## **Privacy**

Effective Date: 11/12/2024

Group 1 Automotive and each of our subsidiaries and affiliated entities (collectively, "Dealership" or "we" or "us") respects your privacy and the information that you have entrusted to us. This Privacy Policy ("Privacy Policy") applies to both the online and offline collection of personal information by Dealership. This Privacy Policy describes how we collect and manage personal information, which is any information relating to an identified or identifiable natural person. Personal information does not include aggregated or deidentified information. By visiting 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") of our United States operations, you acknowledge you have read and understand the terms and conditions of this Privacy Policy. If you do not agree to the terms and conditions of this Policy, please do not use our Sites or Services.

PLEASE NOTE THE ARBITRATION PROVISION SET FORTH BELOW, WHICH REQUIRES, EXCEPT WHERE AND TO THE EXTENT PROHIBITED BY LAW, YOU TO ARBITRATE ANY CLAIMS YOU MAY HAVE AGAINST DEALERSHIP ON AN 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 OR CONSOLIDATED CAPACITY.

## **GENERAL PRIVACY POLICY**

Below are the general terms of our Privacy Policy. For additional privacy information applicable to California Residents, please see the section titled <u>"For California Residents."</u>

## CATEGORIES OF PERSONAL DATA COLLECTED, PROCESSED AND SHARED

The table below describes how we use, and share consumers' personal data. Please note that because the type of personal data collected and shared largely depends on how a consumer has interacted with us, not all of the items listed in the table below will be relevant to you. For example, we may only collect military status when a consumer qualifies for a military rebate.

| Categories of personal data processed                           | Shared with third parties? |
|---|----------------------------|
| · Identifiers, such as: name, postal address, email address, IP | Yes                        |
| address, identification numbers (e.g., social security number,  |                            |

| driver's license number, state identification number, military identification number or passport number)   |            |  |
|--|------------|--|
| Personal information categories contained in customer records, such as: phone number; insurance information; bank account number, credit card number, debit card number, or other financial information, including information relating to consumers' vehicle financing or lease terms, along with vehicle information; and/or signature(s). | Yes        |  |
| Commercial information, such as: vehicle information, vehicle  | Yes        |  |
| <ul> <li>Biometric information - consumers who finance/lease vehicles<br/>may be asked to complete a "Thumbprint form."</li> </ul>   | No         |  |
| . <b>Internet or other similar network activity information</b> , such as: IP address, browsing history, and search history.   |            |  |
| . <b>Geolocation information</b> , such as: IP address and vehicle location.   | Yes        |  |
| · Sensory data, such as audio information from voicemail messages and/or recorded phone calls (with consumers' consent)  | Yes<br>Yes |  |
| Professional or employment-related information, such as: information regarding current occupation; information regarding whether a consumer is or will soon be a college graduate.   | Yes        |  |
| <ul> <li>Inferences drawn from personal information to create a<br/>profile, such as: information regarding consumers' vehicle<br/>preferences and needs</li> </ul>  | 165        |  |
|  | Yes        |  |
| Purposes for processing personal data  |            |  |

· To send informational and marketing communications, respond to requests and inquiries, and communicate with consumers regarding our products or services

- Enter into transactions with consumers, obtain authorization to collect payment from consumers, collect payment from consumers, confirm acknowledgement of receipt of documents we provide to consumers, process transaction(s), process insurance or service contract claims; to effectuate, or in anticipation of effectuating, a vehicle repair covered by a vehicle warranty or a recall; provide copies of documents as required by law, and retain records of transactions as required by law
- ·Complete government forms
- To confirm consumers' identity, confirm consumers are at least 18 years old, confirm consumers are licensed to drive our vehicles or take delivery of a vehicle they have purchased or leased from us, and confirm insurance coverage
- Confirm eligibility for a manufacturer/lender rebate and to apply for and process any applicable rebate, and confirm eligibility for employee price discounts, if applicable
- Appraise consumers' vehicles, improve user experiences by making our website easier to use and navigate, and more personalized based on the profile we create about an individual consumer
- Vehicle tracking as permitted by law

Some phone calls are recorded and video/audio recordings are made in the finance office (with your consent) for security purposes, training our staff and for compliance/quality assurance purposes

## Categories of third parties with whom personal data is shared

- · Operating system providers, internet service providers and analytics providers
- Banks and payment processors
- Warranty, insurance or service contract administrators
- Advertising service providers
- Vehicle manufacturer, if customer purchased/leased a new or certified vehicle or if their vehicle was serviced at our dealership
- · State or federal agencies, when required by law
- Delivery services

**Disclosure for our FCA US customers:** Personal information will be shared with FCA US and used by FCA US in accordance with the FCA US Online Privacy Policy (available at <a href="https://www.chrysler.com/crossbrand\_us/privacy">https://www.chrysler.com/crossbrand\_us/privacy</a>).

