

Our dealership (“we,” “our,” or “us”) takes your privacy very seriously. This Privacy Policy explains how we collect, use, and share information, including personal information. This Privacy Policy applies any time that we collect information from or about individuals or households, whether online or offline. This includes information collected through our website and applications that run on mobile devices or tablets (the “Services”), at our dealerships or retail stores, at our parts and service center, at events, in connection with sweepstakes and contests, and through our call center. It also applies to information we receive from a third-party or other source, including when you connect with or tag us on social media networks.

1. ACCEPTANCE OF THIS PRIVACY POLICY

By disclosing your personal information to us, using our Services or interacting with us offline or online, you consent to our collection and use of your personal information in a manner that is consistent with applicable law and this Privacy Policy. If you do not accept this Privacy Policy, you are not authorized to use our Services and must discontinue using them immediately.

2. PERSONAL INFORMATION WE COLLECT

In conducting every aspect of our business, we may collect personal information. Such information may include, without limitation: your first, middle and last name; home and mailing addresses; email addresses; telephone numbers; credit or debit card number or other payment method; credit history, driving history, insurance information, age, gender, billing information; and other types of Personal Information that you choose to provide to us or that we may obtain about you. We collect personal information in three ways:

Information You Provide to Us: We collect information you provide to us. This may include, for example, when you transact business with us, use our Services, enroll in one of our e-mail reminder services, request information or materials from us, enter promotions or contests offered by us, register for or attend our events, use any of the interactive portions of our website, register on the customer portal, test-drive or purchase a vehicle from us, call our customer service team, communicate with our sales team, respond to a survey, make payments to us, purchase products or other services from us, communicate with us in any way, respond to our advertisements, or apply for employment with us.

Information We Collect from Other Sources: We may collect information about you from other users, dealerships, car manufacturers, and other third parties. For example, we may obtain contact details and other information about you from:

- social media networks when you grant permission to access your data on one or more networks;
- businesses with which we offer co-branded services or engage in joint marketing activities; and/or
- publicly-available sources and data suppliers from which we obtain data to validate or supplement the information we hold.

Information We Collect Automatically: When you use our Services (i.e. visit our website or use applications that run on mobile devices or tablets), some information is automatically collected. For example, when you visit our website your computer’s operating system, Internet Protocol (IP) address, access times, browser type and language, the search engine you used to locate the website, and the website you visited before our site are logged automatically. We also collect information about your usage and activity and information about your device, such as your device and operating system type, wireless carrier, and device IDs, on our mobile applications. In addition, we gather certain navigational information about where you go on our website. This information enables us to determine which areas of the website are most frequently visited and helps us to tailor the sites to the needs and interests of our online visitors.

3. HOW WE USE PERSONAL INFORMATION

We may use your personal information and Other Information to: (i) provide you with Services or process transactions that you have requested; (ii) carry out the purposes for which you provided the information; (iii) improve our Services; (iv) process any applications, forms, requests, inquiries, or other information you submit through the Website or any other Communications; (v) manage our contractual relationship with you; (vi) administer and process payments; (vii) attend to tasks relating to your transactions with us; (viii) provide customer service; (ix) personalize the Services according to your personal preferences; (x) update account information; (xi) inform you of events, programs, products or services that may be of interest to you; (xii) customize the content or functionality of Website to your preferences; (xiii) respond to your Communications; (xiv) communicate with you about the Website, our Services and/or other activities related to the Website or Services; (xv) conduct data analysis, audits, security and fraud monitoring and prevention; (xvi) develop new goods and services; (xvii) enhance, improve or modify our Services; (xviii) identifying usage trends; (xix) determining the effectiveness of our promotional campaigns; and (xx) operate and expand our business activities.

We may use personal information we have collected and aggregated, or anonymized personal information received from third parties, to understand more about our users (for example, we may use aggregated information to calculate the percentage of our users who have a particular telephone area code). This includes demographic data, inferred commercial interests, and other information we may collect from you or from third parties.

4. HOW WE SHARE PERSONAL INFORMATION

We may share your personal information with the third parties described below.

Service Providers. We may share your personal information with third parties who work on behalf of, or with, us such as vendors, processors, suppliers, agents, attorneys, and representatives (collectively, “Service Providers”). Service Providers assist us with a variety of functions including, but not limited to, fulfilling our customers' product orders, sending marketing communications, assisting with advertising and related analytics, delivering packages, scheduling and performing maintenance, servicing products, providing management services, conducting research or surveys, sending regular mail and e-mail, maintaining databases, or processing credit card payments.

Business Partners. We may share your personal information with third-party business partners including other dealers, product suppliers, vehicle or part manufacturers, product manufacturers, partners who we conduct joint-marketing activities with, partners who we offer a co-branded service with or provide advertising and related-analytics services to us (collectively, “Business Partners”).

