

AAA CLUB ALLIANCE PRIVACY POLICY

UPDATED: November 1, 2020

Overview

AAA CLUB ALLIANCE INC. (dba AAA Mid-Atlantic, AAA Allied Group, AAA Oklahoma/South Dakota) and its affiliates and subsidiaries (a list is available at AAA.com/Affiliates) (collectively, "AAA Club Alliance", "we," "us," or "our"), consider data privacy important to you and to us. This Privacy Policy describes the online and offline practices of AAA Club Alliance regarding how we collect, use, disclose and store information about you, including through our websites such as cluballiance.aaa.com, and other websites or mobile applications or social media resources where we post or refer to this Privacy Policy (collectively, the "Website").

This Privacy Policy describes:

- The types of information, including personal information, that we collect
- How we use the information we collect
- How we may share the information we have collected with third parties
- The security of the information
- How you can access and update or modify your information
- How you can let us know if you do not want us to use your information in certain ways

PLEASE REVIEW THIS PRIVACY POLICY CAREFULLY. When you submit information to us, including through the Website or through mobile applications or social media resources, you consent to the collection and processing of your information as described in this Privacy Policy. By providing us with your Personal Information (as defined in this Privacy Policy), and any other non-public information that is associated with such information, or any other party's information, in any manner, or by using the Website or our mobile applications or social media resources, you accept the terms of this Privacy Policy and, if you are using our Website or mobile applications, our [Terms of Use](#), and you consent to our collection, use, disclosure, transfer, retention and removal of your information as described in this Privacy Policy. So we encourage you to read this Privacy Policy before submitting any information.

IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY, THEN PLEASE DO NOT PROVIDE ANY INFORMATION TO US.

CONSUMER PRIVACY NOTICE FOR FINANCIAL SERVICES

If you do business with us, including any of our affiliates that may deliver financial products and services to you, such as insurance services, automobile or personal loans, and online savings accounts and credit card services, we provide special information on our use of the information collected, used and shared for financial products and services in the section at the end of this Privacy Policy labeled "**Consumer Privacy Notice For Financial Services.**" Please refer to that section for information on the privacy practices relating to the delivery of financial products and services. The financial products and services are available only in the United States.

YOU CONSENT TO RECEIVING ANNUAL NOTICES OF OUR CONSUMER PRIVACY NOTICE FOR FINANCIAL SERVICES VIA THE WEBSITE, IF APPLICABLE. THE CONSUMER PRIVACY NOTICE FOR FINANCIAL SERVICES IS AVAILABLE AT THE END OF THIS PRIVACY POLICY.

We also may include the Consumer Privacy Notice for Financial Services yearly in our magazine publication.

Changes to the Privacy Policy

We may change or modify this Privacy Policy from time to time as we deem necessary in our sole discretion. If we make any changes to this Privacy Policy, we will post the effective date of the update on this Privacy Policy or may notify you by email or as otherwise required by applicable laws, rules or regulations. Therefore, we ask you to check this Privacy Policy occasionally to be sure that you are aware of these changes. If we make any material changes as to how we use or share your information, we will also provide clear notice on our website and will obtain your consent, if required. Any changes to this Privacy Policy take effect immediately after being posted or as otherwise provided by us.

Information We Collect

What We Collect Online

We collect certain "Personal Information" (as defined below) about you when you provide it to us or to third party sources while using the Website or other online resources, including social media resources and mobile applications. For example, you may provide us with certain Personal Information and other information when you fill out an online application for membership, or a request for services, (e.g. travel services, automotive services or insurance services) or when you sign up online to participate in some programs (including sweepstakes or contests), including those that we do with other parties, or to receive notifications or elect to receive certain emails or text messages, or provide us with information on our online discounts and shopping platform, or respond to a survey. For each visitor to our Website, our web server automatically collects the visitor's IP address. We also collect non-personally identifiable information about visitors' web activity and equipment. This information includes the operating system a visitor is using, the date and time the user visited the Website, referring URLs (what website the visitor came from), Internet service provider, browser type, device identifier, and information on the pages that visitors' access or visit. Most non-personally identifiable information is collected via cookies or other analysis technologies, and is discussed in greater detail below under "Cookies and Interest-Based Advertising."

