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Privacy Policy

How TaxiTel collects, uses and protects personal data

TAXITEL

ISSUED BY

MHD Nael Almallah & His Partners Co. (TaxiTel)
Ground transportation across Syria since 2004 · Offices in Aleppo and
Damascus

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OWNER / REVIEW

Legal Department Manager · Reviewed at least annually

APPROVED BY

Mohamed Almallah, Managing Director

CLASSIFICATION

Shareable with clients and business partners

Document Control

Title	Privacy Policy
Issued by	MHD Nael Almallah & His Partners Co. (TaxiTel)
Document no. / version	TT-POL-002 · v1.0
Owner	Legal Department Manager
Applies to	Personal data of passengers, client staff, website visitors, drivers, employees and suppliers; binding on all staff, drivers, freelance car owners and suppliers who handle it
Approved / next review	September 2026 / September 2027 (reviewed at least annually)
Classification	Shareable with clients and business partners
Basis	Consolidates the confidentiality standards applied under TaxiTel's contracts with UN agencies and international NGOs and its Driver Conduct and Service Quality Handbook

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SECTION 01

1 Introduction and Our Commitment

Privacy at TaxiTel

Every day, TaxiTel moves people whose safety and privacy depend on us: staff of United Nations agencies and international NGOs, business travellers, families and individual passengers. Knowing who travels, when and where is sensitive information. We treat it with the same care we apply to the journey itself.

This Privacy Policy explains what personal data we collect, why we collect it, how we protect it, who we share it with, how long we keep it, and the rights people have over their data. It brings together, in one written document, the confidentiality standards TaxiTel already works under in its contracts with United Nations agencies, international NGOs and other partners, and in its Driver Conduct and Service Quality Handbook.

Privacy at a glance

- We collect only the data we need to provide safe, reliable transport and to run our business.
- We **never sell** personal data, and we do not use it for advertising profiles.
- Trip details — who travelled, when and where — are confidential. Our staff and drivers may not disclose them.
- Access to our systems is restricted by role, so staff see only what their job requires.
- You can ask to see, correct or delete your data at any time by contacting us (Section 19).

SECTION 02

2 Who We Are

The organisation responsible for your personal data (the **data controller**) is **MHD Nael Almallah & His Partners Co.**, trading as **TaxiTel**, a ground transportation company operating across Syria since 2004, with offices in Aleppo and Damascus.

When TaxiTel provides transport under a contract with a client organisation, that organisation may also be a controller of its own staff's data and may give us instructions on how to handle it. In that case we follow the client's instructions and the data-protection terms of the contract, in addition to this Policy.

The **Legal Department Manager** is responsible for this Policy and for all data-protection matters at TaxiTel, including handling requests from individuals, advising staff, and managing any data breach. The Policy is approved by the Managing Director. Contact details are in Section 19.

SECTION 03

3 Scope

This Policy applies to personal data about:

- **passengers and individual customers** who book rides, intercity trips, airport transfers or vehicle rentals;

- **staff and representatives of client organisations**, including UN agencies, NGOs and companies, who request, approve or use our services;
- **visitors to our website** (taxitel.co) and people who contact us by phone, WhatsApp, email or social media;
- **drivers, employees and job applicants**;
- **freelance car owners, suppliers and other business contacts**.

It covers data handled by TaxiTel in Syria and on cross-border routes to Lebanon and Jordan, in any form — electronic or paper. All TaxiTel owners, staff, drivers, freelance car owners and suppliers who handle personal data on our behalf must follow it.

SECTION 04

4 Personal Data We Collect

Category	Examples
Identity and contact data	Name, phone number, email address, organisation and job title; for cross-border trips, passport or ID details only where required for the journey.
Booking and trip data	Pickup and drop-off locations, routes, dates and times, number of passengers, vehicle and driver assigned, flight details for airport transfers, special requests.
Billing data	Contract and invoice details, trip prices, payment records and the contact details of billing staff at client organisations. We do not store payment-card numbers.
Communications	Messages and calls with our dispatch desk, quote requests, feedback and complaints.
Website data	Information you enter in our quote form, and basic technical data (such as IP address and browser type) that is necessarily processed when a web page is delivered.
Driver and employee data	Identity and contact details, driving licence and vehicle documents, employment records, shift schedules, attendance and leave, pay and cash advances, training, conduct records and vehicle assignments.
Vehicle and operational data	Vehicle usage, kilometres, fuel fills and maintenance records, which may be linked to the driver responsible.
Supplier data	Names and contact details of freelance car owners, workshops and suppliers, ownership and vehicle documents, and the results of sanctions screening.

