

## Sovereign Automotive Privacy Policy

The Kindertons Group is committed to protecting your privacy. This Policy applies to visitors of The Kindertons Group websites, The Kindertons Group mobile applications or any other electronic services or applications ("Electronic Services") offered by The Kindertons Group. The Policy also applies to anyone who accesses The Kindertons Group products and services.

References in this Policy to "The Kindertons Group" apply to all The Kindertons Group companies, which includes but is not limited to: Kindertons Accident Management Limited, Plantec Assist Ltd, Sovereign Automotive Ltd, JP Morriss Assessors Ltd, and Crusader Assistance.

This Policy sets out the basis on which any personal data that The Kindertons Group collects from you or that you provide to The Kindertons Group, will be processed by The Kindertons Group. Please read the following information carefully to understand The Kindertons Group's views and practices regarding your personal data and how The Kindertons Group will handle it.

The Data Controller is Sovereign Automotive Limited, a company registered in England and Wales under company registration number 07068939 and whose registered office address is at Kindertons House, Marshfield Bank, Crewe, CW2 8UY.

All details supplied by you to Sovereign will be safeguarded both by this Policy, and also by relevant data protection laws which include the Data Protection Act 2018 (which includes the General Data Protection Regulation) and any other subsequent data protection legislation in force from time to time.

### Information collected and what it is used for

Sovereign may collect the following information about you:

- Name
- Address
- Contact details (email address, telephone number etc.)
- Vehicle details
- Accident circumstance details
- Third party insured details
- Witness details
- Any other information required by us to provide our services to you

### Card Payments

Payment card information is collected over a secure connection and all payment transactions will be encrypted. Payment card information is used solely for the purpose of processing payment for customer damage or fines such as speeding or parking offences. The Kindertons Group retains no record of payment card details directly and uses a third party WorldPay tokenised hosted payment service compliant with the Payment Card Industry Data Security Standard (PCI DSS).

We may store your account information in our databases indefinitely following the termination of your account with us to the maximum extent permitted by law.

We will need to collect your email address to send you communications about how to access and manage your claim (available within the "Portal" section of the Website).

### **Information we collect if you use our Mobile Applications**

If you choose to download or use our Mobile Applications, or access one of our mobile optimised sites, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as accident location and other personalised content. Most mobile devices allow you to control or disable location services within the mobile device's settings. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or the manufacturer of your particular device.

By submitting personal information to us, you are deemed to have agreed to the terms set out above regarding the use of your personal information.

### **What we do with your data**

All the personal information we hold about you will be processed by our employees who are based in the UK. We may use data processors who are based both in and outside of the EEA for services like printing and scanning, email, and telephone/email services to assist us with the service we provide to you. Where we engage data processors outside of the EEA we will ensure that they work under a specified contract and the appropriate technical safeguards are in place to ensure that your data remains secure.

We take all reasonable steps to ensure that your personal data is processed securely and is kept up to date.

Where appropriate, personal information will be kept for compliance and monitoring purposes.

We may share your data with other businesses within our Group where this is necessary to provide the agreed service.

### **How long do we keep your data?**

We will retain records after our business relationship has ended in accordance with our Group Data Retention Policy, after which time your data will be securely deleted.

Where data is processed solely for marketing purposes, any information we use for this purpose will be kept until you notify us that you no longer wish to receive marketing information from us. More information on our Group Data Retention Policy can be found on our website.

### **Sensitive Personal Data**

It may benefit you to notify us of any health condition or disability you have so that we are aware of these conditions and how they affect you. This will allow us to take any reasonable steps to accommodate specific needs or requirements you have when providing our services to you. This type of information is known under the law as 'special category information' (or 'sensitive personal data') and we require your explicit consent to process this information.

We will only collect this type of information with your consent. It may be necessary to share the information with third parties as part of the service we are providing to you. Where this is the case we will always discuss the disclosure with you.

## **Where we store your personal data**

The Kindertons Group will take all reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy.

All information (except Payment Card information) you provide to The Kindertons Group is stored on The Kindertons Group's secure servers or those provided by secure third-party hosting providers who comply with information security best practices such as ISO 27001.

