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Affinitiv Privacy Policy

Effective: January 1, 2020

Affinitiv, Inc. ("Company" "us" "we" or "our") is a leading provider of data-driven software and service solutions for North American commercial clients within the automotive market.

We are committed to protecting your privacy and have adopted this Privacy Policy with that in mind. This Privacy Policy informs you of the personal information we collect and how and for what purposes we may collect and use certain types of personal information.

This Privacy Policy applies to all information you provide to us, or that we obtain from you, through Affinitiv.com, including any subdomains thereof, electronic communications, any Affinitiv software or service offerings provided to our commercial clients, and any affiliated sites to which this policy applies (collectively, the "Site").

By using the Site, you consent to and accept this Privacy Policy. If you do not agree to the terms and conditions of this Privacy Policy, please do not use the Site.

Additionally, this Privacy Policy applies to any personal information you provide to an automobile dealer or manufacturer that subsequently provides the personal information to us in connection with a software or service offering we provide.

TYPES OF INFORMATION WE COLLECT

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interact with the Site and when (b) you authorize an automobile dealership or manufacturer to provide the personal information to us in connection with the services we provide. In particular, the Company has collected the following categories of personal information about consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol ("IP") 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, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
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.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES

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We Are	I. Professional or employment-related information.	Current or past job history or performance evaluations.		YES	
	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 other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.		YES	

HOW WE COLLECT PERSONAL INFORMATION

In connection with the Company's software and service offering activities in support of the automotive industry, we are sometimes granted access to the categories of personal information described above through dealer management systems or through the customer relationship management system we host on behalf of our dealership customers.

Further, the Site may collect the categories of personal information listed above:

- Directly from you when you:
 - Engage with an automobile dealer or manufacturer that subsequently provides the personal information to us in connection with a software or service offering we provide to them;
 - Inquire about our services and offerings;
 - Contact us through the "Contact Our Experts" link on our Site;
 - Inquire into an employment opportunity or submit a resume through the Site;
 - Create an account in our software or service offerings;
 - Sign up for e-mail updates;
 - Subscribe to our blog, newsletter or eBooks;
 - Enter a contest; or
 - Participate in a marketing survey, promotion or event.
- Indirectly from you:
 - By observing your actions on the Site; or

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e-mail, we typically retain the e-mail in our file servers and collect any contact information you provide so that we can reply to you. Your e-mail also contains metafiles that may contain IP addresses, domain names, and other standard file information and this information may be retained electronically on our servers or in routine back-up files.

If you browse the Site, regardless of whether you create a user account, or otherwise interact with the Site, we log your IP address (the internet address of your computer) to tell us which parts of the Site you visit and how long you spend there. The Company also may track the state and/or country you are accessing the internet from, the date and time you visited and the type of computer, operating system and web browser you are using.

THIRD-PARTY WEBSITES AND INTERACTIONS

As provided above, the Company receives personal information about you from automobile dealers and manufacturers with whom you may have contact. Our use of such personal information is governed by this Privacy Policy. However, the privacy policies of those third party automobile dealers and manufacturers govern those third parties' collection and use of your personal information, including the grounds for which they share personal information with us.

For your convenience, our Site may contain links to websites owned and operated by third parties. Please note that the Company does not control such third-party websites, the content of these sites, any products or services that may be offered through these sites, or any other use of the linked sites. These other websites may send their own cookies to visitors, collect data or solicit personal information, and the privacy policies of these other sites may be significantly different from this Privacy Policy. Your access to and use of such websites is governed by the terms of use and policies of those sites, and shall be at your own risk. The Company is not responsible for the privacy practices of these other sites and cannot guarantee the security of any information collected by any linked or other third-party website. Your use of those websites is governed by any policies existing on or applicable to those websites. The Company encourages you to review the privacy policy of any company or website before submitting your personal information.

The Company is active on social media pages, such as Facebook, LinkedIn and Twitter, and we may integrate social media widgets or features on the Site. These social media companies may recognize you and collect information about your visit to the Site, and they may set a cookie or employ other tracking technologies. Your interactions with those features are governed by the privacy policies of those companies.

Cookies

The Company may use cookies, web beacons or similar technologies or scripts to store certain information when you interact with the Site. We use these technologies to enhance your



deleted when you close your browser ("temporary cookies"), while others can be stored longer on your computer, sometimes until you delete them manually ("persistent cookies"). For example, we may use cookies to collect information about website activity or to tell us whether you are an existing or new visitor to our Site. If you do not wish to accept cookies from the Site, you may configure your web browser so that it does not accept cookies; however, you may lose certain functions available on the Site. To learn more about cookies, please visit <http://www.allaboutcookies.org>.

