

TMC Mobility iQ Privacy Policy

The Mobility iQ mobile and web application (the “**App**”) is a product of The Miles Consultancy, also known as TMC, which is comprised of:

The Miles Consultancy Limited, a company registered in England (company registration number 04679336) with its registered office at TMC House, Spring Farm Business Park, Minshull Vernon, Cheshire CW1 4RJ; and

The Miles Consultancy Europe Limited, a company registered in the Isle of Man (company registration number 135925C) with its registered office at Coutts House, Summerhill Road, Onchan IM3 1NW, (hereinafter referred to as “**TMC**” or “**we**”).

This policy sets out the basis on which we process your data either:

- (i) on our own behalf, as a data controller, where you are using the App as part of a trial, proof of concept or test case in order for us to develop and improve the App; or
- (ii) on behalf of your employer who has engaged us to provide the App pursuant to a services agreement between us and your employer (“**Services Agreement**”). In this context, your employer is the data controller of your personal data and we are a data processor only. We can only act with regards your personal data, on instruction of your employer, or as required of us by law.

If you do not wish to provide us with your personal data, please refrain from using the App. If you are using the App pursuant to a Services Agreement, please speak to your employer if you have any queries regarding the use of your personal data.

This policy covers:

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Information we collect from you

We may collect and process the following data about you depending upon which services your employer has requested we provide or which services you choose to use in the App:

- We will process the following information when you register an account on the App:
 - Employee name
 - Work email address
 - Employee ID (where provided)
 - Home postcode (where provided)
 - Mobile phone number (where provided)

- Favourite locations (where relevant)
 - Recent searches (where relevant)
- We will process the following additional information when you book a ride via our booking service on the App:
 - Pick-up/drop-off coordinates and address
 - Service type and date
 - Picked up/dropped off/completed ride status
- We will process the following additional information when you book a train ticket using our booking service on the App:
 - Transaction details (date and time when ticket purchased, the purchase amount, location of purchase and ticket destination)
 - Date of birth
 - Age
 - Title
 - Passport number for international travel
- We will process the following additional information when you pay for a ride or train ticket using the booking service on our App:
 - Name
 - Email address
 - Billing address (this will be your employer's address where a corporate payment card is used)
 - Credit or debit card number
 - Merchant and location
 - Purchase amount
 - Date of purchase
 - Phone number
- Where we are providing any of our services to your employer, other data we may process includes:
 - Communications with you via our customer service team
 - Data from any other third party engaged by your employer that your employer requests we process as part of our service provision (such as expenses management systems)

IP addresses

Where you access our App, we may collect information about your device, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to interested parties. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

Uses made of the information we collect

We use information held about you for the purposes set out below. Where we are processing your data for our own purposes as a data controller, we rely on the lawful basis stated below. Where we are processing data on behalf of your employer as a data processor, your employer is responsible for ensuring it has a lawful basis for processing the data.

Purpose	Lawful Basis (where we are the data controller)
To provide our services and App	Performance of a contract and legitimate interests
To authenticate your identity	Performance of a contract
To enable you to search, book and pay for rides and train tickets	Performance of a contract and legitimate interests
To provide customer service support	Performance of a contract and legitimate interests
To support and enhance our security measures, including for the purposes of mitigating the risks of fraud or illegal activity	Performance of a contract, legitimate interests and legal obligations
To contact you with service related messages	Performance of a contract and legitimate interests
To gain a better understanding of how you use our services and how we could improve user experience, our services and App	Consent and legitimate interests
To market our services and App to you in your professional capacity	Consent and legitimate interests

How we store your information

The data that we collect from you is stored on cloud servers in the UK. We maintain storage and processing practices that are designed to promote the integrity and confidentiality of personal data. We update and test our security measures on an ongoing basis and have ISO 27001 and PCI DSS accreditation. We use commercially acceptable means to protect your data but we cannot guarantee its absolute security as the transmission of data via the internet is never completely secure.

Our retention of your information

We retain your booking data (including copies of receipts) for 7 years from date of booking and your search requests and results for 12 months from date of request. This is to enable us to: (i) provide the relevant products and services and fulfil our contractual obligations to your employer; (ii) assist you and your employer should you be subject to an inspection by tax authorities; (iii) comply with our legal and other contractual obligations; and (iv) resolve disputes and enforce our agreements.

Disclosure of your information

We may disclose your personal information to any member of our group and to the following third parties:

- To your employer in order for us to provide our products and services to them where there is a Services Agreement in place between us and your employer
- To third parties who are providing ride or rail services booked via our App. These third parties have their own privacy policies which will be presented to you upon making a booking.

- To any suppliers or sub-contractors engaged by us to enable us to provide our products and service. Such suppliers or sub-contractors must comply with our data protection and security requirements
- To other suppliers providing services to TMC provided such suppliers comply with our data protection and security requirements
- Any party to whom we are under a duty to disclose your personal data in order to comply with any legal obligation, enforce our terms of use and other agreements; or to protect the rights, property, or safety of TMC, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

International Transfers

We transfer your personal data to certain service providers outside of the UK and European Economic Area in a secure manner and we ensure there are adequate safeguards in place to protect your personal data when transferred. This will usually be by including the standard contractual clauses of the European Commission/UK government in our contracts with parties outside of the UK or EEA, or relying on the European Commission/UK government adequacy decisions or other approved controls like the EU-US Data Privacy Framework (and UK extension thereto).

Your rights in relation to your information

TMC adheres to data protection laws which are applicable to us and our services. Where we are acting as a data processor, we have statutory and contractual duties to assist the data controller (your employer) with providing you with the below rights. Please note in this situation, we can only act upon the instructions of the data controller (your employer) and so any requests to enforce the below rights are the responsibility of your employer as the data controller:

- If the processing of personal data is based on your consent, you have a right to withdraw consent at any time for future processing
- You have a right to request access to and rectification of your personal data. You can view, edit or delete certain of your personal information via our App, or you may ask us to correct, update or remove information you think is inaccurate by contacting our customer service team
- You have a right to object to the processing of your personal data
- You have a right to lodge a complaint with a data protection authority
- You have the right to request a copy of the information we hold about you

Changes to our privacy policy

Any changes we may make to our privacy policy will be posted on this page and, where appropriate, updated in the App.

Contact

To withdraw your consent to any processing of your personal data by TMC, or if you have any questions, comments, requests and complaints regarding this privacy policy or your personal information, please contact data.protection@tmc.co.uk

15 July 2025