



Data Protection Policy – Customers & Business Partners

Data Protection General Statement:

This Data Protection Statement outlines Beep Limited (t/a Beep) commitment to its customers, business partners and other data subjects, 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 restaurants 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 – Customers and Business Partners

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 Customers and Business Partners

- **Contact information:**
 - Name(s)
 - Address(es)
 - Email address(es)
 - Date of birth (when required)
 - Mobile telephone number
 - My Account username and password

- **Marketing information:**
 - Mobile device general type, version information for Google analytics data for website performance, user engagement etc.
 - Cookie, web beacon data for measuring and improve users experience of our website, delivery service and marketing activities

- **Security and other information**

- IP address(es) for analytics and security data

- Geo-location data for accuracy of delivery drop-off and journey route planning

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 performance of a contract which you have entered into with Beep or as required by law.

Purposes of processing;

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

Purpose	Lawful Bases
To provide you with a personalised delivery service -i.e. as a customer, deliver your purchase to your home, office or work	Data processing will be conducted under the lawful basis of Performance of a Contract.
To provide your business with an efficient delivery service -i.e. provide an out-sourced delivery service for the benefit of your valued customers	Data processing will be conducted under the lawful basis of Performance of a Contract.
To provide you with customer service and support -where you may have queries regarding your delivery or refund or damages	Data processing will be conducted under the lawful basis of Performance of a Contract.
To process the payment and refund (if required) of your delivery charge and perform any required fraud checking - using approved third-party credit card payment providers	Data processing will be conducted under the lawful basis of Performance of a Contract.
To record your customer service rating of our delivery service	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 meet our obligations as a local business under Jersey law e.g. GST, customs duties or other relevant charges	Data processing will be conducted under the lawful basis of Legal Obligation

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 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 customers and business partners , their staff, 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 marketing campaign photos or other engagement activities	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 operate competitions and rewards programmes for customers, business partners and members of the public	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,	Data processing will be conducted under the lawful basis of Legitimate Interest .

managing risks, or obtaining professional advice	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 and in the performance of the contract with you.

Data collection methods:

We collect personal data in the following ways from you;

- When you create an account with us or you change your account settings;
- When you place a delivery order with us by completing, submitting the website booking form or via our approved business partners by the transfer of electronic Point of Sale data to us to complete your delivery requirement
- When you correspond with us via email, website contact form, social media communications, telephone, voicemail, SMS text message or post,
- Through your interactions with us or our services, such as when you request information or to receive marketing, information about Beep initiatives or other communications from us by email, newsletter (you can unsubscribe at any time by clicking on the link within the email newsletter), phone, post, SMS, push notification, or via our chat function;
- Direct from you when you communicate with our delivery driver and rider by telephone, email or via the app online chat service
- When you engage with us in relation to providing reviews of our delivery service, drivers and riders service,
- When you enter into competitions, and any other marketing surveys with us,
- We collect technical information from your mobile device or computer, such as its operating system, the device and connection type and the IP address from which you are accessing our Sites.

- We also collect technical information about your use of our services through a mobile device, for example, carrier, location data and performance data such as mobile payment methods, interaction with other retail technology such as use of NFC Tags, QR Codes and/or use of mobile vouchers. Unless you have elected to remain anonymous through your device and/or platform settings, this information may be collected and used by us automatically if you use the service through your mobile device(s) via any Beep mobile application, through your mobile's browser or otherwise.
- We may process health information about you only where you volunteer and consent to this, for example if you report any specific food allergies after placing an order.
- When you browse or use our Sites (before and after you create an account with us).
- 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,

We also collect information from third party sites, such as advertising and social media platforms and our fraud detection provider. If you link your social media or your third-party accounts to us, we will keep a record of your social media handle, and the other information that is made available to us according to your Social Media account settings. If your employer signs up for Beep as business partner, we may receive your contact details from your employer to enable us to provide our services to you (please see the Beep business partnership section for more details).

Information collected:

Customer and business partner personal data will only be used primarily by us when there is a basis for the performance of a contract or a legitimate basis for us to process your data and as outlined in this Privacy Policy.

