

FRANK MOTOR GROUP PRIVACY POLICY

This Privacy Policy (“Privacy Policy”) explains Frank Motor Group’s (“we,” “us,” “our”) privacy practices for the information described herein. Please read this Privacy Policy carefully to learn how we collect, use, and share information relating to individuals, and to learn about your rights and choices regarding your Personal Information.

This Privacy Policy applies any time that we collect personal information from or about individuals, whether online or offline, including information collected through our website and applications that run on mobile devices or tablets (collectively, the “Services”), information collected when you communicate with us in-person or through phone or email, and information we collect about you from third parties. By using any of our Services, providing your information to us, and/or by agreeing to this Privacy Policy, you understand and acknowledge that we will collect and use personal information as described in this Privacy Policy.

1. PERSONAL INFORMATION WE COLLECT

In conducting every aspect of our business, we may collect personal information. Such information may include, without limitation: your name, home and mailing addresses, email addresses, telephone numbers, credit or debit card numbers or other payment methods, credit history, driving history, criminal and legal history, insurance information, age, gender, billing information, social security number, and other types of personal information that you choose to provide to us or that we may obtain about you. We collect personal information, as well as non-personally-identifiable information, in multiple ways:

1.1 Information You Provide to Us: We collect information you provide to us. This may include, for example, when you transact business with us, use our Services, enroll in one of our e-mail reminder services, request information or materials from us, enter promotions or contests offered by us, register for or attend our events, use any of the interactive portions of our website, register on the customer portal, test-drive or purchase a vehicle from us, call our customer service team, communicate with our sales team, respond to a survey, purchase products or other services from us, communicate with us in any way, or respond to our advertisements.

1.2 Information We Collect from Other Sources: We may collect information about you from a variety of third parties. For example, we may obtain information about you from:

- car manufacturers;
- state and federal government agencies, such as the DMV;
- credit bureaus and credit reporting agencies, such as Equifax;
- social media networks when you grant permission to access your data on one or more networks; and
- publicly available sources and data suppliers from which we obtain data to validate or supplement the information we hold.

1.3 Information We Collect Automatically Through Cookies and Other Collection Technology:

When you use our Services (i.e. visit our website or use applications that run on mobile devices or tablets), we collect some information automatically. For example, when you visit our website, we may collect device, usage and log information such as your computer’s operating system, Internet Protocol (IP) address, access times, browser type and language, the search engine you used to locate the website, and the website you visited before or after our site. In addition, we gather certain navigational information about where you go on our website to help us determine which areas of the website are most frequently visited and helps us to tailor the sites to the needs and interests of our

online visitors. If you use our mobile applications or use our Services on a mobile device or tablet, we may also collect your device type, mobile phone number, operating system type, wireless carrier, and device IDs, on our mobile applications.

Like most companies, we use technologies such as web beacons, pixels, tags, and JavaScript, alone or in conjunction with cookies, to gather this information. When you visit our website, we, or an authorized third party, place or recognize a unique cookie on your browser (including through use of pixel tags) that collects information, including personal information, about your online activities over time and across different sites. We also use web beacons and pixels in our emails to collect information about how you interact with our emails. For example, we may place a pixel in marketing emails that notify us when you click on a link in the email. We use these technologies and the information they collect: (a) for security purposes; (b) to remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (c) to provide custom, personalized content and information; (c) to gather aggregate statistical data and metrics such as total number of visitors, traffic, and demographic patterns to continually improve design and functionality, as well as understand how the websites are used and assist us with resolving questions; (d) to diagnose or fix technology problems; and (e) to deliver, evaluate the effectiveness of, and improve our marketing and advertising.

If you want to remove or block collection technology, you may be able to update your browser settings (consult your browser's "help" menu to learn how to remove or block cookies and similar technology). You can find instructions on how to manage collection technology on different types of web browsers at www.allaboutcookies.org.

