



Privacy Policy

DealerX takes your privacy seriously and is committed to safeguarding your privacy online. Because we do gather certain types of information from visitors to our sites, we have developed a privacy statement to help you understand the terms and conditions surrounding the collection and use of that information. This statement discloses the types of 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.

General Provisions:

By using this site or any affiliated and/or created DealerX website, herein referred to as DealerX sites, you and/or your company, or directed entity accept the terms of this Visitor Agreement. This is a legally binding agreement between you and DealerX; please read it carefully. When using the DealerX Sites, you may be subject to other posted terms and guidelines applicable to certain services available on or through the DealerX Sites. All terms and guidelines on the DealerX Sites, including our privacy policy are part of this Visitor Agreement and incorporated herein by reference. Unless explicitly stated otherwise, any features or services available at any time on the DealerX Sites are subject to this Visitor Agreement. Accessing the DealerX Sites in any manner, even through automated means, constitutes your use of the DealerX Sites and your agreement to be bound by this Visitor Agreement. DealerX may change the terms of this Visitor Agreement from time to time and will revise the effective date when it does so. Your continued use of the DealerX Sites after the posted effective date constitutes your agreement to be bound by this Visitor Agreement as modified, except that modifications do not apply to any dispute arising prior to their effective date. DealerX may change, restrict access to, suspend, or discontinue the DealerX Sites, or any portion thereof.

The material that appears on the DealerX Sites is for general informational purposes only. While we aim to provide a site that is useful, be mindful that the DealerX Sites may, from time to time, contain errors. The DealerX Sites includes materials and information collected from and provided by third parties that we may not have evaluated or reviewed. We make no guarantees regarding the accuracy, completeness, timeliness, or reliability of any of the materials or information on the DealerX Sites, and you should not rely on it without independent verification.

In Summary:

By accessing this website, you accept without limitation or qualification, and agree to be bound and abide by, the following terms and conditions (Terms of Use). DealerX may revise and update these Terms of Use from time to time in its sole discretion. Your continued use of this website following the posting of revised Terms of Use means that you accept and agree to any and all changes to the Terms of Use. You may use this website only for lawful purposes and in accordance with these Terms of Use, and you agree not to: (i) use this website in any manner that could disable, overburden, damage, or impair this website, or interfere with any other use of this website, including, but not limited to, any user's ability to engage in real-time activities through this website; (ii) use any robot, spider or other automatic device, process or means to access this website for any purpose, including to monitor or copy any of the material on this website; (iii) use any manual process to

monitor or copy any of the material on this website, or to engage in any other unauthorized purpose without the express prior written consent of DealerX; (iv) otherwise use any device, software or routine that interferes with the proper working of this website; or (v) otherwise attempt to interfere with the proper working of this website.

California:

Under California law, we will not share information we collect about you with companies outside of DealerX, unless the law allows. For example, we may share information with your consent, to service your accounts, or to provide rewards or benefits you are entitled to. We will limit sharing among our companies to the extent required by California law.

Guiding Principles:

DealerX respects the privacy of individuals who visit our Web sites, send us e-mail, or participate in features/services we offer online. Accordingly, our policy regarding online privacy has been developed using the following guiding principles: DealerX maintains a strict "no-spam" policy. Subscribers to our e-mail services (or any other feature/service found on our Web site) will not receive unsolicited e-mail messages from us. DealerX collect information online primarily to provide our visitors with a more relevant experience on our sites. When doing so, we will make every reasonable effort to avoid excessive or irrelevant collection of data. DealerX will take reasonable physical, electronic and managerial measures to safeguard and secure any information you provide to us (e.g. data will be stored in protected databases on secured servers with restricted access). DealerX will not share any information you've provided to us with anyone without your consent other than to provide the service you've requested. At the time you register for any such service, you will be notified of, and asked to consent to, the sharing of your information with any particular third party necessary to the provision of the requested service.

Non-Personally Identifiable Data:

Anytime you visit our 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 and any search engine you may have used to locate the site. We use this information to help diagnose problems with our server, administer the Web site, and compile broad statistical data. In addition, we gather certain navigational information about where you go on our Web sites. 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 without that individual's consent.

Information Voluntarily Provided:

Any information you provide to us (i.e. name, 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 our Web sites, is securely maintained on our Web server and internal systems. This information 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. You may opt

out of receiving future communications at any time (see opt-out Procedures below). This data may also be used to tailor your experience on our sites by providing content that is relevant to your interests and geographic region.

Information Collected from Other Sources:

To help us better understand and respond to your needs and interests, we may in the future receive information about you from other sources. We will ask any provider of such information to represent and warrant that the information has been gathered and maintained in accordance with all state and federal laws. Any such information will be maintained by us in accordance with the standards set forth in this privacy policy along with other personal information you've provided.

Disclosure of Personal Information:

DealerX understand the importance of your privacy. We collect and maintain the personal information of our consumers for our use and our subsidiaries. We do not sell, rent, or trade consumer information to third parties, other than as described below, and never without your consent.

Business Partners:

DealerX may partner with select retailers and other companies at various times to provide expanded services to our site visitors. As part of such a relationship, we may share with these companies the use of certain interactive Web site functions (i.e. the E-Mail Reminder Service). Information provided by site visitors through the use of such interactive functions may be available to both DealerX and our partners.

