

Appendix A – Sample Privacy Policy

IMPORTANT NOTE:

The following sample privacy policy is presented for educational purposes only. The privacy policy that a dealer uses must be unique to that dealer. Privacy policies vary widely depending on a dealer’s data collection and retention practice, the types of vendors in which they work with, and the products and services they offer to their customers, employees, and job applicants. Please review the manual or contact our partners at ComplyAuto for more information.

Privacy Policy

Last Updated: April 28, 2023

Change language 



California Notice at Collection

To view the categories of personal information we collect and the purposes for which the information is used, or to exercise your rights under the California Consumer Privacy Act (CCPA), click the button below.

[View Notice At Collection](#)

To view how we collect and use personal information as part of our online chat module, click the button below.

[View Chat Module Disclosure](#)

Introduction

[DEALERSHIP] (“Dealership” or “we” or “us”) respects your privacy and the information that you have entrusted to us. This Privacy Policy describes our collection, use, and disclosure of the information we may collect from you whenever you visit the Dealership’s physical location(s) or website(s) (hereinafter a “Site” and collectively the “Sites”), or otherwise access any of our other products, services, and content (hereinafter “Services”). This Privacy Policy applies to all visitors and customers of our Sites, including those consumers and/or customers who apply for and/or receive financing for personal, family, or household purposes. If you become an inactive customer, or if we close or suspend your account, we will continue to adhere to the Privacy Policy in place when we collected your personal information

as long as we retain it in our databases. We may delete any or all of your information at any time without notice to you or for any reason or no reason unless we are otherwise required by law to retain it. You may have other privacy protections under state laws and we will comply with any applicable state laws when we disclose information about you.

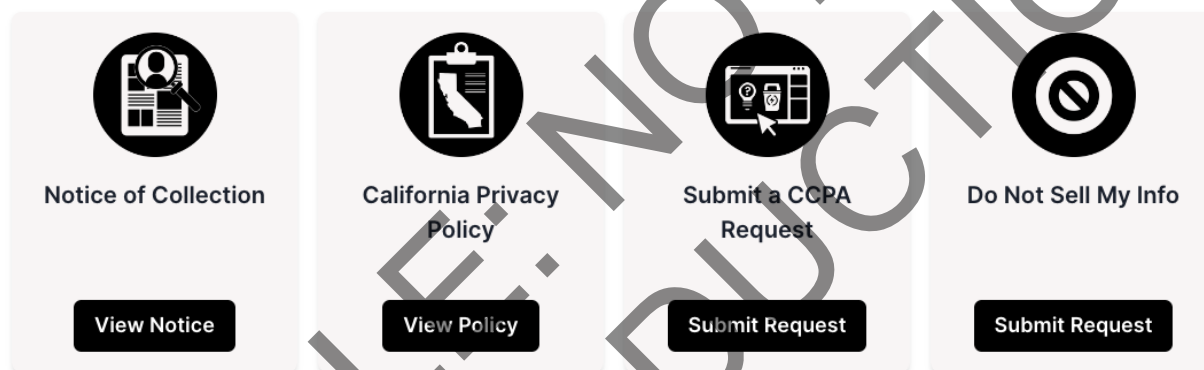
Sections

This Privacy Policy consists of the following sections.

Section 1 - California Consumer Privacy Act Disclosures

Section 2 - Other Important Privacy Disclosures

Section 1 - California Consumer Privacy Act Disclosures



Notice at Collection

The purpose of this Notice at Collection is to provide consumers with information about the categories of personal information that our dealerships collect about them and the purposes for which the personal information will be used.

We collect the following categories of “personal information”, as defined in the CCPA, relating to California residents and businesses:

- **Audio / Video / Visual / Electronic** such as photographs, recorded calls, voicemails, and online & electronic communications, such as those made via a live or automated online chat module.
- **Biometric** such as fingerprints and facial recognition.
- **Commercial** such as vehicles, products, services, and repairs purchased, obtained, or considered; personal property records (e.g., vehicle titles and registration cards); or other purchasing or consuming histories or tendencies.
- **Customer Records** such as digital and electronic signatures, telephone numbers, insurance policy numbers, credit and debit card numbers, financial and credit-related information, physical characteristics and descriptions (e.g., government identification), bank account numbers, and medical and health insurance information (in the context of employment).
- **Education** such as diplomas and transcripts for student rebate eligibility.
- **Geolocation** such as tracking and user-enabled location identification.
- Identifiers such as real name, postal address, IP address, email address, SSN, driver’s license number, passport number, cookies, pixel tags, and similar identifiers.

- **Inferences** to create a profile about you reflecting your product or vehicle preferences, purchasing tendencies and behaviors.
- **Internet Activity** such as interactions with our websites, applications, and advertisements.
- **Professional/Employment** such as job title, occupation, company or business name, and employment history information.
- **Protected Classes** under state or federal law, such as gender, age, and veteran status.