## **COOKIES AND WEBSITE TRACKING TECHNOLOGIES**

We may use cookies and other similar technologies on our website. Cookies are small text files placed on your device that uniquely identify your device and which a website can transfer to a consumer's hard drive to keep records of his or her visit to a website. We may use session cookies or persistent cookies. Session cookies only last for the specific duration of your visit and are deleted when you close your browser. Persistent cookies remain on your device's hard drive until you delete them or they expire. Different cookies are used to perform different functions, which are explained below:

- Essential. Some cookies are essential in order to enable you to move around our
  website and use its features, such as accessing secure areas of our website.
   Without these cookies, we cannot enable appropriate content based on the type of
  device you are using.
- Analytics. We use Google Analytics to measure how you interact with our website
  and to improve your user experience. To learn more about Google Analytics privacy
  practices and opt-out mechanisms, please visit the Google Analytics Security and
  Privacy Principles page
  at <a href="https://support.google.com/analytics/answer/6004245?hl=en">https://support.google.com/analytics/answer/6004245?hl=en</a>. Google also
  provides a complete privacy policy and instructions on opting out of Google
  Analytics at <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>.

Please note that our website may include pixels controlled by OEM partners. These pixels may collect personal information of website users and share that personal information with the respective OEM.

There are several ways to manage cookies. You can control the use of cookies at the browser level, by instructing your browser to accept cookies, disable cookies or notify you when receiving a new cookie. Please note that if you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be limited. The Network Advertising Initiative also offers a means to opt-out of a number of advertising cookies. Please visit <a href="https://www.networkadvertising.org">www.networkadvertising.org</a> to learn more. Note that opting out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted-out will no longer deliver ads tailored to your preferences and usage patterns.

HOW WE RESPOND TO DNT SIGNALS AND UNIVERSAL OPT-OUT MECHANISMS

At this time, some of our websites support Do Not Track ("DNT") and Global Privacy Control ("GPC") browser signals designed to allow internet users to notify businesses of their privacy preferences. These specifications consist of a setting or extension in the user's browser or mobile device and act as mechanisms that some oof our websites can use to honor your privacy settings. If your browser or device has enabled DNT or GPC, it will override your preferences selected in the cookie banner or privacy settings on our websites where DNT and GPC signals are supported.

You can learn more about DNT by <u>clicking here</u>. GPC information is available here: <u>click</u> <u>here to view the options</u>. More information about downloading the GPC can be found here: <u>clicking here</u>.

## **OPTING OUT OF CERTAIN COMMUNICATIONS**

We provide you the opportunity to opt-out of marketing communications by clicking the "unsubscribe" link in email communications or by contacting us using the contact information provided below. We will process your request as soon as possible in accordance with applicable law, but please be aware that in some circumstances you may receive a few additional messages until the unsubscribe is processed.

Additionally, we may send you information regarding our Services, such as information about changes to our policies and other informational notices and disclosures required by law. Generally, users cannot opt-out of these communications, but they will be primarily informational in nature, rather than promotional.

#### YOUR STATE RIGHTS

Depending on applicable state law, you may have the right to object to our collection and use of your personal data at any time, or to require us to review, transmit, change, or delete the data that we have collected and retained about you. We will fulfill your request to exercise any of these rights within the applicable time period prescribed by such laws. You can exercise these rights, express concerns, or obtain additional information about the use of your personal data by contacting us as outlined below.

**Submit a Consumer Privacy Request**. To exercise any of the above rights, please submit a verifiable consumer privacy request:

By email: <u>compliance@group1auto.com</u>.

• By phone: (800) 220-8200

**Authentication.** We cannot respond to your request or provide you with personal data unless we can verify your identity and your authority to make the request and confirm that the personal data relates to you. A verifiable consumer privacy request must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we have collected personal data or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Our Response. We endeavor to respond to an authenticated consumer request within 45 days of receipt. If we require more time, we will notify you in writing of the reason and extension period. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding receipt of the verifiable consumer request. If we cannot comply with part or all of your request, we will explain the reasons in our response. We do not charge a fee to process or respond to your authenticated consumer privacy request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

**Appeals.** Residents of Texas have the right to appeal a denial of their request by contacting us as described in our notice of denial.

