

## Introduction

Our privacy policy will help you understand how we collect, use, share, and otherwise process information that identifies you personally ("Personal Information"), and what choices you have regarding your Personal Information. It is important that you take the time to read our privacy policy prior to using our products and services and providing us with your information.

This privacy policy applies only to Personal Information that we process as a data controller (i.e., where DealerBuilt decides how to use this information). It does not apply to the extent that we process Personal Information in the role of a processor or service provider on behalf of our customers (i.e., where our customers instruct us on how the data is used), including where we offer our customers the following products and services: (i) creating their own websites and applications running on our platforms; (ii) selling or offering their own products and services; (iii) sending electronic communications to others; or (iv) otherwise collecting, using, sharing or processing Personal Information via our products and services.

For detailed privacy information related to a DealerBuilt customer or a customer affiliate who uses DealerBuilt Services as the controller ("Customer"), please contact our Customer directly. We are not responsible for the privacy or data security practices of our Customers, which may differ from those explained in this privacy policy.

## DealerBuilt Services and You

When we talk about the "Services" in this privacy policy, we are referring to the products and services we currently provide or will provide in the future under the 'DealerBuilt' platform. Our Services are currently available for use via a web browser and applications specific to your desktop computer, tablet, or mobile device.

When we talk about "DealerBuilt," "we," "our," or "us" in this privacy policy, we are referring to DealerBuilt and its current and future affiliates and subsidiaries involved in the collection, use, sharing, or other processing of Personal Information. Unless specified otherwise, DealerBuilt is the controller of your Personal Information as described in this privacy policy.

## How We Collect Your Information

We collect your information in several ways:

1. **From You.** We collect certain Personal Information from you when you use our Services or website. The Personal Information that we collect may include your name, birth date or age, telephone number, and e-mail address. If you purchase Services from us, we may also request your credit card / debit card number or other financial information, along with billing information, so we can fulfill your order or request.
  - 1.1. We do not require you to register or provide Personal Information to view our website or access much of its content, such as general information about our products or to view customer testimonials. However, you may be required to provide certain Personal Information, such as your full name, e-mail address, telephone number, and job title, to request a demonstration of or for more information about our Services.
  - 1.2. If you visit our offices, you may be required to register as a visitor and provide us with your name, email address, phone number, company name, and time and date of arrival.
  - 1.3. If you attend one of our marketing events, we may collect your name, email address, phone number, company name, and job title.
  - 1.4. When you use our Services, either directly through us or through a Vehicle Service Provider, we will also collect information through your Service such as your location, usage information, and your preferences. These are discussed in detail below (See "What Information Do We Collect?" section below).

2. **From Vehicle Service Providers.** Various entities engaged in the purchasing and selling of automobiles may use our Services to provide their customers with goods and services (each such entity, a "Vehicle Service Provider"). We typically are a data processor for these Vehicle Service Providers, which may include automotive companies and their providers, original equipment manufacturers (or "OEMs"), parts suppliers, dealers, service stations, and transportation service providers, such as rental car companies, ride-hailing companies and concierge services. Vehicle Service Providers may provide DealerBuilt and our service providers with Personal Information about you such as name, date of birth, vehicle purchases, vehicle preferences, vehicle service records, financial history (e.g., credit scores), credit card information, as well as information regarding any individuals who may guarantee or purchase or apply to purchase a vehicle with you. When we use this information as a data controller, we use it to improve our products and to understand our Customers' needs.
3. **From a Device Associated with You or Your Household.** You also passively provide us with information in other ways through technology. Some of this information may be linked to you personally. This information helps our websites and mobile services work correctly and supports our Customer marketing and analytical efforts to understand our Customers' needs and to improve our products. Here are some examples:
4. **Browsing Information:** We may use cookies, web beacons, log files, or local shared objects (such as Flash cookies), and other technologies to collect certain information about visitors to our website, use of our Services, and to track analytics and statistical information to improve our website and Services. You may refuse to accept browser cookies by activating the appropriate setting on your browser as described below. However, if you select this setting, you may be unable to access certain parts of the website or Services or have limited functionality. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the website or Services. We may also collect information about your use of and interaction with the website and Services, including the webpages viewed, the date and time you visit the website or use the Services, the areas or pages of the website that you visit, the amount of time you spend viewing or using the website, the number of times you return to the website, other click-stream or site usage data, whether you open, forward, or click-through links, emails, and ads, and other website usage data. Collecting this information and linking it with your Personal Information, for example, helps us to best tailor our website and enhance your online experience by saving your preferences while you are visiting a particular site, and to help identify site features, Services, advertisements, and offers that may be of particular interest to you.
5. **Device Information:** We collect technical information when you visit our websites or use our mobile applications or Services. This includes information such as your browser type, operating system, mobile device type and carrier, Internet service provider ("ISP"), device location, and Internet Protocol ("IP") address. We use this information to maintain the security of our Services, review compliance with our applicable usage terms, and to improve Customer and user experience of the Services.
6. **Social Media:** Our website may use social media features, such as the Facebook "like" button, the "Tweet" button, and other sharing widgets ("Social Media Features"). Social Media Features may allow you to post information about your activities on our website to outside platforms and social networks. Social Media Features may also allow you to like or highlight information we have posted on our website or our branded social media pages. Social Media Features are either hosted by each respective platform or hosted directly on our website. To the extent the Social Media Features are hosted by the platforms themselves, and you click through to these from our websites, the platform may receive information showing that you have visited our websites. If you are logged in to your social media account, it is possible that the respective social media network can link your visit to our websites with your social media profile. See the "**Your Choices**" section below for information on how you can opt out of these behavioral tracking technologies and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about such tracking.
7. **Information Collected from Third-Party Service Providers.** We may also collect information from third-party service providers whose products are integrated into our Services. The third-party provider of the