We use the categories of personal information listed above for one or more of the following “business purposes” listed in the CCPA:

- **Advertising & Marketing** to send advertisements and marketing material via physical and electronic mail relating to product specials and other promotional events or offers, perform marketing research and data analytics, and perform similar activities.
- **Claims & Benefits Administration** to process claims, administer benefits, and conduct employee drug tests in accordance with applicable laws.
- **Contextual and Behavioral Targeting** to provide contextual customization of ads shown as part of an interaction with our website or application, such as through the use of “first-party” or “session” cookies.
- **Counting Ad Impressions & Website Interactions** to audit interactions with our websites, applications, advertisements, count ad impressions to unique visitors, verify position and quality of ad impressions, and perform similar activities.
- **Customer Service** to provide customer service, maintain and service products and accounts, provide training for quality assurance purposes, and perform similar activities.
- **Defending Against Claims & Litigation** to defend against or respond to potential or actual claims and litigation, including, but not limited to, those against the manufacturer of a particular vehicle we've sold.
- **Determining Employment Eligibility** to determine eligibility for employment, verify references and employment history, and conduct background checks.
- **Employee Engagement & Emergency Contact Communications** to communicate and engage with employees across the organization, enhance company morale by acknowledging significant events (e.g., birthdays, work anniversaries, etc.) and reaching out to emergency contacts listed for employees.
- **Employee Onboarding** to conduct employee onboarding.
- **Employee Productivity** to ensure employee productivity and adherence to company policies.
- **Fraud Prevention** to help ensure security and integrity, such as necessary to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and to prosecute those responsible for that activity.
- **Human Resources Support & Services** to provide employees with human resources management services and employee data maintenance and support services.
- **Internal Audits & Investigations** to conduct internal audits and investigate complaints, grievances, and suspected violations of internal policies.
- **Monitoring Driving Records** to monitor employee driving records as required or allowed by state and federal law.
- **Performance Evaluations & Customer Satisfaction** to evaluate employee performance during the service and/or sales process and monitor customer satisfaction.
- **Preventing Unauthorized Access** to prevent unauthorized access to or use of company property, including information systems, electronic devices, network, and data.
- **Processing Transactions** to process or fulfill orders and transactions, verify customer information, process payments, confirm eligibility for manufacturer rebates, and perform similar activities.
- **Providing Financing** to provide financing in connection with a vehicle purchase, lease, or related products or services.
- **Public Health and Safety** to conduct screening or temperature checks for COVID-19 symptoms or similar screening activities related to public health and safety.

In the context of employment, we also use the categories of personal information listed above for one or more of the following business purposes:

- **Claims & Benefits Administration** to process claims, administer benefits, and conduct employee drug tests in accordance with applicable laws.
- **Determining Employment Eligibility** to determine eligibility for employment, verify references and employment history, and conduct background checks.
- **Employee Engagement & Emergency Contact Communications** to communicate and engage with employees across the organization, enhance company morale by acknowledging significant events (e.g., birthdays, work anniversaries, etc.) and reaching out to emergency contacts listed for employees.
- **Employee Onboarding** to conduct employee onboarding.
- **Employee Productivity** to ensure employee productivity and adherence to company policies.
- **Human Resources Support & Services** to provide employees with human resources management services and employee data maintenance and support services.
- **Internal Audits & Investigations** to conduct internal audits and investigate complaints, grievances, and suspected violations of internal policies.
- **Monitoring Driving Records** to monitor employee driving records as required or allowed by state and federal law.
- **Performance Evaluations & Customer Satisfaction** to evaluate employee performance during the service and/or sales process and monitor customer satisfaction.
- **Preventing Unauthorized Access** to prevent unauthorized access to or use of company property, including information systems, electronic devices, network, and data.
- **Public Health and Safety** to conduct screening or temperature checks for COVID-19 symptoms or similar screening activities related to public health and safety.

We collect the following categories of "sensitive personal information", as defined in the CCPA, relating to California residents:

- **Biometric Data for Identification Purposes** such as fingerprints and facial recognition used to identify you for the purposes of identity verification and fraud and theft prevention.
- **Contents of Communications** such as a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.
- **Genetic Data** such as family medical history in the context of employment.
- **Government-Issued ID Numbers** such as social security, driver's license, state identification, or passport numbers.
- **Health Information** such as necessary to administer employee health benefits, make special accommodations, and respond to work-related illnesses and injuries.
- **Online Account or Credit Card Info Combined with a Security/Access Code** such as account login information, credit or debit card numbers, or financial account information that is combined with a security or access code.
- **Precise Geolocation Data** such as tracking and online user-enabled location identification that is accurate within a radius of 1,850 feet.
- **Race, Ethnicity, Religion, Philosophical Beliefs, or Union Membership** which may be collected in the context of employment.

Record Retention Notice

We will store your personal information for as long as reasonably necessary for the purposes in which it was collected. In general, the criteria used to determine the length of time that we will retain this information is based on California record retention rules and guidelines, which can be found [here](#). However, note that some of your personal information may need to be retained for longer periods and may not have a set retention period because it is needed for an ongoing business or legal purpose.

