

Privacy Policy

Use of this web site signifies your acknowledgment and consent to this privacy policy. Please read this privacy policy carefully before using this web site.

Our dealership takes your privacy seriously and is committed to safeguarding your privacy online. Because we gather certain types of personal information from visitors to this web site (e.g. name, e-mail address, etc.), we have developed this privacy policy (the "Privacy Policy") to help you understand the terms and conditions surrounding the collection and use of your personal information. This Privacy Policy discloses the types of personal information we gather, how it is used, and how you can gain access to and edit any data that we've collected about you at any time. By using this site, you acknowledge that you have read and agree to be bound by this Privacy Policy and agree and acknowledge that you are subject to this website's governing terms of service.

Guiding Principles:

Our dealership collects personal information online primarily to provide our visitors with a more relevant experience on this web site. When doing so, we will make every reasonable effort to avoid excessive or irrelevant collection of data. Our dealership will take reasonable physical, electronic and managerial measures to safeguard and secure any personal information you provide to us (e.g. data will be stored in protected databases on secured servers with restricted access). However, given that electronically submitted data is not 100% secure, we make no representations or warranties as to the security of any personal information you submit online, which you do at your own risk.

Disclosure of Personal Information

We do not sell, rent, or trade consumer personal information to third parties other than as described in this Privacy Policy or in support of our service offerings to customers and consumers. Our dealership may disclose certain personal information as follows:

- to business partners, such as third-party service providers, agents and affiliated entities in connection with the services that they perform for our dealership, such as providing certain services necessary for the administration of this web site and the provision of certain interactive functionalities. Please note that some of our agents and contractors are located outside of the country and, as such, are subject to foreign laws, including laws that may require disclosure of personal information to government agencies in those countries;
- to law enforcement agencies for the purposes of investigating fraud or other offences; or
- to legal, financial, and other professional advisors or in connection with the sale or reorganization of all or part of its business or operations.

Except as provided above, our dealership will not use or disclose personal information for purposes other than those for which it was collected, except with your consent, as required or permitted by law, and to provide the features and service(s) you've requested and conduct routine business operations. At the time you register for certain features or services, you may be notified of, and asked to consent to, the sharing of your personal information necessary for the provision of these requested features or services.

Non-Personally Identifiable Data:

Anytime you visit this web site, we may gather certain non-personally identifiable information regarding the means you use to access our site. This information may include the type and version of your browser, your service provider, your IP address, device ID, certain geo-location data, and any search engine or other referring site you may have used to locate the site. We use this information to help diagnose problems with our server, administer the Web site, conduct attribution reporting, personalize user experiences (including certain targeted features or advertising), and compile broad statistical data. In addition, we gather certain navigational information about where you go on this web site. This information enables us to determine which areas of the Web sites are most frequently visited and helps us to tailor the sites to the needs and interests of our online visitors. Such information is gathered by us in the aggregate and will not be associated with a specific individual except in connection with specific services and operations such as attribution reporting and maintenance of customer accounts.

Use of Cookies:

Our dealership may use a browser feature known as a "cookie." Cookies are small files placed on your hard drive that assist us in providing you with a customized browsing experience. Our dealership uses cookies to provide you with the convenience of not having to reenter information, such as user IDs and passwords, multiple times during your visits to this web site. Cookies can also be utilized to help us provide you with information targeted to your interests, based upon your prior browsing on this web site. The "help" section of the toolbar on most browsers will inform you on how to prevent your browser from accepting new cookies, how to have the browser notify you upon the receipt of a new cookie, or how to disable the use of cookies completely. As this web site has been designed to take advantage of the use of cookies, should you configure your browser to decline their use, certain features of this web site may not function correctly, and you may be required to reenter any user IDs and passwords more frequently.

Personal Information Voluntarily Provided:

Any personal information you provide to us (i.e. name, telephone, e-mail address, etc.) when you enroll in one of our E-Mail Reminder Services, request information, or use any of the other interactive portions of this web site may be used to provide you with information you've requested about our company, our products and our services, or to provide you with special notices. Certain information you provide, such as veteran or student status, may be used to confirm your eligibility for certain OEM promotions. Certain financial information may be used to begin the purchase and finance application process with our dealership. You may opt out of receiving future communications at any time (see opt-out Procedures and California & Nevada Privacy Notice below). This data may also be used to tailor your experience on this web site by providing content that is relevant to your interests and geographic region.

