks as needed</p>	<p>- Legitimate Interests It is in our interest and in the interests of our Customers to enhance the safety and security of the 333Cars services by offering safety functionalities as part of their journeys.</p> <p>- Vital Interests</p> <p>We process this personal data where your vital interests require protection, such as in the case of emergencies and safety incidents like video recording journeys</p>	<p>- Identification / Verification Data</p> <p>- Device Data</p> <p>- Geolocation Data</p> <p>- Profile Data</p> <p>- App Usage Data</p> <p>- User Generated Data</p>
	<p>- Legitimate Interests It is in our interest and in the interests of our Customers to detect, prevent and address fraud, unauthorised use of 333Cars accounts or other harmful or illegal activity and</p>	<p>- Profile Data</p> <p>- Identification / Verification Data</p> <p>■ Device Data</p>

<p>Our automated anti-fraud system will identify fraudulent accounts, payments and other malicious activity on the 333Cars App, like for example when you top up your balance, start or finish a Journey, or go through authentication processes. To enable us to investigate, a temporary suspension may be applied to a 333Cars account when for example we detect that the Customer is requesting a high amount of requests that are not humanly possible indicating a potential denial of service attack is taking place.</p> <p>While 333Cars may use automated processes for fraud detection purposes, decisions to block a Passenger are taken following human review by our staff, and no account is blocked automatically without first undergoing a human verification process.</p>	<p>maintain the safety and security of our systems, by responding to suspected or actual criminal acts. It is also in our interest and in the interests of our Customers to prevent and address violations of our Terms and Conditions.</p>	<ul style="list-style-type: none"> <li>■ Geolocation Data</li> <li>- App Usage Data</li> <li>■ Payment Data</li> <li>- Communication Data</li> </ul>
<p>To determine an average Customer Rating and encourage positive, safe and respectful interactions between Customers and Drivers on the 333Cars Services, and unmatch Customers and Drivers</p> <p>In order to provide additional reassurance to Drivers and to provide a</p>	<p>- Legitimate Interests</p> <p>It is in our interest and in the interest of our Passengers and Drivers to enhance quality, safety and trust within the 333Cars Services. To encourage positive and respectful interactions between Customers and Drivers of 333Cars and provide a safe, hassle-free and pleasant environment and</p>	<p>-Customer Rating Data</p> <p>-Profile Data</p>

<p>safe and accountable marketplace environment, Drivers provide you with a rating and leave feedback regarding their experience with you after each ride.</p> <p>The Customer Ratings feature empowers Drivers to make informed decisions about accepting or declining ride requests and exercise greater control over their working environment, as they can assess the average Customer Rating of a Passenger based on ratings provided by other Drivers before they accept a journey.</p> <p>For further information about your Customer Rating please email a request for help regarding this topic at <a href="mailto:help@333cars.co.uk">help@333cars.co.uk</a></p> <p>In addition, both the Customer and the Driver have the option to unmatched from each other if either party rates the other with a 1-star rating after a journey. Despite this, the Passenger retains the ability to request journeys with other Drivers. The Unmatching process will be in place till an interview is being taken with the Driver to discuss and improve everything.</p>	<p>experience. It is also in our interest to ensure and to enforce our services are used in accordance with the Terms and Conditions for Passengers and the Marketplace Conduct Guidelines.</p>	
To issue warnings and temporary suspensions	- Legitimate Interests	- Profile Data

<p>when the average Customer Rating drops below a specified threshold (where this feature is available)</p> <p>To balance the interests of Customers and Drivers, if the average Customer Rating drops below a certain threshold, an automatic warning will be issued. If the average Customer Rating is not improved within 90 days following a warning, a 3-month temporary suspension will be issued. This will be based on an discussed decision but does not produce legal or similarly significant effects. For information regarding how to object to this activity, please enquire at <a href="mailto:help@333cars.co.uk">help@333cars.co.uk</a></p> <p>You will get temporality suspended only if you appear (based on your average Customer Rating) to repeatedly:</p> <ul style="list-style-type: none"> <li>- violate the Terms and Conditions for Passengers and Marketplace Conduct Guidelines for Riders; and</li> <li>- have a negative impact on Drivers' interests and the integrity of the 333Cars Services as a whole.</li> </ul> <p>The suspension only limits your ability to order a journey, and does not limit</p>	<p>(for warnings) It is in our interest and in the interest of Drivers of 333Cars to automatically send a warning notice to ensure a reliable and trustworthy service and Platform sustainability, along with Drivers empowerment. It is also in our interest to ensure and to enforce our services are used in accordance with the Terms and Conditions for Passengers and the Marketplace Conduct Guidelines.</p> <p>- Performance of a Contract (for suspensions)</p>	<ul style="list-style-type: none"> <li>- Rider Rating Data</li> <li>- Warning and Suspension Data</li> <li>- User Generated Data</li> </ul>
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your access to the rest of the 333Cars App, or to any other services offered by 333Cars.		
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### **For marketing and advertising**