## **COLLECTION AND USE OF INFORMATION FROM CHILDREN**

Our Services are not intended for children. We do not knowingly collect personal information from children under the age of 16, and none of our Services are designed to attract children. In the event that we learn that a person under the age of 16 has provided personal information to us, we will delete such personal information as soon as possible.

#### THIRD-PARTY LINKS

Our website contains links to other sites. The Dealership is not responsible for the privacy practices or content of such other sites. If you have any questions about how these other sites use your information, you should review their policies and contact them directly.

#### DISCLAIMER REGARDING VIDEO CONTENT

The Services may contain video content, audiovisual content, or content of a like nature (collectively, "Video Content"). Video Content is provided for the purpose of enhancing the user experience within the Services and is, therefore, provided in connection with Dealership providing its automotive dealership-related Services. Dealership is not in the

business of renting, selling, or delivering Video Content in a commercial manner. By using the Services, you agree that Dealership is not a "video tape service provider" as defined in the Video Privacy Protection Act, 18 U.S.C.A. § 2710.

## **CHAT FEATURES AND SESSION REPLAY TECHNOLOGY**

We may collect certain categories of personal information from you when you use our interactive chat module. In addition to information you enter into the chat box or live chat feature, the categories of personal information collected may include: name, phone number, email, mailing address, and other identifiers you may provide. Dealership 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. 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.

#### **SECURITY**

We implement reasonable security measures to ensure the security of your personal information. Please understand, however, that no data transmissions over the Internet can be guaranteed to be 100% secure. 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. If we learn of a security system breach, we may attempt to notify you electronically so that you can take appropriate protective 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. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

### INTERNATIONAL DATA TRANSFERS

Dealership is based in the U.S. If you choose to provide us with information, please understand that your personal information may be transferred to the U.S. and that we may

transfer that information to our affiliates and subsidiaries or to other third parties, across borders, and from your country or jurisdiction to other countries or jurisdictions around the world. If you are visiting from the EU or other regions with laws governing data collection and use that may differ from U.S. law, please note that you are transferring your personal information to the U.S. and other jurisdictions which may not have the same data protection laws as the EU. We put in place appropriate operational, procedural and technical measures in order to ensure the protection of your personal information. You acknowledge you understand that by providing your personal information: (i) your personal information will be used for the uses identified above in accordance with this Policy; and (ii) your personal information may be transferred to the U.S. and other jurisdictions as indicated above, in accordance with applicable law.

## ASSIGNMENT, BUSINESS TRANSFERS, AND RELATED ACTIVITIES

In the event that all or part of our assets are sold or acquired by another party, or in the event of a merger, you grant us the right to assign the personal information collected via the Services.

## **DISPUTE RESOLUTION AND AGREEMENT TO ARBITRATE**

Except where and to the extent 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 Policy or any part of it ("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) days in which to respond to or settle the Dispute. Notice shall be sent to:

- Audi Peabody 252 Andover St; ATTN: Gillian Hobson or
- You, at the address we have on file for you.

Both you and 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 AN INDIVIDUAL BASIS IN TEXAS. 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 OR CONSOLIDATED 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. All such disputes shall be exclusively submitted to the American Arbitration Association (<a href="https://www.adr.org/Rules">https://www.adr.org/Rules</a>) for binding arbitration under its rules then in effect, before a retired federal judge or judge of the state court of general jurisdiction, or an otherwise qualified individual to whom the parties mutually agree.

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 Policy, including any claim that all or any part of this Policy is void or voidable.

## OTHER ARBITRATION AGREEMENTS

In the event of a conflict between this agreement to arbitrate and any other arbitration agreement between you and Dealership, such as an arbitration agreement contained in a retail installment sale contract, lease agreement, or repair estimate ("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 the State of Texas, 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 the State of Texas and you agree and submit to the exercise of personal jurisdiction of such courts for the purpose of litigating any such claim or action.

## **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to change this Policy from time to time. When we do, we will also revise the "Effective Date" at the top of this Policy. If we make material changes to the Policy, we will notify you by placing a prominent notice on our website and/or by sending you an email at the email address we have on file for you. We encourage you to periodically review this Policy to keep up to date on how we are handling your personal information.

