

Privacy Policy

Nostos Holdco Limited T/A SCS (Specialist Chauffeur Services)

Effective date: 12 October 2026

1. Introduction

Nostos Holdco Limited, trading as SCS (Specialist Chauffeur Services) (“SCS”, “we”, “our” or “us”), is committed to protecting your privacy and handling your personal data responsibly.

This Privacy Policy explains how we collect, use, store, share and protect personal data when you visit our website, make a booking, use our chauffeur and private hire services, communicate with us or otherwise interact with our business.

We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 (PECR) and other applicable legislation.

2. Data Controller and Contact Details

Nostos Holdco Limited T/A SCS (Specialist Chauffeur Services) is the data controller responsible for the personal data processed in connection with our business, except where we inform you otherwise.

Registered office:

Nostos Holdco Limited
4 Castle Street, Arete Offices, 1st Floor
Liverpool
United Kingdom
L2 0NE

Email: info@scschauffeur.co.uk

Telephone: 0203 725 4207

For questions about this Privacy Policy or how we handle your personal data, please contact us using the details above.

3. Personal Data We Collect

Depending on how you interact with us, we may collect and process the following categories of personal data.

Personal and Contact Information

Your name, address, email address, telephone number and other contact details necessary to provide our services.

Booking and Journey Information

Details of bookings and services requested, including pick-up and drop-off locations, journey dates and times, itineraries, passenger requirements, special instructions and relevant booking correspondence.

Payment and Transaction Information

Payment status, transaction records, invoices and billing information. Where payments are processed by third-party payment providers, your payment details may be collected and processed directly by those providers in accordance with their own privacy policies.

Driver and Vehicle Information

Where applicable, information relating to drivers and vehicles involved in our operations, including driving licence details, vehicle registration, insurance information, qualifications and other records required for operational, safety, insurance, licensing or legal purposes.

Communications and Customer Service Records

Records of communications with us, including emails, telephone calls, messages, customer enquiries, feedback and complaints.

Front-Facing Dashcam Footage

Our vehicles use front-facing dashcams which may record images and video of the road ahead, including other vehicles, pedestrians, road users, vehicle registration plates and surrounding locations.

We may use this footage for road safety, incident investigation, insurance claims, dispute resolution, protection against fraudulent claims and the protection of our passengers, drivers and business.

Website and Technical Information

Where applicable, technical information generated through your use of our website, including IP address, browser and device information, website usage data and information collected through cookies or similar technologies, subject to applicable consent requirements.

We aim to collect only personal data that is relevant and necessary for the purposes described in this policy.

4. How We Use Your Personal Data

We may use your personal data for the following purposes:

Providing and Managing Our Services

To process bookings, arrange chauffeur services, coordinate journeys, allocate drivers, communicate booking information and deliver the services you have requested.

Customer Service and Communication

To respond to enquiries, manage requests, handle complaints and maintain appropriate records of communications.

Payments and Business Administration

To administer payments, issue invoices, maintain financial records, manage accounts and conduct necessary business administration.

Safety and Security

To protect passengers, drivers and other road users, investigate incidents, and use front-facing dashcam footage where appropriate and lawful.

Licensing and Legal Compliance

To meet applicable legal and regulatory obligations, including relevant private hire licensing requirements administered by Cheshire West and Chester Council where applicable, and to respond to lawful requests from competent authorities.

Business History and Record-Keeping

To maintain historical booking records, support repeat bookings, resolve queries about previous journeys, manage disputes, maintain appropriate business records and protect our legitimate business interests.

Service Improvement

To review customer feedback, monitor service quality, investigate service issues and improve our operations and customer experience.

Marketing and Promotional Communications

To send information about our services, offers and updates where permitted by applicable law. Where consent is required, we will obtain it before sending such communications. You can withdraw your consent or opt out of marketing at any time.

Protecting Our Legal Rights

To establish, exercise or defend legal claims, manage disputes, prevent fraud and protect our legitimate business interests.

5. Lawful Bases for Processing

We process personal data only where a lawful basis under the UK GDPR applies. Depending on the circumstances, these bases include:

Contractual Necessity

Where processing is necessary to enter into or perform a contract with you, including managing bookings and providing requested services.

Legal Obligation

Where processing is necessary to comply with applicable legislation, including relevant licensing, financial, tax, accounting, insurance and other legal requirements.

Legitimate Interests

Where processing is necessary for our legitimate business interests, provided those interests are not overridden by your rights and freedoms. These interests may include maintaining booking histories, managing our business, ensuring safety, investigating incidents, handling complaints, improving services and protecting against fraud or legal claims.

Consent

Where we rely on your consent for a particular purpose, including certain marketing communications and non-essential cookies or similar technologies where consent is required.

You may withdraw consent at any time. Withdrawal does not affect the lawfulness of processing carried out before consent was withdrawn.

