

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.

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;
- 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?

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 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 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 and is used with its permission under licence to Motorway Direct Plc.

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.

Data Security

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.

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(s) 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

Our legal 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.

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 (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.

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.

For insurance products, we will share your data with the insurer and we have 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 will not share your personal data with 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 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 legal basis for contacting you will be under either consent or legitimate interests depending on the nature of how we first received your business. This means that Motorway Direct Plc may use your personal data that we have collected according to this Privacy Policy to tell you about Motorway Direct Plc's services and special offers.

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:

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

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

Potential Customers (Motorway Direct Plc Marketing)

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 if 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 and former employees

The legal 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 legal 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.

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.

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.

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.

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.

People who telephone us

When you call Motorway Direct Plc 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.

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.

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, Motorway Direct Plc 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 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.

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

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.

Automated Decision Making

Motorway Direct Plc does not undertake any automated decision making.

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, which we can then 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.

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. So that we can 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 for which the data were collected.
- Right to object - you can object to processing where we have contacted you for marketing purposes under legitimate interests and we must then cease processing unless we can demonstrate compelling grounds.
- Right to restrict processing - you can ask us to stop processing your data (i.e. 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 you 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 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.

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 from a person, we will 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 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 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 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. Any requests for this, please write to Motorway Direct Plc at the address provided.

How to contact Motorway Direct Plc

- Phone: 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 12/06/2018.