

JLF TRANSFERS

PRIVACY NOTICE

UK GDPR Privacy Information - prepared August 2026

1. Who we are

JLF Transfers provides private-hire and airport transfer booking and transport services. For personal information that JLF Transfers decides how and why to use, JLF Transfers is the data controller. The business is directed by John Fitzpatrick.

2. Information we collect

Depending on your booking or contact with us, we may process your name, postal or pickup/drop-off address, telephone number, email address, booking reference, journey dates and times, passenger numbers, flight or travel details, notes you provide, payment status and transaction-related information, communications with us, and information needed to allocate and administer a journey. We aim to collect only information reasonably necessary to provide and administer the service.

3. Why we use your information and our lawful bases

We use personal information to provide quotations; create, confirm, amend and administer bookings; communicate with customers; allocate journeys to drivers or subcontractors; monitor flights or travel information where relevant to a booked journey; process or reconcile payments; issue invoices and maintain accounting records; handle complaints, cancellations and customer requests; protect the security and integrity of our booking systems; and meet legal, regulatory and tax obligations.

Our principal lawful bases under UK GDPR are **contract**, where processing is necessary to take steps at your request or provide the transport service you have booked; **legal obligation**, where records must be kept or disclosed by law; and **legitimate interests**, where necessary for proportionate business administration, service security, fraud/error prevention, record keeping or the establishment, exercise or defence of legal claims. Where consent is specifically required for a particular activity, we will seek it separately.

4. Booking and payment systems

JLF Transfers uses electronic systems to administer bookings and operations, including its Transfer Pilot/JLFT Operations workflow and Google Workspace services. Card payments may be processed using Stripe. JLF Transfers does not need to receive or store your full card number when payment is handled by the payment provider. Bank-transfer payments are reconciled using the information needed to identify and confirm the booking.

5. Cabubble and other booking sources

Where a booking reaches JLF Transfers through Cabubble or another authorised booking source, we may receive the customer and journey information needed to fulfil that booking. Information received from another platform is then handled under this notice when JLF Transfers uses it for its own booking and transport operations.

6. Drivers and subcontractors

We may provide an allocated driver or independent subcontractor with the information reasonably required to carry out a journey, such as customer name, contact number, pickup/drop-off details, date/time, passenger information and relevant flight or travel details. We do not provide drivers with unrelated customer information. Independent subcontractors remain responsible for their own separate legal and data-protection obligations where they determine their own processing.

7. Other organisations we use

Personal information may be processed through service providers that support our business, including Google Workspace/Google, Wix (website services), Stripe (where card payment is used), Cabubble where relevant to the booking, and communications services such as WhatsApp/Meta where used for operational messaging. These organisations may act as processors or independent controllers depending on the service and circumstances. We use providers subject to their applicable data-protection terms and safeguards.

8. International transfers

Some technology providers may process or make information accessible from countries outside the United Kingdom. Where UK GDPR rules on restricted international transfers apply, the relevant provider arrangements must use a lawful transfer mechanism or safeguard, such as UK adequacy regulations, the UK International Data Transfer Agreement/Addendum, or another legally permitted safeguard. We do not rely simply on a customer's general agreement to make an otherwise unlawful international transfer.

9. How long we keep information

We do not intend to keep identifiable personal information indefinitely. Operational customer and booking information is reviewed against JLF Transfers' documented retention schedule and is deleted or anonymised when it is no longer reasonably required, subject to legal, tax, accounting, complaint, chargeback, investigation or legal-claim requirements.

Financial, accounting and supporting records may need to be retained for the period required by HMRC and company law; for relevant company records this will commonly be six years from the end of the financial year to which the records relate, and may be longer in particular circumstances. Security, incident and audit records are retained for a period appropriate to their purpose. A deletion hold may be applied where information remains necessary for a complaint, dispute, tax enquiry, investigation or legal claim.

10. Security

JLF Transfers uses reasonable technical and organisational measures designed to protect personal information against accidental loss, unauthorised access, disclosure, alteration or destruction. Measures include controlled account access, restricted access to the live operations workbook, system integrity and audit controls, Google account and version-history protections, controlled booking correction processes, and incident/breach recording procedures. Access is limited according to operational need.

11. CCTV and dashcams

JLF Transfers does not currently operate or control business CCTV or driver dashcam systems. Independent subcontractors may have their own equipment under their own control; JLF Transfers does not operate, access or manage that footage as part of its current service. If JLF Transfers begins operating or controlling business CCTV or dashcams, its privacy and regulatory position will be reviewed before that processing is introduced.

12. Marketing

We will distinguish service communications about an existing booking from direct marketing. Where electronic direct marketing requires consent or another specific legal basis, we will follow the applicable UK privacy and electronic communications rules. You may ask us to stop direct marketing at any time.

13. Your data-protection rights

Depending on the circumstances, UK data-protection law may give you rights to request access to your personal information, correction of inaccurate information, erasure, restriction of processing, objection to certain processing, and data portability. Where processing is based on consent, you may withdraw that consent. These rights are not absolute and an exemption or legal retention requirement may apply. We may take proportionate steps to verify identity before responding to a request.

14. Complaints

If you have a concern about how JLF Transfers uses your personal information, please contact us first so we can investigate it. You also have the right to complain to the UK Information Commissioner's Office (ICO), the UK's data-protection regulator.

15. Contact

For privacy questions or to exercise a data-protection right, contact:

JLF Transfers

For the attention of: John Fitzpatrick, Director

Email: jlftransfers2014@gmail.com

Website: www.jlftransfers.com

Where a booking confirmation provides a current operational contact address, you may also use that address for booking-related correspondence.

16. Changes to this notice

We may update this privacy notice when our services, systems, providers or legal obligations change. The current version should be published on the JLF Transfers website. We will review the notice after material changes to the booking process or the organisations that process personal information on our behalf.

Document status

Prepared for replacement of the previous JLF Transfers privacy statement in August 2026. This notice should be reviewed alongside the JLF Transfers GDPR ROPA & Retention record and updated if the business materially changes its processing activities.

Practical note: This document is designed as a clear privacy notice for JLF Transfers' current described operations. It is not a substitute for legal advice where unusual processing, litigation, regulatory action or a material change in business model arises.