2. HOW WE USE PERSONAL INFORMATION

We may use your personal information to:

- Verify your identity and ability to test-drive a vehicle;
- Complete contracts as well as any disclosures or other documents required by law;
- Determine your eligibility for financing, special offers, special pricing, discounts, promotions, and rebates;
- Provide, develop, maintain, and improve our products and Services (e.g. to evaluate the performance of our staff; to deliver a vehicle; to assess the quality of our products and Services; and to help us improve our websites, service centers, and facilities);
- Process any applications, forms, requests, inquiries, or other information submitted to us;
- Send marketing communications, promotional offers, and periodic customer satisfaction, market research or quality assurance surveys;
- Market and advertise our vehicles, products and Services as well as those of Business Partners, and other third parties;
- Communicate with you (e.g., for customer service purposes or to notify you about service appointments, warranty issues, or recalls);
- Process payments and complete purchase of vehicles, parts, or service;
- Create and update your customer account;
- Allow creation of and access to an online customer portal;

- Administer and support participation in sweepstakes, events, special offers, special pricing, discounts, and promotions;
- Personalize our products, websites, and Services, including content, ads and offerings;
- Perform research and analytical activities (e.g. identifying trends and the effectiveness of marketing campaigns);
- Conduct audits, security and fraud monitoring and prevention;
- Protect our legitimate business interests and legal rights;
- Manage all aspects of an applicant or employee’s employment relationship, including, but not limited to the establishment, maintenance, and termination of employment relationships; and
- Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation).

We may also use personal information we have collected and aggregated, or anonymized personal information received from third parties, to understand more about our users (for example, we may use aggregated information to calculate the percentage of our users who have a particular telephone area code). This includes demographic data, inferred commercial interests, and other information we may collect from you or from third parties.

3. HOW WE SHARE PERSONAL INFORMATION

We may share your personal information with the third parties described below.

Service Providers. We may share your personal information with third parties who work on behalf of, or with, us such as vendors, processors, suppliers, agents, attorneys, and representatives (collectively, “Service Providers”). Service Providers assist us with a variety of functions including, but not limited to, sending marketing communications, assisting with advertising and related analytics, delivering packages, scheduling and performing maintenance, servicing products, providing management services, conducting research or surveys, sending regular mail and e-mail, maintaining databases, or processing credit card payments.

Business Partners. We may share your personal information with third-party business partners including other dealers, product suppliers, vehicle or part manufacturers, product manufacturers, partners who we conduct joint-marketing activities with, and partners who we offer a co-branded service with or provide advertising and related-analytics services to us (collectively, “Business Partners”).

Affiliate Companies. We may share personal information with our affiliated entities within the Frank Motor Group (collectively, “Affiliates”).

Financial Institutions. We may share your personal information with financial institutions, including banks, credit unions and other organizations to attempt to obtain a loan or financing for you and to assess whether you would qualify for specific programs, promotions, or discounts (collectively, “Financial Institutions”).

Government Agencies. We may share your personal information with government agencies such as the Department of Motor Vehicles (collectively, “Government Agencies”).

Disclosures Under Special Circumstances. We may disclose your personal information to third parties: (i) where we have a good faith belief that such disclosure is necessary to meet any applicable law, regulation, legal process or other legal obligation; (ii) when we believe disclosure is necessary to protect or prevent harm,

illegal activity, or financial loss; (iii) to detect, investigate and help prevent security, fraud or technical issues; and (iv) to cooperate with law enforcement, government, quasi-governmental and public agency requests or reporting requirements. These third parties are referred to as “Special Circumstances Recipients” in this Privacy Policy.

Corporate Transactions. We may transfer your personal information in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations. These third parties are referred to as “Transaction Recipients” in this Privacy Policy.

With Your Consent or At Your Direction. We may share your personal information with third parties whenever you consent to or direct such sharing. These third parties are referred to as “Authorized Third Parties” in this Privacy Policy.

4. PERSONAL INFORMATION OF CHILDREN

We do not knowingly collect or store any personal information from anyone under the age of 13. If we become aware that we have collected or stored personal information from an individual under age 13, we will remove his or her personal information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to ccpa@frankmotors.com.

5. “DO NOT TRACK” DISCLOSURE

We do not collect or respond to Do Not Track signals and our websites do not function differently based on any Do Not Track preferences that may be received. For more information on Do Not Track signals, please visit <https://allaboutdnt.com/>.