Vital Interests and Other Lawful Grounds

In limited circumstances, we may process personal data where necessary to protect someone's vital interests or where another lawful basis applies.

Where we rely on legitimate interests, we will consider the impact of the processing on your rights and interests.

6. Sharing Your Personal Data

We do not sell your personal data. We may share personal data where necessary, lawful and proportionate for the purposes described in this policy.

Recipients may include:

Drivers and Subcontracted Chauffeurs

We sometimes use third-party drivers, subcontracted chauffeur companies and other operational partners to fulfil bookings.

Where a booking is allocated to a subcontractor, we may share the relevant passenger name, contact details, pick-up and drop-off locations, journey timings, itinerary and necessary passenger instructions.

We limit the information shared to what is reasonably necessary to fulfil the booking and expect relevant subcontractors to handle personal data securely and in accordance with applicable data protection requirements.

Service Providers

Third-party organisations that support our business, including payment processors, booking systems, IT support providers, website hosts, cloud storage providers, communication platforms and other service providers.

Professional Advisers and Insurers

Accountants, solicitors, insurers, auditors and other professional advisers where necessary for legitimate business, insurance, compliance or legal purposes.

Licensing Authorities and Public Bodies

We may share relevant personal data with Cheshire West and Chester Council, where required for applicable licensing or regulatory purposes, and with other competent authorities where required or permitted by law.

Law Enforcement and Courts

We may disclose personal data to the police, law enforcement agencies, courts or other competent authorities where required by law or where disclosure is otherwise lawful and necessary.

Business Transfers

If our business is involved in a merger, restructuring, sale or transfer of assets, personal data may be disclosed to relevant parties where lawful and subject to appropriate safeguards.

Where third parties process personal data on our behalf, we take appropriate steps to ensure that suitable contractual and security arrangements are in place.

7. International Transfers of Personal Data

Some of our service providers may process personal data outside the United Kingdom.

Where personal data is transferred internationally, we will ensure that the transfer complies with applicable data protection legislation. This may include transferring data to a country recognised as providing an adequate level of protection or implementing appropriate safeguards where required.

You may contact us for further information about relevant international transfers and the safeguards used.

8. Data Retention

We retain personal data for as long as reasonably necessary for the purposes for which it was collected, taking into account our business requirements, applicable legal obligations, insurance requirements, disputes and the rights of individuals.

Different categories of information may be subject to different retention periods.

Booking Records

We currently retain booking records indefinitely as part of our business history and record-keeping practices. These records may be used to verify previous bookings, support repeat bookings, respond to historical enquiries, resolve disputes and maintain appropriate business records.

We will periodically review our retention practices and consider whether personal data remains necessary for these purposes. Where personal data is no longer required, we will consider deleting or anonymising it, subject to applicable legal obligations, legitimate retention requirements and the circumstances of the information held.

Financial and Transaction Records

Invoices, payment records and related financial information are retained for the periods required by applicable tax, accounting and other legal requirements, or for longer where a lawful and justified business need exists.

Driver and Vehicle Records

Driver, vehicle, insurance and related operational records are retained for as long as necessary for operational, safety, insurance, licensing and legal purposes, including applicable retention requirements.

Communications and Complaints

Emails, messages, customer service records and complaints are retained for as long as reasonably necessary to manage our relationship with you, address issues and maintain appropriate business and legal records.

Front-Facing Dashcam Footage

Dashcam footage is retained for a period appropriate to its purpose and the capabilities of the recording system. Footage that is not required for an incident or other legitimate purpose should be routinely overwritten or deleted in accordance with our retention arrangements.

Where footage relates to an accident, complaint, insurance claim, suspected fraud or legal proceedings, we may retain the relevant footage for longer where necessary to investigate the matter, establish facts or protect our legal rights.

We will take appropriate steps to prevent unnecessary retention of footage and restrict access to it.

When personal data is no longer required, we will securely delete it, destroy it or anonymise it, unless we are legally required or otherwise permitted to retain it.

9. Front-Facing Dashcams and Vehicle Recording

Our vehicles are equipped with front-facing dashcams that may capture images and video of the road ahead, including other road users, pedestrians, vehicles and surrounding locations.

We use dashcams for legitimate safety, security and business purposes, which may include:

- Investigating road traffic accidents and other incidents.
- Supporting insurance claims and responding to allegations or disputes.
- Protecting drivers, passengers and other road users.
- Investigating suspected fraudulent claims.
- Establishing, exercising or defending legal claims.

Our processing of dashcam footage is based on our legitimate interests where appropriate, or another lawful basis where applicable.

We will take reasonable steps to ensure that access to footage is restricted to authorised individuals and that footage is disclosed only where there is a lawful and appropriate reason to do so.

Where necessary, footage may be shared with insurers, legal advisers, law enforcement agencies, courts or other relevant parties in connection with an incident, claim or legal obligation.

