AA Warranty

Privacy Notice for AA and Opteven Holdings UK Ltd

AA Privacy Notice

This privacy notice lets you know what happens to the personal data we use and hold when you interact with the AA Cars.

The AA and our Data Protection Officer

We are Used Car Sites Limited, known as AA Cars. Our main address is Level 3, Plant Basing View, Basingstoke, Hampshire, RG21 4HG. We are a data controller of your personal data. We have a dedicated data protection officer ("DPO"). You can contact the DPO using the details at the bottom of this notice.

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1. Personal data we hold and use

The list below sets out the types of personal information that we hold and use about you:

- Personal and contact details, such as title, full name, contact details and contact details history
- Your date of birth, gender and/or age
- Records of your contact such as via our phone number and, if you get in touch with us online using our online services, details such as IP address
- Products and services you hold
- Marketing information on you and related data analysis, including history of those communications, whether you open them or click on links
- Vehicle information, such as make and model, faults, repairs and repair costs. Offers may include the AA's car, insurance, financial services, connected car, travel and any of The AA's other products and services
- Information about your use of products or services held with our business partners, such as insurance policies, or financial services and products
- Information we obtained from third parties, such as AA Cars dealerships

We may be unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear

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2. Sources of personal data

The information we hold comes from different sources. These are:

- From you directly
- From AA Cars dealerships where you have given permission
- Information generated about you when you use our products and services
- From a broker or other intermediary (for example, comparison site) who we work with to provide products or services or quote to you
- AA Group companies if you already have a product with them, have applied for one or have held one previously
- Business partners (for example, financial services institutions, insurers), or others who are a part of providing your products and services or operating our business
- Calls may be recorded for training and monitoring purposes. Please refrain from providing credit/debit card information on these calls. If you do so it is at your own risk

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3. Reasons for using of your personal data

The reasons we use your information are below. We have arranged them according to the lawful basis that allows us to use the data.

1. **To provide you with our products or services or decide whether to do so:**
    a. Assessing an application for a product or service, including considering whether or not to offer you the product or service, the price, the risk of doing so, availability of payment method and the terms
    b. Managing the product or service you have with us
    c. Managing any aspect of the product or service
    d. Solving customer disputes in relation to AA Cars products (AA Cars mediation)
    e. To monitor and to keep records of our communications with you and our staff (see below)
    f. To administer our good governance requirements and those of The AA and other members of the AA Group, such as internal reporting and compliance obligations or administration required for Annual General Meeting ("AGM") processes
    g. For market research and analysis and developing statistics
    h. For direct marketing communications and related profiling to help us and The AA to offer you relevant products and service, including deciding whether or not to offer you certain products and service. We'll send marketing to you by SMS, email, phone, post, social media and digital channels (for example, using Facebook Custom Audiences and Google Custom Match). Offers may relate to any of our products and services such as cars, roadside assistance, money and financial services, insurance, travel, member offers ("Member Benefits") as well as to any other offers and advice we think may be of interest
    i. To provide personalised content and services to you, such as tailoring our and The AA's products and services, digital customer experience and offerings, and deciding which offers or promotions to show you on our digital channels
    j. To develop new products and services and to review and improve current products and services
    k. To comply with legal and regulatory obligations, requirements and guidance
    l. To provide insight and analysis of our customers both for ourselves and for the benefit of business partners either as part of providing products or services, helping us improve products or services, or to assess or improve the operating of our businesses
    m. To share information, as needed, with business partners (for example, financial services institutions, insurers), account beneficiaries, service providers or as part of providing and administering our products and services or operating our business
    n. To facilitate the sale of one or more parts of our business
    o. To enable us, The AA or other AA Group companies to perform any of the above purposes

2. For our **legitimate interests:**
    a. Managing your products and services relating to that, updating your records
    b. To perform and/or test the performance of, our and our business partners' products, services and internal processes
    c. To follow guidance and recommended best practice of government and regulatory bodies
    d. For management and audit of business operations including accounting
    e. To carry out searches at Credit Reference Agencies at the pre-application and application stage, and periodically after that. Where you have been introduces to us by a broker or other intermediary, they may do these searches on our behalf
    f. To carry out monitoring and to keep records of our communications with you and our staff (see below)
    g. To administer our good governance requirements and those of other members of our Group, such as internal reporting and compliance obligations or administration required for AGM processes

h. For market research and analysis and developing statistics

i. For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and service. We will send marketing to you by SMS, email, phone, post and social media and digital channels (for example, using Facebook Custom Audiences and Google Custom Match

j. Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses

k. For some of our profiling

l. Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations

3. To comply with our **legal obligations**

4. With your **consent or explicit consent:**
   a. For some direct marketing communications
   b. For some of our profiling
   c. For some of our processing of special categories of personal data such as about your health, if you are a vulnerable customer

