IDRIVE.IM DRIVING TUITION

COMPLIANCE & DATA GOVERNANCE PACK

CEB Ltd t/a iDrive.im Co. No: 137438C | Isle of Man
Address: 11 Ballagarey Crescent, Glen Vine, IM4 4FA
Tel: 07624 495095 | Email: chris@idrive.im

SECTION 1 – PRIVACY POLICY & STATUTORY FRAMEWORK

1. Introduction: iDrive.im (CEB Ltd) is committed to data privacy and regulatory compliance. This policy governs how personal data is collected, stored, and processed under the Isle of Man Data Protection Act 2018 and the Data Protection (Application of GDPR) Order 2018 (Manx GDPR). While operating under Isle of Man Department of Infrastructure regulation, we benchmark our operational standards against the UK DVSA Code of Practice.

2. Data Controller: CEB Ltd (Company No: 137438C), 11 Ballagarey Crescent, Glen Vine, IM4 4FA. Contacts: Christopher Edward Buxton & Beverley Anne Buxton (chris@idrive.im / bev@idrive.im).

2. INFORMATION CATEGORIES & LAWFUL BASES

We process personal information under four primary lawful bases:

- **Contractual Necessity:** Contact information, provisional licence verification, lesson bookings, payment history, and scheduling.
- **Explicit Consent:** In-car audio recording, AI speech transcription, and pupil clip sharing.
- **Legitimate Interests:** Road-facing camera footage for instructor safety, incident investigation, and insurance defence.
- **Legal Obligation:** Financial tax accounting and Isle of Man regulatory compliance.

3. IN-VEHICLE RECORDING & DASHCAM NOTICE

Each tuition vehicle is fitted with two road-facing dashcams (forward and rear). Both also record audio from inside the vehicle. The interior audio is used for lesson review, educational feedback, instructor development and progress analysis. The Dashcam video recording captures road traffic environments and pedestrians to safeguard vehicle occupants, prove incident facts, and defend insurance claims. Exterior decal signage on the vehicle indicates active camera operations.

4. DATA RETENTION SCHEDULE

Data category	Standard retention	Special / extended exceptions
Learner Records (including booking and payment records held in our booking system)	1 month post-tuition completion	Retained until full settlement if balance outstanding.
Audio / Video Footage	1 month post-lesson (copies held by iDrive.im). Audio sent to Google for processing is deleted from Google's service as soon as the review is written.	**3 years exception:** kept 3 years in collision or dispute cases (or 3 years post-18th birthday).
AI Summaries & Notes	1 month post-tuition completion (including copies in secure shared folders)	Anonymised aggregate data kept for syllabus research.
Financial Records	7 years from accounting year end	Statutory requirement under Isle of Man tax laws.

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SECTION 2 – AI PROCESSING, SERVICE PROVIDERS & GOOGLE GEMINI SAFEGUARDS

We use Google's Gemini AI service to analyse lesson recordings and draft structured learning reviews.

Data Privacy: Recordings are processed through Google's paid Gemini API service. Under Google's paid-service terms, recordings are not used to train Google's AI models, although Google may briefly retain them for security and abuse monitoring. We delete the uploaded audio from Google's service as soon as the review has been written.

Service Providers & Transfers: Google acts as our data processor, and processing may take place outside the Isle of Man under Google's data-processing safeguards. Completed reports are stored and shared with you through a secure Microsoft OneDrive folder. Phone alerts we send ourselves are generic and contain no names or lesson details.

Booking, Payment & Messaging Providers: Our website, online booking system and contact records are provided by Wix.com, which acts as a data processor and may process data outside the Isle of Man under its own data-processing safeguards. Bookings and onboarding details you submit on the website are held there. PayPal handles payments made through PayPal, and your bank handles bank transfers; we keep only a record that payment was received. We use WhatsApp (Meta) and email to contact you about your lessons.

Human Verification: All AI-generated transcripts and learning summaries are reviewed and edited by a qualified driving instructor prior to pupil delivery or storage.

SECTION 3 – COOKIE POLICY SUMMARY

Our website (www.idrive.im) uses strictly necessary session cookies to maintain secure booking tools, alongside functional and analytical cookies to evaluate site usage. Visitors can adjust cookie preferences via the website banner.

SECTION 4 – CODE OF PRACTICE & PROFESSIONAL GOVERNANCE

In accordance with best practice recommendations from the UK DVSA Code of Practice and Isle of Man Department of Infrastructure guidelines:

- **No Mobile Distractions:** Mobile phones and handheld electronics will never be operated by instructors while the vehicle is in motion.
- **In-Car Safety & Boundaries:** Instructors maintain absolute professional boundaries. Physical contact is strictly limited to emergency steering or brake interventions to avoid collision.
- **Under-18 Safeguarding:** Learner tuition for 16–17 year olds requires joint consent from a parent or legal guardian for all in-car audio/video recording and AI processing.

SECTION 5 – REGULATORY & INFORMATION RIGHTS CONTACTS

Under Manx GDPR, learners hold rights of access, rectification, erasure, and restriction. Requests for video footage containing third parties will be redacted prior to release.

DATA PROTECTION REGULATOR

Isle of Man Information Commissioner
P.O. Box 69, Douglas, IM99 1EQ
Tel: +44 1624 693260
Email: ask@inforcomm.im

ADI REGULATOR

Isle of Man Registrar of Approved Driving Instructors
Department of Infrastructure, Sea Terminal, IM1 2RF
Tel: +44 1624 686686