SECTION 05

5 How We Collect Personal Data

- **Directly from you** — when you book a trip, request a quote, call or message us, apply for a job, or sign a contract with us.

- **From client organisations** — when an organisation books transport for its staff or visitors and gives us their names, contact details and itineraries.
- **During the service** — when our drivers and dispatch staff record trips, times, kilometres and incidents.
- **From our own systems** — our internal management system records bookings, fleet movements, fuel, maintenance and invoicing.
- **From public or official sources** — for example, sanctions lists used to screen suppliers and partners.

SECTION 06

6 Why We Use Personal Data and Our Legal Basis

Purpose	Legal basis
Arranging and delivering trips, dispatching drivers, and contacting passengers about their journey	Performance of a contract; legitimate interest in delivering a safe, reliable service
Invoicing, collecting payment and keeping accounting records	Performance of a contract; legal obligation
Reporting trip logs, utilisation and incidents to client organisations as agreed in their contracts	Performance of a contract
Passenger and driver safety, journey management, and responding to accidents and incidents	Legitimate interest; protection of vital interests in emergencies
Managing drivers and employees: payroll, attendance, leave, training and conduct	Employment contract; legal obligation
Answering quote requests, enquiries and complaints	Legitimate interest; steps taken at your request before a contract
Screening suppliers and partners against sanctions lists; preventing fraud and corruption	Legal obligation; legitimate interest
Complying with laws, court orders and requests from competent authorities	Legal obligation

Purpose	Legal basis
Sending service updates or offers by message or email	Consent, which you can withdraw at any time

SECTION 07

7 Location and Trip Data

Location data reveals where people live, work and travel, so we apply extra care to it:

- We use pickup points, destinations and routes only to deliver the trip, bill it, report it to the client under contract, and handle safety incidents.
- Trip details of client organisations and their staff are treated as **confidential**. Drivers and staff may not discuss who they transported, where or when, with anyone outside their work.
- If we use vehicle location technology, it is used for dispatch, safety, fleet management and billing accuracy — not to monitor drivers or passengers for any unrelated purpose.
- We do not share location or trip data with third parties for marketing, and we never sell it.

SECTION 08

8 Sharing Personal Data

We share personal data only where necessary, and only with:

- **The assigned driver** — the passenger's name, phone number, pickup and drop-off details, and any information needed for the trip.
- **Client organisations** — trip records and reports about journeys made by their staff, as required by their contracts.
- **Freelance car owners and their drivers** — when they perform a trip on our behalf, under our confidentiality rules.
- **Service providers** who support our operations, such as hosting and database providers, email and messaging services, and IT support. They may use the data only to provide their service to us.
- **Business partners** with whom we operate a joint or licensed service, where necessary for that service and under written terms that protect the data.
- **Authorities** — police, courts, border and other competent authorities, only where required by law or needed to protect someone's safety.
- **Professional advisers and auditors** — including clients and donors exercising contractual audit rights.

What we never do

We do not sell personal data, rent it, or share it with third parties for their own marketing.

SECTION 09

9 International Transfers

Some of the technology services we use, such as cloud hosting, email and messaging platforms, may store or process data on servers outside Syria. Our clients and business partners may also be based outside Syria. When personal data is transferred abroad, we:

- use established providers that apply recognised security standards;
- transfer only the data needed for the purpose;
- follow any transfer requirements in our clients' and partners' contracts, including the use of appropriate contractual safeguards where required.

SECTION 10

10 How We Protect Personal Data

- **Role-based access** — our management system gives each staff member access only to the modules and data their role requires. Financial and pricing data is restricted to authorised administrators.
- **Individual accounts** — staff use personal logins; accounts are removed when someone leaves the company.
- **Confidentiality** — every employee and driver is bound by confidentiality rules. Drivers may not photograph passengers, post about them on social media, or disclose trip details without permission.
- **Paper records** — contracts, forms and documents are kept in secured offices and shared only with authorised staff.
- **Suppliers** — providers who handle personal data for us must protect it and use it only on our instructions.
- **Minimisation** — we collect only what we need, and we avoid collecting sensitive data, such as health or religious information, unless it is genuinely needed and provided voluntarily (for example, a passenger's mobility-assistance request).