<b>Purpose of Processing</b>	<b>Legal Basis</b>	<b>Categories of Personal Data</b>
<p>To market and advertise 333Cars services and those of partners according to your preferences and measure the effectiveness of 333Cars ads.</p> <p>This includes using your personal data to send emails, text messages (including WhatsApp messages), push notifications, in-app messages, and other communications marketing 333Cars products, services, features, offers, promotions, news, and events of 333Cars and our partners</p>	<p>- Legitimate Interests It is in our interest and in the interest of our Customers to inform them about our services and features or those offered by 333Cars partners. It is also in our interest to promote and advertise our services, including engaging in contextual (non-data driven) and personalised advertising, analytics, and measurement of ad performance, in order to expand our user base by deepening relationships with existing Passengers and developing new ones. You can opt out of these communications at any time by clicking the 'unsubscribe' link at the bottom of our emails, typing "STOP" for messages and SMS, or updating your communication preferences in your account settings. (if such features will be available to you)</p> <p>- Consent</p> <p>- Your opt-in consent will be required for example, when the law requires consent for email marketing and for certain tracking technologies.</p>	<p>- Contact Data</p> <p>- App Usage Data</p> <p>- Device Data</p> <p>- Cookies, SDKs, Analytics, and Third-Party Technologies Data</p>



### **For service communications**

<b>Purpose of Processing</b>	<b>Legal Basis</b>	<b>Categories of Personal Data</b>
<p>To communicate with you, including sending you service-related communications and to keep you informed</p> <p>Your name, phone number and email address will be used to communicate with you to let you know that your journey has been completed, to send you trip confirmation emails and receipts, and to let you know about important service updates.</p>	<ul style="list-style-type: none"><li>- Performance of a Contract</li></ul>	<ul style="list-style-type: none"><li>- Profile Data</li></ul>

### **For research and improvement of the 333Cars services**

<b>Purpose of Processing</b>	<b>Legal Basis</b>	<b>Categories of Personal Data</b>
<p>To perform research, testing, and analytics to better understand and improve our business and services</p> <p>For example, we use Geolocation Data and App Usage Data to perform research and improve our algorithms, machine learning, and other modelling. We use Communication Data related to incidents to monitor our security practices and improve our operations and processes.</p>	<ul style="list-style-type: none"><li>- Legitimate Interests It is in our interest to measure the use of our services in order to inform business decisions and to enable provision of accurate and reliable reporting and to continuously improve and develop the services we provide.</li><li>- Consent For certain analytics we may require your consent. If so, you'll be prompted to provide consent for specific purposes and processing activities, with details on how to withdraw consent, including through your profile settings.</li></ul>	<ul style="list-style-type: none"><li>- Geolocation Data</li><li>- App Usage Data</li><li>- Communication Data</li><li>- User Generated Content</li><li>- Device Data</li></ul>
<p>To develop new products, features, partnerships and services</p>	<ul style="list-style-type: none"><li>- Legitimate Interests It is in our interest and in the interest of our Customers to</li></ul>	<ul style="list-style-type: none"><li>- Profile Data</li><li>- Geolocation Data</li></ul>

	develop and adopt new features to improve the 333Cars services.	<ul style="list-style-type: none"> <li>- App Usage Data</li> <li>- Communication Data</li> <li>- User Generated Content</li> <li>- Device Data</li> </ul>
To prevent, find, and resolve software or hardware bugs and issues	<p>Legitimate Interests</p> <ul style="list-style-type: none"> <li>- It is in our interest and in the interest of our Passengers to provide a hassle free and reliable service.</li> </ul>	<ul style="list-style-type: none"> <li>- Profile Data</li> <li>- Geolocation Data</li> <li>- User Generated Content</li> <li>- Communication Data</li> <li>- Device Data</li> <li>- App Usage Data</li> </ul>

