

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.

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 Kindertons Limited, a company registered in England and Wales under company registration number 3711080 and whose registered office address is at Kindertons House, Marshfield Bank, Crewe, CW2 8UY.

All details supplied by you to Kindertons 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

Kindertons may collect the following information about you:

- Name
- Address
- Contact details (email address, telephone number etc.)
- Vehicle details
- Proof of identity (V5, Driving License, Utility Bill, GAP Insurance).
- Accident circumstance details
- CCTV or dashcam footage of your incident
- Third party insured details
- Witness details
- Any other information required by us to provide our services to you
- IP address (where using our live chat service)
- Geo-location tracking of hire vehicles
- Telephone call recording

In order to process this data about you, we rely upon the lawful basis b) "performance of a contract" under Article 6 of the UK GDPR. This means that we are required to process this personal data in order to fulfil our contractual service to you as requested.

Sensitive or "Special Category" 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 is

part of our obligations under the Consumer Duty standards set out by the FCA. Any personal information relating to medical conditions or vulnerabilities you may have is known as “special category data” under the law, and in order to limit our collection of this we will take every effort to only note down onto our systems the “reasonable adjustments” that we must make to accommodate your fair treatment and collect no information specifically referencing any conditions that you notify us of.

Although we will take every step to limit the collection of this more sensitive data, depending on the nature of the reasonable adjustment we make – this data may be easily inferred to determine the nature of the vulnerability or condition that is present. Therefore, we still treat this reasonable adjustments data with the same respect and lawfulness that is required under the UK GDPR. This requires us to identify a special condition for processing under article 9 – and depending on the nature of the condition we may rely on the following:

- e) data made public by the data subject, or
- (g) Reasons of substantial public interest - conditions;
 - 16. Support for individuals with a particular disability or medical condition,
 - 19. Safeguarding of economic well-being of certain individuals.

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.

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 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 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 and Legal Compliance Manager, Kindertons House, Marshfield Bank, Crewe, CW2 8UY, email privacy@kindertons.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).

Sharing Data with Third Parties

We will share your personal data with third parties where this is necessary for us to do so, in order to fulfil your contract with us. For example, we utilize suppliers for rental car fulfilment.

We will also share, and receive data, from other third parties where necessary to fulfil your contract with us or in order to help us prevent and detect fraud in line with our legal obligations.

We also partner with a panel of legal firms for pursuing any personal injury claim opportunity, and we will always rely on your consent before transferring your call to them. We may also pass your information to other legal firms in order to collect missing payments due from Third Party Insurers. This is done in line with our Legal obligations.

Please be assured that we will hold the security and compliance of all third parties to the same high standards as we hold ourselves.

Supplier	Purpose
Carweb	Provide an equivalent vehicle
Loqate - GBG	Postcode look up
Customer Portal (KIMEO)	Create and import customer docs

CHOX Export	Notification & Billing of services
Verify Export	Notification & Billing of services
Mobile App	Update customer
Experian ID Check	ID check
CAPS	Instruct repairers and import LOU dates
Claim Service Pol Validator & Claim Export	Import PH details / check GHV work providers
EVA	Export instructions, import reports and images
LEI Website	Import customer data / Flag GHVs
MID	Reg export and MID result import
DVLA / KADOE	Import result and make decisions
Audatex	Shell day 1 / TL triage day 2
Verius	Export client data and import fraud risk data
FMS Trak Geofence	vehicle movement to aid offhire
Rant & Rave	VOC Programme
Copart	Remove manual touches
CHOX A2A	Remove need for portal use / double keying
Verify A2A	Remove need for portal use / double keying
2 way SMS systems	Import SMS response from Customer
Carweb	Fleet vehicle details import
Loqate - GBG	Postcode look up
1 Link	Instruct repairs and import updates
Worldpay	Worldpay card payment gateway
Nexus - IRIS	Export instructions and import hire car data
Europcar	Export instructions and import hire car data
SMS	SMS on cost reclamation
Trak	Vehicle asset tracking and protection
Juice Fuel (Esso)	Fuel use tracking
LinkedIn	LinkedIn
Google Maps	Google Maps
Bott & Co	Personal Injury Solicitors
Minster Law	Personal Injury Solicitors
New Law	Personal Injury Solicitors
Friends Legal	Personal Injury Solicitors
Jackson Boyd	Personal Injury Solicitors
Walker Thomas	Litigation Solicitors
Camfords Law	Litigation Solicitors
True Solicitors	Litigation Solicitors

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@kindertons.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 25.05.2023. We may change this notice by updating our website to reflect changes in the law or our privacy practices. Please review this notice regularly so that you are aware of any changes.