

# D4Driving School of Motoring

## Privacy Policy

Version 1.0 — June 2026

*D4Driving School of Motoring ('D4Driving', 'we', 'us', 'our') is committed to protecting your personal data and respecting your privacy. This Privacy Policy explains what personal data we collect, why we collect it, how we use it, and what rights you have in relation to it. Please read it carefully. This policy applies to students, prospective students, website visitors, and anyone who contacts us.*

### 1. WHO WE ARE AND HOW TO CONTACT US

- 1.1** The data controller for personal data collected in connection with driving tuition delivered directly by Robert Szatkowski ADI is:
- D4Driving School of Motoring  
Robert Szatkowski ADI  
46 Vixen Close, Peterborough, PE1 5ZD  
Email: [info@d4driving.co.uk](mailto:info@d4driving.co.uk)  
Website: [www.d4driving.co.uk](http://www.d4driving.co.uk)
- 1.2** Where your tuition is delivered by a Franchisee Instructor operating under the D4Driving brand, that Franchisee Instructor is a separate and independent data controller for personal data they collect in connection with your lessons. Their details will be provided to you in writing before or at the time of your first lesson with them.
- 1.3** If you have any questions about this Privacy Policy, wish to exercise your rights, or have a concern about how your data is handled, please contact us using the details in Clause 1.1.

### 2. WHAT PERSONAL DATA WE COLLECT

- 2.1** We collect and process the following categories of personal data:
- (a) Identity data: your full name.
  - (b) Contact data: your home address, telephone number, and email address.
  - (c) Booking and lesson data: lesson dates, times, locations, progress notes, and test results.
  - (d) Payment data: records of payments made and any payment reference numbers. We do not store card details directly — card payments are processed by Stripe (see Clause 5).
  - (e) Dashcam and in-car recording data: video and/or audio footage recorded during lessons for safety and training purposes (see Clause 2.2).
- 2.2** We use a dashcam in our tuition vehicles. Footage may record the interior and exterior of the vehicle during lessons, which may capture your image and voice. This footage is used solely for road safety monitoring and, where appropriate, to support any incident investigation. It is not used for any other purpose. Franchisee Instructors may also use dashcams in their vehicles; you will be informed of this before your first lesson with them.

- 2.3 We do not collect any special category data (such as health or medical information) as a matter of routine. Where you voluntarily disclose a medical condition or prescribed medication to your Instructor in accordance with your obligations under our Terms and Conditions, that information may be noted for safety purposes only and will be handled with the utmost care.
- 2.4 We collect data about website visitors through Cal.com (our booking system) and through the ElevenLabs conversational AI widget embedded on our website. Please see Clause 5 for details.

### 3. HOW AND WHY WE USE YOUR PERSONAL DATA

- 3.1 We use your personal data for the following purposes, each relying on the legal basis indicated:
- (a) To provide driving tuition and manage your bookings — Legal basis: performance of a contract (Article 6(1)(b) UK GDPR).
  - (b) To process payments and maintain financial records — Legal basis: performance of a contract and compliance with a legal obligation (Article 6(1)(b) and (c) UK GDPR).
  - (c) To communicate with you about your lessons, test dates, and any changes to our services — Legal basis: performance of a contract (Article 6(1)(b) UK GDPR).
  - (d) To monitor road safety via dashcam footage and investigate incidents if they occur — Legal basis: legitimate interests (Article 6(1)(f) UK GDPR). Our legitimate interest is the safety of the student, Instructor, and other road users.
  - (e) To comply with our legal and regulatory obligations, including those imposed by the DVSA — Legal basis: compliance with a legal obligation (Article 6(1)(c) UK GDPR).
  - (f) To respond to enquiries made via our website, booking system, or AI assistant widget — Legal basis: legitimate interests (Article 6(1)(f) UK GDPR). Our legitimate interest is responding to prospective student enquiries.
- 3.2 We will not use your personal data for any purpose that is incompatible with the purposes listed above without first obtaining your consent or having another lawful basis to do so.

### 4. HOW LONG WE KEEP YOUR DATA

- 4.1 We retain your personal data only for as long as is necessary for the purposes for which it was collected, taking into account any legal or regulatory retention obligations.
- 4.2 As a general guide:
- (a) Student contact and lesson records: retained for up to 6 years after your last lesson, in line with standard limitation periods for civil claims under the Limitation Act 1980.
  - (b) Payment records: retained for 6 years in accordance with HMRC requirements.
  - (c) Dashcam footage: reviewed and deleted within 30 days unless retained in connection with a specific incident, complaint, or legal claim. Footage retained for an incident will be deleted once that matter is resolved.
  - (d) Website enquiry and booking data: retained for up to 2 years from the date of your last interaction with us.
- 4.3 When personal data is no longer required, it will be securely deleted or anonymised.