integration may share certain information about your account with us. We may combine this information from other sources with the information we collect from you to help us tailor our Services to you and our Customers, and to improve our Services.

- 8. Information Collected from Other Sources.** We may obtain information about you from other sources, including commercially available sources such as data aggregators and public databases or social networks that you use to connect with us. This information may include your name, demographic information, interests, and publicly observed data, such as from social media, online activity, and shopping behavior.

#### How Long is Your Personal Information Retained?

Except as otherwise permitted or required by applicable law or regulatory requirements, DealerBuilt endeavors to retain your Personal Information only for as long as it reasonably believes is necessary to fulfill the purposes for which the Personal Information was collected (including, for the purpose of meeting any legal, accounting, or other reporting requirements or obligations, resolving a dispute, making and defending legal claims, and for any other legitimate business purpose). We may, instead of destroying or erasing your Personal Information, make it anonymous such that it cannot be associated with or tracked back to you.

#### What Information Do We Collect?

We collect and receive several types of Personal Information directly from you via the Services and from Vehicle Service Providers. As discussed below, we may collect the following categories of Personal Information. However, not all categories may be collected about every individual.

1. Personal identifiers, such as name and address
2. Device and online identifiers and related information, such as telephone number and email address
3. Internet, application, and network activity, such as cookie IDs and browser visits
4. Demographic information, such as age and date of birth
5. Employment information, such as occupation, title, licenses, and professional memberships
6. Your interactions with us, such as phone calls that you may make to us on a recorded phone line or contacting us through our website
7. Individual preferences and characteristics, such as inferences related to shopping patterns and behaviors, including purchases and services requested, and service and vehicle preferences expressed by you to a Vehicle Service Provider

We may retain this Personal Information for as long as is needed for the purpose(s) for which it was collected and no longer than is relevant and reasonably necessary. Our retention periods vary based on business, legal and regulatory needs. We securely retain records of data requests for at least 24 months, as required under the CCPA. For further information on our retention criteria see section "How Long We Keep Your Data."

#### How We Use Your Information

We use your Personal Information in connection with the following activities:

1. Providing and maintaining the Services
2. Preventing or addressing service, security, and technical issues
3. To protect the security and integrity of our websites, mobile services, and our business, and to help prevent fraud
4. To conduct business analysis, such as analytics, projections, and identifying areas for operational improvement
5. Understanding, testing, researching, analyzing, and improving the Services, including developing new DealerBuilt products and services



6. Provide news and marketing, including interest-based marketing and advertising, of DealerBuilt products and new features or other products and services that might be of interest to you. You can opt out of these communications at any time by contacting [privacy@DealerBuilt.com](mailto:privacy@DealerBuilt.com)
7. Sharing Personal Information with Vehicle Service Providers to allow them to understand, research, and improve their goods and services
8. Responding to your requests and communications with us
9. To inform you about changes in our Services and important Service-related notices, such as security and fraud notices. We may send these notifications to you by post, courier, email, SMS messages, to your social media accounts, or push notifications within our application ("DealerBuilt Communications")
10. To fulfill our legal function or obligations

To do the above, we combine Personal and non-Personal Information, collected online and offline, including information from third-party sources such as Vehicle Service Providers. It helps us to improve the Services, develop new Services and to deliver better and more personalized experience, including by enabling us to:

- Estimate your preferences and usage patterns
- Store information about your preferences, allowing us to customize the Services according to individual interests
- Speed up searches or requests
- Recognize individuals returning to the Services
- Improve the Services to promote better individual experiences

### Sharing and Disclosure

All the categories of Personal Information that we collect are shared with other companies, including those within our corporate structure, for business purposes. We do not sell or rent your Personal Information for money or other monetary benefit.