What We Collect Offline

We may also obtain other information about you, including Personal Information, when you interact with us, or our agents or contractors, or other third party sources outside of our Website or mobile apps, such as in person, over the phone or by mail, text or email. For example, we may obtain Personal Information from you when you provide it to us by filling out applications or other forms or providing Personal Information by other means in order to apply for or obtain AAA Club Alliance memberships, products and services, such as roadside assistance or auto repair, insurance services or book travel services or submit contest or sweepstakes entries or survey responses or if needed to confirm your identity. When calling 800-AAA-HELP (800-222-4357), your location may be obtained to route your call to the nearest AAA Roadside Assistance Center, or when using the Website or the mobile app, to help provide services. Also, when someone

requests that AAA Club Alliance provide them with Roadside Assistance, we will ask them to show us their membership card and their driver's license which we will ask to scan to confirm that the person who requested the Roadside Assistance is the member, and in order to prevent misuse or fraudulent use of a member's account. We may also obtain Personal Information about you from third parties, including information about products or services you may have purchased through us from such third parties, or if you chose to participate in activities performed by such third parties with or on behalf of us, or through another AAA club organization, or through our affiliates or businesses that provide special offers or services to AAA members. For example, if you rent a car through AAA Club Alliance's arrangement with Hertz, we may be provided with Personal Information regarding your rental. In addition, information we receive from third-party providers helps us verify the information you have given us or to add demographic or other information to help us better understand your potential needs for additional products or services. We may combine information that we receive about you from our Website or social media resources or mobile apps with information we receive about you from offline sources.

You may also give us information about other persons, such as your family members, or friends or your employees or clients, which we will use for the purpose you provide it, but then you are responsible for obtaining any required permission to share this information with us.

Personal Information

"Personal Information" is defined as information related to your membership and/or your transactions with us or that allows someone to identify or contact you, such as (a) your first name or first initial and last name, address, zip code, email addresses and telephone numbers, and your AAA membership number; (b) age, date of birth, gender and marital status and family information, military identification information and veteran status; (c) payment or credit histories, wage/salary information, income data, account balances, credit card, bank account or debit card numbers and other payment information; and (d) other non-public sensitive personal information, such as part or all of your social security number, passport number, alien registration number, driver's license number, other state identification numbers, VIN numbers, user names and passwords or security or access codes or authentication information, insurance policy information and identification numbers, personal health information, biometric identifiers, and geolocation information, and any other personal information that is protected by applicable federal or state laws, rules or regulations or industry requirements. Personal Information also may be referred to as "nonpublic personal information" or "personally identifiable information".

How We May Use Information

We may use the information we collect (including Personal Information) individually, or combine it with other information to generate aggregate statistical information. When we aggregate information it does not identify you personally. The primary uses of the information we collect include:

- To provide products, programs and services you have requested or are entitled to receive as a member;

- To notify you about new products, programs and services and events unless you have opted out of receiving certain types of notifications (including for different business areas), or all emails, text messages or mailings;
- To operate, improve and personalize the products and services we offer, and to give you a more consistent and personalized experience when interacting with us online and offline, such as through the Website or a mobile app;
- For customer service, data security, cybersecurity, to detect fraud or illegal activities, and/or for archival and backup purposes in connection with the provision of the Website, mobile applications and providing our products and services, and to comply with applicable laws, rules and regulations and industry requirements;
- To send to you or have third parties send marketing materials and communications to you about products and services we think may be of interest to you or that you identify that you want to receive (unless you have opted out of receiving certain types of marketing communications);
- To communicate with you, or respond to your inquiries, including through email, telephone and text messaging (as you have consented to);
- To perform market research via surveys or to perform analytics and research to better serve your needs and to improve the effectiveness of our Website, social media resources, mobile applications, your member experience, our various types of communications, advertising campaigns, and/or promotional activities;
- To show online advertisements that are more relevant to your interests;
- To cooperate with law enforcement or other regulatory agency activities;
- To enforce our Privacy Policy, Terms of Use, or other applicable policies; and
- To otherwise conduct our business as may be required by or in order to comply with applicable federal and state laws, rules and regulations, and industry requirements.

