

Motorway Direct Plc

Privacy Notice

Our privacy notice explains how we use the personal data we collect about you and we shall always be transparent with you on how we use your personal details. Motorway Direct Plc cares about protecting your personal information and your privacy, we will always treat your personal data with the highest standards of confidentiality and security.

Where, we do collect, store or use your personal data, Motorway Direct Plc will comply with the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003 (PECR).

The GDPR states that organisations must be open about what information they collect, how they intend to use it and how they store your personal information.

We've created this policy to explain how we...
Collect, use, disclose, transfer and store your personal data.

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

Our privacy notice is drafted with conciseness and clarity in mind. It does not provide exhaustive detail of all aspects of Motorway Direct Plc and our own brands with the use of personal information. However, we are happy to provide any additional information or explanation where needed. Please write to Motorway Direct Plc at the address provided in the 'How to contact Motorway Direct Plc' section of this Privacy Notice.

About Motorway Direct Plc

Motorway Direct Plc are an administrator of guarantee products and insurance policies. We also sell motor-related insurance policies and pet insurance policies direct to the public and for the purposes of GDPR we are the 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 brands 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 (The AA) and is used with its permission under licence to Motorway Direct Plc.

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).

Who is Motorway Direct Plc also registered with?

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

How to contact Motorway Direct Plc

You can contact us in one of the following ways:

- Phone: 03300 555 262;
- Email: customerservices@motorwaydirect.co.uk;
- Post: Customer Services, Motorway Direct Plc, Warranty House, Savile Street East, Sheffield, S4 7UQ;
- If you are a customer through the customer portal.

What information do we collect from you?

The information we collect about you will depend on the context of your relationship with us. So that we can be as transparent as possible we have split our privacy notice into separate categories. To read the right privacy notice for you, please view the relevant category(s) below:

- [Policyholders / Product holders](#)
- [Motorway Direct Plc Marketing - Policyholders / Product holders](#)
- [Motorway Direct Plc Marketing - Potential customers](#)
- [Job applicants, current & former employees - including retired employees](#)
- [Motorway Direct Plc e-learning \(employees and third-party suppliers\)](#)
- [Visitors to Motorway Direct Plc](#)
- [Motor Dealers](#)
- [People who telephone us](#)
- [People who email us](#)
- [Children](#)
- [People who visit our websites](#)
- [What should I do if my personal information changes?](#)
- [Your Rights](#)

Policyholders / Product holders

Data Protection laws require us to have a lawful basis for processing your personal data. Our lawful basis for data processing will be the performance of that contract, and we hold the details of the people who have requested the product or service to provide it. For example, where we process your personal data for the contract of your product or fulfilling our service to you.

Typically, the data we collect and hold about you will include, contact details (for example name, address, phone, email), data on the covered item (in the case of motor-related products the make, model and registration number of the vehicle and in the case of pet insurance the name, age and breed of your pet), 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. For example, contact with our Customer Service Team and/or claims history. We only use these details, so we can contact you about an enquiry you have made, to contact you if there is a problem with your claim, to provide the service you have requested and for other closely related purposes.

From time to time 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.

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.



We may share data with other organisation's or third parties 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.

For insurance products, we will share your data with the insurer. We work with a number of insurance underwriters including, but not limited to, AmTrust International DAC, UK General Insurance Ltd, Zenith Insurance and Collinson Insurance Services Ltd. The name of your insurer is stated in your policy document. When sharing your data, we will share the minimum amount of data with them.

We may share your personal data with the AA. This could include, but is not limited to, complaints information, claims information, or AA warranty branding statistics. Typically, the data we share with The AA will include customer contact details and details of the area of concern.

We will store your personal information safely for the duration of the contract and then for a further three or six years (depending on your relationship with us), 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 our separate servers.

Motorway Direct Plc Marketing - Policyholders / Product holders

Motorway Direct Plc or any of our own brands may contact you for the purposes of direct marketing.

The lawful basis for contacting you, will be either consent or legitimate interests depending on the nature of how we first received your business. This means that we may use your personal data to tell you about Motorway Direct Plc's services and special offers in accordance with this Privacy Notice.

Whenever we collect your personal data, you have the right to amend or object to receiving these direct marketing communications at any time, by contacting us in one of the following ways:

- visiting our customer portal;
- email us at customerservices@motorwaydirect.co.uk and we will amend your preference for you;
- phone us on 03300 555 262;
- in writing to Motorway Direct Plc, Customer Services, Warranty House, Savile Street East, Sheffield, S4 7UQ.
- unsubscribe where provided on communications that we send you or when you take out a policy with us;

Motorway Direct Plc will not share your data with other companies for marketing purposes without your consent.