Analytics

We utilize third party companies and analytics to help us market, sell, and provide information about our products and services; and we provide your personal information to these third party companies to assist us in conducting business with you. We use web analytics tools provided by service providers, including, but not limited to, Google Analytics, which is a third party service that transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand the Site's traffic, and web page usage. For more information concerning Google Analytics and how it collects and processes data please see "How Google Uses Data When You Use Our Partners Web Sites or Apps" located at www.google.com/policies/privacy/partners. We use the information provided by these tools to improve our services and our online advertisements. These tools place session and persistent cookies in your browser to identify you as a unique user the next time you visit our Site. Each cookie cannot be used by anyone other than the service provider (e.g. Google Analytics).

USE OF PERSONAL INFORMATION

We use personal information provided indirectly through our hosted customer relationship management services and through dealerships to assist us in fulfilling our contractual obligations to those third party dealerships and to improve our offerings.

We may use, or disclose the personal information we collect from the Site, and from your engagement with our commercial clients, to assist our Company and our commercial clients in one or more of the following business purposes:

- Assist in answering your questions;
- Provide you with excellent customer service;
- Create, maintain, customize, and secure your account;
- Provide the products and services you request;
- Send you promotional offers we believe will be of interest to you;
- Send you email updates;
- Identify your product and service preferences;
- Customize communications to you;
- Provide information concerning products and services you have purchased and products and services that may be of interest to you;

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We automotive software and service offerings to our commercial clients.

SHARING OF PERSONAL INFORMATION

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The Company may disclose your personal information to a third party for a business purpose.

We may share your personal information with third party service providers who have been retained to perform services on our behalf to help with our provision of software and service offerings to our commercial clients and to help with our own business activities, including without limitation, payment processing, network infrastructure, cloud storage, e-mail marketing, sales, delivery of products, market research, promotions management, website management, accounting, internet service providers, information technology, and that otherwise assist us in running our business.

Further, we may disclose information about you (i) if we are required to do so by law, court order or legal process; (ii) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements; (iii) under the discovery process in litigation or arbitration; (iv) to enforce the Company's policies, contracts or other rights; (v) to collect amounts owed to the Company; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if in good faith we believe that disclosure is otherwise necessary or advisable. In addition, from time to time, server logs may be reviewed by third party forensic investigators and other technology professionals for security purposes – e.g., to detect unauthorized activity on the Site. In such cases, server log data containing IP addresses may also be shared with law enforcement bodies in order that they may identify users in connection with their investigation of the unauthorized activities.

We reserve the right to disclose or transfer any information we have about you in the event of a proposed or actual reorganization, sale, lease, merger, joint venture, assignment, amalgamation or any other type of acquisition, disposal or financing of all or any portion of the Company or of any of our assets (including should we become insolvent, enter into receivership or any similar event occur). Should such an event take place, we will endeavor to direct the proposed or actual transferee and its advisors to use personal information in a manner that is consistent with this Privacy Policy.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, the Company has disclosed the following categories of personal information for a business purpose, to (i) our affiliates, (ii) service providers, and (iii) third parties to whom you or your agents authorized us to disclose your personal information in connection with the products or services we or our commercial clients provide to you:

- Category A: Identifiers.

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- Category D: Commercial information.
- We • Category F: Internet or other similar network activity.
- Category G: Geolocation data.
- Category I: Professional or employment-related information.
- Are • Category K: Inferences drawn from other personal information.

SECURITY

We maintain commercially reasonable procedures and technology designed to prevent the unauthorized access of your information that you provide to us. The Site has reasonable technical and organizational security measures in place to protect the loss, misuse or alteration of information under our control. However, we cannot guarantee that unauthorized third parties will never be able to defeat those security measures.

If you believe your information has been accessed in an unauthorized manner, please contact us immediately.

TRANSFER OF PERSONAL INFORMATION

The Company is based in the United States and our Site is designed for users from the United States. Any information collected through the Site or electronic communications as described in this Privacy Policy may be stored and processed in the United States or any other country in which the Company or its affiliates or service providers maintain facilities. The United States is not recognized as having adequate safeguards. If you are located outside of the United States, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the United States.

RETENTION

We will retain the personal information we receive as described in this Privacy Policy for as long as necessary to fulfill the purpose(s) for which it was collected, provide our services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements and comply with all applicable laws and in accordance with our routine information storage policies.

