



OUR PRIVACY POLICY

UPDATED AUGUST 2025

WHO WE ARE

Our company, [Data Driven Holdings \(DDH\)](#) is dedicated to serving the automotive industry. Our industry-leading brands deliver data-driven technology that powers intelligent advertising across all advertising mediums - websites, direct mail, email, search, social - offering our clients (**Clients**), primarily dealerships and automotive manufacturers, the most advanced sales and service marketing solutions in the business.

OUR AFFILIATES

This policy applies to DDH and each of our affiliates (**Affiliates**) on whose websites it is posted.

OUR APPROACH TO PRIVACY

We are committed to protecting the privacy of your personal information (**Personal Information** or **PI**) and the responsible use of that information to deliver personalized, relevant content on behalf of our Clients. This **Privacy Policy** applies to the Personal Information that DDH and its affiliates (**Affiliates**) (collectively **we, us** or **our**) collect through our websites and other applications (our **Sites**) and the products and services we provide through them (our **Services**). This Privacy Policy describes our policies and procedures for the collection, use and disclosure of that information. Sites we operate on behalf of our Clients, and the services available through them, are also subject to the privacy policies and practices posted on those sites.

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

INFORMATION WE COLLECT

The Personal Information we collect may include:

- Your contact information (e.g., name, postal and email address, phone number)
- Information you provide when communicating with us via email, mail, call, chat or text
- Information about your vehicle - such as sales and service history, vehicle payments, VIN, and mileage
- Information required to process vehicle finance/loan applications and purchases, such as driver's license, insurance policy numbers, social security numbers and other financial and credit-related information
- Details about your online activity and other personal preferences when using our Sites and Services
- Social media details and other information you choose to share on those platforms
- Information about how you access and use our Sites and Services (e.g., computer IP address, browser, type of device used, Site pages visited, geolocation, time and date of visit)
- With respect to our employees and job applicants, we collect employment history, social media postings, and other standard personnel information, including SSNs, as required by law, and bank account information, so we may process direct deposits

HOW WE COLLECT INFORMATION

We collect Personal Information in a number of different ways and from a number of different sources, including:

- Information you choose to provide through our Sites or Services
- From our Affiliates
- From our Clients, including dealerships and automotive manufacturers
- From our subcontractors, vendors and other third party suppliers (our **Suppliers**), including advertising networks, credit reporting agencies, social media networks, data brokers, online lead providers and the like
- Automatically, from devices you use to connect to or interact with our Sites and Services
- Through communications with you - via email, mail, phone, chat or text - by or on behalf our Clients, where we would have the ability and authorization to read or listen to and retain the content of those communications.

How We Use Your Information

We use your Personal Information to:

- Provide our Services
- Communicate with you and respond to your inquiries
- Customize information we provide you, including contextual customization of ads based on your interactions with our Sites
- Promote and market our Services
- Advertise to you on third party websites (e.g., Google, Bing, YouTube, Facebook, Instagram)
- Facilitate financing in connection with a vehicle purchase or lease
- Operate our business and analyze our Sites and Services
- With respect to our employees and job applicants, to facilitate recruitment and manage personnel activities
- By combining your PI with non-personal information and aggregating it with information collected from others; we may use this aggregated data in a number of ways, such as to improve the quality and value of our Sites and Services
- To defend against or respond to actual or potential claims and litigation

We do not engage in profiling in furtherance of decisions that produce legal or similarly significant effects.

Who We Share Your Information With

We may share your Personal Information with:

- Our Affiliates
- Our Clients, including dealerships and automotive manufacturers
- Our Suppliers, that provide certain services or functions on our behalf
- In connection with an acquisition of our company or sale of our assets
- As otherwise required by applicable law

We do not sell your data.