#### **For legal proceedings and compliance with the law**

<b>Purpose of Processing</b>	<b>Legal Basis</b>	<b>Categories of Personal Data</b>
<p>To investigate and respond to claims and disputes relating to the use of 333Cars services, and/or necessary for compliance with applicable legal requirements or with requests from government/law enforcement bodies</p> <p>Depending on the claim, All Data may be processed for establishing, exercising or defending legal claims, including:</p> <ul style="list-style-type: none"> <li>- supporting our own internal investigations;</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with Legal Obligations</li> </ul> <p>We process personal data to comply with an obligation, when there is a request from a regulator, law enforcement or other governmental body.</p> <ul style="list-style-type: none"> <li>- Legitimate Interests</li> </ul> <p>In the context of litigation or other disputes, it is in our interest to protect our interests and rights, our Passengers or others, including as part of investigations, regulatory inquiries or litigation.</p>	<ul style="list-style-type: none"> <li>- All Data</li> </ul>

<ul style="list-style-type: none"> <li>- the assignment of claims and the use of debt collecting agencies; and</li> <li>- the use of legal advisors.</li> </ul> <p>In some circumstances, we are legally obliged to share information with external recipients. For example, under a Court Order or where we cooperate with a data protection supervisory authority in handling complaints or investigations. We also respond to requests, such as those from law enforcement agencies, when the response is required by law or furthers a public interest task such as an emergency situation or where someone's life is at risk. We will take steps to ensure that we have a lawful basis on which to share the information, and we'll make sure that we document our decision.</p>		
To fulfil our tax obligations and comply with tax legislation	<ul style="list-style-type: none"> <li>- Compliance with a Legal Obligation</li> </ul>	<ul style="list-style-type: none"> <li>- Profile Data</li> <li>- Payment Data</li> <li>- App Usage Data</li> </ul>
To reorganise or make changes to our business	<ul style="list-style-type: none"> <li>- Legitimate Interests</li> </ul> <p>It is in our interest to process personal data for organisational and business planning purposes.</p>	<ul style="list-style-type: none"> <li>- All Data</li> </ul>
To ensure the security of the 333Cars services (including the 333Cars	<ul style="list-style-type: none"> <li>- Legitimate Interests</li> </ul> <p>It is in our interest and in the interest of our Customers and</p>	<ul style="list-style-type: none"> <li>- All Data</li> </ul>

App)  Depending on the issue, All Data may be used for technical and cyber security reasons: for example measures for combating piracy and ensuring the security of the service, website, 333Cars Services and App as well as for making and storing back-up copies and preventing/repairing technical issues.	maintain 333Cars security systems, respond to suspected or actual criminal acts and repair any technical issues.	
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When we process your personal data for a new purpose different from the purpose your personal data was originally collected for and we haven't asked for your consent, we will have to ensure that this new purpose is compatible with the initial purpose we collected it for. We will take into account any link between the two purposes and decide if the personal data can be used for this new purpose. Otherwise, we will take appropriate steps to ask for your consent or refrain from processing your personal data.

## **5. Who do we share your personal data with?**

We may share your personal data with the following categories of recipients.

<b>Category of Recipients</b>	<b>Description</b>
333Cars Group Companies and partners	We may share your personal data with our 333Cars Group Companies (including 333Cars local subsidiaries), third party partners, their affiliates and representatives, who may use your personal data in the manner described in this Notice.
Drivers	Your personal data is only disclosed to the Drivers (whether acting on their own behalf as an independent service provider, or acting on behalf of another service provider (for example, acting on behalf of a fleet or another individual) when you engage with a journey in the 333Cars App; in such a case, the Driver will see your name, phone number, pickup, destination and geolocation data. Once the journey is finished, we also share ratings and feedback with the Driver. (We remove your identity associated with ratings and feedback when we share it with Drivers). After providing the transportation service, your name and the telephone number will remain visible to the Driver for 24-48 hours. This is necessary for Drivers to resolve any issues with you like