6. ANALYTICS SERVICES

We also use analytics services provided by third parties, such as Google Analytics. These companies use Collection Technology to collect and store information about the use of the websites and the use of other websites, apps and online resources. You can read Google’s privacy policy, which applies to Google Analytics, at <http://www.google.com/intl/en/policies/privacy/>. You also can opt-out from being tracked by Google Analytics in the future by downloading and installing Google Analytics Opt-out Browser Add-on for your current browser, at <https://tools.google.com/dlpage/gaoptout>.

7. THIRD-PARTY ADVERTISERS

We may use third-party advertising companies to serve advertisements regarding goods and services that may interest you when you access and use the websites or the apps, other websites or apps or other online services. To serve such advertisements, these companies place or recognize a unique cookie on your browser (including through use of pixel tags). If you would like more information about this practice, and to learn about your choices in connection with it, please visit <http://www.aboutads.info/> or http://www.networkadvertising.org/managing/opt_out.asp. To opt out of the practice, you may download the AppChoices app at www.aboutads.info/appchoices.

8. THIRD-PARTY APPLICATIONS

Third-party applications, such as Instagram, Facebook, Twitter, Pinterest, or Google buttons, may be available on our websites. The owners or providers of those third-party applications may collect personal information from you. Your interactions with third-party applications on our website may also be shared with others within your social network. The collection of information by these third-party applications is governed by their own information collection policies and practices, not this Privacy Policy. We are not responsible for the collection and use of your information by such third parties.

9. LINKING TO OTHER SITES

Our website may contain links to other sites that we do not own or operate. We do not control, recommend or endorse and are not responsible for these sites or their content, products, services or privacy policies or practices. These other sites may send their own cookies to your device, they may independently collect information about you or from you, and they may or may not have their own published privacy policies.

10. PROTECTION OF PERSONAL INFORMATION

We store your information using reasonable physical, technical and administrative safeguards. Please be aware that the Services and data storage are run on software, hardware and networks, any component of which may, from time to time, require maintenance or experience problems or breaches of security beyond our control. In addition, no transmission of data over the internet is guaranteed to be completely secure. It may be possible for third parties not under our control to intercept or access transmissions or private communications unlawfully. We cannot ensure or warrant the security of any information you transmit to us over the internet.

11. MARKETING COMMUNICATIONS

If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt out by contacting us by email at ccpa@frankmotors.com, or by following the instructions in any such email you receive from us. We will try to comply with your request as soon as reasonably practicable. If you opt out of receiving marketing emails from us, we may still send you important administrative messages, from which you cannot opt out.

12. UPDATING YOUR PERSONAL INFORMATION

In certain circumstances, you may be able to review and request changes to your Personal Information on our website or by contacting us at ccpa@frankmotors.com.

13. CHANGES TO THIS PRIVACY POLICY

The Privacy Policy may be revised from time to time. The “Last Updated” legend at the bottom of this page indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on any of our websites. Your use of the Services following these changes means that you accept the revised Privacy Policy.

14. CONTACT US

If you have any questions or concerns about this Privacy Policy or our privacy practices, please contact us at ccpa@frankmotors.com.

15. PRIVACY RIGHTS OF CALIFORNIA RESIDENTS (“CCPA PRIVACY NOTICE”)

The California Consumer Privacy Act (“CCPA”) affords California consumers certain rights over their Personal Information (subject to certain exceptions). This CCPA Privacy Notice outlines those rights and explains how such rights may be exercised. This CCPA Privacy Notice also summarizes our data collection and sharing practices, as required by the CCPA. Terms used but not defined shall have the meaning ascribed to them in the CCPA. This section of our Privacy Policy – the CCPA Privacy Notice – applies solely to California consumers. You may download a copy of this CCPA Privacy Notice here.

Information Covered by this CCPA Privacy Notice

This CCPA Privacy Notice relates to our collection, use and disclosure of California consumers’ Personal Information. For purposes of this CCPA Privacy Notice only, “**Personal Information**” generally means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

We Do Not Sell Personal Information

We do not sell Personal Information to third parties. We also do not share any Personal Information with third parties for the third parties’ marketing purposes.

We Do Not Collect the Personal Information of Children

We do not knowingly collect or store any Personal Information from anyone under the age of 16. If we become aware that we have collected or stored Personal Information from an individual under age 16, we will remove his or her Personal Information from our files. If you are a parent or guardian and believe we may have inadvertently collected Personal Information from your child, please notify us immediately by sending an email to ccpa@frankmotors.com.

