

Privacy Notice

Who We Are

The controller when you visit the <https://assurant-warranty.whocanfixmycar.com> website and book a repair appointment (together, the Services) is **TWG Services Limited**, registered at Twenty Kingston Road, Staines upon Thames, Surrey TW18 4LG, part of Assurant Inc. group companies ("**Assurant**", "**We**", "**Our**" or "**Us**").

This website is provided to facilitate the booking of repair appointments with Our authorised repairers. Your personal data will be collected by Whocanfixmycar.com on behalf of Assurant.

This privacy notice applies only with respect to personal data collected when you use the website and does not reflect Our practices with respect to information gathered through other Assurant services, websites, or other applications. For information about other services of Assurant, please refer to the respective privacy notices applicable to such services.

Administrator

- **TWG Services Limited**, registered in England & Wales, company number 1883565, registered office Twenty Kingston Road, Staines upon Thames, Surrey TW18 4LG, authorised and regulated by the Financial Conduct Authority.

Provider for insurance products

- **London General Insurance Company Limited**, registered in England & Wales, company no. 1865673, registered office Twenty Kingston Road, Staines-upon-Thames, Surrey, TW18 4LG, authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority; or
- **London General Life Company Limited**, registered in England & Wales, company no. 2443666, registered office Twenty Kingston Road, Staines-upon-Thames, Surrey, TW18 4LG, authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Provider for non-insurance products

- **The Warranty Group Services (Isle of Man) Limited**, registered in the Isle of Man, company no. 094279C, registered office St George's Court, Upper Church Street, Douglas, Isle of Man, IM1 1EE.

Personal Data We Collect from You

We may collect and use the following personal data for the provision of the Services:

- Name and contact details (e.g. postal address, phone number, email address, company name);
- Policy Number
- Vehicle information (e.g. make, model, manufacturer, registration number, current vehicle mileage, fault reported and evidence if applicable)
- Records of any correspondence regarding any specific enquiry; and
- Feedback provided by you about the Services (including through customer experience surveys).

You can decide whether or not to share this information with Us. If you do not provide Us with any of this information, We may not be to provide the Services.

Personal Data We Collect from Other Sources

We receive your name, contact information (including postal address and phone number), policy number and policy information from Our business partner (through whom you have booked your repair appointment) to enable Us to administer and perform the Services.

How We Use Your Personal Data and Our Legal Basis:

We will only process your personal data when We have a legal basis. Please see below Our legal basis together with the purposes.

- **The performance of the contract to provide you with the Services:** Administration of the service contract, performance of Our obligations towards you, including booking appointments, respond to your enquiries and questions.
- Where necessary to pursue **Our legitimate interests**, in particular:
 - For statistical analysis, performing internal administrative functions, handling customer enquiries, managing customer relationships, evaluating the appropriateness of Our products and services, or to contact you (by post, mobile phone, text, or email) to provide you with information about expiry and renewal dates, important changes to Our products and services, or to obtain your views, for example by asking you to complete a customer satisfaction survey. We use your information for these purposes where necessary for Our legitimate interests (monitoring and improving Our offerings and Our customer experience and administering Our internal processes) in line with Our balancing tests. For more information on Our legitimate interests and Our balancing tests you can contact Us using the contact information below.
 - For marketing purposes, about this and other similar products and services provided by Our group of companies. We use your information for these purposes based on your consent or on Our legitimate interests in accordance with applicable data protection law. You will always be able to withdraw your consent by contacting Us or by clicking on the “unsubscribe” link contained in such messages.
 - Risk evaluation and management (including operational risk), debt recovery, fraud and payment default prevention and evidence management.
 - Anti-money laundering, anti-terrorism efforts and sanctions screening.
 - To improve the safety, security and performance of the Services
- **Compliance with legal obligations.** Where We have a legal obligation to use your personal Data for the prevention of money laundering and terrorist financing and implementation of the applicable sanction regimes. We will use your personal Data whenever necessary to comply with Our legal obligations.
- **Where you have consented** to the use of your personal Data for the purpose We explain at the time. You will always be able to withdraw your consent by contacting Us or using the mechanism described to you at the time that your consent was obtained.

