

AAA Club Partners, Inc.

## AAA SMARTtrek<sup>SM</sup> Privacy Policy

AAA Club Partners, Inc. (“ACP”) offers the AAA SMARTtrek<sup>SM</sup> service to members of your AAA Club. It provides the service using a number of independent vendors and service providers (collectively, our “Service Providers”). When the terms “we” “us” and “our” are used in this Privacy Policy, they refer to ACP together with its Service Providers

Your privacy is important to us. We are committed to protecting your privacy and maintaining a trusted relationship with you. This Privacy Policy describes the information that we may collect, use, store and share in connection with the SMARTtrek service, how we may use it, and to whom such information may be disclosed.

### Relationship with Other AAA Privacy Policies

SMARTtrek is one of a number of services offered by your AAA Club and/or, by ACP. ACP and your AAA Club each publish privacy policies that describe their information policies for your personal information collected and used by each of them in providing other services to AAA members. SMARTtrek involves the collection and use of personal information not commonly needed or collected in connection with other service offerings of AAA Clubs, such as travel or discount programs., SMARTtrek captures such information as how your vehicle is operated and its location at a specific time. We present here the specific privacy terms that govern how ACP and its Service Providers access, use, store and share information accessed through your use of SMARTtrek. This Privacy Policy is applicable to all of your personal information we collect and use in connection with SMARTtrek.

### Protection of Personal Information

We take precautions — including administrative, technical, and physical measures — to safeguard your personal information against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction.

### The Device

Using SMARTtrek involves plugging a telematics device (the “Device”) into your automobile. The Device collects and transmits to us data concerning your automobile, such as diagnostic trouble codes, temperature and some battery information, as well as where, when and how it is being driven.

### What We Collect

We may collect, use and store the following types of information (“Information”) about you and your vehicle:

- contact information (e.g., name, address, telephone number, email address);
- billing information (including your credit or debit card number);
- information about your car, such as the vehicle identification number (VIN), make, model, and year;
- registration information and emergency contact information;
- information that helps us customize our services, such as your use of the Device and various features of SMARTtrek;
- other information that you submit in online forms;
- information about your vehicle’s operation, including location, technical information like diagnostic trouble codes, fuel economy, odometer readings, and speed data;
- information about your driving practices and habits; and
- information about collisions involving your car (including time, location, your vehicle’s movement immediately before the collision and the direction from which your car was hit).

The data described above is collected by the Device and transmitted to us regardless of who is operating your vehicle. You should inform anyone you permit to operate your vehicle that the Device has been installed in it and will collect and transmit to us information concerning the vehicle, its operation and location and that we will collect and record such information

#### How We Collect Information

We collect, Information from you and your car systems in several different ways, including:

- from what you provide to us, whether in person, by telephone, e-mail or use of our website;
- from your use of various SMART *trek* features and services;
- through the Device, which transmits to us vehicle information collected from the data monitoring and recording systems of your vehicle;
- through the Device, which transmits to us location information generated by the Device using the GPS system.

Information collected through the Device is periodically or continuously collected when the Device is installed in your vehicle.

#### How We Use

We may use the Information:

- to provide SMART *trek* and its features to you;
- to communicate with you about your account;
- for troubleshooting;
- for analysis and research;
- as required by law;
- to protect our rights or property or the safety of you or others;
- to prevent fraud or misuse of SMART *trek*;
- to offer you new or additional products or services; and
- for any other purposes when the information is used on an aggregate and anonymized basis.
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#### How We Share :

We may share your information as follows:

- with your AAA Club and others in their role as a Service Provider, so that we and they can provide services to you and to us. This would include sharing your information with roadside assistance providers, emergency service providers, the police, our wireless service providers, credit card processors, data management companies, and others;
- with other non-insurance companies that provide goods and services endorsed by your AAA Club, or that provide services to your AAA Club. We only share your information in this way so that we or your AAA Club can offer you products and services that best meet your interests and needs and to perform transactions that you authorize or request, or to administer, analyze, and otherwise maintain and improve our programs, products and services and those of your AAA Club. The companies outside our own affiliates will use this information (which excludes information about your driving practices and habits; and information about collisions involving your car, including time, location, your vehicle's movement immediately before the collision and the direction from which your car was hit).only to promote their services to you or to provide such services to your AAA Club, and are not permitted to share your information or to use it for any other purpose.
- with third parties when disclosure is legally required. For example: (a) we may furnish information in connection with a subpoena, warrant, or order issued by a court or other body with appropriate legal authority; (b) we may furnish information responsive to a formal request made by another party in connection with a legal action in which we are involved; or (c) we may furnish information to anyone if we believe in good faith that a law, regulation or rule requires us to do so. In the event

that we receive a formal request to disclose information in connection with a legal action, if we reasonably believe we are permitted to do so by law, we will use reasonable efforts to contact you through a valid email address that you provided to us;

- with third parties for any reason if the information is first converted so that it is not personally identifiable to you, and used with similar anonymized information obtained from others or their cars (“aggregate information”);
- with others to protect our rights or property or the safety of you or others;
- as required by law

If our company, or all or a substantial part of our assets or business including SMART*trek* is acquired by another company, that company will possess the personal information collected by us and it will assume the rights and obligations regarding your personal information as described in this privacy policy.

#### Access And Updates To Your Information

While you continue to use the Device, we will permit you to log in and view certain Information that pertains to your use of the Device for the last twelve months. If you notice an error, you should contact us. Please remember that we may be legally obligated to retain that Information. If you have any concerns about the accuracy of your personal information or our Privacy Policy, you can contact us at 800-814-4684 or SMART*trek*help@aaclubpartners.com. Other than the information posted on the Website, we are not required to provide you with additional information or information in different formats (e.g., audio recording of service call). In addition, during the term of your subscription, you may update your contact information using our website.

#### Safeguarding Your Information

Information will be stored on servers controlled by us or others who by contract agree to maintain the security, confidentiality and integrity of your information in accordance with this Privacy Policy. It will be retained in accordance with our security and records management policies. The confidentiality, security, and integrity of the information will be protected through reasonable physical, administrative and technical safeguards. Because we provide SMART*trek* through wireless networks, your communications may be intercepted by others. We cannot and do not guaranty (and we expressly disclaim) the security and privacy of wireless transmissions, and we will not be liable for any lack of security relating to SMART*trek*'s use of wireless transmissions. You agree that you will not hold us liable for any damages resulting from any loss of privacy or security occurring in connection with any communications over wireless networks.

#### Online Practices

Our website may place cookies on your computer, tablet or smartphone to make your experience better, for example, to remember your login ID. We do not use third party “tracking” cookies.

#### Our Companywide Commitment to Your Privacy

To make sure your personal information is secure; we communicate our privacy and security guidelines to our employees and to our Service Providers and strictly enforce privacy safeguards.

#### Feedback

If you provide feedback to us about SMART*trek*, you agree that we may use and disclose such feedback for any purpose, provided we will not associate such feedback with your personal information. We may collect any information contained in such communication and will treat the personal information in such communication in accordance with this privacy policy.

#### Call Recording

We may record and monitor conversations by you or others with us, with emergency service providers, with the police, or with third parties to maintain or improve quality, for issue resolution, for training purposes, or to promote and provide the service to you. Please note that our service representatives may

also remain on the line if they conference in a third party (such as emergency dispatch service providers) to assist in completing a service request. These third parties may also record and monitor your conversations.

*Regarding Children*

We do not intentionally gather personal information about persons who are under the age of 13. If we learn that we have collected the personal information of a child under the age of 13 we will take steps to delete the information as soon as possible.

*Privacy Policy Updates*

This Privacy Policy is subject to occasional revision in the same way that we change the terms of the overall AAA SMARTtrekSM Terms and Conditions. When we change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy.

Updated: April 2014