We may share your Personal Information in limited circumstances such as: to conduct our business; for other companies to offer you products; in the event all or a part of our business is merged, sold, or reorganized; when legally required, as described below; or with your consent.

We will not share your Personal Information outside of our business, except in the following circumstances:

1. **With Our Business Partners.** We may share your information with our business partners such as Vehicle Service Providers.
2. **With Third-Party Services Providers.** We work with third-party service providers to perform services on our behalf, and we may share your information with them to help us support our business and the Services. For example, we may provide your information to third parties to conduct surveys on our behalf or to process payments for our Services. We require our service providers to keep your Personal Information secure and to use it only to provide their services to us.
3. **With Our Subsidiaries and Affiliates.** We may share your information with our subsidiaries and affiliates to help us provide and improve the Services.
4. **With API and Integration Partners.** If you choose to connect to our platform through an integration with a third-party service, we may share information about your use of our platform with that third-party. We are however not responsible for how providers of an integration that you choose may collect, use, and share your information, and we encourage you to read their privacy policies before deciding whether to use their services.
5. **For Legal Reasons.** We may share your information to comply with legal or regulatory requirements; to enforce our terms of service, user agreements, or other policies; and to protect and defend the rights, property, or safety of us, our Customers, Vehicle Service Providers or third parties. This includes enforcing

contracts or policies in connection with investigating and preventing fraud or in the event of a claim or dispute relating to your use of our Services.

- 6. During Changes to Our Business Structure.** We may share your information with third parties and their advisors in connection with a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all DealerBuilt's assets, financing, sale of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g., due diligence).
- 7. Generally.** To fulfill the purpose for which you provided your information, for any other purpose disclosed by us when you provided the information, or otherwise with your consent prior to sharing your Personal Information outside of DealerBuilt.

#### Aggregated Data

This privacy policy is not intended to place any limits on what we do with Personal Information that is aggregated and/or de-identified, so it is no longer associated with an identifiable user or a specific Customer of the Services ("Aggregated Data"). Aggregated Data is useful to Customers, Vehicle Service Providers and other persons involved in or investing in the automotive industry. For example, we may share Aggregated Data with Vehicle Service Providers and with our partners or others for business or research purposes, such as to make recommendations based on the purchasing patterns of Customers or to highlight manufacturing or service issues with certain types of vehicles. While we may use, sell, or disclose Aggregated Data in our sole discretion and for any purpose, we will not attempt to re-identify any Aggregated Data and will require that any third party who receives such data from us will also not attempt to re-identify it.

#### Location of Data

DealerBuilt is headquartered in the United States. We have entities, operations, and service providers in the United States and throughout the world. We and our service providers may transfer your Information to, or access it from, countries other than the one in which you are located. These countries may have data protection laws different from those of the country in which you are located. We will maintain appropriate administrative, physical, and technical safeguards to ensure an adequate level of protection of the Information, for instance, by entering into the appropriate back-to-back agreements and, if required, standard contractual clauses or an alternative mechanism for the transfer of data as approved by the European Commission (Art. 46 GDPR) or other applicable regulators.

#### Your Choices

You may have certain rights relating to your Personal Information, subject to local data protection laws. Depending on the applicable laws, these rights may include the right to:

- 1. Access and Correct Your Personal Information**

You may send us an email at [privacy@DealerBuilt.com](mailto:privacy@DealerBuilt.com) to request access to, correct or delete any Personal Information that you have provided to us. If you have a Customer account, we can delete your Personal Information only by deleting your Customer account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you have any questions about your Personal Information, our use of this information, or your rights when it comes to any of the foregoing, please contact us at [privacy@DealerBuilt.com](mailto:privacy@DealerBuilt.com).

If you are a California resident, please refer to the "**Your California Privacy Rights**" section for additional information on your rights under the California Consumer Privacy Act.