How We Share Your Personal Data

Your personal data may be disclosed to the following parties on a need-to-know basis:

- Other companies in Our group of companies.
- Third party suppliers of the Services, such as repairers, dealerships, and manufacturer. These third parties are permitted to use your personal data only if it is necessary to provide Us with

these business services, such as customer supports, customer communications, third party applications to send marketing communications, and database hosting.

- Other organisations and public bodies including law enforcement agencies in order to prevent or detect fraud or other criminal activity and to satisfy our legal and regulatory obligations where required and allowed under the applicable data protection law.
- An acquirer, successor, or assignee of Our company as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, or in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of Our business assets.

International Data Transfers

In the context of the purposes described above, your personal data may be transferred outside the United Kingdom to countries that are not considered to ensure an adequate level of protection of personal data. We will ensure that appropriate Standard Contractual Clauses are in place for those countries with privacy laws that do not have adequate protection. We may also rely on Our vendor's Binding Corporate Rules. If you would like more information on the relevant transfer mechanism or additional information on the transfers, please address these requests by using the contact details set out below.

How Long We Keep Your Personal Data

Your personal data will in principle be retained no longer than necessary for the aforementioned purposes. However, We may retain your personal data longer if this is required to comply with a law or regulation to which We are subject or necessary for Us to protect or exercise Our rights, to the extent allowed under applicable data protection law.

Automated decision-making and profiling

In general, We make no use of automated decision-making or profiling. Where necessary, We will inform you separately about such measures in individual cases.

Information Security

We have implemented safeguards designed to protect your personal data in accordance with industry standards. We have measures in place to restrict access to personal data to those individuals whom We know have a valid business purpose to have access to such information. We maintain physical, electronic and procedural safeguards. However, no method of transmission over the internet or method of electronic storage is totally secure. Therefore, We cannot guarantee its absolute security.

Minimum age

We do not knowingly collect information from children under the age of 18. You must be at least 18 years old to use the Service.

Your Rights and Choice

You have the following rights regarding your personal data:

- **Right to access** the personal data We hold about you.
- **Right to rectification** (correction) of your personal data when incorrect or incomplete.

- **Right to erasure** of the data We hold about you, when We have no legitimate overriding interest, or once the purpose for which We hold the data has come to an end.
- **Right to restriction** of the use of your personal data, generally while We are deciding on an objection you have made.
- **Right to withdraw your consent** at any time when the processing is based on your consent. We may be able to continue to process your personal data in some limited circumstances if We can base such processing on another valid legal basis.
- **Right to restriction of processing**, this means that the data will be blocked from normal processing but not erased.
- **Right to data portability** where processing is based on your consent, or on a contract.: the right to obtain a copy of the data concerning you in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from us.
- **Right to object to the processing** of your personal data based on Our legitimate interests, provided that there are no compelling legitimate grounds for the processing that would override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Please note that in certain situations, and subject to applicable law, We may not be able or obliged to comply with all your requests, for example comply with a deletion request relating to information We are required by law to keep or have a compelling legitimate interest in keeping.

We may charge you a reasonable fee in case you request additional copies of your personal data or make excessive requests. If We are unable to honor your request, or before We charge a fee, We will expressly inform you. In so far as practicable and required under law, We will notify third parties with whom We have shared your personal data of any request for correction, deletion, and/or restriction to the processing of your personal data. Please note that We cannot guarantee third parties will follow up on Our notification and We encourage you to contact those third parties directly.

Click here to submit your privacy rights request: www.assurant.com/dataprotection/eu. You can also contact Us by any other means or by using the contact details set out below.

You always have the right to lodge a complaint with your local Data protection Authority.

Changes to this Notice

We may from time to time update this privacy notice. If We make material changes to Our notice, We will notify you by email or by means of a notice through the Service.

How to Contact Us

For general queries, please contact Our Customer Relations Team by emailing:

Customer.Relations@thewarrantygroup.com

If you wish to submit a privacy right request, please click here:

www.assurant.com/dataprotection/eu

If you have any questions about Our privacy notice or want to lodge a data privacy complaint, please contact Us:

- By post to: TWG Services Limited, Data Protection Officer, Twenty Kingston Road, Staines upon Thames, Surrey TW18 4LG
- By E-Mail: dataprotectionofficer@assurant.com

Effective date: January 2023