Collection, Use and Disclosure of Personal Information

When you use, purchase, obtain, or consider our Services; use the software applications made available by us for use on or through computers and mobile devices; visit our website and any other websites owned or controlled by us; or communicate with us in any way, we collect Personal Information. We may use your Personal Information for a variety of business and commercial purposes. “Business purpose” generally refers to the use of Personal Information for our operational purpose. “Commercial purpose” refers to when we use Personal Information to advance our commercial or economic interests including, for example, by encouraging others to purchase our products and services. As explained in more detail in Section 3 above, we may also share Personal Information with Service Providers, Business Partners, Affiliates, Financial Institutions, Government Agencies, Special Circumstances Recipients, Transaction Recipients, and Authorized Third Parties.

The table below summarizes our collection, use, and sharing practices relating the Personal Information about California consumers that we have collected, used and disclosed in the preceding 12 months.

Category of Personal Information	Categories of Sources of Information	Business/Commercial Purposes for Collection	Categories of Third Parties with Whom Information Was Shared
Identifiers Examples: real name; alias; postal address; telephone numbers; unique personal identifier; online identifier; Internet	Directly from consumers (online or offline) Information collected through the use	<ul style="list-style-type: none"> Confirm your ability to test-drive a vehicle Provide, develop, maintain, personalize, and improve our products, vehicles, and Services (e.g. to evaluate the performance of our 	Service Providers (including CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data

<p>Protocol Address; email address; account name, social security number, driver’s license number, passport number and other similar identifiers.</p>	<p>of our Services (e.g., through cookies)</p> <p>Websites or companies that provide information regarding vehicles or provide listings of vehicles that are available for sale/lease</p> <p>Business Partners</p> <p>Affiliates</p> <p>Social Media Companies</p> <p>Vehicle Manufacturers</p> <p>Lead Generation Companies</p> <p>Vehicle History Report Companies</p>	<p>staff; to deliver a vehicle; to assess the quality of our products and Services; and to help us improve our websites, service centers, and facilities)</p> <ul style="list-style-type: none"> • Process and fulfill a request or other transaction submitted to us • Confirm eligibility for, apply for, process and fulfill warranties, financing, discounts, special pricing, extended service contracts, promotions, and rebates • Process payments and complete purchase of vehicles, parts, or service • To complete contracts as well as any disclosures or other documents required by law • Allow creation of customer accounts and access to an online customer portal • Administer sweepstakes, events, and promotions • Communicate with you (e.g., for customer service purposes or to notify you about service appointments, warranty issues, or recalls) • Provide personalized products and Services, including content, ads and in-store offerings • Market and advertise our vehicles, products and Services as well as those of Business Partners, and other third parties 	<p>Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Parts and Service Companies, Lead Generation Companies, Vehicle History Report Companies, Management Companies), Affiliates, Credit Reporting Companies, Financial Institutions, Government Agencies, Vehicle Manufacturers, and Authorized Third Parties.</p>
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		<ul style="list-style-type: none"> • Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns) • For our business operations (e.g., auditing and reporting) • Comply with our legal obligations • Promote safety, integrity and security, including to prevent fraud • Protect our legitimate business interests and legal right • Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation) • Special Circumstances 	
<p>Any categories of personal information described in subdivision (e) of Section 1798.80</p> <p>Examples: name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account</p>	<p>Directly from consumers (online or offline)</p> <p>Information collected through the use of our Services (e.g., through cookies)</p> <p>Websites or companies that provide information regarding vehicles or</p>	<ul style="list-style-type: none"> • Confirm ability to test-drive a vehicle • Provide, develop, maintain, personalize, and improve our products, vehicles, and Services (e.g. to evaluate the performance of our staff; to deliver a vehicle; to assess the quality of our products and Services; and to help us improve our websites, service centers, and facilities) • Process and fulfill a request or other transaction 	<p>Service Providers (including CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Parts and Service Companies, Lead Generation Companies, Vehicle History Report</p>