	getting something special back to you which might have been left in the car. Depending on your location, and if our video recording safety feature is available, we may also share an video recording initiated by a Driver with the Driver or law enforcement authorities.
333Cars Business Clients or other Passengers	Some journeys you take may be requested or paid for by others. If you take one of those journeys using the 333Cars Business Profile account of your employer, a code or coupon, a corporate credit card linked to another account, or another user or entity otherwise requests or pays a ride for you, we may share your ride details with that other party, including your name, phone number, the date, time, charge, rating given, region of trip, and pick up and drop off locations of your ride. The data shared with 333Cars Business Clients will be disclosed via reports they can access on their Business Accounts. Processing of personal data will occur under the same conditions as established in this Notice.
Referrers	If you refer someone to the 333Cars App, we will let them know that you generated the referral. If another user referred you, we may share information about your use of the Platform with that user. For example, a referral source may receive a bonus (if this will be applicable) when you join the 333Cars App or complete a certain number of journeys and would receive such information.
Promotional, marketing and strategic partners	We may share limited data like your email address with our promotional, marketing and strategic partners so that they can inform you about promotional events and provide you with information and marketing messages about products or services that may interest you. In addition, we may share your personal data with marketing platform providers, including social media advertising services, advertising networks, third-party data providers, to reach or better understand our users and measure the effectiveness of our ads on other platforms and with social media platforms, including Facebook and Google, for sign-in purposes (when this feature is or will be available to you)
Third-party service providers	Our third-party vendors and other service providers and contractors have access to your personal data to help carry out the services they are performing for us or on behalf of us. This may include vendors and providers who provide email or moreover electronic communication services, tax, legal and accounting services, product fulfillment,

	background checks and identity/verification processes, payment processing, customer support, fraud prevention and detection, data enhancement, web hosting and cloud storage, research, including surveys, analytics, crash reporting, performance monitoring and artificial intelligence, machine learning and statistical services. In addition, we will share data like your geolocation and the journey routes with Google in connection with the use of Google maps in our apps.
Insurers	We will share your data with insurers, where you, or a family member in your absence, request for a claim to be processed, for the purposes of facilitating the processing of insurance claims and for reporting purposes due to contractual requirements from the insurers.
Other third parties	In the event of a likely change of control of the business (or a part of the business) such as negotiations for a sale, an actual sell, a merger, and acquisition, or any transaction, or reorganisation, we may share your personal data with interested parties, including as part of any due diligence process with new or prospective business owners and their respective professional advisers. We may also need to transfer your personal data to that third party or re-organised entity after the sale or reorganisation for them to use for the same purposes as set out in this Notice.
Law Enforcement	We may disclose information under a court order or where we cooperate with a data protection supervisory authority in handling complaints or investigations. For example, we may also share your personal data with law enforcement or other public authorities, including responding to requests when the information is required by law or furthers a public interest task. In any scenario, we will take steps to ensure that we have a lawful basis on which to share the information, and we'll make sure that we document our decision.

Please note, that our websites and apps may contain links to other third-party websites (when and if this feature will be enabled) If you follow a link to any of those third-party websites, please be aware that those websites may have their own privacy notices and that we do not accept any responsibility or liability for their notices or their processing of your personal data. Please check these notices before you submit any personal data to such third-party websites.

## **6. Does 333Cars transfer your personal data to other countries?**

We do not operate outside of UK but we do co-operate with other third party companies that we offer our services which their head offices might be placed in other countries and if such contract comes from this third party companies on a journey that is provided by us we will make sure that we comply with all the regulations stated above and we will obey and carry out such contract based on everything mentioned above. More information about this can be obtained by a request to [help@333cars.co.uk](mailto:help@333cars.co.uk)

## **7. How do we keep your personal data safe?**

The security of your personal data is very important to us, and we have implemented appropriate technical and organisational controls to protect your personal data against unauthorised processing and against accidental loss, damage or destruction. We have implemented data encryption in transit and at rest, data privacy and security training, information security policies and controls around the confidentiality, integrity and availability of our data/systems.

Any personal data collected in the course of providing 333Cars services is transferred to and stored in our data centers which are located within the UK. Only authorised employees of 333Cars Limited company and partners have access to the personal data and they may access the data only for the purpose of resolving issues associated with the use of the services.

