Privacy Policy.

Welcome to Dream Drivers' privacy policy.

We own and operate an online delivery solutions service ("Service") which can be accessed via a web-based site at www.dreamdrivers.co.uk and through our mobile app (together the "Platform").

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data if you are a Customer User or Driver (collectively referred to as "you" in this privacy policy):

Customer User: any individual employee, contractor or agent of any business entity which either (a) lists its required driving shifts ("Shifts") on the Platform or (b) is authorised by us to use the Services for their own internal booking management purposes (each a "Customer").

Driver: any individual driver who registers on the Platform.

User: any person accessing our Platform, whether as Customer User or Driver.

1. Important information about who we are

Driver Share Ltd (company number SC81929), trading as Dream Drivers is the controller and responsible for your personal data (collectively referred to as "Dream Drivers", "we", "us" or "our" in this privacy policy).

We have a team who are responsible for overseeing questions relating to this privacy policy and our data protection practices. If you have any questions about this privacy policy, please contact us using the details set out below.

Contact Details

Full name of legal entity: Driver Share Ltd

Email address: Info@dreamdrivers.co.uk

Postal address: 85 Glasgow Road, Edinburgh, EH12 8LJ

UK's Information Commissioner's Office Registration Number SC819294

Complaints

You will always have the right to lodge a complaint with a supervisory body. The relevant authority in the UK (where we are based) is the Information Commissioner's Office (<u>www.ico.org.uk</u>). If you do have a complaint, we would appreciate the chance to deal with your concerns before you approach the ICO, so please do contact us in the first instance if possible, at the email address above. If you are based in another jurisdiction, you may have additional rights or ability to refer matters to an alternative supervisory body.

Changes to the privacy policy

We keep our privacy policy under regular review and reserve the right to update this privacy policy from time to time. This privacy policy was last updated on 10th November 2025.

Third-party links

Our Platform may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Platform, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

General

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The type of data we collect, use, store and transfer will depend on the way you interact with us and the relationship we have with you. We will we collect personal data from Users.

Where we collect personal data, which we require to provide access to our Platform from a User, we will process that information as a data controller to provide the Services. Where we collect further personal data from Users using our Services, we will process that information as a data processor on behalf of the Customer or Driver to provide the Services. Any data processor activities we carry out will be covered under appropriate terms and conditions with the relevant Customer or Driver.

Categories of personal data

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Contact Data** includes name, email address, postal address and telephone numbers, and if you are a Driver, personal data related to your proof of identity.
- **Driver Data** includes details related to your driving licence and vehicle details and live location data and will be collected if you are a Driver.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details of services you have purchased via our Platform.
- **Technical Data** includes internet protocol (IP) address, your browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Platform or any newsletters we issue.
- **Profile Data** includes your username and password, interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our Platform, products and Services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not knowingly collect data relating to children under 13 years old, special category data or information relating to criminal convictions.

Keeping data up to date

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can do this by logging into your account on our Platform and updating certain information or contacting us directly to update on your behalf.

If you fail to provide personal data

Where we need to collect personal data by law or contractual terms, 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 (for example, to provide you

with goods or services). 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.

3. How is your personal data collected?

We use different methods to collect data from and about you. The main way we will collect your personal data is through your direct interactions with us, but we will also collect data through automated technologies and third parties or other publicly available sources.

- **Direct interactions.** You may give us Contact, Driver, Profile, Financial and Transactional Data by interacting directly with us through our Platform, including when you sign up or register for our Platform. It also might include any information you give us when you request marketing information is sent to you or where you give us feedback or otherwise contact us.
- Automated technologies or interactions. As you interact with our Platform, we will automatically collect Technical Data. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.
- Third Party and publicly available sources. We may collect some personal data about you from you from various
 third parties and public sources. Additionally, Technical Data may be received from third party analytics providers
 or advertising networks (see our cookie policy for further details).

4. How we use your personal data

We will only use your personal data when the law allows us to. This includes UK data protection rules (under the UK GDPR and Data Protection Act 2018) and other applicable laws in countries where we collect and process information.

We will not collect and use your personal data without letting you know. Most commonly, we will use your personal data in the following circumstances:

- Where you have provided consent. We rely on consent only where we have obtained your active agreement
 to use your personal data for a specified purpose, for example if you subscribe to an email newsletter. You
 have the right to withdraw consent at any time, including in relation to marketing, by contacting us or by
 clicking the "unsubscribe" link provided in any communication.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party). We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Where we need to comply with a legal obligation.

