

CARPHORIA Dealer Services, parent company of TRADE-IN VALET, respects your privacy. This Privacy Statement informs you of our privacy practices and of the choices you can make about the way information about you, including from your online activity is collected and how that information is used by TRADE-IN VALET. This statement is readily available at the bottom of the TRADE-IN VALET introduction web page.

## 1. Scope of this Privacy Statement

This Privacy Statement applies to all TRADE-IN VALET-owned websites, domains, services, applications, and products, and those of our wholly owned subsidiaries (CARPHORIA Dealer Services sites or services'), except that a privacy policy or statement specific to a particular TRADE-IN VALET program, product, or service may supersede or supplement this Privacy Statement.

### Links to non-TRADE-IN VALET websites

TRADE-IN VALET sites or services may provide links to third-party applications, products, services, or websites for your convenience and information. If you access those links, you will leave the TRADE-IN VALET site. TRADE-IN VALET does not control those third party sites or their privacy practices, which may differ from TRADE-IN VALET's practices. We do not endorse or make any representations about third-party sites. The personal data you choose to provide to or that is collected by these third parties is not covered by the TRADE-IN VALET Privacy Statement. We encourage you to review the privacy policy of any site you interact with before allowing the collection and use of your personal information.

We may also provide social media features that enable you to share information with your social networks and to interact with TRADE-IN VALET on various social media sites. Your use of these features may result in the collection or sharing of information about you, depending on the feature. We encourage you to review the privacy policies and settings on the social media sites with which you interact to make sure you understand the information that may be collected, used, and shared by those sites.

## 2. Collection of personal information

TRADE-IN VALET may collect personal information from you in connection with

- product or service orders, activations, and registrations
- information requests
- marketing, newsletter or support subscriptions
- contest entries or survey participation

The types of personal information TRADE-IN VALET may collect from you includes:

- personal contact information, such as name, address, telephone number, and email address

If you post, comment, indicate interest or complaint, or share personal information, including photographs, to any public forum, social network, blog, or other such forum, please be aware that any information you submit can be read, viewed, collected, or used by other users of these forums, and could be used to contact you, send you unsolicited messages, or for purposes that neither you nor TRADE-IN VALET have control over. TRADE-IN VALET is not responsible for the personal information you choose to provide in these forums.

In addition to the information you provide, TRADE-IN VALET may also collect information during your visit to a TRADE-IN VALET website, web-based application, or a website “powered by” another company on behalf of TRADE-IN VALET, through our Automatic Data Collection Tools, which include Web beacons, cookies, and embedded Web links. These tools collect certain traffic information that your browser sends to a website, such as your browser type and language, access times, and the address of the website from which you arrived. They may also collect information about your Internet Protocol (IP) address, unique device identifier, clickstream behavior (i.e., the pages you view, the links you click, and other actions you take in connection with TRADE-IN VALET websites or “powered by” websites) and product information. TRADE-IN VALET may also use some of these Automatic Data Collection Tools in connection with certain emails and communications sent from TRADE-IN VALET and therefore may collect information using these tools when you open the email or click on a link contained in the email.

### 3. How we use your information

TRADE-IN VALET may use your information to:

- answer inquiries, provide information, support or advice about existing and new products or services
- manage our relationship with you
- update you on new services and benefits
- provide personalized promotional offers
- measure performance of marketing initiatives, ads, and websites “powered by” another company on TRADE-IN VALET’s behalf
- allow you to participate in contests and surveys
- personalize some TRADE-IN VALET websites
- assess and improve the performance and operation of TRADE-IN VALET websites
- to keep your contact details up to date and provide updated details to TRADE-IN VALET clients

### 4. How we share your information

TRADE-IN VALET will not sell, rent or lease your personal information to others except as described in this Statement. TRADE-IN VALET shares personal information in the following ways:

TRADE-IN VALET retains auto dealers as clients. To support our clients we provide our professional services to dealers and the information received on behalf of TRADE-IN VALET is shared with ONLY the

subscribing dealer. Dealers may not use it for any purpose other than to carry out the services requested by you via TRADE-IN VALET.

From time to time, TRADE-IN VALET participates in marketing initiatives with other companies, including websites “powered by” another company on behalf of TRADE-IN VALET. As part of these initiatives, certain TRADE-IN VALET services and marketing communications may be delivered at the same time as those from other companies. Some of these services and communications offer you the option to share personal information with both TRADE-IN VALET and the other companies participating in these initiatives. If you choose to provide personal information to the other companies, that personal information will be handled according to the privacy policy of those companies, which may differ from TRADE-IN VALET’s policies and practices.

Except as described in this Statement, TRADE-IN VALET will not share the personal information you provide to TRADE-IN VALET with non-TRADE-IN VALET third parties without your permission, unless to: (i) respond to duly authorized information requests of police and governmental authorities; (ii) comply with any law, regulation, subpoena, or court order; (iii) investigate and help prevent security threats, fraud or other malicious activity; (iv) enforce/protect the rights and properties of TRADE-IN VALET or its subsidiaries; or (v) protect the rights or personal safety of TRADE-IN VALET, our employees, and third parties on or using TRADE-IN VALET property when allowed and in line with the requirements of applicable law.

Circumstances may arise where, whether for strategic or other business reasons, TRADE-IN VALET decides to sell, buy, merge or otherwise reorganize business. Such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or the receipt of it from sellers. It is TRADE-IN VALET’s practice to seek appropriate protection for information in these types of transactions.

#### 5. Children's privacy

TRADE-IN VALET does not knowingly collect information from children as defined by local law, and does not target its websites or mobile applications to children under these ages. We encourage parents and guardians to take an active role in their children’s online and mobile activities and interests.

#### 7. Keeping your information secure

TRADE-IN VALET takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the information, TRADE-IN VALET utilizes reasonable and appropriate physical, technical, and administrative procedures to safeguard the information we collect and process. TRADE-IN VALET retains data only as required or permitted by local law and while it has a legitimate business purpose.

#### 8. Changes to this statement

If we modify our Privacy Statement, we will post the revised statement here, with an updated revision date. If we make significant changes to our Statement that materially alter our privacy practices, we may also notify you by other means, such as sending an email or posting a notice on our corporate website and/or social media pages prior to the changes taking effect. This privacy policy was last updated on November 2015.

#### 9. Automated Information

Information regarding your use of the CARPHORIA DEALER SERVICES Sites may be collected and/or aggregated through the use of automated means. This automatically collected information may include information such as:

1. your IP address, the type of browser and operating system used;
2. date and time you access the CARPHORIA DEALER SERVICES Site and pages you visit, and if you linked from or to another website, the address of that website;
3. email you open and links you click on within those email; and
4. Your ISP or mobile carrier, and the type of handheld or mobile device that you used.