

# SafeDrive Go Privacy Policy

# Scope

This privacy policy ("Privacy Policy") together with the NJM SafeDrive Go Terms & Conditions, NJM's Privacy Policy, and any other documents referred to therein, sets out the basis on which SafeDrive Go collects personal data from users, or which users provide, when using the SafeDrive Go app (the "App") and how such personal data will be stored, processed or shared by NJM. By registering to use the App or Services, checking the relevant agreements prior to installing the App and then using the App and Services, you agree to the practices described in this Privacy Policy.

# **Data Controller**

NJM Insurance Group of 301 Sullivan Way, West Trenton, NJ 08628, USA is the data controller of your personal data collected from your use of the Services or App. Cambridge Mobile Telematics Inc. ("CMT") of 314 Main Street, Cambridge, MA 02142, USA administers the App and Services and is the data processor.

# **Legal Basis for Processing**

SafeDrive Go collects and uses the personal data described below in order to provide you with access to the App and Services in a reliable and secure manner. NJM also collects and use personal data:

- For our legitimate business needs,
- To fulfill our contractual obligations to you, and
- To comply with our legal obligations.

# **Collection of Information**

In addition to the data practices outlined in NJM's Notice of Information Practices, NJM collects personal data of users who install and use the SafeDrive Go app.

# Information you provide

The information you give NJM may include your name, user name, password, address, email address, telephone number, title, company name, and any additional information you choose to provide. Such information is requested from you when you create an account as it is necessary to enable the App or Services to function in accordance with the terms of NJM's agreement with you.

# Information we collect

When you use the App or Services, NJM will collect information about your driving style and habits, such as location, speed, acceleration, braking, and cornering and combine this with weather, traffic, time of day, and other contextual data.

#### **Sensitive Data**

SafeDrive Go does not collect personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; or genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health.

### Use of Information

# Information you provide

In addition to the uses outlined in NJM's Notice of Information Practices, information collected from the App will be used:

- To carry out NJM's obligations arising from any contracts entered into between you and NJM (including managing transactions, reporting, invoices, renewals, and other operations related to providing services to you);
- To provide you with the information, products and services that you request from us;
- To maintain, support, deliver, and provide you with requested products and Services;
- To provide you with information about other goods and services NJM offers that are similar to those that you have already purchased or enquired about;
- To notify you about changes to the website, App or Services:
- To ensure that content from NJM's website and Services is presented in the most effective manner for you and for your computer; and
- To satisfy governmental reporting, tax, and other requirements.

# Information we collect

In addition to the uses outlined in NJM's Notice of Information Practices, information collected from the App will be used:

- To profile and analyze the driving habits of users and create a personalized driving score for each user;
- To create aggregated statistics on all users of the Service and App;
- To administer CMT's website, App or Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;



- To inform you about scheduled website or Service downtimes and new features;
- To improve CMT's website, App or Services to ensure that content is presented in the most effective manner for you and your computer;
- For the purposes of performance, usability, site administration, security reviews, and to help improve the experience of visitors to CMT's website;
- To allow you to participate in interactive features of CMT's website, App or Services, when you choose to do so; and
- As part of CMT's efforts to keep the website, App or Services safe and secure.

NJM may retain information about its former customers and would disclose that information to affiliates and nonaffiliates as described in this notice.

### Disclosure of Information

NJM also may disclose personal data for other purposes or to other third parties where you have explicitly consented to this on registering to use the App or Services, in accordance with NJM's Notice of Information Practices. Driving data is collected so NJM can provide the products and services it offers.

NJM will connect your SafeDrive Go driving data to other information you provide, such as your name, email address and policy number. NJM will treat this combined data in accordance with its Notice of Information Practices.

Anonymized data may be shared with CMT for the purpose of providing the Service and improving the Service and technology, and for no other purpose.

### **Changes to the Privacy Policy**

This Policy may be amended from time to time, consistent with the Privacy Shield Principles and applicable data protection and privacy laws and principles.