We have implemented procedures to help ensure that our Suppliers who may have access to Personal Information operate in accordance with both industry standards and applicable law. These include conducting pre-engagement diligence and incorporating data safeguards provisions into our supplier contracts. While we have implemented policies and procedures to protect your Personal Information, we cannot control, and are not responsible for, the manner in which third parties use that information. Accordingly, you should review their privacy policies, as well as ours.

EXTERNAL LINKS; DATA USE BY THIRD PARTIES

Our Sites and 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 on those third-party websites. Our Sites and Services may also include third-party advertising and other programs offered by or in collaboration with third-party businesses (e.g. Google, Bing, YouTube, Facebook, Instagram). These third-parties may collect information from you when you interact directly with them or through their tracking technologies on our Sites. We are not responsible, and assume no liability, for the privacy policies and/or practices of any third-party and use of your information by third-parties is subject to their privacy policies and terms of use. Accordingly, we encourage you to visit their sites and review their policies.

COOKIES, ETC.

We use a number of technologies to automatically collect information, including cookies, tracking pixels and web beacons. Our Sites include a notice that we use “Cookies”, which 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 experience 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 third-party software that may capture information about your visit that will help us improve the quality of our Sites and 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 yet 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 employ data safeguards that comply with applicable federal and state law, including the updated FTC Safeguards, and in accordance with industry standards, to preserve the integrity and security of your Personal Information. 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 PI, in the manner and within the time periods required by applicable law. For further information, please review our **Data Security and Compliance FAQs**, available through a link on this Site.

DATA RETENTION

We retain your information only for as long as it is necessary and relevant for the purposes described in this Privacy Policy, and as required by applicable law. With respect to information provided by our Clients and their customers, we use that information for the sole purpose of providing services to those Clients and their customers. We do not sell client or customer data and cease using and promptly and securely remove it from our systems upon Client request or conclusion of our business relationship.

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 Personal Information 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.

JURISDICTIONS

Your Personal Information 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 PI 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 subpoenas, to protect our rights or that of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be, or may pose a risk of being, illegal, unethical or subject to legal action.

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 Personal Information.

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.

STATE PRIVACY LAWS

Some states have adopted privacy laws and regulations that provide their residents with additional rights (collectively, ***State-Specific Privacy Laws***). These states include **California** (pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act), **Virginia** (pursuant to the Virginia Consumer Data Protection Act), **Colorado** (pursuant to the Colorado Consumer Privacy Act), **Connecticut** (pursuant to the Connecticut Data Privacy Act) and **Utah** (pursuant to the Utah Consumer Privacy Act). If you are a resident of one of these states, then you have certain rights concerning your Personal Information, including:

- The right to know how and for what purpose we collect it
- The right to access your information and request corrections to inaccurate information
- The right to opt-out of it being sold to third parties
- The right to opt-out of targeted advertising
- Subject to certain exclusions for legitimate business purposes, the right to have it deleted

In addition, **Nevada** privacy laws requires website operators to provide a way for Nevada residents to opt-out of the sale of certain information that website operators collect about them.

Furthermore, **California** privacy laws provides employees and job applicants who are California residents with certain rights with respect to their Personal Information. Accordingly, such employees and job applications should review our Privacy Policy to see the types of PI we collect and how we use it.

We monitor federal and state law privacy law developments and will update our policies and procedures as more

states adopt State-Specific Privacy Laws, to comply with any new laws and enable residents of those states to exercise their rights thereunder.

If you have further inquiries about your information under a State-Specific Privacy Law, or are a resident of one of those states and wish to access, correct, opt-out or have your information deleted, please contact us as specified below under “**How to Contact Us**”. We will need to verify your identity before taking any action, in order to protect against the unauthorized disclosure or deletion of PI.

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.

HOW TO CONTACT US

If you have any questions or concerns regarding your privacy when using our Sites or Services, or are a resident of one of the states listed above and wish to exercise your rights under an applicable State-Specific Privacy Law, please click here to email us at: legal@datadrivenholdings.com. We will make every effort to promptly respond and address your concerns.