

# Privacy Notice for Jaguar Land Rover end-clients and beneficiaries of Roadside Assistance Services

## Privacy Notice

### We care about your personal data

**AWP SERVICES NL B.V.**, (“we, “us” “our”), trading under the brand “Allianz Global Assistance Europe”, is a company belonging to Allianz Partners Group, authorised under the Dutch regulation. Protecting your privacy is a top priority for us. This privacy notice explains how and what type of personal data will be collected, why it is collected and to whom it is shared or disclosed. Please read this notice carefully.

#### 1. Who is the data controller?

A data controller is the individual or legal person who controls and is responsible to keep and use personal data, either in paper or electronic files.

**AWP SERVICES NL B.V.** is, as defined by relevant data protection laws and regulations, the Data Controller in regard to the personal data that we request and collect from you for the purposes detailed in this privacy notice.

#### 2. What personal data will be collected?

If you contact us to request any of our roadside assistance services, we will ask for the following personal details:

- Surname, first name
- *Licence plate number*
- *Telephone numbers*
- *Email address*
- *Location of the assistance event*
- *Your voice, if the call is recorded*

On the occasion of the provision of the Roadside Assistance Services we may collect other information that eventually could be considered “personal”. For instance, your postal address if we must organize your return to the origin of your travel, or even information related to other people travelling with you that could be also beneficiaries of the Services.

 **By providing us personal details of other people that could be beneficiaries of the Services, you commit to give them the information contained in this Privacy Notice and you accept not to provide that information otherwise.**

#### 3. How will we obtain and use your personal data?

We will collect and use the personal data that you provide to us and that we receive about you (as explained below) for a number of purposes and with your express consent unless applicable laws and regulations do not require us to obtain your express consent, as shown below:

Purpose	Is your express consent required?
<ul style="list-style-type: none"><li>• To provide you the roadside assistance services in the Terms and Conditions of the Service Agreement existing between Jaguar Land Rover (contract holder) and Allianz Global Assistance Europe (service provider), to be provided to Jaguar Land Rover end-customers (beneficiaries),</li></ul>	<ul style="list-style-type: none"><li>• We will process your data in order to comply with our obligations under the referred Service Agreement as required by civil and commercial laws, in the legitimate interest of both parties and your own one, as beneficiary</li></ul>

Purpose	Is your express consent required?
<ul style="list-style-type: none"> <li>To re-invoice to Jaguar Land Rover the amounts that we could pay to you, when appropriate according to the above mentioned Service Agreement.</li> </ul>	<ul style="list-style-type: none"> <li>The processing of your data for this purposes is necessary for us, Allianz Global Assistance Europe, to exercise our rights front of Jaguar Land Rover, and for Jaguar Land Rover to comply with the obligations under the Service Agreement existing between both parties.</li> </ul>
<ul style="list-style-type: none"> <li>To provide information to Jaguar Land Rover with the purpose of monitoring the correct performance by Allianz Global Assistance Europe of its obligations as defined in the Service Agreement.</li> </ul>	<ul style="list-style-type: none"> <li>No, to the extent these processing activities are a legitimate interest of Jaguar Land Rover as contract holder</li> </ul>
<ul style="list-style-type: none"> <li>To communicate your contact information to Jaguar Land Rover or to a third Company acting on its behalf, to contact you with the purpose to conduct quality surveys about the services provided by us, with the purpose to assess your level of satisfaction and improve your customer experience</li> </ul>	<ul style="list-style-type: none"> <li>No, on the basis of the legitimate interest of Jaguar Land Rover to verify independently the quality of the Services, and the one of Allianz Global Assistance Europe to prove compliance with Jaguar Land Rover quality standards</li> </ul>
<ul style="list-style-type: none"> <li>To defend in case of complaints or even litigation cases that Jaguar Land Rover or it beneficiaries could trigger claiming contractual or third party liabilities related to any service provided by Allianz Global Assistance Europe or our collaborators</li> </ul>	<ul style="list-style-type: none"> <li>No. We are entitled to process any personal data that you will provide to us, and that will be adequate, relevant and non-excessive for these purposes, on the basis of our legitimate interest to defend.</li> </ul>
<ul style="list-style-type: none"> <li>To perform statistical and quality analysis on the basis of aggregated data.</li> </ul>	<ul style="list-style-type: none"> <li>If we carry out any of these processing activities, we will do in by aggregating and anonymizing data. After this process, the data are not considered "personal" data anymore and your consent is not required.</li> </ul>
<ul style="list-style-type: none"> <li>To meet any legal obligations (e.g. those arisen from Laws on civil and commercial agreements, roadside assistance activities, regulations on taxes, accounting and administrative obligations, to prevent money laundry, or with purposes of sanction screening, i.e. to check whether you, your country or your sector are subject to sanctions impeding or restricting us to make payments if relevant)</li> </ul>	<ul style="list-style-type: none"> <li>No, to the extent these processing activities are expressly and legally authorized, even required, we are entitled to process your personal information, and to keep the necessary supporting documentation, with these purposes without having to request your consent.</li> </ul>
<ul style="list-style-type: none"> <li>Fraud prevention and detection, including, when appropriate, for example, comparison of your information with previous service requests</li> </ul>	<p>No, it is understood that the detection and prevention of fraud is a legitimate interest of the Controller, therefore We are entitled to process your data for this purpose without collecting your consent.</p>
<ul style="list-style-type: none"> <li>Audit purposes, to comply with legal obligations or internal policies</li> </ul>	<ul style="list-style-type: none"> <li>We can process your data in the framework of internal or external audits either required by law, by internal policies, or requested by Jaguar Land Rover in the scope of the Service Agreement with regards to which you are beneficiary. We won't request your consent for these processing to the extent that they are legitimated by the applicable regulations or the legitimate interests of Allianz Global Assistance Europe or Jaguar Land Rover. However, we will ensure that only the strictly necessary personal data are used, and treated with absolute confidentiality.</li> </ul> <p>Internal Audits of Allianz Global Assistance Europe are usually conducted by our holding</p>