### **CONTACT US**

If you have any questions, comments or concerns about our privacy practices or this Privacy Policy, please contact us at:

Group 1 Automotive dealerships in California

Attention: Gillian Hobson

Address: 730 Town & Country Blvd, Suite 500, Houston TX 77024

Toll-free phone number: (833) 220-8200 Email address: ccpa@group1auto.com

Group 1 Automotive dealerships in other states

Attention: Gillian Hobson

Address: 730 Town & Country Blvd, Suite 500, Houston TX 77024

Toll-free phone number: (800) 220-8200

Email address: compliance@group1auto.com

#### FOR CALIFORNIA RESIDENTS

#### NOTICE AT COLLECTION FOR CALIFORNIA RESIDENTS

The purpose of this Notice at Collection is to provide California residents with the categories of personal information that our Dealerships collect about them and the purposes for which the personal information is used. We retain the below information for as long as required to provide you with the Services, comply with our legal obligations, resolve disputes, and enforce our agreements. If you are an employee of a Dealership, please refer to your specific Employee Privacy Policy for an explanation of how we collect, use, and retain employee personal information. More detailed disclosures for California residents are located in the section "PRIVACY NOTICE FOR CALIFORNIA RESIDENTS." We may collect the following categories of personal information from you: Identifiers, Personal information categories contained in customer records, Protected classification characteristics, Commercial information, Biometric information, Internet or other similar network activity information, Geolocation information, Sensory data, Professional or employment-related information, Inferences drawn from personal information to create a profile, and Sensitive Personal Information. We use the categories of personal information listed above for one or more of the following "business purposes": to provide our sites and services, advertising and marketing, contextual and behavioral targeting, to understand website interactions, to provide customer service, to defend against claims and litigation, fraud prevention, processing transactions, and providing financing.

## PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Below is a table regarding the personal information we have collected about California consumers (excluding job applicants and employees) during the last 12 months. We retain the below information for as long as required to provide you with the Services, comply with

our legal obligations, resolve disputes, and enforce our agreements. If you are an employee of Dealership, please refer to the specific Employee Privacy Policy for an explanation of how we collect, use, and retain employee personal information.

| Category of Personal<br>Information  | Sharing/Sale of Information  | Disclosures to Third Parties for a Business Purpose                |
|--|--|--|
| Identifiers, such as:  Name, postal address, email address, IP address, identification numbers (e.g., social security number, driver's license number, state identification number, military identification number or passport number)                               | To vehicle manufacturer for marketing and analytical purposes, if customer visits a dealership website, or purchased/leased a new or certified vehicle, or if their vehicle was serviced at our dealership  To state or federal agencies, when required by law | To service providers for administrative and operational assistance |
| Personal information   | · To vehicle manufacturer  | · To service providers for   |
| categories listed in the   | for marketing and  | administrative and   |
| California Customer  | analytical purposes, if  | operational assistance   |
| Records statute (Cal. Civ.   | customer   |  |
| Code § 1798.80(e)), such as:   | purchased/leased a new   |  |
| Phone number; insurance information; bank account number, credit card number, debit card number, or other financial information, including information relating to consumers' vehicle financing or lease terms, along with vehicle information; and/or signature(s). | or certified vehicle or if their vehicle was serviced at our dealership  To state or federal agencies, when required by law  To banks to confirm availability of funds   |  |

# Protected classification characteristics, such as:

A photocopy/scan of government issued identification reveals personal information. For example:

- Driver's license/state identification card - includes image, date of birth, physical description and gender
- Permanent resident card includes image, date and place of birth;
- Social security card includes social security number
- Passport includes image, date and place of birth and nationality
- Military ID includes image and rank

Completion of a Translated Contract Acknowledgement or signing of translated documents reveals a consumer's primary language

- To vehicle manufacturer if customer purchased or leased a new or certified vehicle or if their vehicle was serviced at our dealership
- To manufacturer or lender for processing rebate, if applicable
- To state or federal agencies, when required by law

 To service providers for administrative and operational assistance

# Commercial information>, such as:

Vehicle information, vehicle ownership information, vehicle transaction information relating to

