

Privacy Notice.

What data do I hold and why?

I have been hired to teach you* to drive, so as such it is necessary to hold certain data on you under Contractual, Legal Obligation and Legitimate Interest bases; in other words, I need to hold certain data in order to fulfil my contractual obligations to you, to comply with the law, and in order to fulfil my role as effectively as possible.

The following data is held on a computer database:

- your BSM pupil number,
- title and name
- full address
- contact phone number(s)
- date of birth
- driving licence number and expiry date,
- possibly an email address
- possibly next of kin/account payer contact details too.

Additionally, I hold your name, address and phone number in the contacts list on my phone. (The contacts list can also be viewed from my other devices - tablet, home computer and smart watch). It is necessary for me to keep this information on my phone to make communication easier with regard to arranging lessons, or if one of us is held up etc.

I also hold some paper records; a payment tracker is filled in every lesson and I keep brief notes of what we cover on each lesson, to keep track of your progress and allow me to plan future lessons. If the driving licence number and expiry are not provided at the time of booking, these details may be recorded on the contract on your first lesson.

It is also necessary for me to check certain details of a person's driving licence, such as whether they have any points on their licence. This can either be done in front of you on the first lesson, or by you providing me with a "Check Code" which allows me one-time access to the data via a link on gov.co.uk. Once the Check Code has been used/expired I cannot get access to your details again, and it is only necessary for me to look at the details, nothing will be recorded.

When you start lessons, we ask you to fill in a health questionnaire, detailing any health concerns that may affect your ability to learn or to drive, and to assess any Covid-19 risk. Depending on how you send us the information, it will either be stored in our email or with your paper records, and will be subject to the same safeguards as above. We require you to keep us informed of any changes to your health or medication throughout the time you learn with us, which may be noted on your health questionnaire form if necessary.

After someone has passed, I like to take a "Victory Photo" to mark the occasion and to use on my social media; separate consent will be sought for this on the day you pass.

I do **not** hold any bank details for people who pay via bank transfer; all that shows up on my statement is the Reference entered by you at the time of payment, which may be your name or the learner's name.

How do I protect your data?

Your contact details and driving license information is held on a computer database managed by BSM (of whom I am a franchisee). My own access to this database is password protected, I am the only person to know my password and I will never share it with anyone.

My phone is password and fingerprint protected, my other devices are also all password protected, and data stored on it is automatically encrypted. I will never share my password with anyone.

The payment tracker and lesson records are stored in a locked briefcase which is either in the car (during working hours) or in my office (outside of working hours). I have the only key to the briefcase and will never give the key to anyone else.

Disclosure.

I will never share any of your data with anyone else, unless at your request, for example if you change instructor.

How long do I hold this data for?

At the end of our professional relationship, I will keep your paper records for at least 6 years (the duration of the Statute of Limitations) in a locked filing cabinet in my office, after which it will be securely disposed of.

Text/email conversations may also be kept for the same amount of time if relevant.

Your contact details will be deleted from my phone unless you require me to hold on to them, for example if you are planning on doing Pass Plus. Once deleted from my phone, they will automatically be deleted from my other devices at the same time.

I will also “archive” you as a customer on the BSM database, after which I have no access to this data unless you are removed from the archive, for example in order to do Pass Plus or a 'refresher lesson'.

Your rights.

You can request to view/amend/delete information I hold on you. Requests will be responded to within one month. Some data may not be able to be deleted, for example if I need to keep it in order to comply with the law or if our contract has not yet finished. You may be required to provide proof of identity before I respond to your request, for example if the request has not been made in person.

I will be reviewing and updating this policy on a regular basis and will keep you informed of any changes.

* “you” refers to yourself, or your son/daughter/ward.

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