Principles of processing

We will not process personal data in a way that is incompatible with the purposes for which it has been collected or subsequently authorised by you. We also will not collect any personal data that is not needed for the mentioned purposes.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the tables below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To provide access to the Platform and our Services (including confirming your identity, meeting our contractual and legal obligations, and exercise other rights we have under contract and provide customer support services)	(1) Contact(2) Profile(3) Driver	 (a) Performance of a contract with you or your employer (b) Necessary to comply with a legal obligation (c) Legitimate interests (we need to be efficient about how we meet our obligations and want to provide good service to customers)
To manage our relationship with you which will include: (i) Notifying you about changes to our terms or privacy policy; (ii) Asking you to leave a review or take a survey; and (iii) Responding to a request for support or information.	(1) Contact(2) Profile(3) Marketing and Communications(4) Technical	 (a) Performance of a contract with you or your employer (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how Users use our Platform and Services to enable us to develop our relationships and grow our business)
To administer and protect our business and the Platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(1) Contact(2) Technical(3) Profile	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud) (b) Performance of a contract with you or your employer

To use data analytics to improve our Platform, Services, marketing, User relationships and experiences	(1) Technical (2) Usage	Necessary for our legitimate interests (to keep our Platform updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services available on our Platform that may be of interest to you	(1) Contact(2) Technical(3) Profile(4) Marketing and Communications	(a) Necessary for our legitimate interests (to develop our Services and grow our business)(b) Performance of a contract with you or your employer
To deliver relevant Platform content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(1) Contact(2) Profile(3) Technical(4) Marketing andCommunications	Necessary for our legitimate interests (to study how Users use our Services, to develop them, to grow our business and to inform our marketing strategy)
To liaise with you in relation to our Platform, Services or wider business.	(1) Contact (2) Profile	Necessary for our legitimate interest (to develop our Services and grow our business).
If you are a Driver, to track your live location in order to help monitor the provision of our services.	(1) Driver Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (for running our business, and provision of administration)

Marketing

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving the marketing. We will process your Contact, Profile and Technical Data to form a view on what we think you may want or need or what may be of interest to you.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of use of the Platform, or as a result of a product/service purchase.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see https://ico.org.uk/for-the-public/online/cookies/.

6. Disclosures of your personal data

We may require to share your personal data with the parties set out below for the purposes set out in section 4 above:

Third party	Detail
Other Users	Personal data provided will be processed by us within the Platform. If you are a Driver, it will be shared with relevant Customers, each as part of a booking process for relevant Shifts. The use of a Driver's personal data by the relevant Customers may also be subject to their own specific privacy policy which should also be reviewed.
Third party service providers	Where we appoint third parties to provide services on our behalf and as our processors, like payment, systems administration, web hosting, marketing and support services.
Professional advisers:	including lawyers, bankers, auditors and insurers who provide banking, legal, insurance and accounting services.
Authorities:	regulatory, government and industry bodies, like ICO, HM Revenue & Customs, fraud prevention organisation or law enforcement bodies who require reporting of processing activities in certain circumstances, especially in the prevention of money laundering and fraud.
Corporate partners:	includes third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International transfers and Data Security

At present, we do not transfer your personal data outside the UK. If there were any international transfers, we would ensure that a similar degree of protection is afforded to it by having appropriate safeguards in place prior to any international transfer taking place.

8. Data Security

We know that it is incredibly important to protect and manage personal data appropriately, but unfortunately the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted online or through the Platform.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those

employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may keep your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. Your legal rights

Under the UK data protection laws, you have certain rights in relation to your personal data. We have set these out in the below:

Your Right	What it means
Right to be informed You have the right to be told how we will use your personal data	We provide this privacy policy to explain how we use your personal data.
Right of access You can ask us to receive a copy of your personal data, commonly known as a SAR.	If you ask, we will confirm how we process your personal data and, in certain cases, provide you with a copy of the personal data we hold about you. There are some exemptions where we do not need to provide copies (like communications we have had with our legal advisers), and we can't give you any personal data about other people or personal data which is linked to ongoing investigations, and we are prevented by law from sharing.
Right to rectification You can ask us to correct your personal data if you think it is wrong or complete if it is incomplete	You can have incomplete or inaccurate personal data corrected. Before we update your file, we may need to check the accuracy of the new personal data you have provided, and we will restrict processing while we verify the accuracy.
Right to erasure You can ask us to delete personal data in certain circumstances	If we do not have a reason for holding your personal data and continue to use it, if you gave us consent and have now withdrawn that consent, you have objected to us using your personal data or we are using it unlawfully, you can ask us to delete it.

	Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.	
Right to restrict processing In certain circumstances, you can ask us to restrict or suspect use of your personal data.	You can ask us to suspend the processing of your personal data in the following scenarios: • If you want us to establish the data's accuracy. • Where our use of the data is unlawful but you do not want us to erase it. • Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims. • You have objected to our use of your data but we need to	
	verify whether we have overriding legitimate grounds to use it.	
Right to object You can object to us processing your personal data for (i) direct marketing or (ii) our own legitimate interests.	If you object to direct marketing, we must stop using your personal data for that reason. If we are using legitimate interest, you can object to us using your personal data. But if there is an overriding reason why we need to use your personal data, we do not need to accept your request to stop and can continue to use your personal data. If you object to us using personal data which we need in order to provide our Services, we may need to close your account as we won't be able to provide the Services.	
Right to data portability You can ask us to transfer your personal data to you or another company	We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.	

If you wish to exercise any of the rights set out above, please contact us on the details above.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is

not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.