



August 20, 2020 v4.2

MYKAARMA PRIVACY POLICY

Last updated: **August 20, 2020 v4.2**

myKaarma d/b/a Kaarya LLC ("us", "we", or "our") provides various web applications and other software services such as a communications and payments platform ("the App"), and operates the website www.mykaarma.com, (collectively, the "Services"). We gather various types of information, including information that identifies or may identify you as an individual ("Personal Information") as explained in more detail below. This page informs you of our policies regarding the collection, use and disclosure of Personal Information when you use our Services. For the purposes of this privacy policy, the term "personal information" and "personally identifiable information" as used herein has the same definition as in Cal Civ. § 1798.80 (e).

We will not use or share your information with anyone except as described in this Privacy Policy.

We use your Personal Information for providing and improving the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. For more information about the information collected by the dealership about you using myKaarma services, see your dealership's website for a copy of its privacy policy, or ask your service adviser.

In accordance with the California Consumer Privacy Act of 2018, verified residents of California have certain rights under the law effective January 1, 2020. For information on the rights of California residents under this law, see the section [CCPA Consumer Rights](#), below.

MYKAARMA DOES NOT SELL THE PERSONAL INFORMATION OF ANYONE.

Information Collection And Use

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to, your email address, name, phone number, postal address ("Personal Information"). We collect this information for the purpose of providing the Services, identifying and communicating with you or facilitating communications between consumers and automobile dealerships. For more information about the



Communications Data

For customers of dealerships who utilize myKaarma services in the course of their transaction with that dealership, myKaarma, on behalf of such dealership it acts as a service provider to, may collect communications between the customer and the dealership related to the service and goods which are the subject of the transaction. Communication data collected may include text, digital audio and digital video.

Transaction Information

For customers of dealerships who utilize myKaarma services in the course of their transaction with that dealership, myKaarma, on behalf of such dealership it acts as a service provider to, may collect both information related to the services and goods provided by such dealership to the customer, which may include vehicle and contact information for the customers, as well as transaction payment information. myKaarma does not collect payment card information. For more information about the information collected by the dealership about you using myKaarma services, see your dealership's website for a copy of its privacy policy, or ask your service adviser.

Log Data

We may also collect information that your browser sends whenever you visit otherwise use the Services ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, and if applicable, the browser type, browser version, and information relating to web application or web site pages related to use of the Services, including statistical information about your use of the Services.

In addition, we may use third party services such as Google Analytics that collect, monitor and analyze this type of information in order to increase our Service's functionality. These third party service providers have their own privacy policies addressing how they use such information.

Cookies

Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and transferred to your device. We use cookies to collect information in order to improve certain Services provided for you or on behalf of a dealership for you.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The Help feature on most browsers provide information on how to accept



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mykaanma also utilizes certain cookies which may collect information during mobile transactions in order to improve service and are a required component of processing mobile transactions.

DoubleClick Cookie

Google, as a third party vendor, uses cookies to serve ads in certain instances of our Services. Google's use of the DoubleClick cookie enables it and its partners to serve ads to our users based on their visit to our Service or other web sites on the Internet.

You may opt out of the use of the DoubleClick Cookie for interest-based advertising by visiting the Google Ads Settings web page: <http://www.google.com/ads/preferences/>

Non-Personally Identifiable Data

Anytime you use the Services, we may gather certain non-personally identifiable information regarding the means you use to access the Services. 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. We use this information to help diagnose problems with our performance or the Services and administration of the Services, and to compile broad statistical data. In addition, we gather certain navigational information about particular web addresses/pages you may access during use of the Services. This information enables us to determine aspects of the Services which are most frequently visited and helps us to tailor the Services to the needs and interests of our users. Such information is gathered by us in the aggregate and will not be associated with a specific individual without that individual's consent.

Personally Identifiable Data

Certain Services may require you to provide personally identifiable data or information for services rendered by a dealership or associated dealership third party vendor. For the purposes of this privacy policy, the term "personal information" and "personally identifiable information" as used herein has the same definition as in Cal Civ. § 1798.80 (e). When such information is requested and/or required for the transaction, it may be communicated to the dealership or associated third party vendor through a secure portal, "Secure Vault" and collected as part of the transactional record by the dealership or associated third party vendor. Such information may include images or otherwise digitized documents which contain personally identifiable information including for example, a copy of your driver's license or government issued identification. For more information about the information collected by the dealership about you



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We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

Service Providers

We may employ third party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services and/or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Information only to perform specific tasks on our behalf and are obligated not to disclose or use your information for any other purpose.

Compliance With Laws

We will disclose your Personal Information where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Service.

Business Transaction

If myKaarma is involved in a merger, acquisition or asset sale, your Personal Information may be transferred as a business asset. In such cases, we may provide notice before your Personal Information is transferred and/or becomes subject to a different Privacy Policy. You should periodically check this policy for notice of any such changes.

Security

The security of your Personal Information is important to us, and we strive to implement and maintain reasonable, commercially acceptable security procedures and practices appropriate to the nature of the information we store, in order to protect it from unauthorized access, destruction, use, modification, or disclosure.

However, please be aware that no method of transmission over the Internet, or method of electronic storage is 100% secure and we are unable to guarantee the absolute security of the Personal Information we have collected from you.



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may differ than those from your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we transfer the information, including Personal Information, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Links To Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over, and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Dealership Services

You may be using Services which are provided on behalf of an automobile dealership such as an instance of the myKaarma appointment scheduler, or a payment made through the myKaarma online payment interface. In such cases, information is collected on behalf of the automobile dealership you are patronizing. This information may be passed to or from you, the dealership, and the Services, to a payment processor or to the automobile dealership's information systems, without any collection of such data by myKaarma. In other cases, myKaarma may process, store, or communicate information as part of and for the purpose of completing a business transaction between you and an automobile dealership. In performance of such Services on behalf of an automobile dealership, myKaarma may be required by government regulation to store certain information relating to automobile service, such as communications between you and the automobile dealership you are patronizing indicating your approval or rejection of automobile repair or related services or goods.

Children's Privacy

Only persons age 18 or older have permission to access our Service. Our Service does not address anyone under the age of 13 ("Children").

We do not knowingly collect personally identifiable information from children under 13. If you are a parent or guardian and you learn that your Children have provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from children under age 13 without verification of parental



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This Privacy Policy is effective as of the above indicated date and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we may notify you either through the email address you have provided us, or by placing a prominent notice on our website.

CCPA Consumer Rights

The CCPA provides consumers (California residents) 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 (whether collected directly or on behalf of a dealership) 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 (either



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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, 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.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to your respective dealership that you received services from, or to myKaarma directly, by either:

- Contact myKaarma by email or telephone at the address or phone number identified at the bottom of this notice.
- Contacting the dealership from whom you have purchased or otherwise received goods or services.

Only you or a person registered with the California Secretary of State 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.



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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 will 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. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. 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.

Contact Us

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

By email: privacy@mykaarma.com

By US Mail:

Attention: Privacy Department
Kaarya, LLC
100 W. Broadway Suite 300



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