RAC Privacy Policy

This privacy policy explains how we collect and use the personal information you give us, as well as information we collect from other sources. We will notify you of any significant changes to how your personal information is used, but also recommend that you review the contents of our privacy policy regularly.

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1. Who we are

In this Privacy Notice, "we", "us" and "our" refers to RAC Limited, you will know us simply as RAC. RAC Limited is a data controller. The RAC Data Protection Officer ("DPO") acts as a point of contact if you have any questions or concerns and can be contacted on dpo@rac.co.uk

RAC Limited is part of a larger group of RAC companies. More information can be found at http://www.raccorporate.co.uk/

Full details on how you can contact RAC and the RAC Data Protection Officer can be found at the bottom of this notice Contact us.

This privacy policies applies to:

- RAC websites and webpages linking to this policy
- When you contact us by email, telephone, or by post
- When you post content or contact us through Social Media
- When you access traffic and travel services including an online route planner and up-todate traffic information via phone or the internet
- When you purchase products and services at the roadside or through our Direct Sales Agents.

2. The personal information we collect

The personal information we collect is sourced in a number of difference ways, including:

- Personal information you provide us
- Additional information we process when you engage with one of our products or services
- Contact and device information
- Third party information

Personal Information you provide to us

This personal information is typically provided directly by you when you apply for, or receive a quotation for one of our products or services.

Information will also be collected in relation to any other additional members or beneficiaries of your product or service. Please ensure that any beneficiaries are made aware of this privacy notice and please ensure you obtain their permission before providing their information.

- Loan application details including your title, name, home address, email address and telephone contact details (including home and mobile telephone numbers) as well as the purpose of the loan
- Date of birth, age, or age range
- Financial information such as income as well as employment and occupancy status
- Communication and marketing preferences information about how you choose to manage your communications from us, including whether you prefer paperless documents and whether you would like to receive marketing information about similar products or services from us.

It is important that any information you provide directly to us is accurate and correct, we recommend letting us know immediately if you need to change anything on your policy or your contact details using any of the methods provided in the <u>Contact us</u> section. Providing false or inaccurate information in order to obtain a product or service may also result in services being restricted or cancelled.

Contact and device information

Some of the information we collect will be obtained during the course of your interactions with us, for example through the devices you use or when you contact us, including:

Device information including details about the device you use to access our web services, such as the IMEI number of your mobile telephone.

Location data when you use our mobile app and have allowed access to location services, or the collection of the IP address of the computer your using to view our website, the start and end of journies collected through our traffic and travel services.

Web use data from the use of cookies and similar technologies. More information about the types of cookies we use and how they work can be found in our cookie policy.

Telephone conversations and communication by email, post and social media are recorded for training, monitoring and analysis purposes, and may also be used to investigate and analyse any queries or concerns you raise with us.

Social media information obtained if you access our website through a third-party connection or log-in, for example, through Facebook Connect, by "following," or "liking". This information could include; the user ID associated with your account, information you have permitted the third party to share with us, and any information you have made public in connection with that service. You

should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our services.

3. How we use your personal information

Here you can find out more about how your information is used, as well as the legal basis we rely on to ensure your personal information is always processed fairly and lawfully.

How we use your information	For the performance of your contract with us	To comply with our legal and regulatory obligations	Processing necessary for our legitimate business interests	Where you give us your consent
Processing or disclosing your information where law requires us to do so		✓		
For marketing our own products or services where you have not opted out and for development of our marketing strategy, this may include the use of profiling techniques to identify products and services we believe you may be interested in			✓	
To improve our products and services through the processing of market intelligence including testing, reporting, analysis and identification of improvements in products and processes			√	
For internal business processes and operations, including quality assurance, governance, accountancy, management and audit practices			√	
Use of cookies to monitor use of our website and for optimisation of user experience at device level			✓	
Where you have given us permission to collect or share certain personal information				✓

4. Who your information may be shared with

To administer and provide RAC products and services we will share your information with:

Other companies involved involved in the provision of this service, including:

- RAC Motoring Services
- RAC Financial Services Limited
- RAC Insurance Limited
- RAC Brand Enterprises LLP
- Shawbrook Bank Limited
- Organisations within the RAC group of companies, external specialists and our
- business partners who provide great products and services;
- External organisations who help with fraud protection and detection, including credi reference agencies; and
- Statutory bodies, or where we are required to give this information by law.