- To vehicle manufacturer of some of the listed personal information, if customer purchased or leased a new or certified vehicle or if their vehicle
- To service providers for administrative and operational assistance

| purchase or lease of vehicles (including finance or lease terms), purchase of parts, service repairs, maintenance or vehicle inspections | was serviced at our dealership  To state or federal agencies, when required by law   |  |
|--|--|--|
| Biometric information  | N/A  | N/A  |
| Consumers who finance/lease vehicles may be asked to complete a "Thumbprint form"  |  |  |
| Internet or other similar  | · To vehicle manufacturer  | · To service providers for   |
| network activity information, such as:   | for marketing and analytical purposes, if customer visits a                          | administrative and operational assistance                          |
| IP address, browsing history,<br>and search history  | dealership website   |  |
| Geolocation information, such as:  IP address and vehicle location   | N/A  | To service providers for administrative and operational assistance |
| Sensory data, such as Audio information from voicemail messages and/or recorded phone calls (with consumers' consent)                    | N/A  | To service providers for administrative and operational assistance |
| Professional or  | ·To manufacturer or lender   | N/A  |
| employment-related   | for processing rebate or   |  |
| information, such as: Information regarding current occupation   | employee discount, if applicable  To state or federal agencies, when required by law |  |

| 1                              | 1                       | 1                          |
|--------------------------------|-------------------------|----------------------------|
|                                |                         |                            |
| Non-public education           | · To manufacturer or    | N/A                        |
| information (per the Family    | lender for processing   |                            |
| Educational Rights and         | rebate, if applicable   |                            |
| Privacy Act (20 U.S.C.         |                         |                            |
| Section 1232g, 34 C.F.R. Part  |                         |                            |
| <b>99))</b> , such as:         |                         |                            |
| Information regarding          |                         |                            |
| whether a consumer is or will  |                         |                            |
| soon be a college graduate     |                         |                            |
| Inferences drawn from          | N/A                     | · To service providers for |
| personal information to        |                         | administrative and         |
| create a profile, such as:     |                         | operational assistance     |
| Information regarding          |                         |                            |
| consumers' vehicle             |                         |                            |
| preferences and needs          |                         |                            |
| Sensitive Personal             | · To state or federal   | · To service providers for |
| information, such as:          | agencies, when required | administrative and         |
| Social Security number,        | by law                  | operational assistance     |
| driver's license number, state | · Some of the listed    |                            |
| identification number,         | personal information to |                            |
| passport number; account       | banks to confirm        |                            |
| log-in, financial account,     | availability of funds   |                            |
| debit card, or credit card     |                         |                            |
| number in combination with     |                         |                            |
| any required security or       |                         |                            |
| access code, password, or      |                         |                            |
| credentials allowing access    |                         |                            |
| to an account; precise         |                         |                            |
| geolocation information;       |                         |                            |
| contents of mail, email, and   |                         |                            |
| text messages unless the       |                         |                            |
| business is the intended       |                         |                            |
| recipient of the               | 1                       |                            |
|                                |                         |                            |

|   | data; biometric data for the |
|---|------------------------------|
|   | purposes of uniquely         |
|   | identifying a consumer.      |
| ı |                              |

# Categories of sources from which the personal information is collected

- · Directly from consumers
- · Indirectly from consumers (e.g., from observing consumers' actions on our Services)
- · Third-parties, including advertising companies, analytics providers, vehicle manufacturer, and websites or companies that provide information regarding vehicles or provide listings of vehicles available for sale/lease, that forward identifiers provided by consumers
- · From vehicles equipped with GPS tracking (as permitted by law)

# Business or commercial purpose for collecting, selling, or sharing personal information

- To send informational and marketing communications, respond to requests and inquiries, and communicate with consumers regarding our products or services
- Enter into transactions with consumers, obtain authorization to collect payment from consumers, collect payment from consumers, confirm acknowledgement of receipt of documents we provide to consumers, process transaction(s), process insurance or service contract claims; to effectuate, or in anticipation of effectuating, a vehicle repair covered by a vehicle warranty or a recall; provide copies of certain documents written in the language in which a transaction was primarily negotiated as required by law, and retain records of transactions as required by law
- · Complete government forms
- · To confirm consumers' identity, confirm consumers are at least 18 years old, confirm consumers are licensed to drive our vehicles or take delivery of a vehicle they have purchased or leased from us, and confirm insurance coverage
- · Confirm eligibility for a manufacturer/lender rebate and to apply for and process any applicable rebate, and confirm eligibility for employee price discounts, if applicable

- · Appraise consumers' vehicles, improve user experiences by making our website easier to use and navigate, and more personalized based on the profile we create about an individual consumer
- · Vehicle tracking as permitted by law
- · Some phone calls are recorded and video/audio recordings are made in the finance office (with your consent) for security purposes, training our staff and for compliance/quality assurance purposes

## JOB APPLICANT INFORMATION

In some instances, you may be provided with a separate privacy notice when you apply for a job with us. In all other instances, the below disclosure describes how we handle your personal information when you apply for a job with us.

