

PRIVACY POLICY

This webpage sets out when and how we use your personal information that you or others provide to us. Your privacy is of the utmost importance to us. We want to make sure you fully understand the terms and conditions surrounding the capture and use of that information. This privacy policy describes what information we collect about you (including from third parties such as Facebook), how we use it, and the rights you have in relation to that collection and usage.

Got a question? Feedback? please [contact us here](#)

WHO WE ARE

We are LIFTSHARE.COM LIMITED, a private limited company incorporated and registered in England and Wales with the company number 03968472 whose registered office is at 4 Duke Street, Norwich, England, NR3 3AJ. Please note that references to 'Liftshare', 'Mobilityways', 'we', 'us' and 'our' are references to Liftshare.com Limited.

All references to 'Liftshare' are deemed to be interchangeable with 'Mobilityways' depending on the nature of the Services: Liftshare = car sharing services; and Mobilityways = travel solutions utilising a range of transport options.

For the purposes of the UK GDPR (Retained Regulation (EU) 2016/679), Data Protection Act 2018, the EU General Data Protection Regulations (to the extent that processing occurs outside of the EU) and any other applicable data protection and privacy laws and regulations ("**Data Protection Legislation**"), Liftshare will be the 'data controller' for all personal information we determine the means and purpose of processing and has registered with the Information Commissioners Office under registration number Z5010286.

If you register an account to become a Member, Liftshare will act as the data controller, either on our own or jointly with your employer for some of the data we collect. You can access all of your personal information and enact all of your rights by contacting Liftshare directly. Where appropriate, we will work together with your employer to ensure your request is carried out in compliance with Data Protection Legislation.

Occasionally, Liftshare will act solely as the data processor for some of our clients. This will only be for the purposes of our initial scoping exercises to assess the viability of the service or in relation to Liftshare creating pending accounts for customers' employees. If you are the employee of one of these clients we will be the data processor for the purposes of your personal information and your employer will be the controller.

Your employer should notify you of any data processing relevant to this scoping exercise prior to the scoping commencing. If you wish to discover how your data is handled under Data Protection Legislation, please refer to the privacy notice belonging to your employer.

HOW DO YOU USE MY DATA?

We gather two types of information about our Members:

1. data that Members or their employers provide through optional, voluntary registration; and
2. data gathered through tracking information derived mainly by tallying page views and journey plan posts throughout the Liftshare Network.

This information enables us to improve the tailoring of our features and content to Members' needs and to help our clients better understand the demographics of our Members. How we use the data we collect from you is described in more detail below.

When you register with us

The Website offers free, voluntary registration to Members. By registering, Members can enter journey plans, post new journey plans and reply to existing journey plans, and book journeys; they can take advantage of personalization (the ability to filter matches according to a user-supplied criteria); and they have the ability to edit existing journey plans.

When you register with us, we will use your personal information to create your account. The details we collect from you will include your name, age, gender and email address.

Where you are a 'Pending Member' (meaning an individual whom Liftshare will be processing personal

information in relation to before the individual becomes a Member), we may have received your name, email address and postcode from your employer pursuant to facilitating pending accounts for the employer's travel scheme.

If you are joining a particular employer scheme when you register with us, you may also be asked to provide your car registration number, your employee number and employer name.

If you are part of a live employer scheme, we will also share relevant journey information with your employer to help them assess the utility of the service.

If you use the Liftshare Trip Authentication software and Companion App, we may also collect and process data about your location.

We need to process your personal information in this way to enter into and perform the services you have asked to receive.

To help Members increase their chance of connecting with others travelling their way, we will also share summary journey information for journeys that members have chosen to register onto the public Liftshare network with other travel planning websites and in our quick search tools.

When you use our services or website functionality

We use your data to provide personal travel plans matching the journey criteria requested by you through our online platform, or as part of your employer's travel to work communication plan.

If you ask us to, we will also send out emails notifying you of replies to specific journey postings. We also provide the option for you to allow other Members to respond to postings directly via their email.

Our Website also enables members to reciprocally post reviews relating to their car sharing experiences, both in a positive and negative aspect. We reserve the right to post, monitor and remove reviews relating to members as we think appropriate to deliver services to our community of members.

We may also send you email notifications of specific changes to the Website and our service offering. Unless we need to as part of providing the services, we never share individual email addresses, telephone numbers or postcodes with any third parties, including advertisers or partners, without your prior consent from the relevant Members.

We need to process your personal information in this way to enter into and perform the services you have asked to receive.