Purpose	Is your express consent required?
	company, Allianz Partners SAS (7 Rue Dora Maar, 93400 Saint-Ouen, France).

We can collect the personal information to be used for the above purposes directly from you, from a beneficiary of the services with whom you could be travelling, or even from our providers to which we will assign the provision of the Services to you

We will need your personal data if you would like to benefit from the Services that Jaguar Land Rover has contracted with Us for its end-customers. If you do not want to provide the requested information to us, we may not be able to provide the services and or assistance that you request.

#### 4. Who will have access to your personal data?

We will ensure that your personal data is processed by our staff confidentially, on a need-to know basis, and in a manner that is compatible with the purposes indicated above.

For the stated purposes, your personal data may be disclosed to the following parties who operate as third party data controllers:

Public authorities, other Allianz Partners and Allianz Group companies (e.g. for audit purposes), third parties collaborators and partners participating in the provision of the services (such as roadside assistance drivers/ providers, travel agencies, airlines, taxi companies, repairers, fraud investigators, lawyers), independent experts, etc.

To the extent informed in this Privacy Notice, we can also share your personal information with Jaguar Land Rover, in its condition of Contract Holder of the Services you are beneficiary of.

For the stated purposes, we may also share your personal data with the following parties who operate as data processors, i.e., processing the data under our instructions, and subject to the same obligations of confidentiality, need-to-know and compatibility with the purposes described in this Privacy Notice.

Other Allianz Partners or Allianz Group companies, or third party companies acting as subcontractors of internal activities (e.g. other Companies belonging to Allianz Partners Group, acting as subcontractors of Allianz Global Assistance Europe handling the services in the countries covered by the Service Agreement existing between Jaguar Land Rover and Allianz Global Assistance Europe, companies belonging to ALLIANZ TECHNOLOGY Group providing of IT support and maintenance, other IT providers, tax management companies, postal providers, document management providers), technical consultants, surveyors (IT, postal, document management);

Finally, we may share your personal data in the following instances:

- In the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in any insolvency or similar proceedings; and
- To meet any legal obligation, including to the relevant ombudsman if you make a complaint about the product or service we have provided to you.

#### 5. Where will my personal data be processed?

Your personal data may be processed both inside and outside of the European Economic Area (EEA) by the parties specified in section 4 above, subject always to contractual restrictions regarding confidentiality and security in line with applicable data protection laws and regulations. We will not disclose your personal data to parties who are not authorized to process them.

Whenever we transfer your personal data for processing outside of the EEA by another Allianz Group company, we will do so on the basis of Allianz's approved binding corporate rules known as the Allianz Privacy Standard (Allianz's BCR) which establish adequate protection for personal data and are legally binding on all Allianz Group companies. Allianz's BCR and the list of Allianz Group companies that comply with them can be accessed [here](#). Where Allianz's BCR do not apply, we will instead take steps to ensure that the transfer of your personal data outside of the EEA receives an adequate level of protection as it does in the EEA. You can find out what safeguards we rely upon for such transfers (for example, Standard Contractual Clauses) by contacting us as detailed in section 9 below.