Once The Kindertons Group has received your information, The Kindertons Group will use strict procedures and security features try to prevent any unauthorised access.

## **Confidentiality and Security**

We limit access to personal information about you to employees who we believe reasonably need to come into contact with that information to provide products or services to you or in order to do their jobs.

We have physical, electronic, and procedural safeguards that comply with our legal responsibilities to protect personal information about you.

We take your security seriously and take reasonable steps to protect your information.

## **Vendors and Partners**

We work with vendors and partners to protect the security and privacy of user information whilst in their control.

## **Employee and Contractor Access to Information**

We limit access to personal information about you to those employees who we reasonably believe need to come into contact with that information to provide products or services to you or in order to do their jobs.

## **Education and Training for Employees**

We have implemented a company-wide education and training program about security that is required of every The Kindertons Group employee.

## **Disclosure of your information**

We may disclose your personal information to third parties as follows:

- a) Where we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce our terms and conditions and any other agreements.
- b) In the event that The Kindertons Group sells or buys any business or assets, in which case The Kindertons Group may disclose your personal data to the prospective seller or buyer of such business or assets.
- c) If The Kindertons Group or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- d) The Kindertons Group may share your personal identifiable information with its group companies where this is necessary for the service we are providing to you
- e) For the purposes of the prevention or detection of offences, and/or the apprehension or prosecution of offenders, we may share any information that we collect with the Police, other public or private sector agencies, governmental or representative bodies in

accordance with the relevant legislation. This will include public authorities, insurance companies, finance companies, automotive advertising companies and/or other agencies.

- f) We may outsource selected business activities to trusted third party partners where it isn't feasible for The Kindertons Group to perform the activity directly. The Kindertons Group are sure to audit our partners carefully and ensure that they meet our strict data protection policies. These companies do not have any independent right to share this information.

Where we use a data processor to assist with your claim, they may be required to store your data and share it within the vehicle industry to help the prevention and detection of fraud or for commercial reasons.

## **Your Rights**

Under data protection legislation, you have several rights regarding the use of your personal data as follows:

### **Information/Access**

You have the right to obtain confirmation from us about that we are processing your personal data, what personal data is being processed and to obtain a copy of that data free of charge.

### **Rectification**

You have the right to ask us to rectify inaccurate data or complete and incomplete personal data that we hold.

### **Erasure (The Right to be Forgotten)**

You have the right to ask us to erase your personal data without delay in certain circumstances. If you request us to erase your personal data, then this means that our business relationship will end as we cannot provide our services without processing your data. Due to legal and regulatory obligations we will need to store your personal data in accordance with our Group Data Retention Policy but no other processing will take place.

### **Restriction of Processing and the Right to Object**

You have the right to restrict the processing of your personal data under certain circumstances, including if you have contested its accuracy and while this is being verified by us, or if you have objected to its processing and while we are considering whether we have legitimate grounds to continue to do so.

### **Right of Data Portability**

You have the right for certain data you have given to us to be provided to you in a structured and commonly used electronic format (for example, a Microsoft Excel file), so that you can move, copy or transfer this data easily to another data controller. You may also request that we transmit this data directly to another organisation where it is practical for us to do so.

### **Automated individual decision-making, including profiling**

You have the right not to be subjected to a decision solely on automated processing, including profiling. The Kindertons Group do not make any decisions about you using automated methods.

### **How to exercise your rights**

If you wish to contact us in respect of any of the Rights described above please get in touch with The Data Protection Officer and Group Compliance Manager, Kindertons House, Marshfield Bank, Crewe, CW2 8UY, email [privacy@sauto.co.uk](mailto:privacy@sauto.co.uk) We will respond to your request free of charge and usually within one month.

## Legitimate Interests

We may process personal information for certain legitimate business purposes, which include some or all of the following:

- Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our customers
- To identify and prevent fraud
- To enhance the security of our network and information systems
- To better understand how people interact with our websites
- To provide you with information on other products and services that may be of benefit to you
- To determine the effectiveness of promotional campaigns and advertising
- To monitor customer service and quality using independent third party survey providers

When we process your personal information for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests – we will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

## Verius Risk Solutions and Vbase

We have provided you with a notice relating to sharing your data with Verius Risk Solutions. This notice is contained within the Hire Agreement documentation that we provided to you.

