

# 1. Internal GDPR/Data Protection Policy (for your company and staff/contractors)

[Westway Transfers Ltd]

**Data Protection & GDPR Policy**

**Date:** [17.11.2025]

**Review Date:** [17.11.2026]

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## 1. Purpose

This policy sets out how [Westway Transfers Ltd] complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 in relation to the collection, storage, use, and protection of personal data.

## 2. Scope

This policy applies to all staff, drivers, contractors, and anyone working on behalf of [Westway Transfers Ltd].

## 3. Personal Data We Process

We collect and process personal data necessary for running our services, including:

- Customer names, phone numbers, and contact details.
- Pickup and drop-off addresses, journey details, and booking history.
- Payment details (processed securely via third-party providers).
- Contractor/driver details for scheduling and payments.

## 4. Lawful Basis for Processing

- **Contract:** To fulfill bookings and provide transport services.
- **Legal obligation:** To maintain tax and accounting records.
- **Legitimate interest:** To manage operations and ensure safety.
- **Consent:** For marketing communications (if given).

## 5. Data Security

- Personal data is stored securely in password-protected systems.
- Access is restricted to staff and contractors who need it for business purposes.
- Devices used for company work must be secured with passcodes.
- Paper records (if any) are stored securely and disposed of by shredding.

## 6. Data Sharing

- We only share personal data with trusted third parties (e.g. booking platforms, payment processors, HMRC, contractors providing the transfer service).
- Any third parties must demonstrate GDPR compliance.

## 7. Data Retention

- Booking records: kept for [6 years] for tax/accounting purposes.
- Customer contact details: kept for as long as reasonably necessary for bookings and customer service.
- Contractor details: retained during the period of engagement and [X years] after, as required by law.

## **8. Data Subject Rights**

Individuals have the right to:

- Access their data (Subject Access Request).
- Rectify incorrect data.
- Request erasure (where legally permitted).
- Restrict or object to processing.
- Data portability (where applicable).

Requests must be sent to [info@westwaytransfers.co.uk]. We will respond within one month.

## **9. Data Breaches**

All suspected breaches must be reported immediately to [info@westwaytransfers.co.uk]. Where a breach poses a risk, the ICO will be notified within 72 hours, and affected individuals will be informed if required.

## **10. Responsibilities**

- The company is responsible for compliance with data protection law.
- All staff/contractors must handle personal data in line with this policy.

## **11. Policy Review**

This policy will be reviewed annually or when significant changes occur.

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# **2. Customer & Contractor Privacy Notice (external-facing, e.g. website/booking forms)**

## **Privacy Notice – [Westway Transfers Ltd]**

At [Westway Transfers Ltd], we take your privacy seriously. This notice explains how we collect, use, and protect your personal data in line with the UK GDPR and Data Protection Act 2018.

### **What data we collect**

- Your name, phone number, and contact details.
- Pickup/drop-off addresses and journey information.
- Payment details (processed securely by third-party providers).
- Contractor/driver details for scheduling and payments.

## **Why we use your data**

We use your personal data to:

- Provide and manage your booking.
- Communicate with you about your journey.
- Process payments and invoices.
- Comply with our legal obligations (e.g. tax records).
- Improve our services.
- Send marketing communications (only if you opt in).

## **Legal bases**

We rely on **contract**, **legal obligation**, **legitimate interest**, and **consent** (for marketing).

## **Who we share data with**

We may share your data with:

- Drivers/contractors providing your transfer service.
- Booking and payment providers.
- Regulatory or law enforcement bodies if required by law.

We do not sell your data to third parties.

## **How long we keep your data**

- Booking and payment records: [6 years].
- Customer contact details: only as long as necessary to provide services.
- Contractor/driver details: during engagement and [6 years] after.

## **Your rights**

You have the right to:

- Access your data.
- Correct inaccurate data.
- Request deletion of your data (where possible).
- Object to processing or restrict use of your data.
- Withdraw consent for marketing at any time.

## **Contact us**

If you have questions about your data or want to exercise your rights, contact:

[Westway Transfers Ltd]

[Data Protection Lead – Shahid Hussain, [info@westwaytransfers.co.uk](mailto:info@westwaytransfers.co.uk)]

You also have the right to complain to the **Information Commissioner's Office (ICO)**:

[www.ico.org.uk](http://www.ico.org.uk)