How We May Share Information

We may share and disclose information including Personal Information as described at the time information is collected or as follows:

With Our Affiliates and Certain Non-Affiliated Companies

We may share information about you, including certain Personal Information, with our affiliates and subsidiaries, other AAA clubs, AAA National organization, preferred travel partners, companies that offer our members discounts through the AAA Discounts and Rewards Program, and other non-affiliated companies that provide goods, services and/or AAA member benefits to you, including Roadside Assistance, driving school, insurance and other financial services, transportation services, and health related services. We only share your information in this way to offer you products and services that may meet your interests and needs and to effect transactions, programs and services that you authorize or request. The companies outside our own affiliates are permitted to use this information, including Personal Information, only to promote their products and services offered through us to you, or to provide goods, services, member benefits, or effect transactions, programs and/or services, and are not permitted to share your information or to use it for any other purpose without our or your specific consent. We are not liable for the privacy policies or information security practices of any such non-affiliated companies so you should review their privacy policies.

Also see our Consumer Privacy Notice For Financial Services (included at the end of this Privacy Policy) to see how you can limit some of this sharing with respect to your nonpublic personal financial information.

With Our Service Providers

We share information, including Personal Information, with our service providers and contractors as needed so that they can perform the functions for which we engage them (such as Website hosting and data analyses, providing information systems for storing or processing our business data, with respect to our provision of services, sending communications and processing credit card payments). We may also share information as needed to operate the Website, mobile applications and our information systems and other aspects of our business.

For Legal Purposes

We also may share information that we collect to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose information, including Personal Information, as we deem necessary to respond to a subpoena, warrant, governmental request, legal investigation, court order or other legal or regulatory process or to comply with reporting and other legal requirements (including relating to any data security breaches) or when necessary to protect our members, customers and others.

Corporate Changes

We may transfer information, including your Personal Information, in connection with our, or any of our affiliates' participation in (in each case whether in whole or in part) a merger, sale, reorganization, joint venture, acquisition or other change of ownership or control by or of us or any affiliated company. If this occurs, we will disclose your information in accordance with applicable law, and will notify you if required by law or other agreement.

Security of Your Information

We utilize a variety of industry standard security technologies and have internal security practices to safeguard the information we have about you and to protect the privacy and confidentiality of your Personal Information and transactions with us, and to comply with applicable federal and state laws, rules and regulations and industry regulations. We use administrative, technical and physical safeguards designed to restrict access to all of your Personal Information and account information to those AAA Club Alliance employees, agents, independent contractors or service providers who have a legitimate business need for such information with respect to our services and we require them to agree to protect such information. However, the security of information transmitted through the Internet or via e-mail or other means, can never be guaranteed. We are not responsible for any interception or interruption of any communications by you through the Internet or sent to us through your email, or for changes to or losses of data. Users of the Website are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of the Website. You should recognize that your use of the Internet and the Website is solely at your own risk. However, we do offer to members an identity theft monitoring program that may help you safeguard your financial security. If any data security breach of any personal information or confidential information is suspected or has occurred, we may suspend use of any of the Website, mobile applications or other systems, without notice, to protect personal information and any other types of

information while we investigate the issue. Access to and use of password-protected and/or secure areas of any of the Website, mobile applications or other systems is restricted to authorized users only. Unauthorized access to such areas is prohibited.

Mobile Computing

We may provide Websites and online resources that are specifically designed to be compatible with and used on mobile computing devices. Mobile versions of our Website or other mobile applications may require that users log in with an account. In such cases, information about the use of each mobile version of the Website may be associated with user accounts. In addition, we may enable individuals to download an application, widget or other tool that can be used on mobile or other computing devices. Some of these tools may store information on mobile or other devices. These tools may transmit information to us to enable you to access user accounts and to enable us to track use of these tools, such as location services so we can provide you with services. We may use Personal Information or non-identifiable information transmitted to us to enhance these tools, to develop new tools, for quality improvement and as otherwise described in this Privacy Policy or in other notices we provide.

