

Motorway Direct Plc

Privacy Notice

This privacy notice explains how we use any personal data we collect about you and we shall always be transparent with you on how we use your personal details. The Data Protection Act 1998 states that organisations must be open about what information they collect and how they intend to use it.

We've created this policy to explain how we...

- Collect;
 - Use;
 - Disclose;
 - Transfer;
 - Store;
- ...your personal data.

This policy also explains how you can access the personal data that we hold about you and how to raise a query or a complaint about how we process your personal data.

Who are Motorway Direct Plc (MWD)?

Motorway Direct Plc (MWD) are an administrator of guarantee products and insurance policies, we also sell motor-related insurance policies and pet insurance policies direct to the public. We are a Data Controller for these purposes. We process personal information to enable us to promote our services, support our accounts and records and to look after and manage our staff.

We operate under our own trading styles of:

- Car Protect (www.carprotect.co.uk);
- Protect Your Pet (<https://protect-your-pet.com>);
- Business & Domestic Insurance Services (www.businessanddomestic.co.uk);
- AA Warranty (www.aawarranty.co.uk).

AA Warranty is a trademark of AA Group of Companies and is used with its permission under licence to MWD.

CCTV

At MWD we use CCTV systems for the safety and security of our employees and property. For further information contact our Head Office at Warranty House, Savile Street East, Don Valley, Sheffield, South Yorkshire, S4 7UQ.

Data Security

We employ a number of organisational and technical measures to protect the personal data that we hold. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose any personal information to you. We review and amend these practices regularly to ensure we meet our data protection obligations.

What information do we collect from you?

The information we collect about you will depend on your relationship with us. To read the right privacy notice for you, please view the relevant category below:

- Policyholders / Product holders
- Potential customers
- Job applicants, current & former employees (including retired employees)
- People who telephone us
- People who email us
- People who visit our websites

Policyholders / Product holders

We hold the details of the people who have requested the product or service in order to provide it. In this instance, our legal basis for data processing will be the performance of that contract.

The source of the personal data we hold will be from the sales distributor, or in respect of our direct sales activity, from the customer themselves.

Typically, the data we hold will include contact details (such as name, address, phone, email), data on the covered item (in the case of motor-related products details such as the make, model and registration number of the vehicle and in the case of pet insurance details such as the name, age and breed of your pet). We often hold payment details, such as a sort code and account number if you are paying by direct debit. We will also hold details of our customer's interactions with us, such as contact with our Customer Service Team and/or claims history.

We only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who use our products and services to carry out a survey to find out if they are happy with the level of service they receive from us.

We may share data with other organisations to provide our customers with the service they have requested, such as passing on your name, contact number and vehicle's make and model to a Motor Repairer when a vehicle goes in for a repair when a claim is made. When doing so we will only share the minimum amount of data with them. We will not share your personal data to third parties unless we have your permission or are required to do so by law.

We will store your personal information safely for the duration of the contract and then for a further three years after the contract has been terminated. The data will then be destroyed. All personal information is accessed only by authorised members of the team on a need to know basis.

We back data up regularly to prevent loss or damage, all files are encrypted before they are backed up on separate servers.

MWD Marketing (Policyholders / Product holders)

MWD or any of our Trading Styles may contact you for the purposes of direct marketing. This means that MWD may use your personal data that we have collected according to this Privacy Policy to contact you about products that you have purchased and to tell you about MWD's services and special offers.

Whenever we collect your personal data you have the right to amend or withdraw your consent to receiving these direct marketing communications at any time by doing one of the following:

- email us at customerservices@motorwaydirect.co.uk and we will amend your preference for you;
- tick the relevant preference box where provided on communications that we send you or when you take out a policy with us;
- contact us on 03300 555 262;
- Write to us at Motorway Direct Plc, Customer Services, Warranty House, Savile Street East, Sheffield, S4 7UQ

MWD will not share your data with other companies for marketing purposes without your consent.

Potential Customers (MWD Marketing)

MWD have a direct sales team who contact individuals to discuss with them the benefits of our products and services. We use third-party data providers to buy in marketing data such as Omnis Data (Omnis) who supply us with the data we need to make the call. Our data provider ensures all our data is opt-in for marketing purposes and that it is not TPS registered.

We request from Omnis the minimal data needed for us to make the call (such as a name, address and phone number). We also impose tight criteria to ensure our marketing activity is as focused and relevant as we can make it (for example only requesting opt-in data on individuals whose vehicles fall within a certain age and/or mileage limit).

We will store this information safely for the duration of the telesales campaign. All our telesales campaign data is "one-time use" which means that if someone does not wish to take up a product or service with us, we will respect the customers wishes and will not attempt to contact them again at that time. We will retain the minimum details of their data to ensure that we honour this commitment, such as placing their phone number on a "do not dial" list if requested. The data on the "do not dial" list is anonymised.