Your California Privacy Choices

To opt out of the sale or sharing of your personal information; or to limit the use of your sensitive personal information, [click here](#).

California Privacy Policy

The purpose of this California Privacy Policy is to provide consumers with a comprehensive description of our dealership's online and offline practices regarding the collecting, use, disclosure, and sale of personal information and of the rights of consumers regarding their personal information under the CCPA.

The tables below describe how we collect, use, and disclose California consumers' personal information based on definitions laid out in the CCPA. Please note that because the categories of personal information collected and shared largely depends on how a consumer has interacted with our dealership, not all of the items listed in the tables below will be relevant to you. For example, we generally only collect veteran status when a consumer qualifies for a military rebate. Similarly, certain pieces of information, such as health and medical information, are only collected in the course of administering employment benefits and claims, but are not collected from customers.

Categories of Personal Information We Collect

Categories of Personal Information Collected	Categories of Sources from which the Personal Information is Collected	Business or Commercial Purposes for which the Personal Information was Collected or Sold
<p>Audio / Video / Visual / Electronic such as photographs, recorded calls, voicemails, and online & electronic communications, such as those made via a live or automated online chat module.</p>	<p>Advertising Networks & Agencies such as digital advertising companies and other marketing firms.</p> <p>Captive Finance Companies and wholly-owned subsidiaries of automakers that offer loans, lease programs, and other financial services to our customers.</p>	<p>Advertising & Marketing to send advertisements and marketing material via physical and electronic mail relating to product specials and other promotional events or offers, perform marketing research and data analytics, and perform similar activities.</p>
<p>Biometrics such as fingerprints and facial recognition.</p>	<p>Cell Phone Carriers otherwise referred to as wireless service providers, wireless carriers, cellular companies, or mobile network carriers.</p>	<p>Claims & Benefits Administration to process claims, administer benefits, and conduct employee drug tests in accordance with applicable laws.</p>
<p>Commercial such as vehicles, products, services, and repairs purchased, obtained or considered; personal property records (e.g., vehicle titles and registration cards); or other purchasing or consuming histories or tendencies.</p>	<p>Credit Reporting Agencies such as Experian, Transunion and Equifax that gather account information from various creditors and provide that information to dealers in connection with an application for credit.</p>	<p>Contextual and Behavioral Targeting to provide contextual customization of ads shown as part of an interaction with our website or application, such as through the use of "first-party" or "session" cookies.</p>
<p>Customer Records such as digital and electronic signatures, telephone numbers, insurance policy numbers, credit and debit card numbers, financial and credit-related information, physical characteristics and descriptions (e.g., government identification), bank account numbers, and medical and health insurance information (in the context of employment).</p>	<p>Data Brokers & Analytics Providers such as equity mining, data mining, call tracking, and sales prospecting tools.</p> <p>Directly from Consumers through our website forms and via in-person applications, forms and contracts.</p>	<p>Counting Ad Impressions & Website Interactions to audit interactions with our websites, applications, or advertisements, count ad impressions to unique visitors, verify position and quality of ad impressions, and perform similar activities.</p> <p>Customer Service to provide customer service, maintain and</p>

<p>Education such as diplomas and transcripts for student rebate eligibility.</p>	<p>Government Entities such as the Department of Motor Vehicles (DMV) and various other state and federal agencies.</p>	<p>service products and accounts, provide training for quality assurance purposes, and perform similar activities.</p>
<p>Geolocation such as tracking ad user-enabled location identification.</p>	<p>Insurance Companies that provide us with information relating to vehicle collisions, auto accidents, and other claims.</p>	<p>Defending Against Claims & Litigation to defend against potential or actual claims and litigation, including, but not limited to, those against the manufacturer of a particular vehicle we've sold.</p>
<p>Identifiers such as real name, postal address, IP address, email address, SSN, driver's license number, passport number, cookies, pixel tags, and similar identifiers.</p>	<p>Internet Service Providers that provide services for accessing, using, or participating in the internet.</p>	<p>Determining Employment Eligibility to determine eligibility for employment, verify references and employment history, and conduct background checks.</p>
<p>Inferences to create a profile about you reflecting your product or vehicle preferences, purchasing tendencies and behaviors.</p>	<p>Job Boards & Screening Companies such as background check companies and services that allow job seekers to submit resumes and apply to us directly.</p>	<p>Employee Engagement & Emergency Contact Communications to communicate and engage with employees across the organization, enhance company morale by acknowledging significant events (e.g., birthdays, work anniversaries, etc.) and reaching out to emergency contacts listed for employees.</p>
<p>Internet Activity such as interactions with our websites, applications, and advertisements.</p>	<p>Online Lead Providers and third party websites that collect and share data relating to consumers whose product preferences or inquiries align with the offerings of our dealership.</p>	<p>Employee Onboarding to conduct employee onboarding.</p>
<p>Professional/Employment such as job title, occupation, company or business name, and employment history information.</p>	<p>Social Media Networks such as Facebook, Instagram, and other platforms used to run various advertising campaigns.</p>	

Protected Classes under state or federal law, such as gender, age, and veteran status.