Emails and Text Messages

You may receive emails or text messages from us if you have provided us with your email address or cell phone number, unless you have opted out of receiving these. You can opt out by (i) clicking on the links available in our emails, or as may be stated in the text message, or (ii) by going online to the Preference Center, where you may opt out of different kinds of emails, text alerts, phone calls or postal communications, or (iii) by contacting us as provided in this Privacy Policy. Our Text Alert Policy is available at <https://cluballiance.aaa.com/mobile-services/text-alerts-terms-and-conditions?rdl=midatlantic.aaa.com>.

We try to strike a balance between the security of your Personal Information and account information and your convenience. We note that we may send you an e-mail or a text message in unencrypted form (i.e. instantly readable) because many of our members and customers are unable to access encrypted (i.e. coded) e-mails or texts. This means that such message, if misrouted or intercepted, could be read more easily than encrypted messages. For this reason, please do not include confidential information or certain Personal Information, such as your credit card number, passport numbers, driver's license numbers, or account passwords, in any unencrypted e-mail or text you send to us.

On our Website, you may be able to choose to use a send or share service to send information from the Website to someone else. In such case we will ask you for certain Personal Information of such persons, such as their email address, as well as your name and email address. The information you provide will be used to send a single message by us on your behalf. This information will not be collected or stored for any additional purpose. By providing us with this information you affirm that you are entitled to provide it to us.

Social Media

We may also enable you to post content to social networking sites (e.g. Facebook, Instagram, Twitter, LinkedIn, YouTube) for purposes such as answering some questions or asking questions or providing comments. If you choose to do this you acknowledge that you are responsible for your use of a social networking site. We are not responsible for the availability or accuracy of such social networking sites or your use of such sites. You also should not include any confidential information and certain types of Personal Information in any post you

make to a public area of a third party social network page, especially since any such posting immediately becomes public.

Linking From AAA.com to other Websites

For your convenience, we may provide links on our Website to third party websites. We may also provide links to third party websites of our business partners or certain service providers so that they can provide you with the products or services that you request. For example, when you book travel through us or certain of our affiliates, we may direct you to the booking system of our third party service provider which is hosted by them on their own website. Please remember that this Privacy Policy is not applicable to such third party websites and that we are not responsible for the privacy practices of such third parties. Your browsing, use of your email address, providing any information including Personal Information, and interaction on any other website, including sites which have a link on this Website, are subject to the terms, conditions, and privacy policies of that website. Please read over those terms, conditions and policies before proceeding.

Note about Children

We do not knowingly solicit, collect or maintain Personal Information directly from any person under the age of thirteen (however, if their Personal Information is provided to us by their parents, for example, in connection with travel services or transportation services, such persons are therefore providing any legally required parental consents by doing this). No parts of our Services are directed to or designed to attract anyone under the age of thirteen directly.

Our Use of Cookies and Interest-Based Advertising

We use "cookies" or "web beacons" (also called "clear GIFs" or "pixel tags") to obtain certain types of information when your web browser accesses our Website.

What are cookies? Cookies are small pieces of information that a website transfers to your computer's hard drive while you are viewing the Website for record keeping and other purposes. Cookies make navigating the Web easier for you by saving your registration, passwords and preferences while you're at the Website. By using cookies, we can serve you better since they help us understand what information interests you.

The use of cookies is an industry standard; most major websites use them. Cookies come in two types that might be used on our Website: a persistent cookie and a session cookie. A persistent cookie gets entered by your Web browser in the "cookies" folder on your computer and remains in this folder after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the site. A session cookie is held temporarily in your computer's memory and disappears after you close your browser or shut off your computer.

Web beacons are small graphic files with a unique identifier, similar in function to cookies which are used to track online movements of Web users.

We may work with third parties, including advertising companies, media agencies, and website analysis firms, who also use cookies and web beacons to collect non-personally identifiable information when you visit our Website and third party sites. This non-personally identifiable information is typically used by these third party advertising companies (i.e., advertising

networks) to serve you with advertisements tailored to meet your interests and needs while on third party sites.

