



Data Protection Policy – Delivery Drivers & Riders

Data Protection General Statement:

This Data Protection Statement outlines Beep Limited (t/a Beep) commitment to its delivery drivers, delivery riders and other employees to operate its business activities in a manner which meets the compliance obligations of the Jersey data protection legislation, the Data Protection (Jersey) 2018 Law (“DPJL”) and the General Data Protection Regulation (EU) 2016/679.

Beep understands and respects your right to privacy and we are committed to ensuring the confidentiality and security of your personal data and the personal data processing activities within our organisation by applying the appropriate technical and organisational measures required to achieve this objective.

This document covers the policies and procedures for processing personal data in a compliant manner and outlines the rights of the data subjects in respect of that data. The Privacy Policy below explains how we may use, process and store your personal data.

Data Controller:

Beep Limited (t/a Beep) is the data controller of all personal data and data processing activities of its business operating in Jersey, Channel Islands. The business runs delivery services for local restaurant and retail businesses, and for customers who want to have their food and non-food purchases delivered to them at their home, office or other designated delivery address in Jersey. The company operates its website www.beep.je and delivery driver mobile app.

The Registered Office is located at 18 La Ville de L’Eglise, St. Peter, Jersey, JE3 7AR. Beep is registered as data controller with the Jersey Office of the Information Commissioner and its number is 70506.

Reference documents:

- Data Protection (Jersey) Law 2018
- Data Protection (Registration and Charges)(Jersey) Regulations 2018
- EU General Data Protection Regulation 2016/679

Privacy Policy – Delivery drivers and riders

Introduction:

This privacy policy explains how Beep and its service providers collect, share and use your personal information. You will also find information about how you can exercise your privacy rights in this Policy.

We aim to protect the personal information of all visitors and users who access our website or services through any mobile application, website platform or device (collectively, the “Services”).

By using our Services, you agree to Beep using your personal information as described in this Privacy Policy. The terms “we”, “us,” or “our” are each intended as a reference to Beep Limited and any terms not defined in this Privacy Policy are defined in our Terms.

Scope of application:

This Privacy Policy applies to our business activities operating within Jersey, Channel Islands, or the personal data processing of the data subjects within Jersey, UK and European Economic Area (EEA).

Personal data:

Personal data means any information relating to an identified or identifiable natural person.

Beep collects the following categories of personal information;

From Delivery Drivers and Riders

- **Contact information:**
 - Name(s)
 - Address(es)
 - Email address(es)
 - Mobile telephone number

- **Employment information:**
 - Date of birth
 - Gender
 - Nationality
 - CV, and previous employment references (if required)
 - Residency details, and work visa/permits (if required)
 - Driver’s licence, any endorsement, suspension, or disqualification information
 - Identification information of vehicle, motorbike or other mode of transport (if required)
 - Health & Safety information e.g. physical disability, or other relevant data

-Payroll information e.g. tax reference numbers, IT IS and Social security card information, bank account details

- **Delivery tracking information:**

- Geo-location data when using the designated delivery app
- Mobile phone type

- **Marketing and security information:**

- Google analytics data for website performance, user engagement etc.
- Analytics data from delivery app
- IP address

Note 1:

Please note that the list above is not exhaustive, and Beep may also collect and process personal data to the extent that it is necessary for the fulfillment of our obligations as employer and as required by law.

Purposes of processing;

Beep will use your personal data noted above for the following range of activities,

Purpose	Lawful Bases
<p>To recruit delivery drivers, riders and other skilled staff -e.g. advertising job vacancies by online and other marketing channels</p>	<p>Data processing will be conducted under the lawful basis of Legitimate Interest.</p> <p>You have the right to object to such processing by contacting our data protection manager</p>
<p>To process your job application form and personal information e.g.</p>	<p>Data processing will be conducted under the lawful basis of Consent.</p> <p>Candidates can withdraw their consent at any time prior to entering into an employment contract with us.</p>
<p>To employ delivery drivers, riders, and other skilled staff -e.g. selection, employment, training of new staff members etc.</p>	<p>Data processing will be conducted under the lawful basis of Performance of a Contract -i.e. employment contract</p>
<p>To meet our employer obligations under Jersey law e.g. income tax, social security, work residency and employment laws.</p>	<p>Data processing will be conducted under the lawful basis which covers the legal obligations within Employment and social fields</p>