5. For a **public interest,** such as:
   a. Processing of your special categories of personal data such as about your health or if you are a vulnerable customer

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4. Sharing and disclosures of your personal data

We may share information with the following third parties for the purposes listed above:

- With AA Group and branded companies, in particular Automobile Association Developments Limited (including AA Breakdown Services), Automobile Association Insurance Services Limited, and Automobile Association Financial Services Limited
- Business partners (for example, financial services institutions, insurers), account beneficiaries, or others who are a part of providing your products and services or operating our business including Evolution Funding Ltd, the Bank of Ireland (UK) plc, Northridge NIIB Group Ltd, trading as Northridge Finance, AUTOD2 Ltd, trading as Wizzle and Marshall Leasing Ltd, trading as Marshall Leasing
- Governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner's Office and under the Financial Services Compensation Scheme
- Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions
- Market research organisations who help us to develop and improve our products and services
- With AA Cars dealerships

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5. Withdrawing your consent

If we rely on your consent, you can withdraw this at any time. Use the contact details below or on our website.

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6. Transfers outside of the UK or EEA

Your personal information may be transferred outside the UK or European Economic Area, for example to service providers. If we do so, we'll make sure that suitable safeguards are in place where required, for example contractual agreements or other legal measures unless certain exceptions apply.

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7. Changes to your data

You should tell us so that we can update our records via the contact details provided below and we'll then update your records if we can. Alternatively, you can update your personal information on your AA Cars account.

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8. Monitoring communications

We may monitor, communications with you, where permitted by law. We do this for quality control and staff training purposes, to comply with regulatory rules, to prevent or detect crime, to protect the security of our communications and data to enforce compliance with business polices.

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9. Use of automated decisions

When applying for car finance, your personal data will be shared with Evolution Funding Limited, who are a credit broker. In order to process your application, Evolution Funding Limited, and some of the finance companies that your application may be sent to, may use automatic decision making as part of the funding decision process.

You have a number of rights in relation to automated decision making, which can be exercised in this case by contacting Evolution Funding Limited. For more information on how your personal data is handled for this activity, or to exercise your data rights in relation to automated decision making, please visit/contact **https://www.evolutionfunding.com/public/customer-data-processing/ - dataprotectionofficer@evolutionfunding.com.**

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10. Retention of your data

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs;
- For as long as we provide products or services to you and then for as long as someone could bring a claim against us; or
- To comply with legal and regulatory requirements or guidance.

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11. Your data protection rights

Here is a list of the rights that all individuals have under UK data protection laws. They don't apply in all circumstances so your request may not always be granted. If you wish to use any of them, we'll explain at that time if they apply or not, and if we will comply or not with your request, including the reasons why.

- The right to be informed about the processing of your personal information;
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed;
- The right to object to processing of your personal information;
- The right to restrict processing of your personal information;
- The right to have your personal information erased;
- The right to request access to your personal information and how we process it;
- The right to move, copy or transfer your personal information; and
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you.

You have the right to complain to the **Information Commissioner's Office** which enforces data protection laws. You can contact our DPO for more details on all the above.

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12. Your right to object

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us via **dataprotection@theaacars.com** to exercise these rights.

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13. Opting out of Marketing

You can stop our marketing at any time by contacting us on the details below, emailing **dataprotection@theaacars.com** or following the instructions in the communication.

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14. Changes to this privacy notice

We may change this privacy notice from time to time by updating this page to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit the AA Cars website.

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15. Contact us or our DPO

If you have any questions about this privacy notice, or if you wish to exercise your rights or contact the DPO, you can contact us by going to the **Contact us** section of our website. Alternatively, you can write to AA Limited, Level 3, Plant Basing View, Basingstoke, Hampshire, RG21 4HG, marking it for the attention of the DPO or email **dataprotection@theaacars.com.**

AA Warranty

Privacy Notice for Opteven Holdings UK Ltd

Opteven Holdings UK Ltd Privacy Notice

1. Data Protection

We are committed to protecting and respecting your privacy in accordance with the current Data Protection Legislation ("Legislation"). This notice sets out the basis on which we will process any personal data that we collect from you, or that you provide to us. For the purposes of the Legislation, the Data Controller in relation to any personal data you supply to us will be the Group Company to whom you have provided your data.