For our research and scientific purposes, all data, like bulk Geolocation Data, is anonymised so you can never be identified from it. Regarding anonymised data, we will not attempt to re-identify your personal data that has been deidentified, in the course of sharing your data with other organisations.

You are responsible though for choosing a secure password when we ask you to set up a password to access parts of our sites or apps. You should keep this password confidential and you should choose a password that you do not use on any other site.

## **8. How long do we retain your personal data for?**

We keep your personal data only as long as necessary to provide you with our services and for the purposes described above in Section 4 “What purposes do we use your personal data for and what is our legal basis for processing?”.

This means that the retention periods will vary according to the type, the amount and sensitivity of your personal data, the potential risk of harm from unauthorised use or disclosure of your personal data and the reason that we have collected the personal data in the first place. Certain data will be destroyed immediately due to the sensitive information they hold and such data or contracts will be kept locked away at all times.

Below are the key criteria we use for determining our retention periods:

<b>Retention Periods Criteria</b>	<b>Description</b>
Personal data retained until you remove/delete it	It's your right to request that we delete certain of your personal data. See Section 9 "What are your rights?" below for more information.
Personal data that expires after a specific period of time	We have set certain retention periods so that some data is not retained after a specific period of time. See table below for further details. After a retention period has lapsed, the personal data is securely deleted, unless it is necessary for the establishment, exercise or defence of legal claims.
Personal data retained until your 333Cars account is deleted	We keep your data until you're 333Cars account is deleted unless further retention of certain personal data is required for the purposes described in the second table below.

We have listed below the specific retention periods that apply to the personal data we process about you:

<b>Category of Retention Periods</b>	<b>Description</b>
Tax, accounting and financial reporting purposes	We retain data for 6 months after the last journey if your personal data is necessary for tax, accounting and financial reporting purposes. (certain data will be deleted immediately like names, phone numbers, email addresses and other sensitive data that our Clients require to be deleted)
Provision of services purposes	We retain your data as long as you have an active customer account. If your account is closed, personal data will be deleted (according to our retention schedule and rules), unless such data is still required to meet any legal obligation, or for accounting, dispute resolution or fraud prevention purposes. You may request deletion of your account at any time through the 333Cars App or by email at <a href="mailto:help@333cars.co.uk">help@333cars.co.uk</a>
Formal investigations of a criminal offence, fraud or false information	We retain data for as long as necessary according to the internal, legal, and regulatory requirements, in the event that there are formal investigations of a criminal offence, fraud or false information having been provided.
Disputes	We retain data in the event of disputes, until the claim is satisfied or the expiry date of such claims.



Complaints	We retain a record of all complaints which we make available to an authorised officer of the licensing authority on request in the case of an investigation for 3 months.
Instant Messages	We retain data about instant messages between you and the Customer Support Team via email for 90 days, except in cases where messages are related to a reported incident or in the event, they are related to a dispute, in which cases we will store them for 3 months. Instant messages between Passengers and Drivers are kept in the 333Cars App only until the order is completed and for 1 Week after in our systems.
Video journey recording	We retain Video Recording Data through our Video Trip Recording in vehicle: 3 months, while stored in the hard drive of each vehicle which is mandatory by Portsmouth city council for any vehicle that operates under Portsmouth city council licence. The recordings are automatically deleted after 3 months if a report to 333Cars Customer Support team is not created Recordings shared and investigated by 333Cars will be automatically deleted after 3 months unless the retention period is manually extended for investigation/legal reasons.
Customer Support	We retain data in relation to support tickets, phone calls and chats for 1 week unless needed to be kept for longer depending on the situation.
Customer Ratings	We retain Customer Rating Data for: 3 months for specific ratings and comments for the duration of Passenger or Driver account for the unmatched status

Please note that the deinstallation of 333Cars App in your device does not cause the deletion of your personal data. If the 333Cars App has not been used for three years, we'll get in touch and ask you to confirm whether you wish to keep your account active for future use. If no reply is received in a week, the account will be closed and personal data will be deleted unless such data is required for any purpose mentioned earlier in this Notice.