The personal data collected is used to

- meet our obligations to you in the performance of a contract
- promote customer and business partner engagement activities and reward programmes,
- analyse data about your use of our services from your location data to create profiles relating to you and for you. This means that we may make certain assumptions about what you may be interested in and use this, for example, to send you more tailored marketing communications, to present you with partners that we think you will prefer, or to let you know about special offers or products which we think you may be interested in (including the Beep business partnership).

This activity is referred to as profiling. You have certain rights in relation to this type of processing. Please see the Your Rights section below for more information.

- We may also use your information to comply with any legal obligation or regulatory requirement to which we are subject.
- 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 relevant Jersey laws e.g taxation, consumer protection, health & safety
- assist you in case of an emergency situation e.g. food allergies or accident
- 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 or instruction from relevant law enforcement,
- 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 processed in accordance with this Privacy Policy, or it may be collected and processed as required by law.

Beep for business partners:

We also process your information to determine whether you may be interested in hearing about our Beep business partnership service and, if your employer signs up for the Beep business partnership, to make this service available to you.

Where we think you are using your Beep account for business purposes and your company may be interested in our Beep business partnership service, where appropriate, we may contact you (by email or telephone) to let you know about this service. We do this as it's in our legitimate business interests. You have the right to object to receiving these types of communications, which you can do by responding to our emails to unsubscribe or by contacting us using the contact details in this privacy policy.

If your employer signs up for Beep business partnership service, we will contact you to let you know that the Beep business partnership service is available to you. If you would like to take up your employer's offer to use Beep business partnership service, we will tag your Beep account as having a Beep business partnership service allowance. For more information, please contact your employer or Beep.

When you use Beep business partnership service, we will process your information for the purposes set out in this Privacy Policy. We will also share personal data relating to your order (such as the order date and time, the payment amount and the partner with which the order was placed) with your employer.

Special category information:

We may collect information directly from you when you contact us via the Beep website, webforms, email, delivery app chat communication, 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 legal obligations or in the performance of a contract, 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 direct marketing communications in relation to our services (e.g. MailJet, Twillo),
- Restaurants and other retail business partners in relation to the orders you have asked us to collect and deliver to you
- 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 business partner clients 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 or related 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 or joint venture 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. Customers and business partners (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 recognised 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 customers and business partner clients for 10 years from the date of the transaction where they are deemed to be part of the financial records of the business,
- Information relation to any insurance or legal claims will be retained for a long as is required by law and for the resolution of any claim
- Our legitimate interests where we have carried out balancing tests (see the Data Subjects’ Right section below),
- Any other information will be either deleted after 3 years 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:

We conduct fraud checks on all customers and clients. Where we believe there may be fraudulent activity we may block you from placing an order and using our Sites.

We undertake fraud checks on all customers because this is necessary for us to perform our contracted services to customers, by ensuring that the services we (and all our partners) provide are duly paid for, and also so that individuals themselves are protected from fraudulent transactions on their cards.

Given the volumes of customers and orders we deal with, we use automated systems provided by our third party fraud detection providers and credit and debit card providers, which analyses your order data in order to make automated decisions as to whether or not we will accept an order. We find this is a fairer, more accurate and more efficient way of conducting fraud checks since human checks would simply not be possible in the timeframes and given the volumes of customers that we deal with.

The checks and decisions that are made look at various components including known industry indicators of fraud which our expert fraud detection provider makes available to us, as well as fraud patterns we have detected on our Sites. When combined, these generate an automated score indicating the likelihood of a fraudulent transaction. If our systems indicate a high score for you, then we may decline an order or even block you from our services. The specific fraud indicators are dynamic so will change depending on what types of fraud are being detected in the wider world, country and our Sites at any particular time.

You have certain rights in respect of this activity - please see the Your Rights section below for more information. Our fraud detection is in place to protect all of our customers as well as Beep. You have the right to contest any fraud decision made about you and to be given more information about why any such decision was made by contacting us using the Contact Details above.

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 unauthorised or unlawful processing of your personal data or accidental loss or destruction of your personal data. Our email communications, website, customer and business client database is encrypted to provide the strongest protection for your personal data.

We take steps to protect your information from unauthorised access and against unlawful processing, accidental loss, destruction and damage. Where you have chosen a password that allows you to access certain parts of the Sites, you are responsible for keeping this password confidential. We advise you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will take steps to protect your information, we cannot guarantee the security of your data transmitted to the Sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

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.