To meet our employer Health & Safety obligations	Data processing will be conducted under the lawful basis of Legal Obligation
To provide driver and rider with assistance and support in the performance of their work duties with us	Data processing will be conducted under the lawful basis of Legitimate Interest . You have the right to object to such processing by contacting our data protection manager
To keep accurate records of time taken, and worked by the driver and rider, in fulfilling the assigned, and accepted, delivery orders undertaken by them, for payroll and customer service purposes	Data processing will be conducted under the lawful basis of Performance of a Contract -i.e. employment contract
To assess work performance and quality of service to our customers	Data processing will be conducted under the lawful basis of Legitimate Interest . You have the right to object to such processing by contacting our data protection manager
To ensure the safety of our delivery drivers and riders, our staff members, members of the public and our customers	Data processing will be conducted under the lawful basis of Legitimate Interest . You have the right to object to such processing by contacting our data protection manager
To ensure the safety of our business computer systems, third party service providers' computer systems, our office and company property	Data processing will be conducted under the lawful basis of Legitimate Interest . You have the right to object to such processing by contacting our data protection manager
To protect the safety of our restaurant and other business partners , their staff and management and their property	Data processing will be conducted under the lawful basis of Legitimate Interest . You have the right to object to such processing by contacting our data protection manager
To promote our business via social media, on our website or by other means e.g. staff	Data processing will be conducted under the lawful basis of Legitimate Interest .

marketing campaign photos or other engagement activities	You have the right to object to such processing by contacting our data protection manager
To operate competitions and rewards programmes for customers and staff	Data processing will be conducted under the lawful basis of Legitimate Interest . You have the right to object to such processing by contacting our data protection manager
To obtain or maintain business, accident or other types of insurance cover, managing risks, or obtaining professional advice	Data processing will be conducted under the lawful basis of Legitimate Interest . You have the right to object to such processing by contacting our data protection manager
To comply with legal, tax and regulatory obligations	Data processing will be conducted under the lawful basis of Legal Obligation
To establish or defend a legal claim	Data processing will be conducted under the lawful basis of Legitimate Interest . You have the right to object to such processing by contacting our data protection manager

Please note that this list is not exhaustive and Beep may also collect and process personal data to the extent that it is necessary for the provision of our services in compliance with our legal obligations.

Data collection methods:

We collect personal data in the following ways;

- Direct from the delivery driver or rider, when they apply for a job with Beep and they complete the required webform and submit the information, along with any uploaded CV information or other information, onto our website platform
- As outlined above but via email or post, should the candidate communicate with Beep in that way
- Direct from the delivery driver and rider when they communicate with us via email, telephone, voicemail message, website forms, customer or staff reviews, competitions, surveys, SMS text messaging, or app communications

- Direct from the driver and rider when they communicate via the app online chat service to the dispatch manager or other relevant parties
- Direct from the delivery driver and rider where they are using the Beep social media platform(s)
- Direct from the delivery driver and rider when they accept the invitation from Beep to sign-up to join and download the delivery app (via our third-party service provider) and to complete the onboarding process, so they can start working for Beep
- From the delivery driver/rider app to track the travel route taken, the date, time, distance, delivery performance and customer delivery service rating
- From any third-party channels such as public registers, social media, LinkedIn and any other public open forums,
- from use of cookies and beacons which may track your usage of our website and the delivery app, uploading of information to the website and delivery app, your device ID, your browser type, and how long you interact with our Services,

Information collected:

Delivery drivers and riders' personal data will only be used primarily by us when there is a basis for the performance of an employment contract or a legitimate basis for us to promote for the recruitment of skilled staff members or improve the engagement and wellness of our staff.

The personal data collected is used to

- meet our obligations as employer in the performance of an employment contract
- assist you in case of an emergency situation e.g. a motor accident, or personal injury
- promote employee engagement activities and reward programmes,
- assist us in the delivery and operation of secure business communications via the Beep website, delivery apps, email, business systems and other relevant means,
- meet our legal obligations in relation to Jersey employment and Health & Safety laws
- meet any legal obligations in relation to the defence of a legal claim or where we received a court order for the disclosure of personal data,
- meet any other legal obligations from relevant local laws.

Personal data may be used for legitimate business interest of Beep as indicated above.

Any other personal information is only passively collected and is processed in accordance with this Privacy Policy, or it may be collected and processed as required by law.

Special category information:

We may collect information directly from you when you contact us via the Beep website, webforms, email, social media accounts and telephone calls. This information may include special category information, such as health-related information (e.g. disabilities, religion, ethnic origin). This data will only be used in accordance with our employer legal obligations, to process such data for employment and social field activities and if required, following us obtaining your explicit consent to process such information.

Recipients of data:

Personal data collected may be disclosed or transferred to;

- Data processors who provide services in relation to the operation of our email systems (e.g. Microsoft), SMS text messaging (e.g. Twilio), website and CMS systems (Snap.je),
- Data processors who provide the services of notifying you of job opportunities via direct marketing communications (e.g. MailJet, Twillo),
- Restaurant and other retail business partners in relation to the orders you have agreed to delivery for them to their customers
- Beep's data processors who provide services in relation to the secure and safe running of its business systems and processes,
- Data processors who provide the delivery app software for managing orders, drivers and riders, and for the fulfillment of client and customer orders
- Professional agents in the provision of required services (e.g. lawyers, bankers, HR consultants, H&S consultants, accountants, auditors),
- Competent authorities as required by law,
- Law enforcement and fraud prevention agencies, to help tackle fraud or where such disclosure is necessary for compliance with legal obligation,
- Other third parties when requested by you and when relevant consent has been obtained from you,
- Any group company of Beep Limited, where it is required to deliver the engaged services, to help improve our services and customer experience,
- Any new owner of Beep Limited should it be acquired or merged with another company.