When you phone us

When you phone us, we may also handle your personal information (your name, contact details and the other details you provide to us during the call) in order to provide the customer services you have asked us to. This could be when you ask us to confirm your account details, or explain our services to you.

When you have expressed an interest in our services:

If you have opted in via our website to receive marketing communications from us, we will handle your personal information for example (your name, email address and postal address and telephone number) to provide you with marketing communications in line with any preferences you have told us about.

Every email we send to you for marketing purposes will also contain instructions on how to unsubscribe from receiving them.

When we send you marketing material in the post, we rely on our legitimate interest to let you know about our latest offers and services.

You are not under any obligation to provide us with your personal data for marketing purposes.

1.1.1 You can tell us that you do not want your personal information to be processed in this way at any time by [contacting us here](#) or, where relevant, by following the unsubscribe link shown in every marketing

communication you receive from us. You can also unsubscribe by managing your settings in the "Account Settings" section of our online platform.

To make our site better:

We will also use your personal information to provide you with a more effective user experience (such as by displaying potential journeys or car sharing options we think you will be interested in, based on your previous journey history).

Our use of your information in this way means that your experience of our site will be more tailored to you, and that the options and recommendations you see on our site may differ from someone accessing the same site with a different journey history or browsing habits.

We also share your aggregated, anonymous data with third party analytics and search engine providers that assist us in the improvement and optimisation of our site. The following are the types of third party providers which we currently engage with:

- Analytics platforms
- Email providers
- Cloud storage companies

We will also use your personal information for the purposes of making our site more secure, and to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

We process your data for this reason because we have a legitimate interest to provide you with the best experience we can, and to ensure that our site is kept secure.

You can prevent us from using your personal information in this way by using the 'do not track' functionality in your internet browser. If you enable do not track functionality, our site may be less tailored to your needs and preferences.

If our business is sold:

We will transfer your personal information to a third party:

- if we sell or buy any business or assets, we will provide your personal information to the seller or buyer (but only to the extent we need to, and always in accordance with data protection legislation); or
- if Liftshare or the majority of its assets are acquired by somebody else, in which case the personal information held by Liftshare will be transferred to the buyer.

We process your personal information for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your personal information in this way, the relevant seller or buyer of our business may not be able to provide services to you.

In some circumstances we may also need to share your personal information if we are under a duty to disclose or share it to comply with a legal obligation.

WHAT ABOUT TECHNICAL INFORMATION AND ANALYTICS?

Information we collect about you: When you visit our site we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, screen resolution, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators, clickstream to,

through and from our site (including date and time), page response times, download errors, 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.

- we may collect information about the devices you use to access our services, including the hardware models, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion information and mobile network information.

Information we receive from other sources: We are also working closely with third party advertising networks, analytics providers, hosting providers and search information providers from whom we may also receive general aggregated anonymous information about you.

We use [Hotjar](#) in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behaviour and their devices. Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking on [this link https://www.hotjar.com/legal/policies/privacy](https://www.hotjar.com/legal/policies/privacy).

IF YOU FAIL TO PROVIDE US WITH PERSONAL INFORMATION:

You always reserve the right to withhold your personal information, but this may affect how we provide our services

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

COOKIES

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. For more information please see our Cookies policy <https://liftshare.com/uk/other/cookieinfo>

WHERE IS MY DATA STORED?

The data that we collect from you will be stored in a location within the UK or outside of the EEA where we have implemented adequate data transfer mechanisms.

All information you provide to us is stored on our secure servers or those of our third party sub-contractors. Your data may be stored in Microsoft applications such as OneDrive, Exchange and Sharepoint. Microsoft applications allow us to securely share your data within Liftshare when required and encrypt sensitive data such as financial information automatically to better protect your data. For more information, please see Microsoft's privacy statement by clicking on this link [Microsoft Privacy Statement – Microsoft privacy](#).

Some of your data may be stored in HubSpot as this will allow us to track our communications and interactions with you. For more information, please see HubSpot's privacy policy by clicking on this link [HubSpot Privacy Policy](#).

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. You must not share your password with anyone.

HOW LONG DO WE RETAIN YOUR DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Where you have created an account with us, we will retain your data for the duration of your membership to ensure that we are able to assist you should you have any questions, feedback or issues in connection

with any of our services or if any legal issues arise.

Pending Members can request that we delete their personal information at any time by [contacting us here](#). We will then promptly delete your pending account.

