

Passenger Privacy Notice

Template provided by the transfer company to its passengers · Articles 13 & 14 GDPR

Who processes your data

Controller: [company name], [VAT number], [registered address], [email], [telephone].

What data

Full name, telephone, email address, **pick-up point and destination**, number of passengers, **flight number** and arrival/departure time, any **note you provide** (e.g. child seat, luggage), and the **personal tracking link** for your trip.

If your trip is a **shared transfer with intermediate stops**, the **stops** are recorded too: each pick-up point, how many people board there, and **the surname — and, where given, the telephone number — of each party**, so the driver knows who to expect at each stop.

If your booking comes with a **document** — an agency voucher, a PDF or a photo sent to us by your hotel or agency — that file is **attached to the booking** and may contain your details as written by whoever issued it.

Only if you request an invoice from the tracking page: **company name and VAT number** so it can be issued, and the **email address** it is sent to. If you do not request one, none of this is collected at all.

⚠ **The tracking link is personal.** Your trip details — your name, the pick-up, the destination, the driver and the number plate — travel **inside the address itself**, so that nobody has to keep them stored. That means **anyone holding the link can see them**: please do not forward it to third parties. Those details sit **after the "#" symbol** of the address, which means they **never leave your device**: your browser does not send them to any server when you open the page. The page is kept out of search engines, and the link stops showing the vehicle's position a few hours after your pick-up.

Where we got it from

Either **from you** when you booked, or **from the hotel, the agency or the online platform** through which the transfer was booked. *(Article 14(2)(f))*

Why, and on what legal basis

Purpose	Legal basis
Carrying out your transfer (assigning vehicle & driver, pick-up time)	Performance of a contract — Article 6(1)(b)
Informing you about the vehicle, the driver and the arrival time	Performance of a contract — Article 6(1)(b)
Tracking your flight so that pick-up follows the actual landing time	Performance of a contract — Article 6(1)(b)
Issuing an invoice and keeping accounting records	Legal obligation — Article 6(1)(c)
Safety of the trip and resolution of disputes	Legitimate interest — Article 6(1)(f)
One email after the trip about your receipt, a return transfer or your feedback	Legitimate interest — Article 6(1)(f) · Article 11(3) of Law 3471/2006

We neither request nor seek special categories of data (Article 9). The note field is free text; **please do not enter health data there.**

Who sees it

- The **driver** serving you — your trip only.
- The **office** of our company.
- The **software provider Anasa** as a **processor**, under a signed Article 28 agreement. Your details are held **encrypted on the company's device** and the provider has **no technical means of reading them**. *(Exception: **every message that arrives from outside** — by email to our bookings address, by **WhatsApp**, from the **form on our website**, from your **hotel's or agency's portal**, from a **return request** entered by one of our drivers, or from a **request you send yourself from the tracking page** (receipt, return trip, extra service) — is written by the **provider's server** the moment it arrives, because the sender does not have — and must not have — our company's

secret passphrase. The message stays stored there encrypted **with the provider's own key**, meaning the provider **can technically read it**: in full, as you wrote it, together with your name, telephone number, route and note. If it is a **receipt request** from the tracking page, it also contains the **company name, VAT number and email address** you gave for the invoice. It is deleted together with the rest of your data — **3 months after the trip**, 6 at most. **The booking** derived from it is encrypted as soon as our company's first device retrieves it. In addition, for the two free-text channels — **email and WhatsApp** — the text is transmitted to an **automated reading service in the USA** so that it can be turned into a booking; that service **keeps the text for up to 30 days** for its own abuse monitoring and does **not use it to train models**. The **same** service also receives whatever **our office** pastes or photographs inside the app to turn into a booking — a message from Viber or SMS, a screenshot, or a **photo of a handwritten note** — along with everything it contains: name, telephone, route, flight, note. The website form and the hotel portal do **not** pass through that service: they arrive already in fields.)* *(Second exception: for as long as the **tracking link** we sent you lives — **up to 30 days** — the provider holds **your name and the pick-up point** — and nothing else for the link to work — in readable form, so that if you press "I'm ready" the driver's notification can say who and where. The **live vehicle position** stops earlier, a few hours after pick-up; the record itself is deleted at the end of the 30 days.)* *(Third exception: **the email we send you**. In order to be composed and delivered, your email address, your name, the pick-up point, the destination and the vehicle details pass in readable form through the provider's server and through the **email delivery service**. They are **not stored** on the provider's server: there they are composed, sent and not kept. The **email delivery service**, however, keeps a copy of the message and the delivery history for **up to 30 days** — that is how you can tell whether an email was delivered or failed — and deletes them afterwards. The only things that stay readable at the provider are what the **first**, the **second** and the **fourth** exception describe. The same applies to any email you ask for, such as the receipt.)* *(Fourth exception: **your flight number** and its time. So that the pick-up can follow the **actual landing time**, the provider's server has to match your booking against the arrivals board — which means the flight number stays **readable** to it. Our company can encrypt that too, but then flight tracking is **lost** and delay notifications become generic, per airport.)*