Accessing this Web Site:

This web site is hosted on servers located in the United States. As such, your connection will be through and to servers located in the U.S. Any personal information you provide during

your visit will be processed and maintained on our Web server and other internal systems located within the U.S.

External Links:

This web site contains links to other sites. Our dealership is not responsible for the privacy practices or the content of such web sites. To help ensure the protection of your privacy, we recommend that you review the privacy policy of any site you visit via a link from this web site.

Passwords:

The personal data record created through your registration with this web site can only be accessed with the unique password associated with that record. To protect the integrity of the personal information contained in this record, you should not disclose or otherwise reveal your password to third parties.

Public Forums:

This web site may make chat rooms, forums, message boards, and/or news groups available to its users at various times. Please remember that, unless otherwise stated, any information that is disclosed in these areas becomes public information and you should exercise caution when deciding to disclose your personal information in these areas.

Opt-out Procedures:

Other than as set forth in this Privacy Policy, when any personally-identifiable information about you may be shared with third parties you will have the ability to decline to share that information.

You may always opt-out of receiving future communications from our dealership. This web site allows users to opt-out of receiving such communications at the point where personal information is requested, or through other means as identified.

Changes to this Privacy Policy

We reserve the right to change and update this Privacy Policy. These changes will be made when appropriate, in a timely manner. We encourage you to examine our Policy from time to time to ensure you are aware of any changes we may have made. Your continued use of this site and affiliated sites after any such update indicates your agreement to the same.

Use of Third-Party Service Provider Behavioral Services:

This website may use third-party tracking services to collect non-personally identifiable online demographical and behavioral data generated by website visitors. A data collection script provided by this service and installed on this website may collect the following kinds of data: website session activity, including your personally identifiable information when

entered into a form field such as name, phone, email, or when you arrive at our website through a link containing a unique identifier; links that you click, pages that you view, form fields that you select, and text fields that you enter. The information is used to compile your shopping activity to produce an individual shopping profile for you, which contains information about your brand preferences, and to aggregate your website behavioral data in anonymized form with all other visitors' anonymized shopping activity data on our website to help us analyze industry trends, general shopping patterns, overall consumer demands, and website performance.

Children:

We believe that it is especially important to protect children's privacy online. We do not knowingly collect or use any personally identifiable information from children under the age of 13 and we do not knowingly provide any personally identifiable information, regardless of its source, to any third party for any purpose whatsoever from visitors younger than 13 years old. No information should be submitted to or posted by visitors younger than 13 years old.

Collection of Information by Third Parties:

As noted above, affiliates, third parties who place advertisements on this website, and other third-party service providers may collect and use information about your visits to and use of this website through the use of cookies, web beacons and other similar technologies. For example, we may work with companies that collect statistical information regarding site usage and provide related analytical services. We may work with third-party advertising companies that use cookies and web beacons to serve advertisements when you come to the site and to generate statistics and metrics related to the delivery of such advertisements. We also may work with third-party advertising platforms and networks that use cookies, web beacons and other technologies to collect non-personally identifiable information about your visits to and interactions with this site and other websites in order to provide targeted communications and other advertisements.

Third-party service providers may also collect information from your devices and may combine personal and non-personal information about you with information from other sources including your visits to this and other websites, mobile websites and/or mobile applications across your various devices.

If you would like to obtain more information about the practices of some of these parties, or if you would like to make choices about their use of your information, please click here: <http://www.aboutads.info/choices/>

More information and additional consumer choice options may be found at this link: http://www.networkadvertising.org/managing/opt_out.asp

Information and additional consumer choice options regarding mobile device tracking may be found at these links (or successor URLs):

IDFA limit ad tracking: <https://support.apple.com/en-us/HT202074>

AAID reset and opt-out: <https://support.google.com/googleplay/android-developer/answer/6048248?hl=en>

California & Nevada Privacy Notice– Your California Privacy Rights:

If you are a California or Nevada resident, state law may provide you with additional rights regarding our use of your personal information. This information is intended to comply with the California Consumer Privacy Act of 2018 and Nevada Senate Bill 220 (an Act relating to Internet privacy) and other California and other state privacy laws (all such laws are collectively referred to for purposes of this Privacy Policy as the “CCPA”). Any terms defined in the CCPA have the same meaning when used in this Privacy Notice.