<p>number, credit card number, debit card number, or any other financial information.</p>	<p>provide listings of vehicles that are available for sale/lease</p> <p>Business Partners</p> <p>Affiliates</p> <p>Social Media Companies</p> <p>Vehicle Manufacturers</p> <p>Lead Generation Companies</p> <p>Vehicle History Report Companies</p>	<p>submitted to us</p> <ul style="list-style-type: none"> • Confirm eligibility for, process and fulfill warranties, financing, discounts, special pricing, extended service contracts, promotions and rebates • Process payments and complete purchase of vehicles, parts, or service • To complete contracts as well as any disclosures or other documents required by law • Allow creation and access to an online customer portal • Administer sweepstakes, events, and promotions • Communicate with you (e.g., for customer service purposes or to notify you about service appointments, warranty issues, or recalls) • Market and advertise our vehicles, products and Services as well as those of Business Partners, and other third parties • Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns) • For our business operations (e.g., auditing and reporting) • Comply with our legal obligations • Promote safety, integrity and security, including to 	<p>Companies, Management Companies), Affiliates, Credit Reporting Companies, Financial Institutions, Government Agencies, Vehicle Manufacturers, and Authorized Third Parties.</p>
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		<p>prevent fraud</p> <ul style="list-style-type: none"> • Protect our legitimate business interests and legal rights • Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation) • Special Circumstances 	
<p>Characteristics of protected classifications under California or federal law</p> <p>Examples: age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.</p>	<p>Directly from consumers (online or offline)</p> <p>Information collected through the use of our Services (e.g., through cookies)</p> <p>Websites or companies that provide information regarding vehicles or provide listings of vehicles that are available for sale/lease</p> <p>Business Partners</p> <p>Affiliates</p> <p>Social Media Companies</p> <p>Vehicle Manufacturers</p>	<ul style="list-style-type: none"> • Confirm ability to test-drive a vehicle • Provide, develop, maintain, personalize, and improve our products, vehicles, and Services (e.g. to evaluate the performance of our staff; to deliver a vehicle; to assess the quality of our products and Services; and to help us improve our websites, service centers, and facilities) • Process and fulfill a request or other transaction submitted to us • Confirm eligibility for, process and fulfill warranties, financing, discounts, special pricing, extended service contracts, promotions and rebates • Process payment and complete purchase of vehicles, parts, or service • To complete contracts as well as any disclosures or other documents required 	<p>Service Providers (including CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Parts and Service Companies, Lead Generation Companies, Vehicle History Report Companies, Management Companies), Affiliates, Credit Reporting Companies, Financial Institutions, Government Agencies, Vehicle Manufacturers, and Authorized Third Parties.</p>

	<p>Lead Generation Companies</p> <p>Vehicle History Report Companies</p>	<p>by law</p> <ul style="list-style-type: none"> • Allow creation and access to an online customer portal • Administer sweepstakes, events, and promotions • Communicate with you (e.g., for customer service purposes or to notify you about service appointments, warranty issues, or recalls) • Market and advertise our vehicles, products and Services as well as those of Business Partners, and other third parties • Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns) • For our business operations (e.g., auditing and reporting) • Comply with our legal obligations • Promote safety, integrity and security, including to prevent fraud • Protect our legitimate business interests and legal rights • Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation) • Special Circumstances 	
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<p>Commercial Information</p> <p>Examples: records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>Directly from consumers (online or offline)</p> <p>Information collected through the use of our Services (e.g., through cookies)</p> <p>Information provided by websites or companies that provide information regarding vehicles or provide listings of vehicles that are available for sale/lease</p> <p>Business Partners</p> <p>Affiliates</p> <p>Vehicle Manufacturers</p> <p>Lead Generation Companies</p> <p>Vehicle History Report Companies</p>	<ul style="list-style-type: none"> • Confirm ability to test-drive a vehicle • Provide, develop, maintain, personalize, and improve our products, vehicles, and Services (e.g. to evaluate the performance of our staff; to deliver a vehicle; to assess the quality of our products and Services; and to help us improve our websites, service centers, and facilities) • Process and fulfill a request or other transaction submitted to us • Confirm eligibility for, process and fulfill warranties, financing, discounts, special pricing, extended service contracts, promotions and rebates • Process payments and complete purchase of vehicles, parts, or service • To complete contracts as well as any disclosures or other documents required by law • Allow creation and access to an online customer portal • Administer sweepstakes, events, and promotions • Communicate with you (e.g., for customer service purposes or to notify you about service appointments, warranty issues, or recalls) • Market and advertise our vehicles, products and 	<p>Service Providers (including CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Parts and Service Companies, Lead Generation Companies, Vehicle History Report Companies, Management Companies), Affiliates, Credit Reporting Companies, Financial Institutions, Government Agencies, Vehicle Manufacturers, and Authorized Third Parties.</p>
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		<p>Services as well as those of Business Partners, and other third parties</p> <ul style="list-style-type: none"> • Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns) • For our business operations (e.g., auditing and reporting) • Comply with our legal obligations • Promote safety, integrity and security, including to prevent fraud • Protect our legitimate business interests and legal rights • Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation) • Special Circumstances 	
<p>Internet or other electronic network activity information</p> <p>Examples: browsing history; search history; and information regarding a consumer’s interaction with an internet website, application, or advertisement.</p>	<p>Directly from consumers (online or offline)</p> <p>Information collected through the use of our Services (e.g., through cookies)</p> <p>Websites or companies that provide</p>	<ul style="list-style-type: none"> • Provide, develop, maintain, personalize, and improve our products, vehicles, and Services (e.g. to evaluate the performance of our staff, to deliver a vehicle, to assess the quality of our products and Services and to help us improve our websites, service centers, and facilities) • Process and fulfill a request or other transaction submitted to us 	<p>Service Providers (including Computer Software Companies, Website and Application Development Companies, Information Technology Services Companies, Data Storage Companies, and Data Analytics Companies)</p>