## 5. THIRD-PARTY SERVICES THAT PROCESS YOUR DATA

- 5.1 We use a small number of trusted third-party services that may process your personal data on our behalf or as independent data controllers. These are:
- (a) Stripe — We use Stripe to process card and electronic payments. When you pay by card, your payment details are entered directly into Stripe's secure platform. D4Driving does not store or have access to your card number, expiry date, or CVV. Stripe is PCI-DSS compliant. Stripe's privacy policy is available at [stripe.com/gb/privacy](https://stripe.com/gb/privacy).
  - (b) Cal.com — We use Cal.com for online lesson booking. When you book a lesson through our website, Cal.com collects your name, email address, and any information you provide in the booking form. Cal.com's privacy policy is available at [cal.com/privacy](https://cal.com/privacy).
  - (c) ElevenLabs — Our website features a conversational AI assistant powered by ElevenLabs. If you interact with this widget, your voice input and any text you provide may be processed by ElevenLabs' servers. We recommend reviewing ElevenLabs' privacy policy at [elevenlabs.io/privacy](https://elevenlabs.io/privacy) before using the widget. Interactions with the AI assistant are not stored by D4Driving beyond any summary or lead information passed to us by the widget.
- 5.2 We do not sell your personal data to any third party. We do not share your personal data with any third party for their own marketing purposes.
- 5.3 We may disclose your personal data to third parties where required to do so by law, by a court order, or by a regulatory authority such as the DVSA or the Information Commissioner's Office (ICO).

## 6. DATA TRANSFERS OUTSIDE THE UK

- 6.1 Some of the third-party services we use (including Stripe, Cal.com, and ElevenLabs) may store or process data on servers located outside the United Kingdom. Where this is the case, we take steps to ensure that any such transfer is subject to appropriate safeguards as required by the UK GDPR, such as adequacy decisions or standard contractual clauses.
- 6.2 If you would like further information about the safeguards in place for any specific transfer, please contact us using the details in Clause 1.1.

## 7. YOUR RIGHTS UNDER UK GDPR

- 7.1 Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, you have the following rights in respect of your personal data:
- (a) Right of access — you have the right to request a copy of the personal data we hold about you (a 'subject access request').
  - (b) Right to rectification — you have the right to ask us to correct any inaccurate or incomplete personal data we hold about you.
  - (c) Right to erasure — you have the right to ask us to delete your personal data in certain circumstances (for example, where it is no longer necessary for the purpose for which it was collected).
  - (d) Right to restriction of processing — you have the right to ask us to restrict the processing of your personal data in certain circumstances.
  - (e) Right to data portability — where processing is based on your consent or on a contract, and is carried out by automated means, you have the right to receive your data in a structured, commonly used, and machine-readable format.
  - (f) Right to object — you have the right to object to processing based on our legitimate interests. We will stop processing unless we can demonstrate compelling legitimate grounds that override your interests.
  - (g) Rights related to automated decision-making — you have the right not to be subject to a decision made solely by automated processing that produces legal or similarly significant effects on you. We do not currently carry out any such processing.

- 7.2 To exercise any of these rights, please contact us in writing at the address or email in Clause 1.1. We will respond within one calendar month of receiving your request. We will not charge a fee for handling your request unless it is manifestly unfounded or excessive.
- 7.3 Where your data is held by a Franchisee Instructor and your request relates to data processed by them, you should contact that Instructor directly using the details provided to you under Clause 2 of our Terms and Conditions.
- 7.4 You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you believe your personal data has been handled unlawfully. The ICO can be contacted at [ico.org.uk](http://ico.org.uk) or by calling 0303 123 1113.

## 8. DATA SECURITY

- 8.1 We take the security of your personal data seriously and have put in place appropriate technical and organisational measures to protect it against unauthorised access, loss, destruction, or alteration. These include password-protected devices, secure cloud storage, and limiting access to personal data to those who need it.
- 8.2 Where we share data with third-party processors (such as Stripe and Cal.com), we take steps to ensure they have appropriate security measures in place.
- 8.3 In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the ICO within 72 hours of becoming aware of it, and will notify you directly if the breach is likely to result in a high risk to you.

## 9. COOKIES AND WEBSITE TRACKING

- 9.1 Our website at [www.d4driving.co.uk](http://www.d4driving.co.uk) may use cookies and similar tracking technologies. Cookies are small text files placed on your device when you visit a website.
- 9.2 We use only the cookies necessary to operate the website and our booking system (Cal.com). We do not currently use advertising cookies, tracking pixels, or behavioural analytics tools.
- 9.3 You can control cookies through your browser settings. Disabling cookies may affect the functionality of the booking system on our website.

## 10. CHANGES TO THIS PRIVACY POLICY

- 10.1 We may update this Privacy Policy from time to time to reflect changes in our practices or in applicable law. Where we make a material change, we will publish the updated policy on our website and, where appropriate, notify you directly.
- 10.2 The current version of this Privacy Policy is always available at [www.d4driving.co.uk](http://www.d4driving.co.uk). The version number and date at the top of the document indicate when it was last updated.