#### 6. What are your rights in respect of your personal data?

Where permitted by applicable law or regulation, and within the scope therein defined, you have the right to:

- Access your personal data held about you and to learn the origin of the data, the purposes and ends of the processing, the details of the data controller(s), the data processor(s) and the parties to whom the data may be disclosed;
- Withdraw your consent at any time where your personal data is processed with your consent;
- Update or correct your personal data so that it is always accurate;
- Delete your personal data from our records if it is no longer needed for the purposes indicated above;
- Restrict the processing of your personal data in certain circumstances, for example where you have contested the accuracy of your personal data, for the period enabling us to verify its accuracy;
- Obtain your personal data in an electronic format for you or for your new insurer; and
- File a complaint with us and/or the relevant data protection authority.

You may exercise these rights by contacting us as detailed in section 9 below providing your name, email address, account identification, and purpose of your request.

**7. How can you object to the processing of your personal data?**

Where permitted by applicable law or regulation, you have the right to object to us processing your personal data, or tell us to stop processing it (including for purposes of direct marketing). Once you have informed us of this request, we shall no longer process your personal data unless permitted by applicable laws and regulations.

You may exercise this right in the same manner as for your other rights indicated in section 6 above.

**8. How long do we keep your personal data?**

We will retain your personal data only as long as they are necessary for the purposes informed in this Privacy Notice, and deleted or anonymized when no longer required. Here below we inform you some of the retention periods applicable to the purposes informed in section 3 above.

However, please be aware of , sometimes additional specific requirements or events may override or modify them, such as ongoing legal holds over relevant information, or pending litigation or regulatory investigations, which may supersede or suspend these periods until the matter has been closed, and the relevant period to review or to appeal has expired. In particular, retention periods based on prescription periods for legal claims can be interrupted and stat to run again.

<p>Personal information collected on the occasion of the assistance services that you request under the Service Agreement existing between Allianz Global Assistance Europe and Jaguar Land Rover</p>	<p>We will keep the personal information that you will provide to us as long as they will be adequate, relevant and non-excessive for the purposes informed in Section 3.</p> <p>In particular, we will process your personal information while we will be handling the assistance services requested by you under the referred Service Agreement, and once concluded, as long as necessary to provide the information that, as contract holder, Jaguar Land Rover requires to Allianz Global Assistance Europe in order to verify the adequate fulfilment of our contractual obligations (e.g. performance of the services contracted under the conditions agreed, compliance with the Service Level Agreements, key Performance Indicators, etc)</p> <p>Moreover, we will be entitled to retain your personal information during the prescription periods that applicable regulations define to claim any eventual or potential contractual or third party liability, with the purpose to defend from them, or to exercise our rights to you, Jaguar Land Rover or any other party concerned.</p>
<p>Personal Information that could be in invoices to obtain from Jaguar Land Rover the reimbursement of amounts that we could anticipate to you as beneficiary of the services in the agreement, or in any other documentation supporting these invoices.</p>	<p>We will process this information as long as it will be necessary to manage the reimbursement of the referred amounts, as well as for those periods that accounting regulations require to store the documentation supporting the accounting entries in the corresponding accounting records.</p>

Contact Information for Jaguar Land Rover quality Surveys	We will process your contact details as long as they will be necessary to prove to JLR that we have complied with our contractual obligations in the Service Agreement on this regard, according to the German regulation, governing law of that contract.
Personal Information necessary to comply or to prove compliance with legal obligations (e.g. those arisen from Laws on Civil or Commercial contracts, those related to Roadside Assistance activities, regulations on taxes, any accounting and administrative obligation, to prevent money laundry, or with purposes of sanction screening, i.e. to check whether you, your country or your sector are subject to sanctions impeding or restricting us to make payments if relevant, etc).	We will process your personal information if adequate, relevant and non-excessive for these purposes for the periods required by the corresponding applicable regulations.
Personal information contained in documents eventually evidencing any kind of fraud.	We will keep this information as long as it will relevant for us to prevent new fraud attempts, unless posterior or additional information that we could obtain or you could provide, will evidence its inaccuracy.

We will not retain your personal data for longer than necessary and we will hold it only for the purposes for which it was obtained.

#### 9. How can you contact us?

If you have any queries about how we use your personal data, you can contact us by email or post as follows:

**AWP SERVICES NL B.V.**

Att. Data Protection.

**Poeldijkstraat 4 · 1059 VM · Amsterdam · Nederland**

Email: [dataprivacy.fos.nl@allianz.com](mailto:dataprivacy.fos.nl@allianz.com)

You can also use these contact details to exercise your rights, or to submit your queries or complaints to other Allianz Partners entities acting as controllers (see section 4 above) to which we may have shared your personal data. We will address them your request and support their handling and answer to you in our local language.

#### 10. How often do we update this privacy notice?

We regularly review this privacy notice. This privacy notice was last updated in **September 2019**