## **9. What are your rights?**

As a data subject you have following rights:

**Access your personal data (known as “Right of Access”):** You have the right to access and to request copies of your personal data by contacting our Customer Support Team by email at [help@333cars.co.uk](mailto:help@333cars.co.uk)

**Update/correct your personal data (known as “Right of Rectification”):** You have the right to request us to correct personal data that is inaccurate or incomplete. You can change and correct certain personal data yourself within the 333Cars App or by contacting our Customer Support Team by email at [help@333cars.co.uk](mailto:help@333cars.co.uk)

**Delete your personal data (known as “Right of Erasure”):** You have the right to request that we erase your personal data, under certain conditions (e.g., we are processing your personal data under your consent). Personal data that is processed pursuant to a legal obligation or where we have an overriding legitimate interest may not be deleted upon request. You can request erasure of your personal data by contacting our Customer Support Team by email at [help@333cars.co.uk](mailto:help@333cars.co.uk)

**Restrict use of your personal data (known as “Right to Restrict Processing”):** You have the right to request that we restrict the processing of your personal data, under certain conditions (e.g., we are processing your personal data under consent). You can request restriction of the use of your personal data by contacting our Customer Support Team by email at [help@333cars.co.uk](mailto:help@333cars.co.uk)

**Object to use of your personal data (known as “Right to Object”):** You have the right to object to our processing of your personal data, under certain conditions (e.g., we are processing your personal data under legitimate interests). You may submit an objection to the use of your personal data by contacting our Customer Support Team by email at [help@333cars.co.uk](mailto:help@333cars.co.uk)

**Object to solely automated decisions being made about you which has legal or similarly significant effect on you (known as “Right to object to automated decision making”)** - You have the right, under certain circumstances, to object to any solely automated decisions we have made which have a legal effect or similarly significant effect which does not involve human review. You can ask that a person review the decision, obtain an explanation of the decision reached after such assessment and challenge the decision by contacting our Customer Support Team by email at [help@333cars.co.uk](mailto:help@333cars.co.uk) Please note that certain exceptions and limitations may apply to your right to object to automated decision-making, as permitted by applicable laws and regulations. We will provide you with clear information regarding the implications of exercising your rights and the processes involved in objecting to solely automated decision-making.

**Port your personal data (known as “Right to Data Portability”):** You have the right to request that we transfer the personal data that you have given us to another

organisation, or directly to you, under certain conditions. This only applies to information you have given us. You can request for your personal data to be ported by contacting our Customer Support Team at [help@333cars.co.uk](mailto:help@333cars.co.uk)

**Withdraw your consent:** If we process your personal data using consent as legal basis, then you have the right to withdraw your consent at any time (e.g., by unsubscribing from marketing communications or by updating your communication preferences in the 333Cars App). Withdrawing your consent won't change the legality of processing undertaken by 333Cars Limited before you withdraw your consent.

**File a complaint:** If you have any concerns regarding the processing of your personal data, you have the right to lodge a complaint via email at [help@333cars.co.uk](mailto:help@333cars.co.uk). You may also have a right to seek a judicial remedy.

To exercise any of the above rights, you can contact our Customer Support Team via email at [help@333cars.co.uk](mailto:help@333cars.co.uk)

You can also contact the Office of the Data Protection Officer Team by emailing our Privacy Mailbox at [help@333cars.co.uk](mailto:help@333cars.co.uk) - please mark the subject line of the email "For the attention of 333Cars Limited Data Protection Officer".

#### **10. How do we use your personal data for direct marketing?**

Please be aware that you may from time to time receive updates about special offers and promotions related to our services. We send these communications based on our legitimate interests (soft opt-in) in providing you with information about opportunities that could be beneficial to you. You have complete control over these communications, and if you decide at any time that you do not wish to receive them, you can stop them by clicking the "unsubscribe" link at the bottom of our emails, typing "STOP" for messages and SMS, or updating your communication preferences in your account settings.

Additionally, we may seek your opt-in consent for specific direct marketing activities where this is required by law. For example, we might request your consent to send you information regarding third-party promotions and offers that we think might be of interest to you. You always have the ability to opt out by changing your communication preferences in your account settings. We also personalise direct marketing messages using information about how you use the 333Cars services (for example, how often you use the 333Cars App).

#### **11. How do we notify you of changes to this Notice?**

We may make changes to this Notice from time to time. If we make significant changes, we will notify you (as required) via the 333Cars App, website or via another method such as email.