- **The hotel or the agency** through which the booking was made, for their own customer service.
- **Another transport company, but only if we subcontract your trip to them.** This happens when we have no vehicle or driver available at the time you need one. We then send them your **name, phone number, pick-up and drop-off, date and time, number of passengers, flight, any child seats you requested and your note** — what they need in order to collect you. We do **not** send them your price, the live tracking link, or any history of your other trips. From the moment they take the job, that company is a **controller in its own right** for carrying out the transfer. If you want to know who your trip was assigned to, ask us.
- **Google's notification service (Firebase Cloud Messaging).** When a notification is sent to the driver's or the office's phone — e.g. "the customer is ready" — its text includes **your name and the pick-up point**, so the driver knows who and where. Depending on what happened, it may also include your **destination**, your **flight number** with its time and baggage belt, and — if the booking arrived by **email** — the **subject of your message** or, where there is no subject, the **email address** you wrote from. If it arrived by **WhatsApp**, it includes the **name you appear under** there and the **first 120 characters of your message**, exactly as you wrote it. It passes through Google's infrastructure like any mobile notification.
- **Map and address-lookup providers.** To place the pick-up point or the destination on the map, the **address text** or the **coordinates** are sent to an address-lookup and route-calculation service. Your **name, phone number and booking identity are not sent** — only the location. One more thing, so you know exactly what happens: when you open the tracking page, **the map is downloaded from the tile provider directly to your device**. That means the provider sees your **IP address**, as does every website you visit. Your link is **not** revealed to it: the browser is configured to send only our site's name, never the address of your page with the trip details.
- **Meta (WhatsApp), if our company contacts you over WhatsApp.** In that case your **phone number** and the **text of the message** pass through Meta's infrastructure, as in any WhatsApp conversation. If you would rather we did not write to you there, tell us — we can use email or a phone call. *[Delete this paragraph if your company does not use WhatsApp.]*
- **The e-invoicing provider and the Greek tax authority (AADE), only if an invoice is issued** for your trip. In that case your **name** and the **email address** the receipt is sent to are transmitted, together with the amount — what tax law requires. This is not our choice: it is a **legal obligation** (Art. 6(1)(c)).
- **Nobody else.** We do not sell or make your data available for advertising.

How long we keep it

- **Your contact details** (name, telephone, email, note, tracking link, **the intermediate stops together with the names and telephone numbers of their passengers, the escort or tour guide** for the trip where there is one — name and telephone — and **the document attached** to the booking): deleted **automatically [1 / 3 / 6] months** after the trip — default **3 months**, with no option to switch this off.

- **Trip details** (date, route, amount): **[3 / 6 / 12 / 24] months** — default **12** — for the company's books.
- **If your booking came from a hotel or agency with its own portal**, a copy also stays in **that portal's history**, so the reception desk can see what it has sent us. **Your details** are deleted from there **within 6 months at the latest** — even if our company has set a shorter period for everything else. After those 6 months, and **for up to 12**, only the line **without you** remains: route, number of passengers, date and time, flight and child seats — **no name, no email, no note of yours** — so that the reception desk can prove what it submitted. At **12 months** that too is deleted.
- **The invoice** is retained for as long as tax legislation requires.
- **Backups**: up to **35 days** in addition; they are not used in normal operation.

Transfers outside Europe

Data is stored in data centres **within the EU (Belgium/Netherlands)**. Certain infrastructure providers operate globally; those transfers are covered by an **adequacy decision** of the European Commission (e.g. the EU-US Data Privacy Framework) or by **Standard Contractual Clauses (SCCs)**.

Your rights

Access · rectification · erasure · restriction · portability · objection. Contact us at **[company email]**. We reply **within one month** (Article 12(3)).

The right to object (Article 21) concerns the purposes that rely on legitimate interest.

Right to lodge a complaint: Hellenic Data Protection Authority (HDPa), 1-3 Kifissias Avenue, 115 23 Athens, Greece, tel. +30 210 6475600, **dpa.gr**.

What does NOT happen

- **No profiling** concerning you (Article 22): we do not rate you, rank you, or keep a history of your behaviour.
- **Which vehicle and which driver picks you up may be chosen automatically** — and we say so rather than leave it out. If our company has switched on the "Driver assignment: automatic" setting, the app proposes and records the vehicle by itself. The criteria are **purely operational**: vehicle capacity for your party size, whether it is free at that hour, whether it already carries the equipment you asked for (e.g. a child seat), the distance and time to your pick-up, how many trips each vehicle has already been given that day, and the size of the vehicle relative to your party. **No criterion concerns you as a person.** The choice **is shown with its reason** and **can be changed by a human** at any time; **no legal consequence** for you is produced automatically by the app *(Article 22(3))*.
- **No sale of your details to third parties**, no advertising use by third parties, no advertising profile. **One thing we say plainly, because it does happen:** if our company has it switched on, a few hours after your trip you may receive **one** email from us pointing you back to your trip page — for your **receipt**, for a **transfer back**, for **what else we run**, or for a **word about how it went**. It is sent **once** per trip and **stops immediately** if you reply that you do not want it — the message itself says so. Legal basis: **legitimate interest** (Article 6(1)(f)) and **Article 11(3) of Greek Law 3471/2006** (ePrivacy) for contacting an existing customer about a similar service, with the right to object.
- **No tracking of your own location.** The position you see on the tracking page is that of the **vehicle**, not yours.