	<p>information regarding vehicles or provide listings of vehicles that are available for sale/lease</p> <p>Business Partners</p> <p>Affiliates</p> <p>Social Media Companies</p> <p>Vehicle Manufacturers</p> <p>Lead Generation Companies</p> <p>Vehicle History Report Companies</p>	<ul style="list-style-type: none"> • Confirm eligibility for, process and fulfill warranties, financing, discounts, special pricing, extended service contracts, promotions and rebates • Process payments and complete purchase of vehicles, parts, or service • To complete contracts as well as any disclosures or other documents required by law • Allow creation and access to an online customer portal • Administer sweepstakes, events, and promotions • Communicate with you (e.g., for customer service purposes or to notify you about service appointments, warranty issues, or recalls) • Market and advertise our vehicles, products and Services as well as those of Business Partners, and other third parties • Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns) • For our business operations (e.g., auditing and reporting) • Comply with our legal obligations • Promote safety, integrity and security, including to prevent fraud 	
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		<ul style="list-style-type: none"> • Protect our legitimate business interests and legal rights • Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation) 	
<p>Geolocation data</p> <p>Examples: the geographic location (latitude and longitude) of an Internet-connected device such as a cell phone, tablet or computer or any other device connected to the internet and used to visit our websites or use our software.</p>	<p>Directly from consumers (online or offline)</p> <p>Information collected through the use of our Services (e.g., through cookies)</p>	<ul style="list-style-type: none"> • Provide, develop, maintain, personalize, and improve our products, vehicles, and Services (e.g. to evaluate the performance of our staff, to deliver a vehicle, to assess the quality of our products and Services and to help us improve our websites, service centers, and facilities) • Process and fulfill a request or other transaction submitted to us • Confirm eligibility for, process and fulfill warranties, financing, discounts, special pricing, extended service contracts, promotions and rebates • To complete contracts as well as any disclosures or other documents required by law • Allow creation and access to an online customer portal • Market and advertise our vehicles, products and Services as well as those of Business Partners, and other third parties 	<p>Service Providers (including Computer Software Companies, Website and Application Development Companies, Information Technology Services Companies, Data Storage Companies, and Data Analytics Companies)</p>

