

ACG AAADrive App Privacy Notice

Effective Date: **6-12-2024**

The Auto Club Group and its insurance carriers who are providing this notice (Auto Club Insurance Association (ACIA), Auto Club Group Insurance Company (ACGIC), MemberSelect Insurance Company (MS), Auto Club Property Casualty Insurance Company (ACPCIC), Meemic Insurance Company (Meemic), Fremont Insurance Company (Fremont), Auto Club South Insurance Company (ACSIC), Auto Club Insurance Company of Florida (ACICF), Universal Insurance Company (UIC), The Members Insurance Company (TMIC)) (collectively, "ACG") respect your privacy. This AAADrive App Privacy Notice ("Privacy Notice") describes the types of personal information we obtain when you use the AAADrive application ("App"). This Privacy Notice also describes how we use the information, with whom we may share it, the measures we take to protect the information and how you can contact us about our privacy practices.

Unless indicated otherwise, this Privacy Notice applies solely to your use of the App. Consumers who have a financial product or service with ACG should also refer to our [U.S. Consumer Privacy Notice](#) which provides additional information about how we collect and share your non-public personal information and how you may limit our sharing of such information.

Information We Obtain

We obtain certain personal information about you when you use the App, including:

- Contact information, such as name, mobile number and email address;
- Login credentials, such as username and password;
- Account information, such as policy number; and
- Other information you choose to provide, such as other content you upload to the App, communications, registrations and sign-up forms.

As part of the AAADrive Program, the App will detect and record your trips. The App will identify all trips as "driving" trips (*i.e.*, where the App determines you are operating a vehicle) or "non-driving" trips (*i.e.*, where the App determines that you are not operating a vehicle). In the App, you may manually exclude trips where you were not driving, by identifying the specific trip and re-labeling that trip. Any such exclusion of trips as a "driving trip" must be completed within 30 days of the trip or it will be deemed a driving trip.

To enable your participation in the AAADrive Program, the App will require access to your device's:

- Precise geolocation (through GPS, Bluetooth, WiFi signals and other technologies), which enables us to record your trips. The App's location access must be set to "Always" or "Allowed all the time" (meaning the App will have access to your device's location even when it is in the background and you are not using the App) to enable automatic detection of a trip when a vehicle is in motion without the need for you to take manual action to record your trips; and
- Motion activity, which enables us to accurately detect that you are moving in a vehicle rather than through other means (*e.g.*, walking or running).

Your device's operating platform may provide you with a notification when the App attempts to collect your device's precise geolocation and motion activity. Please note that if you decline the App's access to your device's precise geolocation and motion activity as described above, you will not be able to use the App for the AAADrive Program.

In addition to your device's geolocation information and motion activity, the App records data about your driving activity that is designed to help identify risky driving events, such as:

- Start and end time of driving trips, distance traveled, and road type (e.g., time spent on primary, secondary and tertiary roads);
- Information about the movement and activity of the vehicle you are driving, such as braking information (e.g., hard braking), turn-related data (e.g., hard turns or cornering), vehicle speed, and data from the vehicle's sensors (e.g., accelerometer, gyroscope, barometer, magnetometer); and
- Information about phone usage during driving, such as phone motion and phone screen interaction.

Information We Obtain By Automated Means

When you use the App, we also may collect certain information by automated means, such as through device logs, server logs and other technologies. The information we collect in this manner may include the device type used, mobile operating system, device identifier and similar unique identifiers, device settings and configurations, IP address, location data (as described above), WiFi network identifier and signal, diagnostics data, battery and signal strength, usage statistics, referring emails and web addresses, dates and times of usage, actions taken on the App, and other information regarding your use of the App.

We may use these automated technologies on our App to collect information about your equipment, browsing actions, and usage patterns. These technologies help us:

- Remember your information so you do not have to re-enter it;
- Track and understand how you use and interact with our App;
- Tailor the App around your preferences;
- Measure the usability of the App and the effectiveness of our communications; and
- Otherwise manage and enhance our products and services, and help ensure they are working properly.

For mobile devices, you can manage how your device shares certain device data by adjusting the privacy and security settings on your mobile device. Without these technologies, however, you may not be able to use all of the features of the App.

How We Use The Information We Obtain

We may use the personal information we obtain through the App to:

- Provide our products and services, including to:
 - Evaluate your driving activity, including developing or adjusting driving scores;
 - Manage, adjust, increase and/or decrease your policy premiums;
 - Modify our underwriting rules and procedures, including affecting your eligibility;
 - Detect whether an accident may have occurred;
 - Assist in claim handling and investigations;
- Communicate with you (including providing you with driving feedback and coaching), respond to inquiries and offer customer support;
- Establish and manage accounts;
- Report to credit bureaus;
- Verify your identity;

- Personalize your experience on our App;
- Establish and manage our business relationships;
- Perform analytics (including, but not limited to, market research, trend analysis, financial analysis, and analysis of our customer base), and anonymization of personal information;
- Operate, evaluate and improve our business (including developing new products and services; enhancing, improving and analyzing our products and services; managing our communications; and performing accounting, auditing and other internal functions);
- Maintain and enhance the safety and security of our App, products and services and prevent misuse;
- Protect against, identify and prevent fraud and other criminal activity, claims and other liabilities;
- Exercise our rights and remedies and defend against legal claims; and
- Comply with and enforce applicable legal requirements, relevant industry standards and ACG policies and terms.

We also may use the information in other ways for which we provide specific notice at the time of collection.

Third-Party Analytics Services

We may use third-party analytics services on our App, such as Google Analytics. The information we obtain through the App may be disclosed to or collected directly by these services. To learn more about Google Analytics, please visit <https://www.google.com/policies/privacy/partners/>.

Information We Share

We may share the information we obtain about you with our affiliates and subsidiaries and with our business partners. We also may share the information we obtain about you with third-party vendors and other entities to perform services on our behalf, such as application hosting, data analytics, marketing, payment processing, fraud prevention, and other services. In addition, with your authorization, we may share the information we obtain about you with other insured members of your household upon their request.

We also may disclose personal information (1) if we are required to do so by law or legal process (such as a court order or subpoena); (2) in response to requests by government agencies, such as law enforcement authorities, or self-regulatory organizations; (3) to establish, exercise or defend our legal rights and those of our affiliates, subsidiaries or business partners; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (5) in connection with an investigation of suspected or actual illegal activity; or (6) otherwise with your consent or as directed by your representative.

We reserve the right to transfer any personal information we have about you in the event of an actual or prospective sale or transfer of all or a portion of our business or assets (including in the event of an actual or prospective merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation).

How We Protect Personal Information

We maintain administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorized access, destruction, loss, alteration, disclosure, disposal or use.

Children's Privacy

Our App is designed for a general audience and is not directed to children. We do not knowingly collect personal information online from children under the age of 13.

Third-Party Links And Features

For your convenience and information, our App may provide links to other online services, and may include third-party features such as apps, tools, widgets and plug-ins. These online services and third-party features may operate independently from us. The privacy practices of the relevant third parties, including details on the information they may collect about you, are subject to the privacy statements of these parties, which we strongly suggest you review. To the extent any linked online services or third-party features are not owned or controlled by us, we are not responsible for these third parties' information practices.

Updates to Our Privacy Notice

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will indicate at the top of the Privacy Notice when it was most recently updated.

How To Contact Us

You can submit a request or ask us questions about this Privacy Notice by contacting us at AAADriveAppSupport@acg.aaa.com