Subject: Fwd: Fields Auto Group - Vendor Addendum/Risk Assessment - Action Required XTIME
From: Jane Copeland <jane@apinet.com>
Date: 6/10/23, 9:42 AM
To: Charles Willgren <charles@apinet.com>

Jane

Begin forwarded message:

> **From:** "Hilsen, Scott (CAI - Atlanta - LD)" <Scott.Hilsen@coxautoinc.com>
> **Date:** June 9, 2023 at 1:52:43 PM CDT
> **To:** jane@apinet.com
> **Cc:** CAI - Privacy <privacy@coxautoinc.com>
> **Subject: FW: Fields Auto Group - Vendor Addendum/Risk Assessment - Action Required XTIME**

> Hello Jane – Thanks for your question about RTS. To add to our explanation below, RTS is an outsourced provider for state departments of motor vehicles, and it is not involved in vehicle financing or credit. The title and application that a dealer gives to RTS to register a vehicle is sent to and owned by the particular state. RTS is only facilitating/transmitting the information that a dealer otherwise would have to give to a DMV and the GLBA does not apply to state governments. Personal information provided to DMVs is instead governed by state's Driver Privacy Protection Act. Hope this helps.
>
> **Scott Hilsen**
> Chief Compliance & Privacy Officer
> **COX AUTOMOTIVE, INC.**
> scott.hilsen@coxautoinc.com
>
> *Do The Right Thing. Always.*
> Ethics Hotline: 1-877-329-0696 | CoxEthicsHotline.EthicsPoint.com
>
> ---
>
> **From:** Jane Copeland <jane@apinet.com>
> **Sent:** Friday, June 9, 2023 12:15 PM
> **To:** CAI - Privacy <privacy@coxautoinc.com>; jane@apinet.com
> **Subject:** RE: Fields Auto Group - Vendor Addendum/Risk Assessment - Action Required XTIME
> **Importance:** High
>
> Abbey,
> How can that be when titles record liens and bank information?
>
> Thanks
> Jane
>
> ---
>
> **From:** CAI - Privacy <privacy@coxautoinc.com>
> **Sent:** Friday, June 9, 2023 11:05 AM

To: jane@apinet.com
Subject: RE: Fields Auto Group - Vendor Addendum/Risk Assessment - Action Required XTIME

Thank you. The GLBA is not applicable to RTS because RTS does not obtain non-public personal information to provide or facilitate services relating to a consumer obtaining a financial product.

Abbey Morrow
Corporate Counsel
Compliance & Privacy
6205 Peachtree Dunwoody Road
Atlanta, GA 30328

COX AUTOMOTIVE

Ethics & Compliance Center | Cox Ethics Hotline

From: Jane Copeland <jane@apinet.com>
Sent: Friday, June 9, 2023 11:50 AM
To: CAI - Privacy <privacy@coxautoinc.com>
Subject: RE: Fields Auto Group - Vendor Addendum/Risk Assessment - Action Required XTIME
Importance: High

We also requested the same addendum and risk assessment from RTS Titling. We found out later that this too is a COX product. Could you verify that this company adheres to the same GLB safeguards and guidelines as your other companies please.

Thanks you for your prompt attention to this matter

From: CAI - Privacy <privacy@coxautoinc.com>
Sent: Friday, June 9, 2023 10:38 AM
To: jane@apinet.com
Subject: RE: Fields Auto Group - Vendor Addendum/Risk Assessment - Action Required XTIME

Hi Jane, Thanks for reaching out. I understand Fields Auto Group is seeking responses for the following Cox Auto companies: Dealer Dot Com (“DDC”), Dealertrack, Xtime, and vAuto.

We appreciate you reaching out and assure you that Xtime, DDC, and Dealertrack have implemented and maintain appropriate safeguards for consumer personal information that is covered by the GLBA. We are aware of the updates to the Safeguard Rule and understand the impact on dealers. To the extent that the GLBA is applicable, our existing Data Access Addendum and Master Terms & Conditions already provide in writing that Xtime, DDC, and Dealertrack will comply with the GLBA by implementing appropriate safeguards for covered consumer information. Please see https://www.coxautoinc.com/terms/usa/. Additionally, the proposed GLBA Addendum purports to amend and supplement the terms Xtime, DDC, and Dealertrack’s underlying customer agreement, which is not acceptable because Xtime, DDC, and Dealertrack have thousands of customers and cannot agree to different terms with different customers. Nevertheless, our Legal Team is happy to answer any specific questions you may have relating to the information security programs of our applicable businesses.

As service providers, Xtime, DDC, and Dealertrack comply with the Safeguard Rule by providing adequate safeguards to protect our customers’ data and to detect and respond to potential security events. Cox Automotive has a comprehensive information security program that is managed and operated by a team of nearly 100 security professionals, and includes administrative, technical, and physical safeguards for covered personal information, such as multi-factor authentication, encryption, access controls, vulnerability/penetration testing, and mandatory security training for all employees. Please see the attached Information Security Program Overview for additional details about our safeguards.

I understand that you are also a customer of vAuto; however we do not believe the GLBA is applicable and vAuto will not be able to sign the proposed agreement. vAuto does not obtain non-public personal information to provide or facilitate services relating to a consumer obtaining a financial product. vAuto is an inventory management software platform designed for valuating dealer-owned vehicles, not consumer-owned vehicles. vAuto is not marketed or intended to be used as a CRM or repository of consumer PI for appraisals. While dealers may be able to upload consumer PI, or any other data for that matter, the platform is not engineered to store or process GLBA-covered PII.

Any questions can be sent to our Privacy Department at privacy@coxautoinc.com.

Abbey Morrow
Corporate Counsel
Compliance & Privacy
6205 Peachtree Dunwoody Road
Atlanta, GA 30328

<image001.png>

Ethics & Compliance Center | Cox Ethics Hotline

From: Jane Copeland <jane@apinet.com>
Sent: Thursday, June 8, 2023 2:24 PM
To: CAI - Privacy <privacy@coxautoinc.com>
Subject: FW: Fields Auto Group - Vendor Addendum/Risk Assessment - Action Required XTIME
Importance: High

To whom it may concern,
The Fields Auto Group has made multiple requests to members of your individual organizations asking them to complete the GLB Addendum and Risk Assessment. To date the majority of these people have not responded in any manner to our requests. I attach the request for XTIME and respectfully ask that you complete this and return it to us as soon as possible.

In the event you have a standard data privacy document which for XTIME which you would prefer to submit, please feel free to do so.

Thanks you for your prompt attention to this matter.

Best wishes,
Jane Copeland

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

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