Here are some examples of how we use cookies and web beacons:

Our use of cookies and web beacons includes login verification, session management, load balancing and personalization to enhance your user experience. A cookie lets our computers remember that you've registered, which allows us to speed up your future activities at our Website. Using cookies to do this record keeping saves you the trouble of entering information over and over again. For example, when you initially visit AAA.com, a persistent cookie is used to capture your zip code to make it easier to ensure you visit the appropriate AAA club website. We also use cookies to estimate the number of visitors to our Website, track visits to and sales at the sites referenced on our Website, and analyze our users', members' and customers' visiting patterns. Similarly, cookies help us tailor our product and service offerings, and those of our business partners, to suit your personal interests, and for that reason we may share cookies that contain your email address or AAA membership number with our business partners.

We also use clear gif tracking images on some of our pages and in our HTML e-mails that we send you to determine open rates.

We use web analytics tools, including Google Analytics, to help analyze how users use the Website. The web analytics tools use cookies to collect standard Internet log information and visitor behavior information in an anonymous form. The information generated by the cookie about your use of the Website (including IP address) is transmitted to our web analytics service providers. This information is then used to evaluate visitors' use of the Website and to compile statistical reports on Website activity for us. By using our Website or mobile applications you consent to the processing of information about you by web analytics services.

We do not use cookies to store any of your Personal Information or financial information on your computer. Also, we do not use cookies to retrieve information from your computer that was not originally provided by you or provided by your browser in a visit to our Website. Once you visit or click on a link to third party websites, their sites may use cookies. We do not control what information those websites collect or their use of cookies, and they are not subject to our Privacy Policy, including the use of cookies.

What to do if you do not want cookies used:

If you do not want cookies used in connection with your visit to our Website, or if you wish to limit their use, you can generally adjust your browser settings on your computer. Most Internet browsers allow you to set your own preferences for use of cookies, and websites may let you accept or not accept the use of cookies. To learn more about cookies and interest-based advertising, or to opt out of cookies, visit the opt-out services of the National Advertising Initiative here: <http://www.networkadvertising.org/choices>, or visit www.aboutads.info, and follow the simple opt-out process. If you decline cookies, you may have difficulty navigating our Website, which could adversely impact your AAA online experience. A couple of important notes about this opt-out tool: (1) it includes all the advertising networks that we may work with, and many advertising networks that we do not work with, and (2) it may rely on

cookies (called "Opt-out Cookies") to ensure that a given advertising network does not collect information about you. An explanation of how Opt-out Cookies work can be found on www.aboutads.info. If you use different equipment, change web browsers or delete these Opt-out Cookies from your computer, you will need to perform the opt-out task again. Visitors desiring to prevent data from being collected by Google Analytics may use the opt-out browser add-on <https://tools.google.com/dlpage/gaoptout/> developed by Google for this purpose.

Do Not Track Features:

Certain browsers may offer you the option of providing notice to websites that you do not wish for your online activities to be tracked for interest based advertising purposes ("DNT Notice"). Some browsers are, by default, set to provide a DNT Notice, whether or not that reflects your preference. Providing DNT Notice is often touted as a means to ensure that cookies, web beacons and similar technology are not used for interest based advertising purposes – that is, to restrict the collection of non-personally identifiable information about your online activities for advertising purposes. Unfortunately, given how interest based advertising works, DNT Notices may not effectively accomplish this goal. For this and a variety of other reasons, we do not recognize or take any action in response to browser-based DNT Notices. Rather, if you do not wish to participate in interest-based advertising, you should follow the opt-out process described above in the **"What to do if you do not want cookies used" section of the Privacy Policy.**

Non-US Users

The Website and our affiliates' websites are not meant to be used by persons residing or located outside of the United States and also by persons not residing in the states or jurisdictions where we are licensed to do business. The services and products offered on our Website are available to or for use only by persons located in the United States where we are licensed to do business. And our club members must reside in the states/territories where we operate.

Contact Us

If you are a member and want to update or modify your Personal Information, please go to My Account (<https://cluballiance.aaa.com/membership/account>) or contact Member Services at 866-636-2377.

If you want to opt out of receiving future marketing or promotional emails, text messages, mailings, or telephone calls, please go to <https://cluballiance.aaa.com/prefcenter> or follow the directions in the communications or contact us at 1-800-763-9900.

