

## AAA Club Partners, Inc.

### AAA Roadwise<sup>SM</sup> Privacy Terms

AAA Club Partners, Inc. (“ACP”) operates the AAA Roadwise<sup>SM</sup> Platform together with a number of independent vendors and service providers and your AAA Club (collectively, our “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 access, use and store in connection with operating the Roadwise Platform, how we may use it, and to whom such information may be disclosed.

#### Relationship with Other AAA Privacy Notices

The AAA Roadwise Platform provides its users with an individualized service that fits within the overall service offerings of your AAA Club (and your AAA insurer, if you have AAA insurance). Those AAA entities publish privacy notices that describe their general information practices for your personal information collected and used by each of them (except that your personal information relating to the Roadwise Information and made available to them only by ACP or another Service Provider continues to be governed by this privacy policy).

However, the AAA Roadwise Platform involves the accessing and use of information not commonly contemplated for auto club or insurance purposes (such as information about how your vehicle is operated and its location at a specific time), so we have created these specific privacy terms that govern how ACP and its Service Providers access, use and store information accessed through your use of the Platform.

#### The Device

Use of the Platform involves the installation of a Device in your automobile which collects and transmits to ACP and/or our Service Providers data concerning your automobile and its operation, as well as where, when and how it is being driven.

#### What We Access

We may access, use and store the following types of information about you:

- contact information (e.g., name, address, telephone number, email address);
- billing information (including your credit 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 Services;
- other information that you submit in online forms;
- information about the car’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, such as the direction from which your car was hit.

#### How We Access Information

We access, use and store information from you and your car systems in several different ways, including:

- from what you provide to us;
- from your use of services;
- from calls or emails between us;
- from our website;
- from vehicle recording systems of your vehicle;
- from our wireless service providers and third party data providers; and
- from your car itself periodically or continuously when the Device is installed.

### Call Recording

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

### Consent

You (1) understand and agree that regardless of who is operating your vehicle the data collected by the Device and accessed by us is owned by you; (2) agree that you will inform anyone you permit to operate your vehicle that a Device has been installed to collect information concerning the vehicle, its operation and location and that we will have access to such information and have provided the consent to us appearing below. In addition, for yourself, and on behalf of anyone else operating your vehicle, (1) expressly consent to the monitoring and recording activities described herein, as well as our use and disclosure of your information described herein, and (2) release us and our Service Providers from all claims, liabilities and losses resulting in connection with our access, storage use and disclosure of your information as described herein.

### Retention

We may retain the information we access indefinitely but will take all reasonable measures to protect the security and privacy of your personal information.

### Use

We may use the Information:

- to provide the Platform and its services 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 the Platform and its services;
- 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.

### Sharing:

We may share your information as follows:

- with our Service Providers and others so that we and they can provide services to you and to ACP. 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, AAA affiliated insurers and others, as may be required, to deliver services;
- with your AAA Club which may share it with other 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 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, in our discretion, legal reasons compel disclosure. For example: (a) a subpoena, warrant, or order issued by a court, person or body with jurisdiction compels the

production of information; (b) we receive a formal request to disclose information in connection with a legal action; or (c) 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 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 when the information is anonymized (i.e., 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;
- with other AAA Clubs or our affiliated legal entities, provided that each agrees to treat any personal information about you in accordance with this privacy policy.

If our company, or all or a substantial part of our assets related to the Platform, 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.

#### 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.

#### Access And Updates To Your Information

You will be able to view the information related to your use of the Device on our website. We will maintain the information as stated above. While you continue to use the Platform, we will permit you to log in and view certain information that pertains to your use of the Device for the current year. 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 practices, you can contact us. 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 from the website we have incorporated into the Platform.

#### Safeguarding Your Information

Information will be stored on servers controlled by us or our Service Providers who by contract agree to maintain the security, confidentiality and integrity of your information in accordance with our 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 the Platform through wireless networks, your communications may be intercepted by others. We and our Service Providers cannot and do not guaranty (and we and our Service Providers expressly disclaim) the security and privacy of wireless transmissions, and we and our Service Providers will not be liable for any lack of security relating to the use of the Platform by you or your Vehicle. You agree that you will not hold us or our Service Providers liable for any damages resulting from any loss of privacy or security occurring in connection with any communications over such networks.

#### Online Practices

Our website may place cookies on your computer 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 the Platform, Device, or our service, 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.

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 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 Roadwise™ 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: September 2012