RIGHTS AND CHOICES FOR NON-CALIFORNIA RESIDENTS

You may have the right to access, correct, or delete your personal information in certain circumstances. You may also have the right to withdraw any consent you have given the Company to process your personal information. If you have questions about the personal information the Company has about you, need to modify, access or delete your information, or want to withdraw your consent to process your personal information, you can contact us as provided below.

You can opt-out of receiving marketing and promotional communications from the Company or its commercial clients by



RIGHTS AND CHOICES FOR CALIFORNIA RESIDENTS

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The California Consumer Privacy Act of 2018 ("CCPA") provides

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California residents with specific rights regarding their personal information. This section describes California residents' CCPA rights and explains how to exercise those rights.

As a service provider of software and service offerings to commercial clients, we collect and use your personal information as directed and contractually authorized by our clients. We do not sell this personal information. To exercise your privacy rights, please contact the automobile dealerships or the businesses with whom you have direct relationships, which can authenticate you and provide information about the rights that you may have under CCPA or other applicable laws.

We also collect contact information from commercial clients and business professionals within the automotive industry. We do not sell this personal information, but we may share such commercial business information with our affiliates and service providers. We may also disclose personal information to third parties for business purposes as permitted by the CCPA.

Access to Specific Information and Data Portability Rights

You have the right to request from the automobile dealerships and businesses with whom you have relationships that certain information be disclosed to you about our collection and use of your personal information over the past 12 months. Once our commercial client receives and confirms your verifiable consumer request, pursuant to their instruction we will disclose:

- 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.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing: (1) sales, identifying the personal information categories that each category of recipient purchased; and (2) 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 from the automobile dealerships and businesses with whom you have relationships that the Company delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once our commercial client receives and confirms your verifiable consumer request, pursuant to their instruction we will delete (and direct our

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Exercising Access, Data Portability, and Deletion Rights

We

You, California resident business professionals, and California resident job applicants engaged directly by and with the Company may exercise the access, data portability, and deletion rights described above directly with the Company by submitting a verifiable consumer request to us, by either:

- sending an email to privacy@affinitiv.com, or
- writing to us at:

Affinitiv, Inc.
1130 W Lake Cook , Suite 120
Buffalo Grove, IL 60089
Attn: Legal Dept, CCPA Privacy Office

Timing

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.

Personal Information Sales Opt-Out

As a service provider to our commercial clients, we collect and use your personal information only as directed and contractually authorized by our clients. We do not sell personal information obtained in our capacity as a service provider, nor obtained from business professionals in the course of our commercial activity, and your rights to opt-out from sales of your information are provided here for informational purposes.

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the “right to opt-out”). The personal information of consumers actually known to be less than 16 years of age cannot be sold, unless affirmative authorization is received (the “right to opt-in”) from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by contacting us in writing as provided in this Policy.

Once you make an opt-out request, assuming we were to sell your information, we would wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information



rights. We will only use personal information provided in an opt-out request to review and comply with the request.

Are 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.

PRIVACY POLICY FOR CHILDREN

This Site is not directed to children. We do not knowingly collect information from children under the age of 16 on the Site. If you are under the age of 16, please do not provide any personal information to us. If we become aware that we have collected personal information from a child under the age of 16, we will make commercially reasonable efforts to delete such information from our database.

CHANGES AND UPDATES TO THIS PRIVACY POLICY

If you choose to visit our Site, your visit and any disputes over privacy are subject to this Privacy Policy. We reserve the right to change this Privacy Policy at any time without notice except as otherwise provided here. Please check back periodically to see if our Privacy Policy has been updated. Your continued use of the Site constitutes your agreement to the terms of this Privacy Policy and any future versions of this Privacy Policy.

GOVERNING LAW

Unless otherwise required by applicable law, this Privacy Policy, and the Company's collection and use of personal information, shall be governed and interpreted in accordance with the laws of the United States and the State of Illinois.

HOW TO CONTACT THE COMPANY

You can contact us by using any of the following methods:

- sending an email to privacy@affinitiv.com
- writing to us at:

Affinitiv, Inc.
1130 W Lake Cook, Suite 120
Buffalo Grove, IL 60089
Attn: Legal Dept, Privacy Office



847-955-9740
solutions@affinitiv.com

Affinitiv Login

877-606-6588
solutions@affinitiv.com

AutoLoop Login

877-850-2010
al_support@affinitiv.com

XRM Login

800-847-5649
crmsupport@affinitiv.com

Trade-In Valet Login

877-210-2153

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