

## 1. ABOUT THIS NOTICE

Your privacy is important to us. Future 45 and our group companies (“we”/ “us”) would like to keep you informed on how we use your personal information and with whom we share that information.

We are committed to protecting your privacy and to providing transparency in regard to our processes. We will review and update this notice regularly in order to keep you informed of any changes and in accordance with current Data Protection Legislation. We recommend that you review this page from time to time.

Contact details relating to questions regarding the content of this notice or your rights regarding your personal data are provided in section 10.

## 2. ABOUT US

Future 45 provides automotive protection and insurance products. Our parent company, AutoProtect Group Limited, is a UK based company and parent to all of our other group businesses:

- AutoProtect (MBI) Limited
- AutoProtect Administration Ltd.
- AutoProtect Group Limited
- iComply Online Limited
- DealTrak Limited
- Take the Weekend Off Limited (trading as Shine!)
- AutoProtect Polska
- M R Automotive Ltd.
- Mymotorhub.com Limited
- Future 45 Limited



## 3. WHAT INFORMATION (PERSONAL DATA) DO WE HOLD?

The information you provide to us directly via our websites, apps or by phone, letter, email or other direct means is provided entirely voluntarily and will only be used for the purposes described in section 4.

We may also process personal data that we receive via our 3rd party retail partners such as vehicle manufacturers and dealerships (further detail is provided in section 5).

The personal data we collect may include: Name, address and contact details; vehicle details; age and date of birth; bank account details; employment and occupation details and any other personal data specifically required to provide a service or product or in regard to recruitment activity. We will not collect personal data that is not relevant or required for the purpose intended.

We may at times be required to ask for and hold ‘special’ categories of personal data which are items of personal data considered to be more sensitive. Where such data is provided we will make clear to the individual(s): i) the reason for capturing and processing this data and ii) under what specific legal basis and conditions it is held.

## 4. HOW WE USE YOUR INFORMATION

The table below explains the reasons we have for using personal data across our business activities, and the applicable legal basis.

How we use your personal data:	The legal basis for its use:
<ul style="list-style-type: none"> <li>• In order to provide insurance and for administration and claims handling in regard to our products and services</li> </ul>	<i>To carry out our contractual obligations with you</i>
<ul style="list-style-type: none"> <li>• To meet our legal and/or regulatory obligations and to safeguard against fraud and financial crime</li> <li>• To notify you about changes to our service</li> <li>• To provide access to systems and for administration purposes</li> </ul>	<i>Legal and regulatory requirement</i>

<ul style="list-style-type: none"> <li>To demonstrate compliance within regulatory framework</li> </ul>	
<ul style="list-style-type: none"> <li>To provide you with information on the products and services available from our group companies. We do not share your information with any 3rd party outside of the AutoProtect Group in this regard</li> <li>To offer renewal information</li> <li>To conduct research and testing in order to continually improve our products, services and customer service</li> <li>For network and information security purposes</li> <li>For recruitment purposes</li> </ul>	<p><i>In order to pursue our legitimate interests as a business</i></p>

## 5. WE MAY DISCLOSE YOUR PERSONAL DATA TO THE FOLLOWING

**AutoProtect Group Companies** - We may disclose your personal data with other AutoProtect Group companies (as detailed above) for the reasons set out in section 4.

**Our Service Providers** - We may disclose your personal data to our third party agents, services providers, instalment credit providers, repairers and subcontractors where they are contracted to provide services to us and to you, or to act on our behalf. We will only share personal data with these third parties that is specifically required for the processing or delivery of a service and we will ensure that they are contractually obliged to keep that data secure and not to use it for any other purpose than that agreed with us.

**Our Retailers** - We may have received your personal data from a third party provider (for example the motor dealership where you purchased one of our products), we may share your information with this retailer and /or their manufacturer partner for the purposes detailed in section 4. We do not share your information with any other retailer. In many cases these retailers may also be a Data Controller and will explain how they use your personal data in their own privacy policy which we advise you to review.

**Our Insurers and Brokers** – We may share your personal data with relevant insurers and insurance brokers for the reasons set out in section 4.

**Credit Reference Agencies** – We may share your personal information with credit reference agencies having advised you of this requirement and in line with the reasons set out in section 4.

**Legal and Regulatory Bodies** – To meet our obligations under duty or legal obligation.

In the event that we sell or purchase a business or the assets of a business we may be required to disclosure relevant personal data to the other parties.

We do not transfer your personal data outside the European Economic Area (“EEA”).

## 6. YOUR RIGHTS AND ACCESS

We are committed to ensuring you are confident in the placement of your personal data with us and would like to make you aware of your rights in its regard. We will acknowledge any query in relation to your rights at the earliest opportunity and may ask you for further information to enable us to complete your request. We will respond in full where possible within 30 days following receipt of your request. Where this is not possible, we will advise you of the reason for this within 30 days.