Web Scraping, Crawling and Data Mis/Re-appropriation:

Automated Queries. Automated queries (including screen and database scraping, spiders, robots, crawlers and any other automated activity with the purpose of obtaining information from the Services) are strictly prohibited on the Services, unless you have received express written permission from DealerX. As a limited exception, publicly available search engines and similar Internet navigation tools ("Search Engines") may query the Services and provide an index with links to the Services' Web pages, only to the extent such unlicensed "fair use" is allowed by applicable copyright law. Search Engines are not permitted to query or search information protected by a security verification system ("captcha") which limits access to human users.

Under no circumstances should you or an entity you direct employ the use of a web crawler (software or 3rd party software) to scrape, for the purpose of dating and/or collecting dated content, or for the repurpose of content and/or website data from this site or any DealerX affiliated site, or through the use of tags, containers or tracking scripts collect Cookie Data, visitor behavior, visitor(s) ID – UUID – MUID, Fingerprinting of device(s) with out the express written permission of DealerX is a violation of 18 U.S. Code § 1030 – Fraud and related activity in connection with computers.

Please guide yourself accordingly

Agents:

DealerX may use other companies and individuals to perform certain functions on our behalf. Examples include administering e-mail services and running special promotions. Such parties only have access to the personal information needed to perform these functions and may not use or store the information for any other purpose. Subscribers or site visitors will never receive unsolicited e-mail messages from agents working on our behalf.

Business Transfers:

In the event that one of DealerX sells or transfers a particular portion of its business assets, consumer information may be one of the business assets transferred as part of the transaction. If substantially all of the assets of DealerX are acquired, consumer information may be transferred as part of the acquisition.

Compliance with Law/Safety:

DealerX may disclose specific personal information based on a good faith belief that such disclosure is necessary to comply with or conform to the law or that such disclosure is necessary to protect the users of our Web sites, the sites themselves, or the public.

With Consent:

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

Use of Cookies:

DealerX 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. DealerX use 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 our Web sites. Cookies can also be utilized to help us provide you with information targeted to your interests, based upon your prior browsing on our Web sites. 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 our Web sites have been designed to take advantage of the use of cookies. Should you configure your browser to decline their use, certain features of our Web sites may not function correctly and you may be required to reenter any user IDs and passwords more frequently.

Accessing Our Web Sites from Outside of the United States:

If you are visiting our Web site from a location outside of the U.S., your connection will be through and to servers located in the U.S. Any 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:**

Our Web sites contain links to other sites. DealerX are 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 one of our Web sites.

Passwords:

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

Public Forums:

Our Web sites 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.

DealerX Ad Targeting & Behavioral Analysis

DealerX's Privacy and Data Integrity Policies provide foundational framework for our business decisions and data solutions.

Our focus is to support the auto buying process for the automotive industry and the consumer by blindly aggregating and analyzing billions of anonymous shopping sessions to better understand changes in consumer trends and demands. Thus improving the consumer shopping experience, reducing waste at all levels of the vehicle supply chain, and ultimately providing the right vehicle at the lowest cost to the consumer. DealerX provides these benefits while protecting the rights of all consumers and data owners.

Overview

DealerX is a comprehensive aggregator of data relating to automotive shopping behavior.

We collect data from websites using our data collection script. We do collect all website session activity, and maintain upon capture your personally identifiable information entered into a form field such as name, phone, email, or when you arrive at a website through a link containing a unique identifier.

Your personally identifiable information is made available only to the website owner where you disclosed the information, and those third parties designated by the website owner. We do from time to time collect Personally Identifiable Information (PIII) from website owners who are using our pixel/tracking scripts as part of a DealerX provided service, BUT not as 3rd party with no 1st party service being leveraged by the website owner.

Your shopping activity is aggregated to produce an individual shopping profile, and aggregated with all shopping activity data to power information solutions such as industry trends, consumer demand analysis and website performance measurements.

Data Collected

Data collected by DealerX includes interactions with the website where our data collection script is present. Examples of the types of data we collect include:

- Links clicked
- Pages viewed
- Form field selections (NO CREDIT APPS)
- Videos Played
- Content Interacted with

We collect all website session activity, and often capture personally identifiable information entered into a form field such as name, phone, email, or when you arrive at a website through a link containing a unique identifier.

We do NOT collect Social security numbers, credit card numbers and passwords as they are intentionally excluded from our data collection efforts.

Personally identifiable information may also be introduced into the DealerX system through record set imports. These record sets are typically exported from a customer and lead database, and include the following consumer information disclosed to a website owner:

- First and last name and/or unique identifier



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- Phone numbers
- Email addresses
- Mailing Address

However, if we have been contracted to simply collect interaction/behavioral data from a 3rd party website for analysis and or ad targeting we do NOT capture any of these four items listed here:

- First and last name
- Phone numbers
- Email addresses
- Mailing Address

Data Maintained

DealerX manages all data collected under a comprehensive information security program. Personally identifiable information is limited to those employees/contractors with a need to access basis, and specific protocols are defined for the access, use and transfer of this data.

Data Usage

If disclosed, your personally identifiable information such as name, phone, email or other unique identifiers is only made available to the website owner and their designated third parties.

Your behavioral data is used to create a profile of your vehicle preferences. This profile contains how long you've been shopping, when and what you're most likely to purchase.

Your behavioral data is also aggregated with all shopping activity data from all consumers to power information solutions such as industry trends, consumer demand analysis and website performance measurements.

Personally identifiable information imported to our database may be appended with shopping preferences based on your aggregated shopping activity.