Members can at any point delete their account, this account removal option is available to the member in their account pages. The data is removed from the live website immediately; data replication will remove data from mirrored backups up to a maximum of 15 minutes later. Once your membership terminates we will retain your personal information for 24 months – we retain this personal information under the legal basis of legitimate interests to allow us to service any enquiries from former customers or to help returning customers re-establish their membership account. We will anonymise any other information we hold on your behalf and only use this for compiling into aggregated statistical analysis of our services. Any personal information we are not obliged to retain that cannot be anonymised securely, will be destroyed.

Where we have used your personal information to contact you for marketing communications:

If you tell us that you no longer wish to receive marketing communications from us, we promise to stop sending them to you. If you wish to unsubscribe from our marketing communications, we will immediately remove your personal information from our marketing database and ensure your contact details are suppressed to prevent us contacting you in future about promotional offerings unless you inform us otherwise.

Where we have processed your data for any other reason (such as where you have contacted us with a question in connection with our services) we will retain your data for 3 years. As we are holding this data under our legitimate interests, your rights to object (as outlined in “Your right to object under data protection law”) apply as normal.

Any restorations of data for development or testing purposes is anonymised.

LAWFUL BASIS OF PROCESSING

We will only process your information for as long as we have a relevant legal basis to do so. This is usually in order to provide you with the services you have requested from Liftshare and unless stated, all of the above processing is conducted under the legal basis of performance of a contract.

- 1.2 We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we consider the new purpose to be incompatible with the original purpose of collection, we will conduct a Privacy Impact Assessment or contact you to request your consent for further processing. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contacting us here](#).

YOUR RIGHT TO OBJECT UNDER DATA PROTECTION LAWS

You have the right to object to us handling your personal information when:

- we are handling your personal information based on our legitimate interests (as described in the “How do you use my data” section above). If you ask us to stop handling your personal information in this way, we will stop unless we can show you that we have compelling grounds as to why our use of your personal information should continue; and/or
- for marketing purposes. If you ask us to stop handling your personal information on this basis, we will stop.

WHAT ARE MY RIGHTS UNDER DATA PROTECTION LAWS?

- 1.3 You have various rights under the data protection laws, which you can exercise by contacting us. The easiest way to do this is by [contacting us here](#).

Right of access

You are entitled to receive confirmation as to whether your personal information is being processed by us, as well as various other information relating to our use of your personal information.

You also have the right to access your personal information which we are handling.

Right to rectification

You have the right to require us to rectify any inaccurate personal information we hold about you. You also have the right to have incomplete personal information we hold about you completed, by providing a supplementary statement to us.

Right to restriction

You can restrict our processing of your personal information where:

- you think we hold inaccurate personal information about you
- our handling of your personal information breaks the law, but you do not want us to delete it
- we no longer need to process your personal information, but you want us to keep it for legal reasons
- we are handling your personal information because we have a legitimate interest (as described in the “How We Use Your Data” section above, and are in the process of objecting to this use of your personal information)

Where you exercise your right to restrict us from using your personal information, we will then only process your personal information when you agree, except for storage purposes and to handle legal claims.

Right to data portability

You have the right to receive the personal information we hold about you in a structured, standard machine readable format and to send this to another organisation controlling your personal information.

Right to erasure

You have the right to require us to erase your personal information which we are handling in the following circumstances:

- we no longer need to use your personal information for the reasons we told you we collected it for
- where we needed your consent to use your personal information and you have withdrawn your consent
- you object to our use of your personal information and we have no compelling reason to carry on handling your personal information
- our handling of your personal information has broken the law
- we must erase your personal information to comply with a law we are subject to

Right to complain

You have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales (<https://ico.org.uk/concerns/>).

WHAT ABOUT WEBSITES WE LINK TO?

Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates.

Our site connects you to different websites. If you follow a link to any of these websites or use our services, please note that you have left our site and these websites have their own privacy policies.

We do not accept any responsibility or liability for these policies or websites. Please check their policies before you submit any personal information to these websites.

INFORMATION REGARDING CHILDREN

We do not intentionally market our services or collect information via this website from data subjects under the age of 18. We do not collect information regarding children for the provision of our services and will erase any data collected if informed by the parent or legal guardian of a child whose data we have erroneously collected.

WHEN WILL YOU CHANGE YOUR 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 or post.

Please check back frequently to see any updates or changes to our privacy policy.

HOW DO I CONTACT YOU WITH FEEDBACK?

Questions, comments and requests regarding this privacy policy are welcomed and should be made by [contacting us here](#).

This privacy policy was last updated on **December 2020**