Information We Collect:

We may collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples (Including, but not limited to) or (non- exhaustive list)	Collected(YES or NO)
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A 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 number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin (including language use and possession of a driver's license issued to persons unable to provide their presence in the United States as authorized under federal law), citizenship, religion or creed (including religious dress and grooming practices), marital status, medical condition (including cancer or a record or history of cancer), AIDS/HIV, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy, childbirth, breastfeeding and related medical conditions), sexual orientation, veteran or military status, Political affiliations or activities,	YES

Category	Examples (Including, but not limited to) or (non- exhaustive list)	Collected(YES or NO)
	status as a victim of domestic violence, assault, or stalking, genetic information (including familial genetic information), request for family care leave, request for leave for an employee's own serious health condition, request for Pregnancy Disability Leave, retaliation for reporting patient abuse in tax-supported institutions.	
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information	Imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.	NO
F. Internet or similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data	Physical location or movements.	YES
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from personal information	Profile reflecting a person's preferences, characteristics, trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes	YES

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:

- health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from our users when they submit a lead form or other web form on the site.
- Directly and indirectly from interaction with our website (or an affiliated site). For example, from submissions through our website portal or website usage details (including without limitation IP address, device ID, geolocation data collected automatically).
- Directly and indirectly from our service providers or their agents.
- From data aggregators/providers and similar vendors.
- From third parties that interact with us in connection with the services we perform. For example, we may receive aggregated vehicle sales records for analytics and other purposes.
- From anti-fraud and other crime prevention partners.

Use of Personal Information:

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order to indicate interest in a particular vehicle, promotion or offering.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you including the powering of products and features used throughout the site.
- To power and maintain saved user accounts.
- For attribution purposes.
- To send promotional materials.
- To provide custom and/or individually-tailored website experiences.
- For ad serving, targeting and retargeting, creation of audience segments, and related OBA (online behavioral advertising) purposes.
- To create inferred search preferences and inclination/intent to purchase certain vehicles or makes/models for improved ad targeting and custom experience implantation.
- For internal operations and site optimization including product development.

- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To enable anti-fraud and crime prevention efforts.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.
- For additional purposes more fully described in this Privacy Policy.
- We share the information we collect from you with FCA US, including so that they may provide you with promotional information on FCA products and services that may be of interest to you. This includes information we collect, for example, when you request further information from us about purchasing a vehicle, inquire about vehicle financing or other offers, or by submitting a lead form on our website. To learn more about FCA's privacy practices, please review the FCA Privacy Policy at <https://www.fcagroup.com/en-US/footer/Pages/privacy.aspx>.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information:

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- A. Identifiers
- B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- C. Protected classification characteristics under California or federal law
- D. Commercial information
- F. Internet or similar network activity
- G. Geolocation data
- K. Inferences drawn from personal information

Categories of Parties to which we may Disclose Personal Information:

We may disclose your personal information for a business purpose to the following categories of third parties:

– Our subsidiaries, parent(s) and affiliates

- Service providers (including, without limitation, website and internal operations platform providers)
- Automotive OEMs
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months we have not sold personal information.

Your Rights and Choices:

The CCPA provides consumers with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech and/or ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.

- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Only you (or a person registered with the Secretary of State of your state of residence that you authorize to act on your behalf) may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

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

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we reserve the right to deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option (if no preference is indicated we reserve the right to contact you at our discretion). Any disclosures we provide will only cover the 12-month period preceding the receipt date of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

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

Non-Discrimination:

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to this Privacy Policy

We reserve the right to update and periodically amend this Privacy Policy at our discretion and at any time. If we make changes to this Privacy Notice, amendments will be posted online, and the date of update will be included. Your continued use of this site and affiliated sites after any such update indicates your agreement to the same.