Subject: Fwd: Fields Auto Group - Vendor Addendum/Risk Assessment - Action Required (vAuto)
From: Jane Copeland <jane@apinet.com>
Date: 6/8/23, 2:48 PM
To: Charles Willgren <charles@apinet.com>

VAUTO Response

Jane

Begin forwarded message:

> **From:** CAI - Privacy <privacy@coxautoinc.com>
> **Date:** June 8, 2023 at 1:49:16 PM CDT
> **To:** jane@apinet.com
> **Subject: RE: Fields Auto Group - Vendor Addendum/Risk Assessment - Action Required (vAuto)**

> Hello, The FTC Safeguard Rule/GLBA is not applicable to vAuto, as 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. Accordingly, we will be unable to sign the proposed agreement. Thank you for your business.
>
> **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:** Thursday, June 8, 2023 2:19 PM
> **To:** CAI - Privacy <privacy@coxautoinc.com>
> **Subject:** FW: Fields Auto Group - Vendor Addendum/Risk Assessment - Action Required (vAuto)
>
> **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 VAUTO 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 VAUTO 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=ihb
Risk Assessment: https://comserver.apinet.com/fields-compliance/risks/?d=ihb

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