



Privacy Policy

Pursuant to Part 141.11 (10), AAA (“NY AAA”) has “...published privacy rights at the beginning of the course materials...” by including the Privacy Statement below in its Student Enrollment Contract.

Before the student can begin the course, the student is required to read the Student Enrollment Contract. The student “...must type ‘I Agree’ to acknowledge and agree to all course completion requirements and the sponsor’s privacy policy information...” as required by Part 141.11 (11). The Student Enrollment Contract is discussed in detail in Tab 20 of this submission.

NY AAA’s Privacy Policy meets the Federal regulations detailing the Driver’s Privacy Protection Act contained under 18 USC §2721 et. seq., as required in the Data/Security Requirements – Federal Regulations of Appendix A [page 25].

AAA– New York IPIRP Privacy Policy

AAA ("NY AAA") knows the foundation of its business is built on trust. To maintain that trust, NY AAA is committed to maintaining the privacy of its members' Nonpublic Personal Information ("NPI" or "Member Information"). NY AAA would like to take this opportunity to inform you of how we are committed to protecting your Member Information. This Privacy Policy also acknowledges our processes related to privacy for the NY AAA IPIRP Course, which is accessed via the Internet at www.AAA.com.

PRIVACY COMPLIANCE

Recent federal legislation requires that all Financial Institutions provide customers with a statement outlining the policies and practices related to the sharing of NPI. At NY AAA, we have always been committed to protecting your privacy and are providing this notice to you to demonstrate our commitment to you. If you decide to end your relationship with NY AAA or your membership lapses, we will continue to abide by the practices described in this notice and any amendments to this notice.

WHY WE COLLECT INFORMATION

NY AAA collects information about you in order to protect your identity from unauthorized access, to better understand your needs as a member, to improve and develop new products, provide services that may be of value and to inform you of special promotions. We may also use information collected to better understand the needs of AAA.com users and to improve the site's content. We also collect information necessary to administer your account and to process services associated with your membership. We maintain this information to provide the highest possible quality of service.

In addition, NY AAA collects information, including but not limited to that information prescribed for collection and dissemination by the New York State Department of Motor Vehicles, from our NY AAA IPIRP customers.

INFORMATION WE COLLECT

We collect Member Information about you from the information we receive from you on applications or other forms, information about your transactions with us or others, information we receive from consumer reporting agencies, from other companies we work with,

from companies providing marketing and demographic information and information obtained to protect against insurance fraud and identity theft.

We also collect information about AAA.com users. The following non-volunteered information is collected automatically when visiting AAA.com:

- The referrer (the site prior to entering AAA.com)
- The IP address of the workstation
- Date and time logged in and out
- Pages visited while on our site
- Time spent on each page
- Files downloaded
- Criteria used when searching

If the user supplies his/her telephone number online, s/he may be contacted by AAA regarding orders placed online.

For NY AAA IPIRP customers, information collection is described in detail, as to its use and dissemination, in the following categories:

Product Registration and Ordering

NY AAA collects all information necessary to appropriately process student enrollment and completion of the IPIRP for final reporting to the New York State DMV in response to its state-mandated requirements as stated in 15 NYCRR, Part 141.

During this process, course users are required to give contact data (e.g., name, e-mail address, mailing address, NYS driver license information, and phone number) and a biometric sample among other requirements. For internal processing, we utilize this data

for the purpose of communicating with users, providing requested services and transmission of data to the New York State DMV.

As part of the course registration process, we also collect credit card information (such as account name, number and expiration date), which is used solely for payment processing. During this process, credit card data is encrypted to ensure the protection and propriety of this sensitive financial data.

Communications from NY AAA

In order to ensure a positive user experience, we may communicate with a customer to provide requested services and for account-related issues via e-mail, phone, instant messaging or regular mail.

Automatic Data Collection

Our websites utilize features that automatically collect information from customers for the purpose of ensuring appropriate course content delivery in compliance with DMV mandates. One example of Automatic Data Collection is our use of "cookies," which are essentially a piece of data stored on the user's hard drive containing information about the user. Cookies are necessary for tracking a customer's time and course progression.

NY AAA also uses e-mails to provide registration verification and other course-related data to users. For our internal user validation purposes, we gather date, time, browser type, navigation history and IP address of all course users. We also use this information for our internal security and system administration.

GLOSSARY

"Affiliate" means any company that controls, is controlled by or is under common control with NY AAA.

"Financial Institution" means any institution the business of which is engaged in financial activities as described in section 4(k) of the Bank Holding Company Act.

"Nonpublic Personal Information" means personally identifiable financial information about an individual provided to a financial institution in order to obtain a financial product or service.

"Nonaffiliated Third Party" means any person except an affiliate of a financial institution or a joint employee of a financial institution and a third party.

OPT-OUT

If you prefer NY AAA not disclose your Member Information to Nonaffiliated Third Parties (except as permitted or required by law), you may exercise your right to opt out of such disclosure by contacting us at:

AAA

Attention: Privacy

100 International Dr

Buffalo, NY 14221

By opting out you will be precluded from receiving notice of special promotions offered through NY AAA that may benefit you. We may still include notices and information about other products and services when communicating with you about your account and related products and services. You will also still receive the "Going Places" magazine six times per year. Opting-out will not prevent you from receiving solicitations from other companies obtaining information about you from other sources.

Mail the following information:

Please AAA Membership

Complete: No. _____

Customer
Name _____

(Please Print)

Street
Address _____

City _____ State _____ Zip
Code _____

Please OPT me out of:

Mailing & Phone calls

Customer
Signature _____

NY AAA IPIRP INFORMATION SHARING

NY AAA, for the purposes of its IPIRP Course, does not share personally identifiable information with other companies. We will disclose information we maintain when required to do so by law, for example, in response to a court order or a subpoena or other legal obligation, or in response to a law enforcement agency's request.

NY AAA IPIRP SECURITY

We use strict precautions to protect information about our users while it is stored on our servers or in transit to our vendors

processing on our behalf, such as credit card processing. Sensitive information that is transmitted to us online (such as credit card number) is encrypted and is transmitted to us securely. In addition, access to all of our customers' information, not just the sensitive information mentioned above, is restricted. The servers on which we store personally identifiable information are kept in a secure environment.

NY AAA IPIRP LINKS

Our web sites contain links to other sites. NY AAA is not responsible for the privacy practices or content of such other sites. We encourage our users to be aware when they leave our site and to read the Privacy Policies of each web site to which we may link that may collect personally identifiable information.

NY AAA IPIRP NOTIFICATION and CHANGES

If we change our Privacy Policy, we will post those changes on our course website. Users should check this policy frequently to keep abreast of any changes.

For all other questions concerning the practices of this site or any dealings with NY AAA, please contact us at: AAA, 100 International Drive, Buffalo, New York 14221. Or, by telephone, please contact us at (877) 476-1254.