Towing Companies that transport customer vehicles to the dealer's service department.

Vehicle Manufacturers for which we are franchised to sell new motor vehicles.

Vehicle Subscription Services that partner with dealerships to deliver vehicles to customers that subscribe to their short-term or month-to-month vehicle programs.

Employee Productivity to ensure employee productivity and adherence to company policies.

Fraud Prevention to help ensure security and integrity, such as necessary to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and to prosecute those responsible for that activity.

Human Resources Support & Services to provide employees with human resources management services and employee data maintenance and support services.

Internal Audits & Investigations to conduct internal audits and investigate complaints, grievances, and suspected violations of internal policies.

Monitoring Driving Records to monitor employee driving records as required or allowed by state and federal law.

Performance Evaluations & Customer Satisfaction to evaluate employee performance during the service and/or sales process and monitor customer satisfaction.

Preventing Unauthorized Access to prevent unauthorized access to or use of company property, including information systems, electronic devices, network, and data.

Processing Transactions to processor fulfill orders and transactions, verify customer information, process payments, confirm eligibility for manufacturer rebates, and perform similar activities.

Providing Financing to provide financing in connection with a vehicle purchase, lease or related products or services.

		<p>Public Health and Safety to conduct screening or temperature checks for COVID-19 symptoms or similar screening activities related to public health and safety.</p>
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SAMPLE: NOT FOR REPRODUCTION

Disclosure of Personal Information to Third Parties

Categories of Personal Information Disclosed for a Business Purpose or Sold to Third Parties	Categories of Third Parties to Whom the Information was Disclosed or Sold
Audio / Video / Visual / Electronic such as photographs, recorded calls, voicemails, and online & electronic communications, such as those	Attorneys & Law Firms, Social Media Networks, Software Vendors
Biometric such as fingerprints and facial recognition.	Attorneys & Law Firms, Records Management Companies, Software Vendors
Commercial such as vehicles, products, services, and repairs purchased, obtained or considered; personal property records (e.g., vehicle titles and registration cards); or other purchasing or consuming histories or tendencies.	Advertising Networks & Marketing Agencies, Attorneys & Law Firms, Auctions & Wholesalers, Auditors & Consultants, Car Rental Companies, Chat Modules, Check Guarantee Companies, Data Brokers & Analytics Providers, Debt Collection Agencies & Repossession Companies, Digital Retailers & eCommerce Platforms, F&I Product Providers & Administrators, Financial Institutions, Government Entities, Insurance Brokers (non-health related), Lien Sale Companies, Professional Service Companies, Records Management Companies, Repair & Sublet Facilities, Reputation Management Companies, Social Media Networks, Software Vendors, Transportation Companies, Vehicle Manufacturers, Website and Hosting Providers
Customer Records such as digital and electronic signatures, telephone numbers, insurance policy numbers, credit and debit card numbers, financial and credit-related information, physical characteristics and descriptions (e.g., government identification), bank account numbers, and medical and health insurance information (in the context of employment).	Advertising Networks & Marketing Agencies, Attorneys & Law Firms, Auctions & Wholesalers, Auditors & Consultants, Car Rental Companies, Chat Modules, Check Guarantee Companies, Claims & Benefits Administrators, Credit Reporting Agencies (CRAs), Data Brokers & Analytics Providers, Debt Collection Agencies & Repossession Companies, Digital Retailers & eCommerce Platforms, Employee Screening & Background Check Companies, F&I Product Providers & Administrators, Financial Institutions, Government Entities, Insurance Brokers (non-health related), Payment Processors & Gateways, Professional Service Companies, Records Management Companies, Repair & Sublet Facilities, Reputation Management Companies, Rideshare Companies, Social Media Networks, Software Vendors, Towing Companies, Transportation Companies, Vehicle Manufacturers, Website and Hosting Providers
Education such as diplomas and transcripts for student rebate eligibility.	Attorneys & Law Firms, Auditors & Consultants, Debt Collection Agencies & Repossession Companies, Financial Institutions, Records Management Companies, Software Vendors, Vehicle Manufacturers, Website and