Motorway Direct Plc Marketing - Potential Customers

From time to time, Motorway Direct Plc may contact potential customers to discuss the benefits of our products and services. Where we do market to potential customers we will buy in marketing data from a third-party who will supply us with the data we need to make the call.

We will only contact you where you have consented to our data provider to pass your details onto ourselves and will ensure all our data is opt-in for marketing purposes and that it is not TPS registered.

Job applicants, current & former employees - including retired employees

Data Protection laws require us to have a lawful basis for processing your personal data, our lawful basis for processing employee data will be either contract, legal obligation or legitimate interests depending on the type of processing.

For example, legal obligation will be the lawful basis where we are required to process data and disclose employee salary details to the HMRC. The contract lawful basis will be where we process employee data for the contract of their employment and legitimate interests is used where for example we monitor our sales staff for competency and to see if there is a training need required.

Job Applicants

When individuals apply to work at Motorway Direct Plc, we will only use the information they supply to us to assess their suitability for the role they have applied for. This information is used to process their application and to monitor recruitment statistics.

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.

We do sometimes use a third-party Recruitment Agency for some of our recruitment activities. Where we want to disclose information to a third party, for example where we want to take up a reference, we will obtain permission from the applicant beforehand, this information will then be held in the employee's file.

Where a job applicant applies through a third-party Recruitment Agency, we recommend they read the privacy notice or statement of the third-party Recruitment Agency prior to using them.

Current and Former Employees

Once a person has taken up employment with Motorway Direct Plc, we will compile an employee file relating to their employment, this will be retained by us for the duration of your employment plus 6 years following the end of your employment and then destroyed securely. This information will be kept securely 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.

Pre-employment checks

It is a legal requirement to ensure that all our staff are of good repute and we may perform background checks to this end.

For example, we may perform bankruptcy checks via the Individual Insolvency Register (IIR) which is a public record. We may also request a basic disclosure criminal conviction check via the Disclosure and Barring Service (DBS) formerly the Criminal Records Bureau (CRB).

Our lawful basis for processing this data will be legal obligations and legitimate interests.

In the eventuality you object to these checks, we may be unable to employ you, or you may be unable to continue in your current role.

Further information relating to your employment can be found in our employee privacy notice.

Motorway Direct Plc e-learning (employees and third-party suppliers)

We operate an e-learning training system which is provided by a third-party supplier. Details of our current supplier can be requested via Customer Services.

The personal data we collect is limited typically to: name, email address and job/department title. This information will be processed so we can create individual log-ins and a personal learning experience.

Motorway Direct staff

The lawful basis of processing data will be legitimate interests and legal obligation. For example, to ensure appropriate staff complete the training required to perform their role and to provide evidence for minimum training requirements to the regulator.

Non-Motorway Direct staff

The lawful basis of processing data will be performance of a contract. For example, to provide e-learning modules appropriate to product knowledge or other training needs as requested.

Visitors to Motorway Direct Plc

Where your visit is planned, your name and visit information will be passed to our reception. On your arrival you will be asked to sign in and out of reception and will be asked to complete a visitor pass. A visitor pass must be worn throughout your visit and all passes will be destroyed when you leave our premises.

The lawful basis we rely on to process your personal data is legitimate interests, the purpose for processing this information is for security and safety reasons.

CCTV operates outside and within some sections of the building for security purposes. Please see the 'Closed-Circuit Television (CCTV)' section of this privacy notice.

Motor Dealers

Our lawful basis of processing your personal data will be performance of a contract. For example, managing our relationship with you, setting you up as one of our motor dealers or general day to day administration.

The personal data we will collect from you will include your name and position with the company, your dealership name, address, telephone number, company details (such as Companies House Information, FCA and ICO registration details).

The source of the personal data we hold about you will be from us at the inception of your contract and through ongoing account management communications (BDM and Sales Support).

Where you are an AA warranty motor dealer, we will share your contact details with the AA. From time to time the AA may contact you with information around their other products and services.

People who telephone us

When you call Motorway Direct Plc we collect Calling Line Identification (CLI) information, this is the phone number you are calling from (if it isn't withheld). 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.