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2. Information we may collect or receive about you

We may collect and process personal data that you provide directly to us by filling in forms, via our website, over the phone or via mobile phone apps, or that we received via third parties such as brokers and agents. Sensitive (Special) Personal Data (such as information relating to health or criminal convictions), may be required by us for the specific purposes of underwriting and fraud detection, or as part of the claims handling process. The provision of such data is conditional for us to be able to provide insurance or non-insured products or manage a claim and, whilst you can withdraw your consent for us to process such data, this may result in us not being able to continue cover, or to process any claims. Where such data is provided to us, it will only be used for the specific purposes set out above and will be treated securely and in line with this notice.

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3. How we use your data

We may use the provisional data we hold about you in the following ways:

- For the purpose of providing insurance
- Handling claims and any other related purposes – this may include underwriting decisions made via automated means.
- For the performance of the insurance contract between you and us. For offering renewal, research, or statistical purposes.
- Our legitimate interests for us to analyse historic activity, to improve our rating algorithms and to help predict future business impact. To further our commercial interests, to enhance our product offering and to develop new systems and processes.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.

Where you have provided consent to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

Our legitimate interests – for us to analyse activity and traffic and for testing, research, statistical and survey purposes.

- To notify you about changes to our service
- To safeguard against fraud and money laundering
- To meet general legal or regulatory obligations.

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4. Disclosure of your personal data

We may disclose your personal data to third parties involved in providing products or services to us, or to service providers who perform services on our behalf. These include:

- Our group companies, Affinity partners, Brokers, agents, third party administrators
- Other insurance intermediaries, Insurance reference bureaus, Credit agencies, Fraud detection agencies, Loss adjusters, External law firms, External Auditors, Regulatory authorities

- As may be required by law. We may also disclose your personal information:

  In order to enforce or apply our terms of use set out in the terms of use or terms and conditions page and other agreements; or to protect the rights, property, or safety of the insurer, our customers, or others.

5. International transfers of data

We do not transfer your data outside of the EAA (European Economic Area).

6. Your rights

You have the right to:

- Ask us not to process your data for marketing purposes. See a copy of the personal information we hold about you. Ask us to delete any of your personal data (subject to certain exemptions). To have any inaccurate or misleading data corrected or deleted. Restrict the processing of your data. Ask us to provide a copy of your data to any controller. Lodge a complaint with the local data protection authority.
- For access to your personal data please write to: The Data Protection Officer, Opteven Holdings UK Ltd, Oxford House, Oxford Road, Thame, Oxon OX9 2AH or alternatively email ukdpo@opteven.com.

7. Marketing

Where you have provided consent, we may share personal data that you provide to us within Opteven Holdings UK Ltd and with other companies that we establish commercial links with. They and we may contact you (by mail, e-mail, telephone, text, or other agreed means) in order to tell you about products, services or offers that we believe will be of interest to you, or to provide you with commercial updates. If you do not wish us to continue marketing to you, please email ukmarketing@opteven.com.

8. Retention

Your data will not be retained for longer than is necessary and will be managed in accordance with our data retention policy. In most cases the retention period will be for a period of seven (7) years following the expiry of the insurance contract, or our business relationship with you, unless we are required to retain the data for a longer period due to business, legal or regulatory requirements. In any case, where data is retained, we will endeavour to delete or to anonymise any personal elements, in order to maintain your privacy and security.

9. Changes to our privacy policy

We may revise the privacy policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we make.

If you have any questions concerning our use of your personal data, please contact The Data Protection Officer, Opteven Holdings UK Ltd, Oxford House, Oxford road, Thame, Oxon, OX9 2AH or alternatively email ukdpo@opteven.com.

10. Legal terms and conditions

Opteven Holdings UK Ltd, company Number 07104868. Opteven Insured UK Ltd, company number 04801804, (part of Opteven Holdings UK) is authorised and regulated by the Financial Conduct Authority, under firm reference number 311375. Registered Office: Oxford House, Oxford Road Thame, Oxon, OX9 2AH.