	Hosting Providers
Geolocation such as tracking and user-enabled location identification.	Advertising Networks & Marketing Agencies, Attorneys & Law Firms, Chat Modules, Digital Retailers & eCommerce Platforms, Social Media Networks, Software Vendors, Vehicle Manufacturers, Website and Hosting Providers
Identifiers such as real name, postal address, IP address, email address, SSN, driver's license number, passport number, cookies, pixel tags, and similar identifiers.	Advertising Networks & Marketing Agencies, Attorneys & Law Firms, Auctions & Wholesalers, Auditors & Consultants, Car Rental Companies, Chat Modules, Check Guarantee Companies, Claims & Benefits Administrators, Credit Reporting Agencies (CRAs), Data Brokers & Analytics Providers, Debt Collection Agencies & Repossession Companies, Digital Retailers & eCommerce Platforms, Employee Screening & Background Check Companies, F&I Product Providers & Administrators, Financial Institutions, Government Entities, Insurance Brokers (non-health related), Lien Sale Companies, Payment Processors & Gateways, Professional Service Companies, Records Management Companies, Repair & Sublet Facilities, Reputation Management Companies, Rideshare Companies, Social Media Networks, Software Vendors, Tow Companies, Transportation Companies, Uniform & Apparel Companies, Vehicle Manufacturers, Website and Hosting Providers
Inferences to create a profile about you reflecting your product or vehicle preferences, purchasing tendencies and behaviors.	Advertising Networks & Marketing Agencies, Data Brokers & Analytics Providers, Digital Retailers & eCommerce Platforms, Social Media Networks, Software Vendors, Vehicle Manufacturers, Website and Hosting Providers
Internet Activity such as interactions with our websites, applications, and advertisements.	Advertising Networks & Marketing Agencies, Attorneys & Law Firms, Chat Modules, Data Brokers & Analytics Providers, Digital Retailers & eCommerce Platforms, Reputation Management Companies, Social Media Networks, Software Vendors, Vehicle Manufacturers, Website and Hosting Providers
Professional/Employment such as job title, occupation, company or business name, and employment history information.	Attorneys & Law Firms, Auditors & Consultants, Claims & Benefits Administrators, Credit Reporting Agencies (CRAs), Data Brokers & Analytics Providers, Debt Collection Agencies & Repossession Companies, Digital Retailers & eCommerce Platforms, Employee Screening & Background Check Companies, Financial Institutions, Government Entities, Insurance Brokers (non-health related), Records Management Companies, Social Media Networks, Software Vendors, Uniform & Apparel Companies, Website and Hosting Providers

Protected Classes under state or federal law, such as gender, age, and veteran status.

Attorneys & Law Firms, Auditors & Consultants, Car Rental Companies, Check Guarantee Companies, Claims & Benefits Administrators, Credit Reporting Agencies(CRAs), Data Brokers & Analytics Providers, Debt Collection Agencies & Repossession Companies, Digital Retailers & eCommerce Platforms, Employee Screening & Background Check Companies, Financial Institutions, Government Entities, Insurance Brokers (non-health related), Records Management Companies, Social Media Networks, Software Vendors, Vehicle Manufacturers, Website and Hosting Providers

Your Rights Under the CCPA

1. Right to Know About Personal Information Collected, Disclosed, or Sold

Under the CCPA, you have a right to request that we disclose the categories of personal information we have collected, used, disclosed, and sold. We call this a “categories” request. You also have the right to request that we disclose the specific pieces of personal information that we have collected about you, which we call a “specific pieces” request. These are referred to collectively as “Right to Know” requests under the CCPA.

2. Right to Request Deletion of Personal Information

You also have a right to delete the personal information we’ve collected about you. The “Right to Delete” is subject to several legal exceptions, such as when we are required by another state or federal law to retain your information.

3. Right to Opt-Out of the Sale or Sharing of Information

The CCPA provides consumers with the right to opt-out of the sale of their personal information and sharing of their personal information for cross-context behavioral advertising. The CCPA defines a “sale” as disclosing or making available to a third-party personal information in exchange for monetary or other valuable consideration. Cross-context behavioral advertising is defined as the targeting of advertising to a consumer based on the consumer’s personal information obtained from the consumer’s activity across businesses, distinctly-branded websites, applications, or services with which the consumer does not intentionally interact.

While we do not sell personal information for monetary value, we may disclose personal information to third parties, such as vehicle manufacturers, in such a way that may be considered a “sale” of personal information under the CCPA. We also share information with third-party advertising companies for cross-context behavioral advertising to identify and present advertisements tailored to your behavior (e.g., retargeting ads). To direct us to stop the sale or sharing of your personal information, [click here](#) to submit a request using our interactive web form.

We do not sell or share personal information of minors who we know are under 16 years of age.

4. Right to Non-Discrimination for the Exercise of Your CCPA Rights

You have a right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA.

5. Right to Correct Inaccurate Personal Information

You have a right to correct any inaccurate personal information that we store on you.

6. Right to Limit the Use & Disclosure of Sensitive Personal Information

Under the CCPA, you have the right to limit the use and disclosure of your sensitive personal information for the purpose of inferring characteristics about you. Under California law, “sensitive personal information” includes, but is not limited to, your precise geolocation data, ethnicity, or social security, government-issued identification, bank account, or credit card number.

We may use and share certain categories of your sensitive information, such as geolocation data collected on our website, to infer characteristics about you. To direct us to stop the use and disclosure of your sensitive personal information, [click here](#) to submit a request using our interactive web form.

