

# Privacy Notice

## About Motorway Direct Plc

Motorway Direct Plc (we/us/our) is a third-party administrator of products and services distributed by other corporate entities, predominantly in the motor trade. Your product documentation will confirm whether we are the administrator of your product. Although we no longer sell insurance products directly to the public, we have done so in the past. We continue to be the administrator of those products.

Our own brands are:

Car Protect

Protect Your Pet

Business & Domestic Insurance Services \*1

AA Warranty \*2

The Motoring Organisation \*3

\*1 Motorway Direct Plc sold Business & Domestic Insurance Services to Blink Innovation (UK) Limited on 11/09/2019.

\*2 AA Warranty is a trademark of AA Group of Companies (The AA). This trademark was used with The AA's permission under licence to Motorway Direct Plc until 29/02/2020.

\*3 Motorway Direct Plc ceased using the trading style "The Motoring Organisation" on 29/01/2020. From 30/01/2020, "The Motoring Organisation" became the trading style of The Motoring Organisation Limited, a separate corporate entity.

### Our registered details

Our office: Warranty House, Savile Street East, Sheffield, South Yorkshire, S4 7UQ

Companies House: registered No 3222540 England

Group VAT registration: No 804050184

Information Commissioner's Office: Registration Number Z5321981

Financial Conduct Authority: Reference Number 311741



# Privacy Notice

## About Motorway Direct Plc

We process personal information to enable us to support our accounts and records and to promote our services.

We are strongly committed to protecting your personal information and privacy. This privacy notice describes why and how we collect and use your personal data and provides information about your rights. This privacy notice applies to personal data provided to us, both by individual's themselves and by a third party for example, the sales distributor.

We will always treat your personal data and privacy with the highest standards of confidentiality and security. Where we 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 personal information they collect, store and use. We've created this policy to explain that. This privacy notice also details 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.

This privacy notice is drafted with conciseness and clarity in mind. It does not provide exhaustive detail of all aspects of our use of personal information. We are happy to provide any additional information or explanation where needed. Please write to us at the address provided in the "How to contact us" section of this privacy notice.

## How to contact us

You can contact us in one of the following ways:

- Phone: 03300 555 262;
- Email: [customerservices@motorwaydirect.co.uk](mailto:customerservices@motorwaydirect.co.uk);
- Post: Customer Services, Motorway Direct Plc, Warranty House, Savile Street East, Sheffield, S4 7UQ; or
- Customer Portal (if you are an existing customer).

### **Business & Domestic Insurance Services**

Policyholders should contact Motorway Direct Plc for policies sold before 11/09/2019.

Policyholders should contact Blink Innovation (UK) Limited for policies sold on or after 11/09/2019.

Blink Innovation (UK) Limited T/A Business & Domestic Insurance Services.

6 East Parade, Leeds, LS1 2AD. T +44 (0) 3300 555260, F +44 (0) 3300 555 236



# Privacy Notice

## 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.

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Telephoning us

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# Privacy Notice

## 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 usually be the performance of a contract or consent.

Typically, the data we collect and hold about you will include: contact details (for example name, address, phone number, email), data on the covered item (for motor-related products: the make, model and registration number of the vehicle and for pet insurance: the name, age and breed of your pet), payment details such as a sort code and account number if we are collecting your payments by direct debit.

We also hold details of your interactions with us. For example, your contact with our Customer Service Team and/or your claims history. We only use these details, so we can provide you with the service you have requested, to contact you about an enquiry you have made, to contact you if there is a problem with your claim 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 learn about their level of satisfaction with the service they receive from us and to learn about product/service improvements.

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 when you submit a claim we will pass on your name, contact number and vehicle's make and model to a Motor Repairer when your vehicle goes in for a repair.

For insurance products, we will share your data with the insurer of that product. We work with various insurance underwriters including, but not limited to, Acasta European Insurance Company Limited, UK General Insurance Ltd, Zenith Insurance, AmTrust International DAC, Wakam (formerly La Parisienne Assurances) 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.

For AA Warranty branded products, we may have shared your personal data with The AA. This could include, but is not limited to, complaints information, claims information, or AA Warranty branding statistics. Typically, data shared with The AA would include customer contact details and details of the area of concern.

We will store your personal information safely for the duration of your product/service contract and then for a further three or six years (depending on your relationship with us), after the contract has been terminated/expired. At that point in time the data will then be destroyed. All personal information is accessed only by authorised members of our staff 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.



# Privacy Notice

## Marketing

### Existing Policyholders / Product holders

We 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 our products/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](mailto:customerservices@motorwaydirect.co.uk);
- 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.

### 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 the data provider passing your details onto ourselves. We will ensure that all the data we receive is opt-in for marketing purposes and that it is not TPS registered.

## Visiting us in person

When 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 and wear a visitor pass.

The personal data we will collect from you includes name, company name, who you will be visiting, vehicle registration number and time in/out.

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.



# Privacy Notice

## Motor Dealers

Our lawful basis for processing your personal data will be the performance of a contract, such as the general day to day administration of your account.

The personal data we hold about 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 the corporate entity you contracted with who we act as third-party administrator for.

If you were an AA Warranty motor dealer, we may have shared your contact details with The AA to allow The AA to contact you with information around their other products and services.

## Telephoning us

When you call us, 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 and complaints.

## Emailing us

Any email sent to us, including any attachments, may be monitored for monitoring compliance with office policy and complaints handling. 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.



# Privacy Notice

## Your Rights

Under data protection laws, you are in control of your personal data, and you 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 us" section of this privacy notice.

## What should I do if my personal information changes?

We strive to maintain accurate, complete and current records of personal data. 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 us" section of this privacy notice.



# Privacy Notice

## How long do we 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 by us 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 us” section of this privacy notice.

## Sharing your data with third parties

### Third-party service providers

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

When processing payment card transactions, to ensure that all payments are safe, secure and protected against fraud, we use third-party payment service companies such as World Pay. The third-party service providers may have access to the personal information required to perform their functions, but they will not use your personal information for any other purpose and must process your personal information in accordance with this privacy notice and as permitted by applicable data protection laws.

### Third-party product distributors

We may share your data with third-party distributors for product governance purposes.

## Profiling

We 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 a better 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.





# Privacy Notice

## Visiting our websites and cookies

From time to time, we may use Cookies on our website. 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.

## Links to other websites

Occasionally, we may 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 other websites prior to using them.

## Data Security

We 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 place regarding the collection, storage and disclosure of personally identifiable customer information.

We limit access to your personal information to those who have a genuine business need to know it. Those processing your personal information will only do so in an authorised manner and all of our staff are subject to a duty of confidentiality.

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.



# Privacy Notice

## 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 (USA). 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)

We use CCTV systems for the safety and security of our employees and property. For further information about how we use CCTV, please contact us.

## Complaints / Queries

### To Motorway Direct Plc

We try 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.

### To the Supervisory Authority

Where you feel that we haven't handled your complaint or request in an appropriate manner, you 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



# Privacy Notice

## Changes to our privacy notice

We keep our privacy notice under regular review, and we will place any updated versions on this page. Please ensure that you check our privacy notice regularly for updates. This privacy notice was last updated on 10/03/2020.