Job applicants, current and former employees

When individuals apply to work at MWD, we will only use the information they supply to us. This information is used to process their application and to monitor recruitment statistics.

Where we want to disclose information to a third party, for example where we want to take up a reference, we will not do so without informing the applicant beforehand. We do sometimes use a third-party Recruitment Agency for some of our recruitment activities.

The minimal amount of personal information about unsuccessful candidates will be held for six months after the recruitment exercise has been completed, it will then be destroyed.

Once a person has taken up employment with MWD, we will compile a file relating to their employment. This information will be kept securely on our server and will only be used for purposes directly relevant to that person's employment.

We will need to share some of their data with other organisations only as required for their employment such as for right to work, tax, payroll, and pension administration purposes. Once their employment with MWD has ended, we will retain the file in accordance with the requirements of our retention schedule and then destroy it.

People who telephone us

When you call MWD we collect Calling Line Identification (CLI) information. We use this information to help improve our communications' efficiency and effectiveness. We record and monitor phone calls for monitoring compliance with office policy.

People who email us

Any email sent to us, including any attachments, may be monitored for monitoring compliance with office policy. Blocking (spam) software may also be used.

People who visit our websites and Cookies

From time to time MWD may use Cookies on our websites. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, work more efficiently as well as provide information to the owners of the site.

When someone visits one of our websites we use a third-party service, called Google Analytics, to collect standard internet log information and details of visitor behaviour patterns.

We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

To opt out of being tracked by Google Analytics across all websites visit: <http://tools.google.com/dlpage/gaoptout>

Links to other websites

From time to time MWD may offer links to other companies on our own websites, however once you have used these links to leave our sites you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy notice. You should exercise caution and look at the privacy notice applicable to the website in question.

Data Transfer Overseas

We, or the insurer, may transfer your information if applicable to the product/service outside of the European Economic Area (EEA), for example the United States of America. We or the Insurer will only do this where it is necessary for the conclusion, or performance of your contract. We will ensure that suitable safeguards are in place before transferring any data overseas.

Sharing your data with third-party service providers

We employ other companies and individuals to perform functions on your behalf. Examples include processing direct debit details, storing of personal data and providing our customers with the service they have requested. When processing payment card transactions, MWD use third-party payment services companies such as World Pay, to ensure that all payments are safe, secure and protected against fraud. The third-party service providers may have access to the personal information required to perform their functions, but will not use it for any other purpose and must process the personal information in accordance with this privacy notice and as permitted by applicable data protection laws.

Automated Decision Making

MWD does not undertake any automated decision making.

Profiling

MWD may make use of profiling methods to produce relevant communications, product development and ensure a better experience for our customers. Profiling can help us target our resources more effectively by gaining an insight into our customers, which we can then produce relevant communications to your service requirements. Examples include, analysing performance at work for our employees, personal preferences towards direct marketing and location information such as when we find your nearest motor repairer in case of a claim.

How to access the information we might hold about you

MWD tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a "subject access request" under the Data Protection Act 1998. If we do hold information about you, we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who your data could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to us for any personal information we may hold about you, or to ask us to correct any mistakes, or to have your data erased, please put the request in writing to our Customer Services Team at the address or email below:

Post:

Motorway Direct Plc, Customer Services, Warranty House, Savile Street East, Sheffield, S4 7UQ

Email:

customerservices@motorwaydirect.co.uk

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

Complaints or queries to us

MWD tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously.

If you think that our collection or use of information is unfair, misleading or inappropriate, we encourage people to bring it to our attention. We would also welcome any suggestions for improving our procedures.

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for three years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

This privacy notice is drafted with conciseness and clarity in mind. It does not provide exhaustive detail of all aspects of MWD and its trading styles with the use of personal information. However, we are happy to provide any additional information or explanation where needed. Any requests for this please write to MWD to the address provided overleaf.

How to contact MWD

Tel:
03300 555 262

Email:
customerservices@motorwaydirect.co.uk

Post:
Customer Services, Motorway Direct Plc, Warranty House, Savile Street East,
SHEFFIELD, S4 7UQ

Complaints or queries to the Supervisory Authority

The UK's supervisory authority for data protection is the Information Commissioner's Office (ICO). If you feel that we haven't handled your complaint or request in an appropriate manner, you can contact the ICO directly via:

Phone: 0303 123 1113

Web: <https://ico.org.uk/concerns/>

Email: <https://ico.org.uk/global/contact-us/email/>

Post: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Our registered details

Our registered office is: Warranty House, Savile Street East, Sheffield, South Yorkshire, S4 7UQ (registered No 3222540 England, Group VAT registration No 804050184).

We are also registered with the:
Information Commissioner's Office – Z5321981.
Financial Conduct Authority – 311741.

Changes to this privacy policy

We keep our privacy policy under regular review. This privacy notice was last updated on 31/10/2017.