You have the right to:

- withdraw any consent you have previously provided for direct marketing purposes;
- request a copy of the personal data we hold on you;
- ask us to delete the personal data we hold on you or request us to stop processing your personal data (this is not always possible but we will advise why not in our response);
- ask us to correct any inaccurate personal data;
- ask us to transfer your information to another Data Controller
- lodge a complaint about us with the data protection regulator – details for the Information Commissioners Officer (ICO) can be found with contact details in section 10.

## 7. HOW LONG WE KEEP YOUR PERSONAL DATA

Your personal data will not be kept for any longer than is necessary. AutoProtect group companies will follow strict protocols to delete information at appropriate times according to the retention period required for its original purpose.

Where it is possible and practical to remove personal identifiers from data through the process of, this practice will be followed.

In order to meet our legal and regulatory requirements and to bring or defend any legal claims, we will typically retain personal data for a period of seven years following the end of contract or the last occasion for which it was required.

Information collected from a 3rd party retailer which is not 'activated' (confirmed as an active or declined purchase) within a 24 month period from date of first collection will be deleted. This period is required due to potential lead and delivery times for vehicles on which the requirement for ancillary products may be established early but activated on delivery.

## 8. SECURITY

All AutoProtect group companies use technical and organisational security measures to protect the personal information you provide to us from unauthorised use, access or disclosure and from loss or destruction. These measures are under continual review and enhanced when practical and possible.

The security of your personal information and our Clients' information is important to us. When you enter sensitive information, such as login credentials we encrypt the transmission of that information using secure socket layer technology (SSL). We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it.

We secure the personally identifiable information provided to us by you and third parties (see section 3) on computer servers in a controlled, secure environment.

Though we commit to our best endeavours in regards to your data security, unfortunately, the transfer of data via the internet cannot be guaranteed as completely secure. We ask that you recognise your responsibility in regard to password confidentiality when using any of our systems or processes.

## 9. USE OF COOKIES

As part of respecting the privacy of our website visitors, we do not use any cookies that collect personal information about you. The cookies we do use and the reason for their use is detailed below.

By using and browsing the AutoProtect website you are giving consent for cookies to be used according to our policy. If you do not consent to cookies being used, you can block or restrict any of the cookies through your browser settings or refrain from using the website.

We use cookies which:

**Allow the website to operate** -To make sure that the website operates correctly and runs smoothly we use cookies which assign a session name to each visit, these cookies are removed on closing the browser. Cookies are also used to identify whether Adobe Flash is available or not for a visitor.

**Help us to understand website usage** - To better understand how our website is used and improve its performance for you, we use Google Analytics cookies. Google Analytics is an analytical web service provided by Google, Inc. Cookies are used to collect information such as the time of day a visit occurred, which pages were visited, how long was spent on the site and to identify the point of origin and any search keywords used. This helps us to provide a better website experience and improve its performance.

Google Analytics cookies include:

\_utma | \_utmb | \_utmc | \_utmv | \_utmz | \_utmxx | \_utmz | \_utmcw

In order to improve website performance further we also use real time tracking cookies from HotJar. HotJar enables us to understand visitor behaviour in real time, which is valuable for evaluating the success of news or blog posts and rectifying any issues with the website should they arise.

In order to allow functionality from social media networks such as Twitter and Facebook, third party cookies are used on the AutoProtect website. We have no control over these third party cookies. To find out more about any third party cookie it is advisable to visit the respective site and to review their individual cookie policy.

## 10. CONTACT DETAILS

### 10.1 AutoProtect Group (Us)

Should you have any questions about your personal data, require further information or wish to exercise a right under data protection legislation please contact us at:

Data Protection Officer

AutoProtect Group

Warwick House

Roydon Road

Harlow

Essex

CM19 5DY

EMAIL - [DataProtectionOfficer@AutoProtect.net](mailto:DataProtectionOfficer@AutoProtect.net)

CALL – 01279 456500 (Mon to Fri 9.00 am to 5.00 pm)

Or via our website - [https://www.autoprotect.co.uk/customer\\_support](https://www.autoprotect.co.uk/customer_support)

### 10.2 Information Commissioners Office (ICO)

Tel - 0303 123 1113

Or via the ICO website - <https://ico.org.uk/concerns/>

## 11. Appendix – Record of changes to this notice

This notice was first published in February 2021.

Amendments since first publish:

Section	Change Made	Date of Change
2	Inclusion of new Group Companies	12/04/2022
3	Addition to legitimate interests as a business	12/04/2022