- 2. Tracking Options and California Do Not Track Disclosures**

Certain parts of our website require cookies. You are free to set your Internet browser settings to stop accepting new cookies, to receive notice when you receive a new cookie, to disable existing cookies, and to omit images (which will disable pixel tags).

On your mobile device, you may also adjust your privacy and advertising settings to control whether you want to receive more relevant advertising. By doing so, you may not be able to use certain features on the website or take full advantage of all of our offerings. On your mobile device, your operating system may provide you with options to opt out of interest-based advertising or to otherwise reset your mobile identifier. This is a unique identifier that can be used to identify a mobile device which works in a similar way to a cookie. For example, you may use the "Limit Ad Tracking" setting (on iOS devices) or a setting to "Opt out of Interest-Based Ads" (on Android), which allows you to limit the use of information about your use of apps for purposes of serving ads targeted to your interests.

Our system may not respond to Do Not Track requests or headers from some or all browsers. You can learn more about and opt out from receiving third-party advertiser cookies by visiting the Digital Advertising Alliance's opt-out page [here](#). Without cookies or pixel tags though, you may not be able to take full advantage of all of DealerBuilt's website features.

Some content within the website or Services is served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website or Services. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. However, where these third-parties' tracking technologies include the "Ad Choices" icon or another mechanism to opt out of receiving interest-based advertisements, you may click on the AdChoices icon or visit [www.aboutads.info](http://www.aboutads.info) to receive more information about the collection and use of information about your online activities for interest-based advertising or to learn how to opt out of having your data used for interest-based advertising by Digital Advertising Alliance (DAA) participating companies

1. Canadian users can also visit [www.youradchoices.ca](http://www.youradchoices.ca)
2. European users can also visit [www.youronlinechoices.com](http://www.youronlinechoices.com) to learn how to opt out of having their data used for interest-based advertising by European Interactive Digital Advertising Alliance (EDAA) member companies.
3. The Network Advertising Initiative's (NAI) Opt-Out Tool at [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices) allows you to opt out from the use of information about your online activities for interest-based advertising by NAI member companies.

### 3. Marketing Preferences.

If we use your Personal Information for marketing purposes, you can opt out by sending us an email stating your request to [privacy@DealerBuilt.com](mailto:privacy@DealerBuilt.com).

You may also turn off push notifications on DealerBuilt apps on your device or unsubscribe by contacting us at [privacy@DealerBuilt.com](mailto:privacy@DealerBuilt.com).

Please note that this Opt-out does not apply to information provided to us to process a product purchase, warranty registration, product service experience or other transactions.



#### 4. Your Rights Relating to Customer Data.

As described above, we may also process Personal Information submitted by or for a Customer to our products and services. To this end, if not stated otherwise in this privacy policy or in a separate disclosure, we process such Personal Information as a processor on behalf of our Customer (and its affiliates), who is the controller of the Personal Information. We are not responsible for and have no control over the privacy and data security practices of our Customers, which may differ from those explained in this privacy policy. If your data has been submitted to us by or on behalf of a Customer and you wish to exercise any rights you may have under applicable data protection laws, please inquire with them directly. Because we may only access a Customer's data upon their instructions, if you wish to make your request directly to us, please provide us the name of the Customer who submitted your data to us. We will refer your request to that Customer and will support them as needed in responding to your request within a reasonable timeframe.

Where we hold or process your Personal Information as a data controller, you can contact us at [privacy@DealerBuilt.com](mailto:privacy@DealerBuilt.com) to exercise your data rights.

#### Security

We take security seriously. We take various steps to protect the information you provide to us from loss, misuse, and unauthorized access, alteration, or disclosure. These steps take into account the sensitivity of the information we collect, process and store, and the current state of technology.

The safety and security of your information also depend on you. Where we have given you (or where you have chosen) log in credentials or a password for access to the Services, you are responsible for keeping such login credentials and password confidential. We ask you not to share your login credentials or password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted through use of the Services. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures for the Services.

#### Children's Information

Our Services are not directed at children under 13 years of age, and we do not knowingly collect Personal Information from children under 13. If you are under 13, do not use the Services or provide any information in the Services, make any purchases through the Services, use any of the interactive features of the Services, or otherwise provide any information about yourself to us. If we learn we have collected or received Personal Information from a child under 13 without verification of parental consent, we will delete that information. If you learn that a child under 13 has provided us with Personal Information without consent, please contact us at [privacy@DealerBuilt.com](mailto:privacy@DealerBuilt.com).

