

Privacy Policy

INTRODUCTION

The Drive Project Limited ("**We**") are committed to protecting and respecting your privacy and handling your information in an open and transparent manner.

This policy explains what we do with the information we collect from you, or that you provide to us, what we will use it for and with whom we share that information. The policy also sets out your rights and who you can contact for more information. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

In this policy, your information is sometimes called "personal data". We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data as "processing" such personal data.

In this Policy the term "**Data Protection Legislation**" means the EU General Data Protection Regulation 2016/679 and the UK Data Protection Act 2018; together with all other applicable legislation relating to privacy or data protection.

For the purpose of the Data Protection Legislation, the data controller is The Drive Project Limited of 40 Tavistock Street London WC2E 7PB

WHAT INFORMATION WE COLLECT ABOUT YOU

We may collect, record and use information about you in physical and electronic form and will hold, use and otherwise process the data in accordance with the Data Protection Legislation and as set out in this policy

The personal data we collect and process may include:

- your name;
- your contact information such as your email address and telephone number (or any telephone number used to call our customer services);
- your postings on any other social media applications and services that we provide;
- your IP address, your browser type and language;
- information about your visit to our website, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

The personal data we collect may also include so called 'sensitive' or 'special categories' of personal data, such as details about your health (for example if you are to participate in one of our projects as

a participant). Where reasonably practicable, we will usually seek separate permission from you in writing to process these special categories of personal data.

HOW WE COLLECT INFORMATION ABOUT YOU

- Information you give us to participate in our projects. If you take part in one of our projects as a participant you will fill out an About You Form which can include sensitive personal data e.g. your health status.
- Other information you give us. This is information about you that you give us by filling in forms on our site www.thedriveproject.co.uk (our site) (e.g. the contact us section or to sign up to our newsletter) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register on the site for us to contact you, and when you report a problem with our site.
- The information you give us may include your name, address, e-mail address and phone number.
- Social Media. Depending on your settings or the privacy policies for social media and messaging services such as Facebook, LinkedIn and Instagram you might give us permission to access information from those accounts or services.
- Information we collect about you.
- Like most websites, we use “cookies” to help us make our site – and the way you use it – better. Cookies mean that a website will remember you. They’re small text files that sites transfer to your computer (or phone / tablet). They improve website use and speed – for example by automatically filling your name and address in text fields. There are more details in our Cookie Policy (see below).
- In addition, with regard to each of your visits to our site we will automatically collect certain information e.g. your IP address used to connect your computer to the Internet.

HOW WE USE INFORMATION ABOUT YOU

Generally, we collect and process information about you to enable us to provide beneficiaries with our projects.

We use information held about you in the following ways:

- Information you give to us, in the "About You" form (to participate in our projects). We use this information to ensure that the delivery team who you work with provides the appropriate support and/or resources when you take part in this project.
- Other Information you give to us or we collect about you (including via our site).

We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer;

- to send you our newsletter - with your consent (given by joining our mailing list) we will send you our newsletter and contact you to let you know about the progress we are making on our projects. If you don't want to hear from us let us know via info@thedriveproject.co.uk
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about services that may interest you or them.

LEGAL GROUNDS FOR USING YOUR PERSONAL INFORMATION

Data Protection Legislation requires us to inform you of the legal grounds on which we rely in order to process your personal data.

We rely on one or more of the following lawful grounds:

- you have explicitly agreed to us processing your information for a specific reason (for instance in connection with one of our projects);
- the processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement with you;
- the processing is necessary for compliance with a legal obligation we have such as keeping records for tax purposes or providing information to a public body or law enforcement agency;
- the processing is necessary for the purposes of a legitimate interest pursued by us, which might be:
 - to provide our projects;
 - to protect our business interests;
 - to evaluate, develop or improve our projects;
 - to keep people informed about the progress of our projects.

To the extent that we process any special categories of data relating to you for any of the purposes outlined above, we will do so because either: (i) you have given us your explicit consent to process that data; (ii) you have made the data manifestly public; (iii) the processing is necessary for the establishment, exercise or defence of legal claims.

SHARING YOUR INFORMATION

With regards to the information you have provided on the About You Form we need to disclose this to relevant members of the delivery team to ensure you are adequately supported during your participation in our project. We will not disclose this information to anyone else.

With regards to your other information in connection with one or more of the purposes outlined in the "How we use information about you" section above, we may disclose details about you to the following recipients, or categories of recipients:

- Selected third parties including:
 - business partners, suppliers and sub-contractors for the performance of
 - any contract we enter into with them or you; or
 - analytics and search engine providers that assist us in the improvement
 - and optimisation of our site.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of the Drive Project Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

HOW WE PROTECT YOUR PERSONAL INFORMATION

We ensure that there are appropriate technical controls in place to protect your personal details. For example

- All information found on the About You forms will be stored on our secure database.
- All other information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet (including by email) is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

HOW LONG WE KEEP YOUR INFORMATION FOR

We will only keep the information we collect about you for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate, up-to-date and still required.

We will hold your personal data on our systems for the longest of the following periods: (i) as long as is necessary for your participation in our projects; (ii) any retention period that is required by law; and (iii) the end of the period in which litigation might arise in respect of the our projects.

YOUR RIGHTS

At any time, you have the right:

- to be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);
- to request access to or a copy of any personal data which we hold about you;
- to rectification of your personal data, if you consider that it is inaccurate;
- to ask us to delete your personal data, if you consider that we do not have the right to hold it;
- to withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent);
- to ask us to stop or start sending you marketing messages (e.g. our newsletter) at any time by using the below contact details;
- to restrict processing of your personal data;
- to data portability (moving some of your personal data elsewhere) in certain circumstances;
- to object to your personal data being processed in certain circumstances; and
- to not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data.

Any request for access to or a copy of your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will comply with our legal obligations as regards your rights as a data subject.

We will correct any incorrect or incomplete information and will stop processing your personal data, or erase it, where there is no legal reason for us to continue to hold or use that information.

We aim to ensure that the information we hold about you is accurate at all times. To assist us in ensuring that your information is up to date, do let us know if any of your personal details change.

You may also use these contact details if you wish to make a complaint to us relating to your privacy.

CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to

see any updates or changes to our privacy policy.

CONTACT / COMPLAIN

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the info@thedriveproject.co.uk and alice@thedriveproject.co.uk.

If you have any concerns about our use of your information, you also have the right to make a complaint to the Information Commissioner's Office, which regulates and supervises the use of personal data in the UK, via their helpline on 0303 123 1113.