

DRIVINGLOYALTY.COM, LLC

PRIVACY POLICY

Updated: February 15, 2016

DrivingLoyalty.com, LLC and our affiliates (“Company”, “us” or “we”) have adopted this Privacy Policy, which applies to all users of our website www.drivingloyalty.com and any websites specifically identified as belonging to us (collectively, “Site”).

We provide online technology platforms for our business clients, primarily automotive dealers (“Dealers”), including online and mobile applications for their customers (collectively, our “Services”). Our Privacy Policy applies only to personally identifiable information we collect on our own behalf and not to information we collect on behalf of Dealers or that they collect and store in one of our applications.

We are committed to protecting the privacy and personal information of users of our Site and Services. This Privacy Policy describes our policies and procedures for the collection, use and disclosure of your information and data on our Site and through our Services. You understand that by using the Site or Services you agree to the terms of this Privacy Policy. You further acknowledge having read and accepted our Terms of Use, available at drivingloyalty.com/terms-of-use.

INFORMATION WE COLLECT AND HOW WE COLLECT IT

The personally identifiable information we collect may include your name, address, zip code, phone number, email address, and other identifying information, and may also include information about vehicles you own or lease (“Personally Identifiable Information” or “PII”). We collect PII in a number of different ways and from a number of different sources. We collect PII you provide us through our Site or when using certain aspects of our Services. We may also collect PII you provide to Dealers, auto manufacturers, or our authorized vendors, as well as information we obtain from third party databases (collectively, our “Partners”).

As part of our Services, we may serve as an intermediary between you and a Dealer where emails are transmitted through us. When serving that function, we would have the ability and authority to read and retain the content of those emails. In connection with our Services that include calls, texts or chats with a Dealer, a recording of your conversation, or copy of the chat or text, between you and the Dealer, as well as the phone number or email address you use, would be available to us and we may retain and use the contents of such communications, subject to this Privacy Policy and applicable law.

HOW WE USE YOUR INFORMATION

We use your PII to provide information you request from Dealers about their vehicles or services, to respond to your inquiries, and to customize information and advertising that we believe may be of interest to you. We may also use your PII to provide you with newsletters, marketing or promotional materials,

as well as other information we believe may be relevant to you. If you that you do not wish to receiver any such communications from us, you may unsubscribe by emailing us at unsubscribe@drivingloyalty.com, or, in the case of email communications, by using the built-in “unsubscribe” feature.

Your PII may be shared with our affiliates and Partners, and may also be disclosed to third parties who work with us, our affiliates, or Partners. Dealers and auto manufacturers, for example, may use that information to contact you. We may also work with third parties that provide certain functions on our behalf, such as analyzing data or authenticating contact information. We require our third party service providers to contractually commit to protecting your PII in accordance with both industry standards and applicable law. While we have implemented policies and procedures to protect PII, we cannot control, and are not responsible for, the manner in which our Partners or other third parties use that PII.

We may also use your PII by combining it with non-personal information and aggregating it with information collected from others. We use this aggregated data to improve the quality and value of our Services and to analyze and understand how our Services are used. In addition, we may provide aggregated data to our Partners so that they may understand how people use our Services or their own.

COOKIES

We may use cookies to recognize you, and optimize and tailor your experiences when visiting our Site and using our Services. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it. However, if you do not accept cookies you may not be able to use all of the features of our Site or Services.

EXTERNAL LINKS

Our Site or Services may contain links to other third-party websites. After you leave our Site, we have no control over the information collected from or about you. We are not responsible, and assume no liability, for the privacy policies and/or practices on any third-party websites. This Privacy Policy only governs information collected by us on our Site.

HOW WE PROTECT YOUR DATA

We use safeguards that satisfy generally accepted industry standards to preserve the integrity and security of your PII. However, we cannot guarantee the security of information you provide us with certainty or warrant it will not be accessed, disclosed, altered, or destroyed by unauthorized persons. We will make all legally required disclosures of any breach of the security, confidentiality, or integrity of your PII, in the manner and within the time periods required by applicable law.

Your PII is collected and used by us within the United States. We make no representation that our Privacy Policy complies with the laws of any foreign jurisdictions. If you choose to provide us with PII from outside

the United States, you do so at your own risk and are responsible for compliance with any applicable foreign laws.

COMPLIANCE WITH LAW ENFORCEMENT

We cooperate with government and law enforcement officials, as well as private parties, to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties that we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process, including, but not limited to, subpoenas, to protect our property and rights or that of a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical or subject to legal action.

OUR POLICY TOWARDS CHILDREN

Our Site and Services are not targeted to or intended for use by children. We are concerned about the privacy and safety of children when they use the internet. Accordingly, we will not knowingly request PII online from anyone under the age of 13 without prior, verifiable parental consent. Unfortunately, we cannot always determine the age of a visitor to our Site or user of our Services.

CORPORATE TRANSFER

In the course of a corporate merger, acquisition, divestiture, asset sale, joint venture, bankruptcy, dissolution, reorganization, or any other similar transaction or proceeding, we may sell, divest, transfer, assign, share or otherwise engage in a transaction that involves some or all of our assets, including your PII.

CHANGES

We may modify our Privacy Policy, at any time and for any reason, by posting the revised Privacy Policy on our Site. Your use of our Site or Services after any such posting indicates your acceptance of our modified Privacy Policy.

CONTACT US

If you have any questions or concerns regarding your privacy when using our Site or Services, please contact us at Legal@DrivingLoyalty.com. We will make every effort to respond promptly and address your concerns.