Third parties instructed by us to provide services and products on our behalf, such as:

- Providers of IT services for web site administration and management of our internal systems
- Subcontractors and other specialists who help us provide products and services

• Organisations that specialise in marketing services or market research

Fraud detection and crime prevention agencies organisations that help us with fraud protection and statutory law enforcement agencies

Regulators and financial organisations necessary for meeting our mandatory reporting requirements, financial organisations such as banks that allow us to make or receive payments, our professional advisors and any regulatory or governmental body, (for example the FCA or ICO) or any other supervisory body with rules and/or codes of practice to which we are subject, which requests or requires access to your information

If the RAC business is sold or integrated with another business, we may need to disclose your personal information to our advisers and any prospective purchasers and their advisers and such personal information will be passed on to the new owners of the business

5. How long your information is kept

We will keep your information for as long as is necessary to provide the services or products you have requested, for our own legitimate interests and to meet our statutory obligations. Your information will always be kept in accordance with internal retention policies.

If you cancel any of your services it will be necessary for us to retain your personal information for internal reporting and record keeping and in line with any legal or regulatory requirements. This period of retention is usually 7 years. In any situation where the retention period is longer, we will inform you of this.

6. Where your information is kept

The RAC is a UK based business providing services across Europe and your personal information is managed on our administration systems and databases.

We may share your information with organisations outside of the European Economic Area (EEA) where it is absolutely necessary to enable us to provide you with our services that you have purchased from us, i.e. when you are travelling outside of the UK and need to activate your European Breakdown Cover, we may need to instruct suppliers in the country you are traveling in to provide this service on our behalf. We endeavour to only instruct suppliers that can provide the same level of data security that we have here in the UK.

Where it is necessary to transfer your personal information to a country outside of the EEA and has not been approved by the European Commission, we will will ensure that appropriate safeguards are in place. This will be through the use of approved EU standard contractual clauses or an approved framework, such as the U.S. Privacy Shield.

7. Your information rights

You have a number of rights in relation to your personal information that you can choose to exercise at any time. We have provided a basic overview of those rights below, but if you'd like to find out more, or exercise any of these rights, you can visit our dedicated website www.rac.co.uk/privacyrights.

Alternatively, please contact us using the <u>Contact us</u> details as shown at the bottom of this notice.

You have a right to:

Access information we process about you, to obtain a copy of the information as well as receive other supplementary information.

Object to us using particular information, or using it in a particular way. You can let us know that you object to it and we will consider whether we can grant your request. Your right to object to receiving direct marketing material is as set out in the Marketing section of this privacy policy.

Rectify innaccurate information, you can do this simply by getting in touch using the Contact us details as shown at the bottom of this notice.

Erase your information if we no longer have a lawful basis for processing it.

Port data to another data controller or to yourself in a structured, commonly used and machine-readable format.

Your right to lodge a complaint

If you are concerned about the manner in which we process your personal information you have the right to complain to the Information Commissioner's Office ('the ICO'). The ICO antcipates that you will raise your concern with us in the first instance. For further information please go to www.ico.org.uk or call the ICO helpline on 0303 123 1113.

8. Marketing

We will use your personal information to inform you about other RAC products and services as described in this Privacy Policy.

Profiling is the use of information which enables us to predict your likely product preferences. We may overlay information we process about you with information obtained from third parties for example demographic information to make our marketing campaigns and selections more efficient. Any use of third party information will be subject to appropriate controls.

We will use email, telephone, SMS, post and social media i.e. Facebook or Google to inform you about these products and services.

You have the right to ask us not to use your personal information this way at any time. If you would prefer not to receive this information from us and have not previously advised us of this, please let us know using any of the methods detailed below;

By clicking on 'UNSUBSCRIBE' in any emailed marketing message you receive

By telephone when you call our customer contact centre on - 0333 202 1877

Sending us an email at - membershipcustomercare@rac.co.uk

By post to: Membership Customer Care

RAC

Great Park Road Bradley Stoke BS32 4QN

9. Contact Us

If you have a query or complaint about how we use your personal information, or if you would like exercise any of your rights, then please contact us in the first instance.

Post: Membership Customer Care

RAC

Great Park Road Bradley Stoke BS32 4QN

Email: membershipcustomercare@rac.co.uk

Phone: 0333 202 3059

You can write to our Data Protection Officer at the following address:

Post: Data Protection Officer

RAC

Great Park Road Bradley Stoke BS32 4QN

Email: dpo@rac.co.uk

You are entitled to contact and escalate any complaints in relation to how we use and process your personal information to the Information Commissioner's Office (ICO), however we recommend getting in touch with us first to try and resolve any issues you may have.