



## OUR PRIVACY POLICY

SEPTEMBER 2022

### WHO WE ARE

Our company, [Data Driven Holdings \(DDH\)](#) is dedicated to serving the automotive industry. Through our industry-leading brands - [Team Velocity®](#), [Tier10®](#), [Advid®](#), [SocialDealer®](#), [OfferLogix®](#) and [Qualified Customer](#) - we deliver data-driven technology that powers intelligent advertising across every customer touchpoint, offering dealers and OEMs (our *Clients*) the most advanced sales and service marketing solutions in the business.

### OUR APPROACH TO PRIVACY

We are committed to protecting the privacy of personal information and the responsible use of that information to deliver personalized, relevant content to consumers on behalf of our *Clients*. This *Privacy Policy* applies to this website or mobile application and the websites and mobile applications of **DDH** and its affiliates (*Affiliates*) (collectively *we, us* or *our*) that display this *Privacy Policy* (collectively, *Sites*). We may also operate additional websites or mobile applications that are governed by their own privacy policies. This *Privacy Policy* describes our policies and procedures for the collection, use and disclosure of your information and data on these *Sites* and the services available through them (*Services*). Information we collect on behalf of *Clients* or that they collect and store in one of our applications is subject to their own privacy policies and practices. Our *Privacy Policy* applies only to personal information we collect on our own behalf.

Our *Website Terms of Use*, which is available through a link on this *Site*, govern your use of our *Sites* and the *Services* available through them. You understand that by using these *Sites* or *Services* you agree to the terms of both this *Privacy Policy* and the *Website Terms of Use*.

### INFORMATION WE COLLECT AND HOW WE COLLECT IT

The personal information we collect may include your name, address, zip code, phone number, email address, and other identifying information, and may also include information about vehicles you own or lease, such as sales and service transaction history, vehicle payments, VIN, and mileage (collectively, *Customer Data*). We collect *Customer Data* in a number of different ways and from a number of different sources. We collect *Customer Data* you provide us through our *Sites* or when using certain aspects of our *Services*. We may also collect *Customer Data* you provide to *Clients*, including dealerships and manufacturers, our authorized vendors, or *Affiliates* as well as information we obtain from third party databases (collectively, our *Partners*).

As part of our *Services*, we may serve as an intermediary between you and one of our *Clients* where we may have access to emails, calls, chats or texts. In this capacity, we would have the ability and authorization to read or listen and retain the content of those communications, including contact information. In all cases, the information we may retain and how we may use it are subject to this *Privacy Policy* and applicable law.

We may also collect usage information about how our *Sites* and *Services* are accessed and used. This may include information such as your computer's IP address, browser type, type of device used, pages on our *Sites* that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

### HOW WE USE AND SHARE YOUR INFORMATION

We use your *Customer Data* to provide information you request from *Clients* about their products or services, to respond to your inquiries, and to customize information and advertising that we believe may be of interest to

you. We may also use your **Customer Data** to provide you with marketing materials, as well as other information we believe may be relevant to you. We also use remarketing services to advertise to you on third party websites, such as Google, Bing, YouTube and Facebook and their partners. To control or opt out of any of their ad services, or to review their privacy policies, please visit their sites.

We may also use your **Customer Data** by combining it with non-personal information and aggregating it with information collected from others. We use this aggregated data in a number of ways, such as to improve the quality and value of our **Services** and to analyze and understand how our **Services** are used. In addition, we may provide aggregated data to our Partners so that they may understand how people use our Services or their own.

Your **Customer Data** may be shared with our **Partners** and may also be disclosed to third parties who work with us or our **Partners**. Dealerships and manufacturers, for example, may use that information to contact you. We may also work with third parties that provide certain functions or services on our behalf, such as analyzing data or authenticating contact information.

We require our third party service providers to contractually commit to protecting your **Customer Data** in accordance with both industry standards and applicable law. While we have implemented policies and procedures to protect **Customer Data**, we cannot control, and are not responsible for, the manner in which our **Partners** or other third parties use that **Customer Data**. Accordingly, you should review their privacy policies, as well.

## EXTERNAL LINKS

Our **Sites** or **Services** may contain links to other third-party websites. After you leave our **Sites**, we have no control over the information collected from or about you. We are not responsible, and assume no liability, for the privacy policies and/or practices on any third-party websites. This **Privacy Policy** only governs information collected by us on our **Sites**.