		<ul style="list-style-type: none"> • Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns) • For our business operations (e.g., auditing and reporting) • Promote safety, integrity and security, including to prevent fraud • Protect our legitimate business interests and legal rights • Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation) • Special Circumstances 	
<p>Audio, electronic visual, thermal, olfactory of similar information</p> <p>Examples: information from voicemail messages and/or recorded phone calls, and video surveillance at our dealership.</p>	<p>Directly from consumers (online or offline)</p> <p>Automatically when you visit our stores or call our customer service line</p> <p>Business Partners</p> <p>Affiliates</p> <p>Social Media Companies</p>	<ul style="list-style-type: none"> • Provide, develop, maintain, and improve our products, vehicles, and Services (e.g. to evaluate the performance of our staff, to deliver a vehicle, to assess the quality of our products and Services and to help us improve our websites, service centers, and facilities) • Process and fulfill a request or other transaction submitted to us • Confirm eligibility for, process and fulfill warranties, financing, discounts, special pricing, extended service contracts, promotions and rebates 	<p>Service Providers (including CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Data Storage Companies, Call Center Companies, Management Companies), Affiliates, Government Agencies, and Authorized Third Parties.</p>

		<ul style="list-style-type: none"> • Process payments and complete purchase of vehicles, parts, or service • To complete contracts as well as any disclosures or other documents required by law • Allow creation and access to an online customer portal • Administer sweepstakes, events, and promotions • Communicate with you (e.g., for customer service purposes or to notify you about service appointments, warranty issues, or recalls) • Provide personalized products and Services, including content, ads and in-store offerings • Market and advertise our vehicles, products and Services as well as those of Business Partners, and other third parties • Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns) • For our business operations (e.g., auditing and reporting) • Comply with our legal obligations • Promote safety, integrity and security, including to prevent fraud • Protect our legitimate 	
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		<p>business interests and legal rights</p> <ul style="list-style-type: none"> • Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation) • Special Circumstances 	
<p>Professional or employment-related information</p> <p>Examples: job history, current employer, prior employers, dates of employment, salary and bonus information.</p>	<p>Directly from consumers (online or offline)</p> <p>Websites or companies that provide information regarding vehicles or provide listings of vehicles that are available for sale/lease</p> <p>Business Partners</p> <p>Affiliates</p> <p>Social Media Companies</p> <p>Vehicle Manufacturers</p> <p>Lead Generation Companies</p> <p>Vehicle History Report Companies</p>	<ul style="list-style-type: none"> • Provide, develop, maintain, and improve our products, vehicles, and Services (e.g. to evaluate the performance of our staff, to deliver a vehicle, to assess the quality of our products and Services and to help us improve our websites, service centers, and facilities) • Process and fulfill a request or other transaction submitted to us • Confirm eligibility for, process and fulfill warranties, financing, discounts, special pricing, extended service contracts, promotions, and rebates • Process payments and complete purchase of vehicles, parts, or service • To complete contracts as well as any disclosures or other documents required by law • Allow creation and access to an online customer portal • Administer sweepstakes, 	<p>Service Providers (including CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Parts and Service Companies, Lead Generation Companies, Vehicle History Report Companies, Management Companies), Affiliates, Credit Reporting Companies, Financial Institutions, Government Agencies, Vehicle Manufacturers, and Authorized Third Parties.</p>