Dashcam footage may capture individuals who have not directly engaged with our business. We will take appropriate steps to provide relevant privacy information and comply with applicable data protection requirements.

We will not retain footage indefinitely merely because we retain booking records indefinitely. Dashcam footage is subject to separate retention arrangements appropriate to the purpose for which it was collected.

10. Data Security

We take appropriate technical and organisational measures to protect personal data against unauthorised access, accidental loss, alteration, disclosure or destruction.

Depending on the nature of the information and the risks involved, these measures may include:

- Restricting access to authorised individuals who need the information for legitimate business purposes.
- Using appropriate technical security measures, including encryption where suitable.
- Maintaining appropriate security controls for our systems, devices and data storage.
- Reviewing our data handling and security practices periodically.
- Requiring relevant service providers and subcontractors to implement appropriate safeguards.

- Taking reasonable steps to respond to suspected data breaches and other security incidents.

Although we take reasonable steps to protect personal data, no method of electronic transmission or storage can be guaranteed to be completely secure.

11. Cookies and Website Technologies

Our website may use cookies and similar technologies to ensure the website functions correctly, remember preferences, understand website usage and, where applicable, support analytics or marketing activities.

We intend to provide a cookie and consent banner allowing visitors to make choices about non-essential cookies and relevant marketing preferences.

Where consent is required, non-essential cookies and similar technologies will not be activated before valid consent has been obtained.

Our consent mechanism will, where applicable:

- Explain the purposes for which cookies and similar technologies are used.
- Allow visitors to accept or reject non-essential cookies.
- Provide separate controls for different categories of cookies where appropriate.
- Allow visitors to change their preferences or withdraw consent.
- Record consent choices where appropriate.

Strictly necessary cookies may be used where permitted without consent. Other cookies and tracking technologies will be used in accordance with applicable legal requirements.

Accepting cookies does not automatically mean that you have consented to receive marketing communications. Where consent is required for marketing, we will obtain it separately and clearly.

Further information about the cookies used on our website, their purposes and how to manage your preferences will be provided through our cookie banner or a separate Cookie Policy.

12. Marketing Communications

We may send you marketing communications about our services, offers and updates where permitted by applicable data protection and electronic marketing legislation.

Where consent is required, we will ask you to provide it through an appropriate mechanism, such as a clearly presented and unticked consent option.

Where another lawful basis may be available under applicable legislation, we will ensure that the relevant requirements are satisfied before relying on it.

You can withdraw your marketing consent or opt out at any time by using the unsubscribe link included in a message, where available, or by contacting us at info@scschauffeur.co.uk.

We will respect your marketing preferences and maintain appropriate records of consent and opt-out requests.

Opting out of marketing will not prevent us from sending essential service-related communications, such as booking confirmations or important updates about a service you have requested.

13. Your Data Protection Rights

Under applicable data protection legislation, you may have the following rights in relation to your personal data.

Right of Access

You can request confirmation of whether we process your personal data and, where applicable, obtain a copy.

Right to Rectification

You can request that inaccurate personal data is corrected or incomplete information is completed.

Right to Erasure

You can request deletion of your personal data in certain circumstances. This right is subject to legal exceptions, including where we need to retain information to comply with legal obligations or establish, exercise or defend legal claims.

Right to Restrict Processing

You can request restriction of processing in certain circumstances.

Right to Data Portability

You may request a copy of certain personal data in a commonly used, machine-readable format or ask us to transmit it to another organisation where the legal conditions are met.

Right to Object

You may object to processing based on our legitimate interests in certain circumstances. You have an absolute right to object to the processing of your personal data for direct marketing purposes.

Right to Withdraw Consent

Where we rely on consent, you may withdraw it at any time. This does not affect the lawfulness of processing carried out before withdrawal.

Rights Relating to Automated Decision-Making

Where applicable, you may have rights in relation to decisions made solely by automated means that produce legal or similarly significant effects.

To exercise your rights, please contact info@scschauffeur.co.uk. We may need to verify your identity before responding.

We will respond within the time limits required by applicable data protection legislation. Some rights are subject to conditions and exceptions, and we will explain if we cannot comply with a request in full.

14. Children's Privacy

Where personal data relating to a child is provided in connection with a booking, we will handle that information in accordance with applicable data protection legislation and only for appropriate purposes.

15. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our business practices, data processing activities, services or applicable legal requirements.

The latest version will be published on our website, together with its effective date. Where appropriate or legally required, we may also notify affected individuals of significant changes.

16. Complaints

If you have concerns about how we collect, use or protect your personal data, please contact us first using the details provided in Section 2 so that we can seek to address your concerns.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's independent supervisory authority for data protection.

Website: <https://ico.org.uk/>

17. Contact Us

For questions about this Privacy Policy, requests relating to your personal data or other data protection concerns, please contact:

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