

Subject: RE: Fields Auto Group – Vendor Addendum/Risk Assessment – Action Required
From: Robert Oteri <robert@apinet.com>
Date: 6/5/23, 9:40 AM
To: CAI – Privacy <privacy@coxautoinc.com>, "DeFazio, Tammy (CAI – Florida)" <Tammy.DeFazio@coxautoinc.com>, "securityplanning@apinet.com" <securityplanning@apinet.com>
CC: securityplanning@apinet.com

Hi Abbey,

Thank you for your reply. I will file this info with the Homenet vendor record.

Regards,
Robert

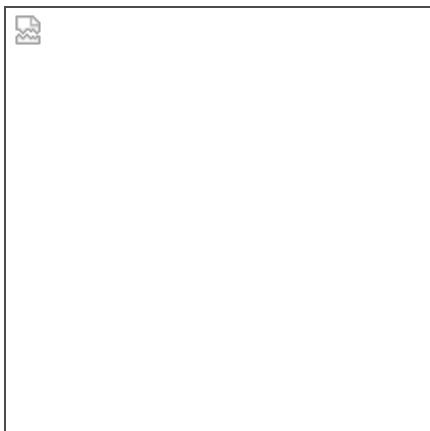
----- Original message -----

From: CAI – Privacy <privacy@coxautoinc.com>
Date: 6/5/23 10:21 AM (GMT-05:00)
To: "DeFazio, Tammy (CAI – Florida)" <Tammy.DeFazio@coxautoinc.com>, securityplanning@apinet.com, robert@apinet.com
Subject: RE: Fields Auto Group – Vendor Addendum/Risk Assessment – Action Required

Hello Robert, We received your email below requesting that Homenet execute a GLBA Vendor Addendum and Risk Assessment. The GLBA is not applicable to Homenet for the following reasons: Homenet does not obtain, process, or store non-public personal information to provide or facilitate services relating to a consumer obtaining a financial product under the GLBA. HomeNet offers merchandising tools and online syndication to third-party advertising sources for dealers to showcase their vehicle inventory. Additionally, to the extent that a dealer may upload consumer personal information into HomeNet, either directly or through an integration, any personal information involved is not related to obtaining a financial product. Accordingly, Homenet will be unable to sign the proposed agreement. Thank you for your business and please email us at privacy@coxautoinc.com with any questions.

Abbey Morrow
Corporate Counsel
Compliance & Privacy
6205 Peachtree Dunwoody Road

Atlanta, GA 30328



[Ethics & Compliance Center](#) | [Cox Ethics Hotline](#)

From: DeFazio, Tammy (CAI – Florida) <Tammy.DeFazio@coxautoinc.com>
Sent: Monday, June 5, 2023 8:48 AM
To: CAI – Privacy <privacy@coxautoinc.com>; securityplanning@apinet.com; robert@apinet.com
Subject: FW: Fields Auto Group – Vendor Addendum/Risk Assessment – Action Required
Importance: High

Hi Robert,

I've added our privacy team who will be able to assist moving forward.

Tammy

From: DeFazio, Tammy (CAI – Florida)
Sent: Saturday, June 3, 2023 10:24 AM
To: robert@apinet.com; Hovey, Pete (CAI – Exton) <Pete.Hovey@coxautoinc.com>
Cc: securityplanning@apinet.com
Subject: RE: Fields Auto Group – Vendor Addendum/Risk Assessment – Action Required
Importance: High

Hi Robert – We received your request that Homenet execute a GLBA Addendum. However, Homenet's services are not covered by the GLBA because Homenet does not obtain or process non-public personal information on behalf of dealers, nor does it provide or facilitate services relating to a consumer obtaining a financial product. See 16 C.F.R. sec. 314.2(l), (n)(1). Rather, Homenet syndicates vehicle advertising listings. Accordingly, the GLBA is not applicable and

Homenet will not be able to sign the proposed GLBA Addendum. I can check further into the risk assessment with the Cox legal team on behalf of HomeNet, but I suspect the same rules apply. I will let you know when I hear back.

If you have further questions, Please feel free to reach out to me.

Tammy

From: securityplanning@apinet.com <securityplanning@apinet.com>
Sent: Friday, June 2, 2023 5:01 PM
To: DeFazio, Tammy (CAI – Florida) <Tammy.DeFazio@coxautoinc.com>; Hovey, Pete (CAI – Exton) <Pete.Hovey@coxautoinc.com>
Cc: securityplanning@apinet.com
Subject: Fields Auto Group – Vendor Addendum/Risk Assessment – Action Required
Importance: High

Hello,

As a valued vendor of the Fields Auto Group family of dealers, we need to ensure our vendors are in compliance with the new Federal Trade Commission's GLB Safeguards Act revisions set to go into effect on June 9th, 2023.

These revisions require us, a Dealer designated as a financial institution, to ensure our vendors are in compliance with these new guidelines. We have developed an addendum to existing Vendor Service Agreements and a Risk Assessment for this purpose. These two documents are prepopulated with the Fields Auto Group stores you provide products and services to.

A qualified individual from your company must complete and submit the Addendum and Risk Assessment. If you are not the qualified individual to complete these documents, please forward this email to that person as soon as possible.

We sincerely appreciate your attention to this request. We are committed to the security and privacy of our customers personal information and look forward to working with our vendors to ensure it remains a top priority. The unique links for your digital documents can be found below.

Vendor Addendum: <https://comserver.apinet.com/fields-compliance/?d=uzag>

Risk Assessment: <https://comserver.apinet.com/fields-compliance/risks/?d=uzag>

Please don't hesitate to reach out with any questions you have.

Sincerely,

Robert Oteri



Robert Oteri

Security Planning Team

API International, Inc.

Fields Auto Group

Mobile: (805) 236-2479

securityplanning@apinet.com