Verification of Right to Know, Correction and Deletion Requests

To protect against fraud, identity theft, and the unauthorized disclosure or deletion of personal information, we require that consumers submitting requests under the CCPA first verify their identity. This may include a combination of SMS (text message) verification, email verification, and one or more questions regarding the consumer's particular interaction or transaction with our dealership. If the consumer fails to verify their request via these methods, or the information provided by the consumer otherwise does not match our existing records, we will deny the request.

How to Submit a CCPA Request

To submit a Right to Know, Correct, Delete, Opt-Out, or Limit request, [click here](#) to access our online consumer request portal, or call our toll-free number at [DEALER PHONE NUMBER].

Authorized Agents

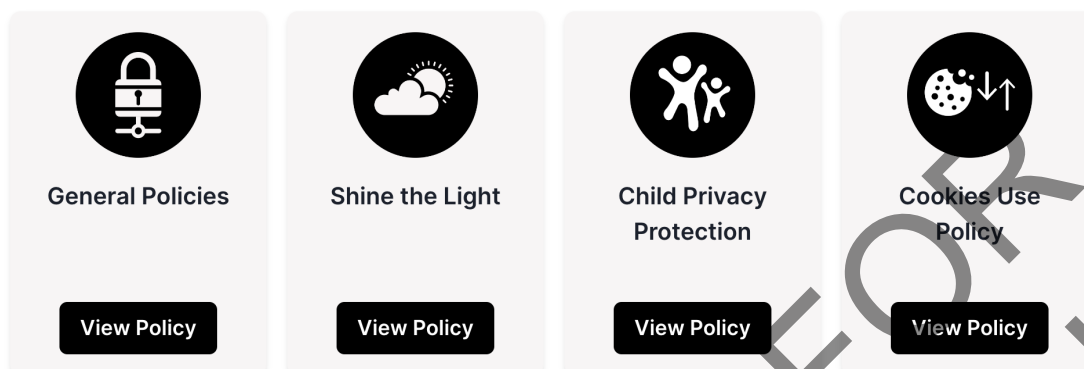
A consumer may designate an authorized agent to make a request under the CCPA on the consumer's behalf. If a consumer wishes to authorize another person to act as an authorized agent on the consumer's behalf, the consumer must provide the authorized agent permission to do so. An authorized agent can submit a CCPA request on behalf of a California resident by [clicking here](#).

To help prevent fraudulent requests, we reserve the right to deny a request from an agent that does not submit proof that he or she has been authorized by the consumer to act on the consumer's behalf. As proof that the agent has been duly authorized by the consumer to submit a CCPA request, the agent will be required to upload either (1) power of attorney signed by the consumer, or (2) other signed permission from the consumer. Pursuant to California Probate Code Sections 4300 to 4310, if an agent provides power of attorney signed by the consumer ("principal") that purports to give the agent authorization to submit the request on the principal's behalf, we may require that the agent provide information reasonably necessary or appropriate to identify the agent and principal and to facilitate the request. This includes, but is not limited to, identification of the agent and principal and the current and permanent residence addresses of the principal. If the agent provides some other signed permission from the consumer, we may require that the consumer (1) verify their identity directly with us through a combination of SMS (text message) verification, email verification, and one or more questions regarding the consumer's particular interaction or transaction with our dealership and (2) confirm that he or she provided the authorized agent permission to submit the request.

Contact Us

For questions or concerns about our California Privacy Policy, please contact us by email at [DEALER EMAIL] or by phone at [DEALER PHONE NUMBER].

Section 2 - Other Important Privacy Disclosures



Consent and Notification of Revisions

By accessing or using our Sites and/or Services, you consent to this Privacy Policy. If you do not agree with this Privacy Policy, please do not access or use the Site(s) or Services. We may periodically modify or update our Privacy Policy with or without notice to you by posting the most updated version on this page. Please see the “Revision Date” at the top of this document to see when the Privacy Policy was last changed. We will update the “Revision Date” in the privacy policy to notify you of any substantive changes to the way we collect and use information. We encourage you to periodically review this Privacy Policy to obtain the most up-to-date information on how we are handling your personal information. If you do not agree to changes to this Privacy Policy, you must stop using the Sites after the last revision date of such changes.

Collection of Anonymous Information

We also collect anonymous, aggregate information from all visitors to our Sites. The anonymous information we collect from your visit is never linked to any of your personal information until you voluntarily submit that personal information. If not, that anonymous information is used only in the aggregate to generate statistical reports about the use of our Sites. We may provide this anonymous information in aggregate form to other parties or use it for our own insights for marketing purposes. This anonymous or aggregate information is not linked to any personal information and our ability to use this information is not restricted in any way.

