

Welcome to *The Dealer's Concierge* (brought to you by DealerGenix, Inc, both hereinafter 'Company'). This Privacy Policy sets Company's policy with respect to information including personally identifiable data ( "Personal Data") and other information that is collected from visitors to Company websites and applications.

# **Collected Information**

When you interact with us through the websites and applications, we may collect Personal Data and other information from you, as further described below:

**Personal Data That You Provide Us:** We collect Personal Data from you when you voluntarily provide such information, such as when you contact us with inquiries, respond to one of our surveys, register for access or use certain websites and applications.

**Security:** Multifactor authentication is required as part of fulfilling our promise of complete security. Encrypted communication and storage of Personal Information is part of the TDC process – our guarantees of privacy are dependent upon users cooperation and exclusive use of these measures to protect all pertinent user information.

By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy. If you provide Personal Data, you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of Company and the authorized third parties we deem Affiliates.

#### **Other Information:**

**Non-Identifiable Data:** When you interact with Company, we receive and store certain personally non-identifiable information. Such information, which is collected passively using various technologies, cannot presently be used to specifically identify you. Company may store such information itself or such information may be included in databases owned and maintained by Company and its affiliates, agents or service providers.

In operating, we may use a technology called "cookies" or similar internet or mobile technology. A cookie is a piece of information that the computer that hosts technology that gives same info to your browser or phone when you access product. We will not collect Personal Data except with your permission. We recommend that you leave cookies turned on because they allow you to take advantage of some of the features online that would otherwise be unavailable. Company may use this or similar technologies to enhance user experience for mobile, internet or other access technologies.

Aggregated Personal Data: In an ongoing effort to better understand and serve the users, this aggregate information does not identify you personally. Company may also disclose aggregated user statistics in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes.



**Location Information:** Our Service may collect and use your location information (for example, by using the GPS on your mobile device) to provide certain functionality of our Service. We may also use your location information in an aggregate way, as described above in the "Aggregated Personal Data" section.

# Your Personal Data and Other Information

Company uses the Personal Data you provide in a manner that is consistent with this Privacy Policy. If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. For instance, if you contact us by email, we will use the Personal Data you provide to answer your question or resolve your problem. Company and its subsidiaries and affiliates (the "Related Companies") may also use your Personal Data and other personally nonidentifiable information collected through the technology to help us improve the content and functionality, to better understand our users and to improve. If at any time you wish not to receive any future marketing communications or you wish to have your name deleted from our mailing lists, please contact us as indicated below.

# **Disclosure of Your Personal Data and Other Information**

COMPANY is not in the business of selling your information. We consider this information to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, as set forth below:

Business Transfers: As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be a part of the transferred assets.

Related Companies: We may also share your Personal Data with our Related Companies for purposes consistent with this Privacy Policy.

Agents, Consultants and Related Third Parties: When we employ another entity to perform a function of this nature, we only provide them with the information that they need to perform their specific function.

Service-related Disclosures: We may share your information with third parties only as may be necessary to provide certain services to you. Example: if you ask us to contact a dealership to request a price quote from that dealership, we will share your information (including Personal Data) with that dealership (or its designee). After the information is provided to such third parties, the subsequent use or disclosure of such information is subject to those third parties' privacy policies and practices and we do not control their subsequent use or disclosure of information.

Legal Requirements: Company may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and



defend the rights or property of Company, (iii) act in urgent circumstances to protect the personal safety of users of the Services or the public, or (iv) protect against legal liability.

Use of Language other than English: This Privacy Policy may have been translated if we have made it available to You on our Service. Translations of any materials into languages other than English are intended solely as a convenience to the non-English-reading public and are not legally binding. We have attempted to provide an accurate translation of the original material in English, but due to the nuances in translating to a foreign language, slight differences may exist. References identifying the original document in English are available in most non-English documents. You agree that the original English text shall prevail in the case of a dispute.

This Privacy Policy shall not apply to any unsolicited information. All Unsolicited Information shall be deemed to be non-confidential and Company shall be free to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution.

Company does not knowingly collect Personal Data from children under the age of 13. If you have reason to believe that a child under the age of 13 has provided Personal Data to Company through the Services, please contact us, and we will endeavor to delete that information from our databases.

This Privacy Policy applies only to the Company services. We suggest contacting those 3rd party sites directly for information on their privacy policies.

No Internet or email transmission is ever fully secure or error-free. In particular, email sent to or from the Company may not be secure. Therefore, you should take special care in deciding what information you send to us via email.

#### **Your Consent**

You (i) agree that any of the Communications we provide to you, or that you sign or agree to at our request, may be in electronic form; and (ii) consent to receiving any of the Communications we provide to you via email, text message, or other electronic medium. We may also use electronic signatures and obtain them from you on any Communication, even if we provide you the Communications in paper form\*

The Communications may be presented, executed, and delivered at the DEALERSHIP, or, via electronic means, with information to be delivered to your phone or e-mail address.

# **Changes to TDC's Privacy Policy**

The Company and our business may change from time to time. As a result, at times it may be necessary for Company to make changes to this Privacy Policy. Company reserves the right to update or modify this Privacy Policy at any time.

# Contact Us

To keep your Personal Data accurate, current, and complete, please contact at specified email address on our app or website. Email: <u>TDC.Compliance@thedealersconcierge.com</u>



### **Your Connecticut Privacy Rights**

Pursuant to Connecticut General Statutes Sec. Section 42-471, it is the policy of *The Dealer's Concierge* to protect the privacy of your personal information by doing the following:

- 1. Safeguarding any data, computer files and documents containing your personal information from any misuse by third parties;
- 2. Destroying, erasing or making unreadable any data, computer files and documents containing your personal information prior to their disposal;
- 3. Protecting the confidentiality of your Social Security number and other personal information;
- 4. Prohibiting the unlawful disclosure of your Social Security number and other personal information;
- 5. Limiting and/or restricting the access to your Social Security number and other personal information to other third parties; and
- 6. Limiting the access of your Social Security number and other personal information only to our employees who need access to your personal information in order to allow us to provide legal services to you, limiting the access of these employees to extent that it is needed, and otherwise imposing restrictions and reasonable safeguards on our employees to prevent them from accessing your personal information.