Children

We do not actively collect or store any personal information about children under the age of 16 and we do not provide services directly to children or proactively collect their personal information. However, we are sometimes given information about children while dealing with a claim or handling a complaint.

People who visit our websites and cookies

From time to time, Motorway Direct Plc 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, function 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. To opt out of being tracked by Google Analytics across all websites visit: <http://tools.google.com/dlpage/gaoptout>.

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 make it clear when we collect your personal information and will explain what we intend to do with it.

What should I do if my personal information changes?

So that we can ensure we only hold accurate and up to date information, please let us know if any of your contact details change (for example name, address, phone, email).

To change your personal information, please contact our Customer Services team, their contact details are provided in the 'How to contact Motorway Direct Plc' section of this privacy notice.

Your Rights

Under the new data protection laws, you are in control of your personal data, and may have the following rights:

- Right of access - you have the right to request a copy of all the personal information that we have about you, for us to locate your personal data, we will need you to provide as much information as possible. We will ask you for identification to confirm we are communicating with the right person.
- Right to rectification - you have the right to ask us to update information that we hold about you where it is incorrect or incomplete.
- Right to erasure - in certain circumstances, you have the right to request the deletion of your personal data. For example, where processing is no longer necessary for the purposes in which the data was collected.
- Right to object - you can object to processing where we have contacted you for marketing purposes under legitimate interests. We must then cease processing unless we can demonstrate compelling legitimate grounds for the processing or the processing is for legal claims.
- Right to restrict processing - you can ask us to stop processing your data (so we cannot make any further changes, delete, or share it). For example, this could be where you wish to challenge the accuracy of data or where you make use of your 'Right to Object'.
- Right to withdraw consent - you have the right to amend your contact preferences at any time by either visiting our customer portal or contacting our Customer Services department.
- Right to portability - you have the right to ask that we transfer the information you gave us from one organisation to another or give it directly to you. (This only applies to information you have given us).

If you would like to exercise any of these rights, please contact our Customer Services team, their contact details are provided in the 'How to contact Motorway Direct Plc' section of this privacy notice.

How long do we keep hold of your personal data?

We will hold onto your personal data only for as long as is necessary for the purpose in which it was provided to us or collected in line with our retention policy (e.g. for as long as is necessary to provide any services requested by you or to respond to your queries).

Where processing is based on your consent, we shall only process your data until such time as you withdraw your consent.

If you would like further information on our retention policy, please contact our Customer Services team provided in the 'How to contact Motorway Direct Plc' section of this privacy notice.

Links to other websites

From time to time Motorway Direct Plc could offer links to other websites. We have no control over these websites and are not responsible for their content. This privacy notice does not extend to your use of these websites and we recommend you read the privacy notice or statement of the other websites prior to using them.

Sharing your data with third-party service providers

We employ other companies and individuals to perform some functions on our behalf. For example, processing direct debit details, storing of personal data and providing our customers with the service they have requested.

When processing payment card transactions, Motorway Direct Plc use third-party payment service 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 they 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.

Profiling

Motorway Direct Plc 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, this will enable us to produce relevant communications to your service requirements. Examples include, analysing performance at work for our employees, personal preferences and buying habits towards direct marketing and location information such as when we find your nearest motor repairer in case of a claim.

Automated Decision Making

Motorway Direct Plc does not undertake any automated decision making.

Data Security

Motorway Direct Plc place great importance on the security of your personal information and we always try to take appropriate precautions to protect it. We employ several organisational and technical measures to protect the personal data that we hold. We have physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information.

Our security procedures mean, that occasionally we may 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.

Data Transfer Overseas

We, or the insurer, may transfer your information 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 or where personal data is stored in the cloud and the relevant servers are located overseas. We will in these circumstances ensure that suitable safeguards are in place to protect your personal data before transferring any data overseas.

Closed Circuit Television (CCTV)

At Motorway Direct Plc 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.

Complaints or queries to us

Motorway Direct Plc tries to meet the highest standards when collecting and using personal information.

For this reason, we take any complaints we receive about us 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, we will make up a file containing the details of the complaint. This typically 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 may 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 our 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.

Complaints or queries to the Supervisory Authority

Where you feel that we haven't handled your complaint or request in an appropriate manner, all individuals have the right to complain directly to the UK's supervisory authority, the Information Commissioner's Office (ICO).

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.

Changes to our privacy notice

We keep our privacy notice under regular review and we will place any updated versions on this page. This privacy notice was last updated on 19/11/2018.