SECTION 11

11 Data Breaches

If personal data is lost, disclosed or accessed without authorisation, TaxiTel will act promptly to contain the incident, assess the risk and prevent it from happening again. We will inform affected client organisations and business partners within any period set in their contracts, and inform affected individuals where the breach is likely to put them at risk. Staff and drivers must report any suspected breach — such as a lost phone containing passenger details — to their manager and to the Legal Department Manager immediately.

SECTION 12

12 How Long We Keep Personal Data

Type of data	Retention period
Accounting, invoicing and contract records	5 years, or longer where a client contract or the law requires
Trip and booking records	5 years, as part of accounting and client reporting records
Driver and employee records	For the duration of employment and up to 5 years afterwards
Unsuccessful job applications	Up to 12 months
Quote requests and enquiries that do not lead to a booking	Up to 24 months
Supplier and freelance car owner records	For the duration of the relationship and up to 5 years afterwards

The full retention schedule is set out in our Records Management and Data Retention Policy (TT-POL-003). When data is no longer needed, it is securely deleted or anonymised. Data involved in a dispute, investigation or audit is kept until the matter is closed.

SECTION 13

13 Your Rights

Subject to applicable law, you may ask TaxiTel to:

- **access** the personal data we hold about you and receive a copy;
- **correct** data that is inaccurate or incomplete;
- **delete** your data where we no longer have a valid reason to keep it;
- **restrict or object** to certain uses of your data, including direct messages about our services;
- **withdraw your consent** at any time, where we rely on consent.

We will respond within **30 days**. We may need to confirm your identity first. Some requests may be limited where we must keep data to meet a legal or contractual obligation — for example, invoices for trips already billed to a client. If you travelled under a client organisation's booking, we may coordinate our response with that organisation.

SECTION 14

14 Children

Our services are booked by adults and organisations. Where children travel, for example with their families, we process only the minimum information needed for the trip, and we deal with the parent, guardian or

organisation responsible for them.

SECTION 15

15 Our Website

Our website, **taxitel.co**, is designed to collect as little data as possible:

- The **quote form** collects your name and phone number and, optionally, your organisation, email address, route, date and notes. We use this only to answer your request.
- Choosing **“Send via WhatsApp”** opens WhatsApp with your message. Your use of WhatsApp is also governed by WhatsApp's own privacy terms.
- The website does **not** use advertising or analytics tracking. Fonts are loaded from Google Fonts, which means your browser's IP address is visible to Google when the page loads.
- Links to our Facebook and Instagram pages lead to services governed by their own privacy policies.

If we add analytics or other tracking in the future, we will update this Policy first.

SECTION 16

16 Driver and Employee Data

We hold data about our drivers and employees to manage their employment: identity and contact details, licences, schedules, attendance, leave, pay and cash advances, training, conduct records and vehicle assignments. This data is used only for employment, safety, legal and operational purposes, is accessible only to staff who need it, and is not shared outside TaxiTel except with service providers acting for us, clients where a contract requires driver details (for example, vetting of drivers assigned to a client), or authorities where the law requires. Drivers and employees have the rights described in Section 13.

SECTION 17

17 Responsibilities of Staff and Drivers

Everyone at TaxiTel who handles personal data must:

- use it only for the job, never for personal purposes;
- keep trip details confidential — including who was transported, where and when;
- never photograph, record or post about passengers without their explicit permission;
- keep phones and devices that contain passenger or client details locked, and report their loss immediately;
- share personal data only through company channels and only with people who need it;
- report any suspected breach or misuse to their manager or the Legal Department Manager.

A breach of these rules may lead to disciplinary action, up to and including dismissal.

SECTION 18

18 Changes to This Policy

The Legal Department Manager reviews this Policy at least once a year, and whenever our services, systems or legal requirements change. The current version is available on our website and from our offices on request. Significant changes will be communicated to our clients and business partners.

SECTION 19

19 Contact Us

Data-protection contact	The Legal Department Manager, TaxiTel
Email	info@taxitel.co — marked “For the attention of the Legal Department Manager”
Offices	Damascus: 011 9338 · Aleppo: 021 9985
WhatsApp	+963 944 999985
Website	taxitel.co

If you have a concern about how we handle your data, please contact us first — we will do our best to resolve it.