When you apply for a job with us, we may collect identifiers, professional or employment-related information, and education information from you via our website forms and otherwise, including:

- Information you provide in connection with your application;
- Information about you that is publicly available;
- Health information, including disability information;
- Information that you authorize us to collect via third parties, including former employers or references;
- Any other information provided in connection with your application.

We only use your personal Information to assess your skills in relation to the applicable job requirements. We may also use your personal information to contact you during the hiring process.

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

# Your California Privacy Rights

Residents of California have the right to object to our collection and use of their personal information at any time, or to require us to review, transmit, change, or delete your information that we have collected and retained about them. We will fulfill your request to exercise any of these rights within the applicable time period subscribed by such laws. You can exercise these rights, express concerns, or obtain additional information about the use of your personal information by contacting us as outlined below.

Specifically, residents of California have certain rights with respect to their personal information, described below. Below this list of rights, we describe how California residents can exercise their rights including appealing a denial of a rights request.

- Right to Know or Access: You have the right to obtain confirmation about whether or not your personal information is being processed by us. You have the right to access the personal information we hold about you and/or request other related information, such as the purposes for which use that information, the categories of personal information we process about you, the recipients (or categories of recipients) to whom your personal information has been or will be disclosed, the retention period for such personal information, or, if not possible, the criteria used to determine that period, your legal rights with respect to your personal information, etc.
- Right to Delete: You have the right to request the deletion of your personal information, except under certain circumstances subject to applicable law.
- **Right to Correct:** You have the right to correct or update your personal information if inaccurate.
- Right to Opt-out of Sale, Sharing, and Targeted Advertising of your Personal Information: You have the right to opt-out of the sale and sharing of your personal information to third parties. You also have the right to opt out of the processing of your personal information for the purposes of targeted advertising.
- **Right to Nondiscrimination:** You have the right to non-discrimination, such as to receive equal service and pricing from a business, even after exercising your rights.
- Right to Data Portability: You have the right to receive the personal information that
  you have given us and that we are processing, in a structured, commonly used and
  machine-readable format. You also have the right to send that personal information
  to another controller.
- **Right to Opt-out of Profiling:** You have the right not to be subject to a decision based solely on profiling or automated decision-making.

Right to Limit the Use and Disclosure of Sensitive Personal Information: You
have the right to limit the use and disclosure of your sensitive personal information if
we use such information to infer characteristics about you; however, we do not use
your sensitive personal information for these purposes, so we do not offer the right
to limit.

**Submit a Consumer Privacy Request.** To exercise any of the above rights, please submit a verifiable consumer privacy request to Dealership:

- By completing our webform located at:
- Or by contacting us using any of the contact information provided above

**Verification.** We cannot respond to your request or provide you with personal information unless we can verify your identity and your authority to make the request and confirm that the personal information relates to you. A verifiable consumer privacy request must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we have collected personal information or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We may ask for you to confirm data points we already have about you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

**Authorized Agent.** As a resident of California, you may, under certain circumstances, authorize another individual or a business, called an Authorized Agent, to make requests on your behalf. Such Authorized Agent must be registered with the California Secretary of State. If you wish to have an Authorized Agent make a verifiable consumer request on your behalf, they will need to provide us with sufficient written proof that you have designated them as your Authorized Agent, and we will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information.

**Dealership's Response.** We endeavor to respond to a verifiable consumer request within 45 days of receipt. If we require more time, we will notify you in writing of the reason and extension period. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding receipt of

the verifiable consumer request. If we cannot comply with part or all of your request, we will explain the reasons in our response.

We do not charge a fee to process or respond to your verifiable consumer privacy request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

**Appeals.** California residents have the right to appeal a denial of their rights request by contacting us as described in our notice of denial.

# California "Shine the Light" Law

California Civil Code Section 1798.83 permits visitors to the Services who are California residents to request certain information, once a year, regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send us an email using the contact information provided above and put "Shine the Light Request" in the subject line of your email.

## ADDITIONAL FORMATS, ACCESSIBILITY, AND LANGUAGES

Our website includes accessibility tools. For information about these tools, click the AudioEye tab located in the footer of our website.