How We Respond To Do-Not-Track Signals & Global Privacy Controls

A “do-not-track” signal is a privacy preference feature in some web browsers that tells a website that a user does not want their online activity to be tracked. We currently support Global Privacy Control (GPC), a specification designed to allow internet users to notify businesses of their privacy preferences, such as whether or not they want to be tracked or have their personal information sold or shared with third parties for targeted advertising. It consists of a setting or extension in the user’s browser or mobile device and acts as a mechanism that our websites can use to honor your privacy settings. GPC is available for an increasing number of browsers and browser extensions, [click here](#) to view the options. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC can be found by [clicking here](#). If your browser or device has enabled GPC, it will override your preferences selected in the cookie banner or privacy settings on this Site.

Third-party Links

This Privacy Policy applies only to our Sites and Services, and information collected for us or by us through various features and online offerings on our Sites. Our Sites contain links to other third-party sites, and our Privacy Policy

does not apply to any third-party site or service linked to our Sites or recommended or referred by our Sites or by our staff. We are not responsible for the website, privacy practices or content of any third-party. If you have any questions about how these other sites use your information, you should review their policies and contact them directly.

Security

We implement reasonable security measures to ensure the security of your personal information. However, no data transmissions over the Internet can be guaranteed to be 100% secure by nature. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you understand that any information that you transfer to us is done at your own risk. We may attempt to notify you electronically of any security system breach so that you can take appropriate steps. By using the Services or providing personal information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Services. We may post a notice via our website if a security breach occurs or send an email to you at the email address you provided. You may have a legal right to receive notice of a security breach in writing depending on where you live.

While we use encryption to protect online information, we also make all reasonable efforts to secure and protect your information offline. All of our customers' information is restricted in our offices and only employees who need the information to perform a specific job function are granted access to this information. The services that store your personal information are housed in a secure environment.

Business Transfers and Related Activities

We may share or transfer your information in the course of any direct or indirect reorganization process such as, but not limited to, mergers, acquisitions, divestitures, bankruptcies, and sales of all or a part of our assets. Your information may be shared as a result of such a transaction and/or during the assessment process pending transfer. In the event your information is transferred due to one of these events, know that your information would remain subject to this Privacy Policy or a privacy policy that protects your privacy to an equal degree as this Privacy Policy.

Chat Modules

We may collect certain categories of personal information from you when you use our interactive chat module. In addition to the information you may enter into the chat box or live chat feature, the categories of personal information include, but are not limited to, name, phone number, email, mailing address, and other identifiers you may provide. Additionally, we may also store any transcripts from such conversations and link those transcripts with your personal information. We may also collect information from you to perform data analytics and thereby enhance your experience and help improve the functionality of our tools and digital advertising in an effort to present to you only relevant products and services. Such Information includes, but is not limited to, geolocation, IP address, pixel tags, browsing history, viewing behavior, clicks, online activity, and other analytics. By interacting with the chat module, you understand and agree that we may use this data to communicate with you about our products and services. You also consent to our collection and analysis of all personal information provided as part of the chat module and understand that we utilize a vendor to process, analyze, and store the content of the chat on our behalf. By using the chat module, you are consenting to us disclosing and sharing with the chat module vendor any personal information you provide.

Your California Privacy Rights

California Civil Code Section 1798.83 permits visitors to our Sites and users of our Services who are California residents to request, once a year, certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make a request, please send us an email at hao@privacy.com and include "Shine the Light Request" in the subject line.

Children Under 13 Years of Age

Our Sites and Services are not intended for children under thirteen (13) years of age. Dealership does not knowingly collect or use any personal information from children under thirteen (13) years of age, and does not knowingly

provide any personal information to any third party for any purpose whatsoever from visitors younger than thirteen (13) years old. If you are under thirteen (13) years old, please do not provide any information on our Sites or through our Services.

Use of Cookies & Similar Technologies

We use cookies and other similar technologies (e.g. web beacons, pixels, or local storage) to deliver content specific to your interests, track your website activity, help our Sites remember you, enhance your online experience with us, and provide you with information you're most likely to need. Cookies are small pieces of text used to store information on web browsers between visits. Cookies and any technology that serves a similar purpose as a cookie in the context of tracking, identifying, or building consumer profiles are included in our use of the term "cookie" for the purpose of this Privacy Policy. We, our service providers, or third-party advertising companies may use "first-party cookies" or "third-party cookies" as described below.

First-Party Cookies.

Many first-party cookies are necessary to facilitate essential website functions and enable you to navigate our Sites and use its features, such as remembering a consumer's shopping cart or chat session across pages or multiple visits. Also, first-party cookies are used to improve the functionality of the Site (such as tracking errors) and may be used to improve the ability to market or advertise to our consumers strictly on our own Sites, such as building consumer interest profiles to improve the recommended products consumers see on our own Sites. By default, our Sites do not support an inherent mechanism to allow users to opt-out of these first-party cookies.

Third-Party Cookies.

