

# Privacy Notice

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The Motoring Organisation is strongly committed to protecting your personal information and privacy. Our privacy notice describes why and how we collect and use your personal data and provides information about your rights. Our 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 do collect, store or use your personal data, The Motoring Organisation 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 have created this policy to explain how we collect, use, disclose, transfer and store your personal data.

This privacy notice also explains 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.

Our privacy notice is drafted with conciseness and clarity in mind. It does not provide exhaustive detail of all aspects of The Motoring Organisation and our own brands with the use of personal information. However, we are happy to provide any additional information or explanation where needed. Please write to The Motoring Organisation at the address provided in the 'How to contact The Motoring Organisation' section of this Privacy Notice.

## About The Motoring Organisation

The Motoring Organisation are an administrator of warranty products and we are the 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:

The Motoring Organisation ([www.TMO.co.uk](http://www.TMO.co.uk))

## Our registered details

Our registered office is: Courtwood House, Silver Street Head, Sheffield, South Yorkshire, S1 2DD (registered No 05304919 England)

## Who is The Motoring Organisation also registered with?

We are also registered with the:  
Information Commissioner's Office – ZA542864.

## How to contact The Motoring Organisation

You can contact us in one of the following ways:

**Phone:** 03300 552 080;

**Email:** [customerservices@tmo.co.uk](mailto:customerservices@tmo.co.uk);

**Post:** The Motoring Organisation, Customer Services, Parkway Works, Kettlebridge Road, Sheffield, S9 3BL;

If you are an existing customer, you may also contact us through the customer portal by visiting the link within your welcome email.

## 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.

## Customers

Data Protection laws require us to have a lawful basis for processing your personal data. Our lawful 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. For example, where we process your personal data for the contract of your product or fulfilling our service to you.

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), 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.

From time to time 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.

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 passing on the above information we collect about you for the purpose of claims handling. We may also share your data for other services, 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.

We will store your personal information safely for the duration of the contract and then for a further three or six years after the contract has been terminated, depending on your relationship with us. 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.

## The Motoring Organisation Marketing - Customers

The Motoring Organisation or any of our own brands may contact you for the purposes of direct marketing.

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## Last updated: 18/02/2019

The Motoring Organisation is a trading style of The Motoring Organisation Limited. Registered office: Courtwood House, Silver Street Head, Sheffield, South Yorkshire, S1 2DD. Registered in England and Wales, Company No.05304919. Group VAT registration: 337 6668 61.

Telephone calls may be monitored and recorded for quality assurance and compliance. You may contact Us using Text Relay. Information is also available in Large Print, Braille and Audio on request. Please call for details.

**THE MOTORING ORGANISATION**

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 The Motoring Organisation's 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@tmo.co.uk;
- phone us on 03300 552 080;
- in writing to The Motoring Organisation, Customer Services, Parkway Works, Kettlebridge Road, Sheffield, S9 3BL;
- by clicking unsubscribe where provided on communications that we send you or when you take out a product with us.

The Motoring Organisation will not share your data with other companies for marketing purposes without your consent.

### **The Motoring Organisation marketing - Potential customers**

From time to time, The Motoring Organisation 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 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 & former employees (including retired employees)**

Data Protection laws require us to have a lawful basis for processing your personal data, our lawful 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 lawful basis will be where we process employee data for the contract of their employment. Legitimate interests are used where for example, we monitor our sales staff for competency and to see if there is a training need required.

**Job Applicants** - When individuals apply to work at The Motoring Organisation, we will only use the information they supply 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.

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.

We do sometimes use a third-party Recruitment Agency for some of our recruitment activities.

Where we want to disclose information to a third party, for example to take up a reference, we will obtain permission from the applicant beforehand, this information will then be held in the employee's file.

Where a job applicant applies through a third-party Recruitment Agency, we recommend they read the privacy notice or statement of the third-party Recruitment Agency prior to using them.

**Current and Former Employees** - Once a person has taken up employment with the Motoring Organisation, we will compile an employee file relating to their employment, this will be retained by us for the duration of their employment plus 6 years following the end of their 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.

The personal data we collect includes but isn't limited to your full name (and proof of identity), your date of birth, your contact details (correspondence address, phone number), your national insurance number and banking details (so that we can pay you).

Where you provide us with personal information relating to members of your family, we will assume that you do so with their knowledge and their consent to the collection and processing of the information, for example next of kin contact information.

We will need to share some of your data with other organisations only as required for your employment such as for right to work, tax, payroll, and pension administration purposes.

**Pre-employment checks** - It is a legal requirement to ensure that all our staff are of good repute and we may perform background checks to this end.

For example, we may perform bankruptcy checks via the Individual Insolvency Register (IIR) which is a public record. We may also request a basic disclosure criminal conviction check via the Disclosure and Barring Service (DBS) formerly the Criminal Records Bureau (CRB).

Our lawful basis for processing this data will be legal obligations and legitimate interests. In the eventuality you object to these checks, we may be unable to employ you, or you may be unable to continue in your current role.

Further information relating to your employment can be found in our employee privacy notice.

### **The Motoring Organisation e-learning (employees and third-party suppliers)**

We operate an e-learning training system which is provided by a third-party supplier. Details of our current supplier can be requested via Customer Services.

The personal data we collect is limited typically to name, email address and job/department title. This information will be processed so we can create individual logins and a personal learning experience.

**The Motoring Organisation staff** - The lawful basis of processing data will be legitimate interests and legal obligation. For example, to ensure appropriate staff complete the training required to perform their role and to provide evidence for minimum training requirements to the regulator.

**Non-The Motoring Organisation staff** - The lawful basis of processing data will be performance of a contract. For example, to provide e-learning modules appropriate to product knowledge or other training needs as requested.

### **Visitors to The Motoring Organisation**

Where 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 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.

### Motor dealers

Our lawful basis of processing your personal data will be performance of a contract. For example, managing our relationship with you, setting you up as one of our motor dealers or general day to day administration.

The personal data we will collect from 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 us at the inception of your contract and through ongoing account management communications (via our Business Development Managers and Sales Support Team).

### Telephoning us

When you call The Motoring Organisation, 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. 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.

### Your rights

Under 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. 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 The Motoring Organisation' section of this privacy notice.

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

The Motoring Organisation strives to maintain personal data, which is accurate, complete and current.

So that we can ensure we only hold accurate and up to date information, 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 The Motoring Organisation' section of this privacy notice.

### How long do we keep 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 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 The Motoring Organisation' 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 details, storing of personal data and providing our customers with the service they have requested.

When processing payment card transactions, The Motoring Organisation use third-party payment service 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 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

The Motoring Organisation 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, 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

The Motoring Organisation does not undertake any automated decision making.

### Visiting our websites and cookies

From time to time, The Motoring Organisation 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, 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 The Motoring Organisation 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 the other websites prior to using them.

### Data security

The Motoring Organisation 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.

### 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)

At The Motoring Organisation we use CCTV systems for the safety and security of our employees and property. For further information, contact our Head Office at The Motoring Organisation, Parkway Works, Kettlebridge Road, Sheffield, S9 3BL.

### Complaints or queries to us

The Motoring Organisation 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, 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 according to the 'need to know' principle.

### Complaints or queries to the Supervisory Authority

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

### 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.