Third party service providers are bound by the requirements of the Data Processor Agreement obligations, where personal data is to be processed to high standards of confidentiality and the required security arrangements are in place.

Social media platforms:

When we use social media platforms e.g. Facebook, Instagram, Twitter, LinkedIn, we only operate it so as to promote our own business and we would not knowingly engage in activities that go beyond this scope. Delivery drivers and riders (and other data subjects) are advised to refer to the respective privacy policies of these social media platforms to

check your data protection and privacy rights. Beep cannot be held responsible for third party social media platforms or websites activities.

Transfer and access to personal data:

Beep keeps all business and personal data in its possession within Jersey jurisdiction where possible, or alternatively within the UK or the EEA. We will only transfer data outside of these areas where it is absolutely necessary for the performance of the contract agreed by you.

Where the destination of the data transfer is outside the Jersey, UK or EEA and does not include a third country that has an “adequacy/equivalence” status, as recognized by the EU Commission, we would always ensure that appropriate safeguards are in place.

Where we cannot guarantee these safeguards, we would always request your consent before the data is transferred.

Retention of data:

Beep will only retain your personal data for as long as is necessary to fulfill the purpose for which it was collected. Summary of the important data retention periods are as follows;

- Beep will retain data in relation to delivery drivers and riders for 10 years from the date of the transaction where they are deemed to be part of the financial records of the business,
- Prospective job candidates’ information will only be kept for 6 months where they are unsuccessful in obtaining employment with us,
- Information relation to any insurance or employment tribunal claims or legal claims will be retained for a long as is required by law and for the resolution of any claim
- Any other information will be either deleted after 24 months or anonymised if appropriate.

This is subject to the exception where the data cannot be deleted for legal or regulatory reasons.

Data subject rights:

Where a data subject in the European Union (or any “adequate/equivalent” status country) wishes to exercise their rights under applicable data protection laws, they should contact us by emailing you enquiry to dataprotection@beep.je.

Data subjects have a number of rights available to them;

- access to their personal data,
- rectification of any inaccuracies,
- restriction on the processing their data
- to object to the processing of their data

- to be forgotten (erasure of your data)
- right to data portability
- right to object to automated decision making and profiling
- right to withdraw consent for those data processing activities based on consent

Each data subject request to exercise the rights noted above will be reviewed against the requirements of the Data Protection (Jersey) Law 2018 and in certain circumstances (e.g. restriction, erasure, objection, data portability) these rights may not be exercisable by the company. Full explanations will be given in such cases.

Automated Decision Making:

A completed delivery under your employment contract is the collection of order items from one or more partner restaurant(s) and delivery to one or more customer(s). Rider fees are paid for completed deliveries only. We analyse your data and automatically confirm which deliveries you are due fees for.

You can choose to unassign from a delivery at any time, through the Driver and Rider App where possible or by contacting Rider Support team. In addition, you can simply reject offers of orders freely. Choosing to not complete a delivery, without informing Beep and while still claiming the delivery fee, is fraudulent activity and a serious breach of your employment contract.

Given the volume of deliveries we deal with, we use automated systems to make the automated decisions described above as they provide a more accurate, fair and efficient way of identifying suspected fraud, preventing repeated breaches of your employment contract and limiting the negative impact on our service. Human checks would simply not be possible in the timeframes and given the volumes of deliveries that we deal with.

You have the right to contest the automated decisions referred to in this section by using the contact details set out in this privacy policy, in which case a person will review the decision.

Making a complaint:

The Jersey Office of the Information Commissioner, Channel Islands ("JOIC"), is an independent statutory authority where you can make a complaint or learn more about data protection in Jersey. Their website is <https://jerseyoic.org> and telephone number is 01534 716530.

Security features:

Beep is committed to ensuring the security of your personal data and has implemented appropriate commercially reasonable technical, physical and organizational measures to prevent unauthorized or unlawful processing of your personal data or accidental loss or destruction of your personal data.

Change to this policy:

Beep may update this Privacy Policy at any time. The updated policy will appear on our website www.beep.je and in the published Terms of Business.

This Privacy Policy was last approved on 27 October 2021.

Contact details:

If you have any questions, concerns or complaints with respect to this Privacy Policy or the handling of your privacy or personal information, please contact our data protection manager at dataprotection@beep.je or telephone 07797 738743.

If you believe that any information we are holding on you is incorrect or incomplete, you can update your information by writing or emailing us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.