Third-party cookies refer to any cookie that shares or enables the sharing of information to an entity other than our own Sites. For example, some cookies used with third-party analytics providers will use a first-party domain but still share the collected information with the third-party provider. Our users can opt-out of certain third-party cookies by making the appropriate selection on our cookie banner that appears upon first visiting our Sites, using a browser or plug-in that supports Global Privacy Control (GPC), by submitting an opt-out request (see our Privacy Policy for more info), or as otherwise described in this Privacy Policy. We allow users to opt-out of the following types of third-party cookies:

- Cookies used to track consumers in order to serve ads to the consumer on other websites (e.g. retargeting ads that might appear on a search engine or social media that redirect you to our Sites).
- Cookies used to build consumer profiles to improve the overall ability to advertise to an individual or group of consumers across multiple Sites.
- Cookies used to track individual consumers to improve the ads they are served from a variety of advertisers (which may include the Dealership).

For some third-party cookies, our Sites do not offer an inherent mechanism for users to opt-out. This includes the following types of third-party cookies:

- Cookies used by our service providers or third-party advertising companies to perform an essential function solely on our own Sites. For example, they may use a cookie to remember a consumer's chat session across pages or visits so that the customer service representative responding to the chat is aware of the previous questions asked by the specific consumer.
- Cookies used by our service providers to perform analytics solely for our own Sites.

Some web browsers offer settings that allow you to choose whether cookies are set by the websites that you visit. These Controls vary by browser, but may allow you to disable all cookies, disable cookies for individual websites, or notify you whenever a cookie is set. Please note that if you disable cookies, you may still use our website, but your ability to use some features or areas of the Site may be limited. Our Sites may use products, such as Google Analytics, to measure how you interact with our Sites and to improve your user experience. For more information on Google Analytics, its privacy practices, and opt-out mechanisms, please visit the Google Analytics Security and Privacy Principles page at <https://support.google.com/analytics/answer/6004245?hl=en>. For Google's privacy policy and instructions on opting-out of Google Analytics, please visit <https://tools.google.com/dlpage/gaoptout>. The Network Advertising Initiative also offers a means to opt-out of a number of advertising cookies. To learn more,

please visit www.networkadvertising.org. Note that opting-out does not mean you will no longer receive online advertising. It means that the company or companies from which you opted-out will no longer deliver ads tailored to your preferences and usage patterns.

Note that this site's cookie banner and privacy settings will only opt you out of the future tracking and sharing by cookies that are deployed by our Sites. In order to manage the information sharing and advertising cookies not deployed by our Sites (e.g., other third-party companies' cookies that are already tracking you), you may want to consider using one of the consumer choice tools created under self-regulation programs, such as the US-based <https://optout.aboutads.info/?c=2&lang=EN> choices page.

Dispute Resolution and Arbitration Agreement

Except where prohibited by law, by using the Services you and Dealership agree that if there is any controversy, claim, action, or dispute arising out of or related to your use of the Services or the breach, enforcement, interpretation, or validity of this Privacy Policy or any part of it (hereinafter "Dispute"), both parties shall first try in good faith to settle such Dispute By providing written notice to the other party describing the facts and circumstances of the Dispute and allowing the receiving party thirty (30) calendar days in which to respond to or settle the Dispute. Notice shall be sent to us at ATTN: [DEALER ADDRESS] or to you at the address or email we have on file for you.

Both you and the Dealership agree that this dispute resolution procedure is a condition precedent that must be satisfied before initiating any litigation or filing any claim against the other party. IF ANY DISPUTE CANNOT BE RESOLVED BY THE ABOVE DISPUTE RESOLUTION PROCEDURE, YOU AGREE THAT THE SOLE AND EXCLUSIVE JURISDICTION FOR SUCH DISPUTE WILL BE DECIDED BY BINDING ARBITRATION ON ANY INDIVIDUAL BASIS. ARBITRATION ON AN INDIVIDUAL BASIS MEANS THAT YOU WILL NOT HAVE, AND YOU WAIVE THE RIGHT FOR A JUDGE OR JURY TO DECIDE YOUR CLAIMS, AND THAT YOU MAY NOT PROCEED IN A CLASS, CONSOLIDATED, OR REPRESENTATIVE CAPACITY. Other rights that you and we would otherwise have in court will not be available, or will be more limited in arbitration, including discovery and appeal rights. The arbitrator, and not any federal, state, or local court or agency, shall have exclusive authority to resolve any dispute arising under or relating to the interpretation, applicability, enforceability, or formation of this Privacy Policy, including any claims that all or any part of this Privacy Policy is void or voidable.

Other Arbitration Agreements

In the event of a conflict between this arbitration agreement and any other arbitration agreement between you and the Dealership such as an arbitration agreement contained in a retail installment sale contract, lease agreement, or repair estimate (hereinafter "Other Arbitration Agreement"), the terms of the Other Arbitration Agreement shall govern and prevail in each instance.

Venue And Choice Of Law

This Privacy Policy has been made in, and shall be construed in accordance with the laws of California without giving effect to any conflict of law principles. Any disputes or claims not subject to the arbitration provision discussed above shall be resolved by a court located in that state and you agree and submit to the exercise of personal jurisdiction of such courts for the purpose of litigating any such claim or action.