

PRIVACY POLICY

Version number: 1.0

Effective date: 25/09/2019

1. Who are we?

1.1 We are Lboard Limited trading as "Lboard". For privacy queries, you can contact us at contactus@lboard.com. Other contact details are on our website.

2. What's the point of this policy?

2.1 It tells you what to expect when we collect your personal information via our website app. Please only use our service if you are completely happy with this policy.

2.2 Generally, the policy covers only information provided to us. If you give personal information to other people, such as payment providers or other websites, please check their privacy policies.

3. Might the policy change?

3.1 Yes. We will post any new version on our website (please check whenever you visit the site) and also notify you by email, SMS, in-app message or otherwise. We will assume you agree to the new version of the policy if you use our site or app after its effective date.

4. What do we collect?

4.1 Information which you upload to our service or otherwise give us such as:

- your name and contact details;
- other information provided when you register with us such as your photo, medical condition relevant to driving, licence number, qualifications and experience;
- details about your transactions on our service;
- information included in your profile, posts, reviews or which you otherwise provide for display on our service or which you include in messages sent via our service;
- contact or other information which you give or allow us to use for newsletters or other marketing; and
- your communications with us.

4.2 Automated information about your use of our service such as: the internet protocol (IP) address used to connect your device to the internet, connection information such as browser type and version, information about your device including device-type and device identifier, operating system and platform, mobile network data, a unique reference number linked to the data you enter on our system, login details, the site from which you arrived at our service, details of your activity with date / time stamps including pages you visited and your searches / transactions.

4.3 If you are a student, we may use your location information to tell you about driving instructors near you or to tell instructors how much time students spend driving or in

the classroom. You will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by contacting us at contactus@lboard.com.

- 4.4 The following information about you may be provided to us by other people:
- We may validate your licence or other details with the DVLA or others
 - Limited billing information sent to us by our payment provider for verification purposes e.g., your name, email address and billing / delivery addresses.
- 5. What's our reason / legal basis for collecting the information?**
- 5.1 Because it's necessary to take steps at your request to enter into a contract with you and/or to perform such a contract, e.g., send service messages, process payments and fulfil orders. This applies to initial enquiries and to contact and transaction details as well as to profiles and other information which you provide for public display on our service.
- 5.2 Because it's in our "legitimate interests", e.g., to manage and improve our service including tracking usage patterns and preventing or detecting fraud or abuse. This applies to automated usage data.
- 5.3 Because you've specifically agreed on our service (e.g, by ticking a consent box). This applies to contact or other information which you give or allow us to use for newsletters or other marketing. You can withdraw permission at any time as explained on our service or by emailing us at the above email address.
- 5.4 If you supply us with someone else's email address for a "Refer A Friend" or similar offer, to send a referral message to that person and we will then immediately delete it.
- 6. How long do we keep personal information?**
- 6.1 Until your account is closed or our contract with you has otherwise ended (or earlier if your account has been inactive for a certain amount of time provided we say so in our terms and conditions). You can close your account by emailing us at the above email address.
- 6.2 We may hold on to some of your information for longer (typically up to seven years) if reasonably needed for legal, regulatory or tax reasons, deal with disputes, prevent fraud or abuse and/or enforce our terms and conditions.
- 6.3 We will keep your information which we use only for newsletters or other marketing until you tell us to stop sending you such messages.
- 7. To whom do we send or make available your personal information?**
- 7.1 To other people who supply us with a service, e.g. website hosts, payment providers, customer service providers and businesses which help us send communications or monitor our website and which provide us with e-commerce, online advertising, analytics, review management, live chat and other IT services.

- 7.2 To other businesses to enable them to send you marketing messages, if you have given permission. You can withdraw permission at any time as explained on our service or by emailing us at the above email address.
 - 7.3 To other users of our service, if you enter personal information into your public profile, such as photo or contact details, or include it in a post, comment, review or other public action on our service. If you are an instructor, you can ask us to remove your profile by closing your account.
 - 7.4 To credit reference agencies, regulators and the police and other law enforcement authorities to help deal with fraud and abuse and/or comply with legal requirements.
 - 7.5 To insurers and professional advisers in connection with our insurance cover or to deal with legal claims.
 - 7.6 To potential buyers so far as reasonably necessary, in the case of an actual or proposed (including negotiations for a) sale or merger or business combination involving all or the relevant part of our business.
- 8. Do we send your information outside the European Union?**
- 8.1 Your personal information which we collect is stored within the EU and is not transferred to any third countries except as follows.
 - 8.2 Your personal information may be transferred to the US by the following companies certified under the [EU-US Privacy Shield Framework](#), which provides certain safeguards for your personal information: Google (analytics / advertising).
- 9. What rights do you have?**
- 9.1 If the legal requirements are met: To ask us for access to your personal information, to rectify it if there are mistakes, to delete or restrict its use in certain circumstances or to “data portability” or to withdraw any consent you’ve given (e.g. marketing).
 - 9.2 You may also have the right to object to use of your personal information in certain circumstances.
 - 9.3 If you have a complaint about how we are dealing with your personal information, please contact us via the email address above. If you are not happy with our response or think we are not handling your personal information in accordance with the law, you have the right to complain to the Information Commissioner’s Office (ICO).
 - 9.4 For more information about your rights, visit the ICO’s website: www.ico.org.uk.