		<p>events, and promotions</p> <ul style="list-style-type: none"> • Communicate with you (e.g., for customer service purposes or to notify you about service appointments, warranty issues, or recalls) • Provide personalized products and Services, including content, ads and in-store offerings • Market and advertise our vehicles, products and Services as well as those of Business Partners, and other third parties • Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns) • For our business operations (e.g., auditing and reporting) • Comply with our legal obligations • Promote safety, integrity and security, including to prevent fraud • Protect our legitimate business interests and legal rights • Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation) • Special Circumstances 	
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<p>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))</p> <p>Example: information regarding whether a consumer is or will soon be a college graduate</p>	<p>Directly from consumers (online or offline)</p> <p>Business Partners</p> <p>Affiliates</p> <p>Social Media Companies</p> <p>Vehicle Manufacturers</p> <p>Lead Generation Companies</p> <p>Vehicle History Report Companies</p>	<ul style="list-style-type: none"> • Provide, develop, maintain, and improve our products, vehicles, and Services (e.g. to evaluate the performance of our staff, to deliver a vehicle, to assess the quality of our products and Services and to help us improve our websites, service centers, and facilities) • Process and fulfill a request or other transaction submitted to us • Confirm eligibility for, process and fulfill warranties, financing, discounts, special pricing, extended service contracts, promotions and rebates • Process payments and complete purchase of vehicles, parts, or service • To complete contracts as well as any disclosures or other documents required by law • Allow creation and access to an online customer portal • Administer sweepstakes, events, and promotions • Communicate with you (e.g., for customer service purposes or to notify you about service appointments, warranty issues, or recalls) • Provide personalized products and Services, including content, ads and in-store offerings • Market and advertise our 	<p>Service Providers (including CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Parts and Service Companies, Lead Generation Companies, Vehicle History Report Companies, Management Companies), Affiliates, Credit Reporting Companies, Financial Institutions, Government Agencies, Vehicle Manufacturers, and Authorized Third Parties.</p>
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		<p>vehicles, products and Services as well as those of Business Partners, and other third parties</p> <ul style="list-style-type: none"> • Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns) • For our business operations (e.g., auditing and reporting) • Comply with our legal obligations • Promote safety, integrity and security, including to prevent fraud • Protect our legitimate business interests and legal rights • Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation) • Special Circumstances 	
<p>Inferences drawn from other personal information</p> <p>Examples: information used to create a profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<p>Directly from consumers (online or offline)</p> <p>Information automatically collected from use of our Services (e.g., through cookies)</p> <p>Websites or</p>	<ul style="list-style-type: none"> • Provide, develop, maintain, personalize, and improve our products, vehicles, and Services (e.g. to evaluate the performance of our staff, to deliver a vehicle, to assess the quality of our products and Services and to help us improve our websites, service centers, and facilities) • Market and advertise our vehicles, products and 	<p>Service Providers (including CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Parts and</p>

	<p>companies that provide information regarding vehicles or provide listings of vehicles that are available for sale/lease</p> <p>Business Partners</p> <p>Affiliates</p> <p>Social Media Companies</p> <p>Vehicle Manufacturers</p> <p>Lead Generation Companies</p> <p>Vehicle History Report Companies</p>	<p>Services as well as those of Business Partners, and other third parties</p> <ul style="list-style-type: none"> • Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns) • For our business operations (e.g., auditing and reporting) • Promote safety, integrity and security, including to prevent fraud • Protect our legitimate business interests and legal rights • Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation) • Special Circumstances 	<p>Service Companies, Lead Generation Companies, Vehicle History Report Companies, Management Companies, Affiliates, Credit Reporting Companies, Financial Institutions, Government Agencies, Vehicle Manufacturers, and Authorized Third Parties.</p>
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Your Rights Under the CCPA

Subject to certain exceptions, the CCPA affords California consumers the following rights:

a) Right to Know/Access Personal Information Collected, Disclosed, or Sold

You have the right to request that we disclose the following information for the 12-month period preceding your request:

- (1) The categories of Personal Information that we have collected about you;
- (2) The categories of sources from which the Personal Information was collected;
- (3) The business or commercial purpose for collecting or selling the Personal Information;
- (4) The categories of third parties with whom we share the Personal Information; and/or
- (5) The specific pieces of Personal Information we have collected about you.

b) Right to Request Deletion of Personal Information

You have the right to request that we delete any Personal Information about you that we have collected or that we maintain.

c) Right to Not Be Discriminated Against

You have the right not to receive discriminatory treatment from us for the exercise of the privacy rights conferred by the CCPA and listed in this CCPA Privacy Notice.

Exercising Your CCPA Rights

- a) **Submitting a Request to Know or Request to Delete.** You may submit a Request to Know or a Request to Delete by contacting us at 888-853-1712, or by using this interactive webform.
- b) **Verification Methods.** Once you submit a request, we will verify that you are the consumer to which the request pertains by matching data points that you provide with information we maintain. Depending on the type of request you submit, we will attempt to match either two or three of the data points you provided. If we are unable to verify your request with the data points you provided, we may reach out to you for additional information to verify your request.

Authorizing an Agent to Exercise Your Rights

California consumers have the right to designate an authorized agent to exercise their CCPA rights. To designate an authorized agent, you must either provide the agent with an executed power of attorney or provide the authorized agent with written permission, signed by you, to exercise your CCPA rights. The agent must also be registered with the California Secretary of State.

Individuals with Disabilities

If you have a disability and need access to our CCPA Privacy Notice in a different format, please contact us at ccpa@frankmotors.com or 888-853-1712.

Last Updated: September 11, 2020