



## OUR PRIVACY POLICY

UPDATED NOVEMBER 2022

### WHO WE ARE

Our company, **Data Driven Holdings (DDH)** is dedicated to serving the automotive industry. Through our industry-leading brands - including **Team Velocity®**, **Tier10®**, **Advid®**, **SocialDealer®**, **OfferLogix®** and **Qualified Customer** - we deliver data-driven technology that powers intelligent advertising across all advertising mediums - including websites, direct mail, email, search and social - offering our clients, primarily dealerships and car manufacturers (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 your personal information (**Personal Information** or **PI**) and the responsible use of that information to provide you with 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 Services we provide to or on their behalf are subject to the privacy policies and practices of those Clients.

Our **Website Terms of Use**, which is available through a link on this Site, 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 about your vehicle - such as sales and service history, vehicle payments, VIN, and mileage;
- 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 sensitive PI such as SSNs, as required by law, and bank account information, so we may process direct deposits.

As a general matter, with the exception of employee records, we do not collect sensitive Personal Information from consumers.

### 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 car manufacturers;
- From our vendors and other third party suppliers (our *Partners*); and
- Automatically, from devices you use to connect to or interact with our Sites and Services.

As part of our Services, we may serve as an intermediary between you and one of our Clients, in which case we may have access to your communications with that Client (e.g., emails, calls, chats, texts). In this capacity, we would have the ability and authorization to read or listen to and retain the content of those communications. In all cases, the information we collect and how we may use it are subject to this Privacy Policy and applicable law.

## 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;
- Promote and market our Services;
- Advertise to you on third party websites (e.g., Google, Bing, YouTube, Facebook, Instagram);
- Operate our business and analyze our Services; and

We also use PI of employees and job applicants to facilitate recruitment and manage personnel activities.

We may also use your PI 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.

If you wish to control how your information is used by third party websites (e.g. Google, Bing, YouTube, Facebook, Instagram), please visit their sites and review their policies.

## HOW WE SHARE YOUR INFORMATION

In connection with providing our Services, we may share Personal Information with our authorized Partners. We have implemented Partner selection procedures to help ensure that our Partners who may have access to PI operate in accordance with both industry standards and applicable law. These include conducting pre-engagement diligence and incorporate data safeguards provisions into our vendor agreements. 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.

We may share your Personal Information with:

- Our Affiliates;
- Our Clients, including dealerships and their automotive manufacturers;
- Our Partners, with whom we may also share aggregated data;
- In connection with an acquisition of our company or sale of our assets; and
- As otherwise required by applicable law.

## EXTERNAL LINKS

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. We are not responsible, and assume no liability, for

the privacy policies and/or practices of any third-party. Accordingly, you should review their privacy policies, as well.

## DATA RETENTION

We retain your information for as long as it is necessary and relevant for the purposes described in this Privacy Policy, and as required by applicable law.

## 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 employ data safeguards that comply with applicable law and in accordance with generally accepted 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 Safeguards FAQs*, available through a link on this Site.

## 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, 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 Personal Information 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 Personal Information.

## 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)*, as amended by the *California Privacy Rights Act (CPRA)*, and, with the CCPA, *California Privacy Laws* provides you with 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;
- 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.

This Privacy Policy sets out the types of Personal Information we collect, how we use it, who we share it with, and for how long we retain it. We do not sell Personal Information. If you have further inquiries about your information under California Privacy Laws or wish to opt-out, 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.

Employees and job applicants who are California residents should review this Privacy Policy to see the types of PI we collect and how we use it. The California Privacy Laws also provide you certain rights with respect to 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.

## HOW TO CONTACT US

If you have any questions or concerns regarding your privacy when using our Sites or Services, or are a California resident and wish to exercise your rights under California Privacy Laws, 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**. In certain circumstances, you may have the right to access, update or delete the information we have on you. We will make every effort to respond promptly and address your concerns.