#### Your California Privacy Rights

DealerBuilt provides services to other businesses, and in doing so, we may collect and process Personal Information on behalf of our Customers, including Personal Information of California residents. In this context, we are a service provider under the California Consumer Privacy Act (CCPA). As a service provider, we collect and process Personal Information on behalf of Customers in accordance with our contracts with them to provide the Services for which we are engaged. If you reside in California, you have certain rights regarding the processing of your Personal Information. Those include:

1. Access your data – you may ask us for an overview of or to obtain a copy of the Personal Information we hold about you.
2. Request a correction – you may request correction of inaccurate or incomplete Personal Information that we possess.

3. Request deletion – you may request that we delete Personal Information.
4. Right to Opt-Out of the Sale or Sharing of Personal Information – You have the right to opt-out of the sale of your Personal Information by us as a business.

We will not discriminate against you for exercising any of your rights described in this Policy. To exercise any of the above rights please contact our Data Privacy Officer by e-mail ([privacy@DealerBuilt.com](mailto:privacy@DealerBuilt.com)).

To learn more about the Personal Information we collect, use, disclose, and share, please see below.

**What Information Can You Obtain When Making a Request?** If you make a request, we will return to you (to the extent required by law):

1. The categories of Personal Information we have collected about you (see section "What Information Do We Collect?").
2. The categories of sources from which we collect your Personal Information.
3. The business or commercial purpose for collecting or selling your Personal Information.
4. The categories of third parties with whom we share Personal Information.
5. The specific Personal Information we have collected about you.
6. A list of categories of Personal Information that we sell to third parties. Please note, however, that we do not sell your Personal Information.
7. A list of categories of Personal Information that we have disclosed for a business purpose and the categories of companies with whom we shared it.

You can ask us to provide you with this information up to two times in a rolling twelve-month period. When you make this request, the information provided may be limited to Personal Information we collected about you in the previous 12 months.

**What Categories of Personal Information Do We Collect About You?** For a list of the categories of Personal Information we collect see section "What Information Do We Collect?" We do not collect any sensitive Personal Information from You in our capacity as a business.

**How Do We Use Your Personal Information?** We may collect the categories of Personal Information for the purposes described above in the section titled "How We Use Your Information."

**What Categories of Personal Information Do We Disclose to Third Parties?** We do not share your Personal Information for money. "Sharing" under the CCPA is defined as the disclosure of Personal Information to a third party "for cross-context behavioral advertising, whether or not for monetary or other valuable consideration." We do not sell or share for purposes of targeted advertising your Personal Information or Personal Information regarding individuals under 16 years of age.

We do share Personal Information between DealerBuilt subsidiaries and affiliates and with certain third parties for business purposes to help us operate, provide, improve, understand, customize, support, and market our Services. For more information about the type of information we collect and share with third parties, please see the sections of this privacy policy titled "What Information Do We Collect?" and "Sharing and Disclosure." You may opt out by following the guidelines outlined in the "Your Choices" section.

**How Do We Verify Your Identity for Requests to Access or Delete Personal Information?** We take the privacy of your Personal Information seriously and want to ensure that we provide only you or your authorized





agent with your Personal Information. As such, we verify the identity of each person who makes a request to access their Personal Information or to delete their Personal information.

To verify your identity, we ask you to provide your:

First name\*

Last name\*

Middle initial

Email address

Phone number

Address\*

*\*required field*

We will use this information only to verify your identity and process your request. We may also request clarifying information from you to ensure we clearly understand the submitted privacy request. You may have the right to designate an agent to submit a request on your behalf, by having the agent contact us at the email address above. In such instances, the agent must also provide proof that you gave the agent signed permission to submit the request on your behalf.

#### **Effective Date and Changes to this Privacy Policy**

This privacy policy is effective as of the date indicated above. We may change this privacy policy from time to time, and if we do, we will notify you by posting any changes on this page. You agree to the revised privacy policy if you continue to use the website or Services after those changes go into effect.

#### **Contacting DealerBuilt**

Please feel free to contact us if you have any questions about our privacy policy or practices. You may contact us at [privacy@DealerBuilt.com](mailto:privacy@DealerBuilt.com) or write to us at:

DealerBuilt Privacy Department  
851 W Maple Rd  
Clawson, MI 48017

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you may lodge a complaint with the applicable supervisory authority in your country. Please feel free to contact us if you need assistance identifying the supervisory authority.