If you have any questions or comments about this Privacy Policy, or need additional assistance please contact us at:

AAA Club Alliance Inc.

One River Place

Wilmington, DE 19801

Attn: Legal Department—Privacy

Phone: 1-800-763-9900

Email: privacy@aaamidatlantic.com

CONSUMER PRIVACY NOTICE FOR FINANCIAL SERVICES

AAA Club Alliance Inc.

AAA Club Alliance Inc. and certain of its affiliates, including but not limited to ACA Club Insurance Agency, Inc. formerly known as Club Services Corporation, AAA Mid-Atlantic Insurance Agency Inc. and AAA Allied Insurance Services, Inc. (collectively for purposes of this Consumer Privacy Notice, "AAA Club Alliance") may provide you with financial products and services such as insurance, automobile and personal loans, and online savings accounts and credit card applications. In connection with providing those financial products or services, AAA Club Alliance may obtain from you or others personally identifiable information that is not publicly available information ("nonpublic personal information"). This Consumer Privacy Notice applies to the collection, use and security of your nonpublic personal information by AAA Club Alliance.

What Information We Collect

Nonpublic personal information we may collect includes information we receive from you on applications or other forms, through conversations or by telephone, or email or text messages, information about your transactions with us, information provided by insurance-support organizations, Bureaus of Motor Vehicles, current and prior insurers, government agencies, credit reporting agencies information and information from your visits to our websites or mobile apps or if you are a member. For example, depending on the product, your nonpublic personal information includes your name, address, email address, telephone number, date of birth, personal demographics (gender, marital status and military identification information and veteran status), social security number, details of insurance coverage, claims, account and payment history, policy identification numbers, credit history and credit scores, credit card, bank account or debit card information, passport numbers, driver's license numbers and vehicle identifiers, driving history and other motor vehicle records, employment information, income and tax data, personal health information (including diagnosis and treatment information, and biometric identifiers) and transactions history with us and our affiliates (individually or collectively your "NPI").

What Information We Disclose

The limited circumstances under which we may disclose a customer's NPI include: to the extent necessary to service or process an application or other services related to insurance or other financial products or services that you requested, authorized or are entitled to receive as a member; to maintain your account; with your consent or at your direction; to respond to a subpoena, court orders or legal investigation; to comply with federal, state or local laws or regulations; and to protect against fraud and identity theft. For example, in connection with issuing an insurance policy, we may disclose NPI to potential insurance companies and consumer reporting agencies. We may also disclose NPI to companies that perform services for us and with whom we have a non-disclosure agreement. For instance, we have service providers with whom we contract to process applications and renewals, administer the policy, and perform customer surveys and research. Information we obtain from a report prepared by an insurance-support organization may be retained and disclosed by that organization. We may also share NPI in the course of referring you to one of our other affiliates or to non-affiliates that market insurance or financial products that may be of interest to you. We may also share NPI with other AAA Clubs or financial institutions under joint marketing

agreements, and with non-affiliates that help us develop and market insurance or financial products.

Our Security Procedures

We use administrative, technical, electronic and physical safeguards designed to protect your NPI and protect our information systems, comply with applicable federal and state laws, rules and regulations, and industry requirements, and to restrict access to all of your NPI to those AAA Club Alliance employees and agents who need to know that information in order to serve you or to permitted service providers.

If you suspect any identity theft or fraud of your NPI, notify us and your local law enforcement agency.

Opt Out

Federal law gives you the right to limit sharing of NPI about your creditworthiness with our affiliates and to limit sharing of your NPI with our affiliates and non-affiliates for marketing purposes. If you choose to limit marketing with our affiliates, your choice will apply for at least five years from when you tell us your choice, and you do not need to act again until we send you a renewal notice. You may contact us using the methods listed below to “opt out” of these types of sharing. Please note this ability to opt out only applies to certain types of sharing by AAA Club Alliance affiliates that provide financial products and services and not to any other services or products offered by AAA Club Alliance.

- Call 1-800-763-9900 and talk to one of our representatives
- Visit <https://cluballiance.aaa.com/prefcenter>