Do Verius ever send my details outside the European union?	The Data Protection Act 2018 enacts the European Union’s General Data Protection Regulations (GDPR) into UK law. Similar legislation has or will be enacted across the EU. Your data is unlikely to be shared outside of the UK and in any event will never be shared outside of the EU.
How long do Verius hold onto my data?	It is usual that Verius deletes any data collected within 6 years of the a policy application or claim made to which the data relates, although Verius Risk Solutions may continue to hold your data for longer than that if the data for example relates to high risk or fraudulent claims or policy application activity. There are a number of known examples where information provided over a long period of time has been relevant for the identification of fraud.
Do I have any rights that I should be aware of?	You have the right to object to your data being processed for legitimate interests where you believe your information is being used unfairly. More information can be seen at <a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-object/">https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-object/</a>  If you wish to object to your information being used in this way you can email <a href="mailto:privacy@kindertons.co.uk">privacy@kindertons.co.uk</a>

<p>Can I withdraw consent for my data to be used?</p>	<p>Verius processes the data you have provided us with in order to protect our legitimate interests (rather than by consent). As detailed in your rights above, if you object to the way Verius may have processed your information you can object to that processing using the form at [<a href="http://www.veriusrisksolutions.com">www.veriusrisksolutions.com</a>]</p>
<p>How can I complain about the way you use information about me ?</p>	<p>If you are concerned or unhappy about how we use your information please feel free to contact us using the form below and we will be happy to try and assist you. If we are unable to help you or you wish to discuss any issues with a regulatory body, here in the UK data your rights as a data subject are managed and controlled by the Information Commissioner’s Office (the ICO). Please see their website <a href="http://www.ico.org.uk">www.ico.org.uk</a> for more information on what to do if you are unhappy about the processing of your data.</p>
<p>Is my data ever used to make automated decisions about me?</p>	<p>We never use your information to make automated decision about your or your claim, however, Verius Risk Solutions often profile personal information in order to assist in the prevention and detection of fraud. Unfortunately, fraudsters are adept at avoiding detection and they are known to use techniques such as stealing the identifies of genuine individuals or using a completely fabricated identity. By identifying what a fraudster (his or her profile) or a fraud claim looks like (its profile) Verius Risk Solutions can proactively prevent fraud. Verius risk solutions never use the data, or profiling to make automated decisions although some of its clients may use the data as part of a bigger automated process such as when providing a quote for car insurance. This will help prevent fraudsters obtaining insurance, driving down the price of insurance for genuine individuals.</p>

Verius Risk Solutions assist us with the assessment of risk and for the purpose of managing, preventing and detecting fraud. This is a legitimate business interest. For further detailed information on the way in which Verius Risk Solutions processes data you may wish to consider the Verius Risk Solutions data processing notice which can be found at [www.veriusrisksolutions.com](http://www.veriusrisksolutions.com).

Verius Risk Solutions collects and processes data provided by insurance companies, compensators, self-insured organisations, credit hire organisations, accident management business and other businesses with a legitimate interest in the management of insurance claims, the application and the administration of insurance policies, the provision of accident management services and other related business. Verius Risk Solutions collects the data provided by these organisations and either shares or processes that data to facilitate the prevention detections and management of fraud or to facilitate the accurate assessment of insurance risk.

### **How to complain about the use of your data**

If you wish to raise a complaint about how we have handled your personal data, including in relation to any of the rights outlined above then please contact The Data Protection Officer and Group Compliance Manager, Kindertons House, Marshfield Bank, Crewe, CW2 8UY, email [privacy@sauto.co.uk](mailto:privacy@sauto.co.uk) and we will investigate your concerns. If you are not satisfied with our response, or believe we are processing your data unfairly or unlawfully, you can complain to the Supervisory Authority - Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. You can find further information about the ICO and their complaints procedure here: <https://ico.org.uk/concerns>

This notice was last updated on 29/09/2020. We may change this notice by updating our website to reflect changes in the law or our privacy practices. However, we will not use your Personal Data in any new ways without your consent. Please review this notice regularly so that you are aware of any changes.