## COOKIES, ETC.

We use a number of technologies to automatically collect information, including cookies, tracking pixels and web beacons. “**Cookies**” are small text files sent from a web server that are stored on your device and enable a site to remember you or your preferences. We may use cookies to recognize you and optimize your experiences when visiting our **Sites** and using our **Services**. Tracking pixels are small images utilized to track a user, typically for advertising or analytics purposes. Web beacons allow data to be exchanged between systems. Our **Sites** may also be monitored by one or more third-party monitoring software(s) and may capture information about your visit that will help us improve the quality of our **Services**. We may use one or more of these technologies on our **Sites** to transmit information to you or about you and connect information about you from different sources, websites, devices, and mobile applications.

You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it. However, if you do not accept cookies, you may not be able to use all of the features of our **Sites** or **Services**. Some browsers incorporate a “**Do Not Track**” (**DNT**) feature that, when turned on, signals to websites and online services that you do not want to be tracked. However, as there is no accepted standard for how to respond to **DNT** signals, we do not currently support **DNT** signals, other than cookies.

## HOW WE PROTECT YOUR DATA

We use safeguards that satisfy generally accepted industry standards to preserve the integrity and security of your **Customer Data**. However, we cannot guarantee the security of information you provide us with certainty or warrant it will not be accessed, disclosed, altered, or destroyed by unauthorized persons. We will make all legally required disclosures of any breach of the security, confidentiality, or integrity of your **Customer Data**, in the manner and within the time periods required by applicable law. For further information, please review our **Data Safeguards FAQs**, available through a link on this **Site**.

## JURISDICTIONS

Your **Customer Data** is collected and used by us within the United States. We make no representation that our **Privacy Policy** complies with the laws of any foreign jurisdictions, including the European Union's General Data Privacy Regulation. If you choose to provide us with **Customer Data** from outside the United States, you do so at your own risk and are responsible for compliance with any applicable foreign laws.

## COMPLIANCE WITH LAW ENFORCEMENT

We cooperate with government and law enforcement officials, as well as private parties, to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties that we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process, including, but not limited to, subpoenas, to protect our property and rights or that of a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical or subject to legal action.

## OUR POLICY TOWARDS CHILDREN

Our **Sites** and **Services** are not targeted to or intended for use by children. We are concerned about the privacy and safety of children when they use the internet. Accordingly, we will not knowingly request **Customer Data** online from anyone under the age of 13 without prior, verifiable parental consent. Unfortunately, we cannot always determine the age of a visitor to our **Sites** or user of our **Services**.

## CORPORATE TRANSFERS

In connection with a corporate merger, acquisition, divestiture, asset sale, joint venture, bankruptcy, dissolution, reorganization, or any other similar transaction or proceeding, we may sell, divest, transfer, assign, share or otherwise engage in a transaction that involves some or all of our assets, including your **Customer Data**.

## OPTING OUT

If you wish to stop receiving email communications from us, you may "**unsubscribe**" using the link at the bottom of the email you receive. If you wish to be placed on our postal mailing "**Do Not Contact**" list, see the "**How to Contact Us**" section below and provide the name and address as listed on the mailing. To stop text communications, respond to the text with the words "**STOP**". You may also control ads appearing on your browser or mobile device by adjusting your settings or using third party ad blocking tools.

## CALIFORNIA PRIVACY RIGHTS

If you are a California resident, the *California Consumer Privacy Act (CCPA)* provides you with certain rights concerning your personal information, including the right to know how and for what purpose businesses collect it, the right to access your data, the right to opt-out of it being sold to third parties and, subject to certain exclusions for legitimate business purposes, the right to have it deleted. If you have further inquiries about your information under the *CCPA* or wish to opt-out, please contact us as specified below under **How to Contact Us**.

## CHANGES TO OUR PRIVACY POLICY

We may modify our **Privacy Policy**, at any time and for any reason, by posting the revised **Privacy Policy** on our **Site**. Your use of our **Sites** or **Services** after any such posting indicates your acceptance of our modified **Privacy Policy**.

## HOW TO CONTACT US

If you have any questions or concerns regarding your privacy when using our **Sites** or **Services**, or wish to exercise your rights under the *CCPA*, please click here to email us: [privacy@datadrivenholdings.com](mailto:privacy@datadrivenholdings.com). California residents may also call us tollfree at [1-888-565-6043](tel:1-888-565-6043). In certain circumstances, you may have the right to access, update or to delete the information we have on you. We will make every effort to respond promptly and address your concerns.