Affiliate Companies. We may share personal information with our affiliated entities within the Frank Motor Group and our parent company (collectively, “Affiliate Companies”).

Disclosures Under Special Circumstances. We may disclose your personal information to third parties: (i) where we have a good faith belief that such disclosure is necessary to meet any applicable law, regulation, legal process or other legal obligation; (ii) when we believe disclosure is necessary to protect or prevent harm, illegal activity, or financial loss; (iii) to detect, investigate and help prevent security, fraud or technical issues; and (iv) to cooperate with law enforcement, government, quasi-governmental and public agency requests or reporting requirement. For the purpose of this Privacy Policy, third parties who receive personal information in accordance with this section shall be referred to as “Special Circumstance Recipients.”

Corporate Transactions. We may transfer your personal information in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or

disposition of all or any portion of our ownership interest, business or operations. For the purpose of this Privacy Policy, third parties who receive personal information in accordance with this section shall be referred to as “Corporate Transaction Recipients.”

5. COOKIES AND OTHER COLLECTION TECHNOLOGY

We use cookies and similar technologies to collect information about your activity, browser and device when you visit our Websites or websites where our ads appear. A cookie is a small data file that a website transfers to your computer’s hard drive. Cookies allow us to collect information such as browser type, time spent on the Websites, pages visited, referring URL, language preferences, and other aggregated traffic data. Similar technologies such as pixel tags, web beacons, clear GIFs, links in emails, JavaScript, device IDs assigned by Google or Apple, web storage, unique advertising identifiers and device ID technology also do the same thing. We use the term “Collection Technology” in this Privacy Policy refer to all technologies that collect information in this way.

We use the information collected through Collection Technology for security purposes, to facilitate navigation, to display data more effectively, to personalize your experience while using the Websites and to recognize your computer to assist your use of the Websites. We also gather statistical data to continually improve design and functionality, understand how the Websites are used and assist us with resolving questions. Collection Technology further allows us to select which advertisements or offers are most likely to appeal to you and display them while you are using the Websites or to send marketing emails. We also use Collection Technology to track responses to online advertisements and marketing emails.

If you want to remove or block Collection Technology from your device at any time, you can update your browser settings (consult your browser’s “help” menu to learn how to remove or block cookies). You can find instructions on how to manage Collection Technology on different types of web browsers at www.allaboutcookies.org.

6. “DO NOT TRACK” DISCLOSURE

We do not collect or respond to Do Not Track signals and our websites do not function differently based on any Do Not Track preferences that may be received. For more information on Do Not Track signals, please visit <https://allaboutdnt.com/>

7. ANALYTICS SERVICES

We also use analytics services provided by third parties, such as Google Analytics. These companies use Collection Technology to collect and store information about the use of the Websites and the use of other websites, apps and online resources. You can read Google’s privacy policy, which applies to Google Analytics, at <http://www.google.com/intl/en/policies/privacy/>. You also can opt-out from being tracked by Google Analytics in the future by downloading and installing Google Analytics Opt-out Browser Add-on for your current browser <https://tools.google.com/dlpage/gaoptout>.

8. THIRD-PARTY ADVERTISERS

We may use third-party advertising companies to serve advertisements regarding goods and services that may interest you when you access and use the Websites or the Apps, other websites or apps or other online services. To serve such advertisements, these companies place or recognize a unique cookie on your browser (including through use of pixel tags). If you would like more information about this practice, and to learn about your choices in connection with it, please visit <http://www.aboutads.info/> or http://www.networkadvertising.org/managing/opt_out.asp. To opt out of the practice, you may download the AppChoices app at www.aboutads.info/appchoices.

9. LINKING TO OTHER SITES

Our website may contain links to other sites that we do not own or operate. We do not control, recommend or endorse and are not responsible for these sites or their content, products, services or privacy policies or practices. These other sites may send their own cookies to your Device, they may independently collect information about you or form you, and may or may not have their own published privacy policies. You should also independently assess the authenticity of any website which appears or claims that it is our website (including those linked to through an email or social networking page).

10. PROTECTION OF PERSONAL INFORMATION

We store your information using reasonable physical, technical and administrative safeguards. Please be aware that the Services and data storage are run on software, hardware and networks, any component of which may, from time to time, require maintenance or experience problems or breaches of security beyond our control. In addition, no transmission of data over the internet is guaranteed to be completely secure. It may be possible for third parties not under our control to intercept or access transmissions or private communications unlawfully. We cannot ensure or warrant the security of any information you transmit to us over the internet.

11. CHILDREN

The Website is not designed to solicit information from individuals under the age of 16. We do not knowingly collect or store any personal information from anyone under the age of 16. If we become aware that we have collected or stored personal information from an individual under age 16, we will remove his or her personal information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to ccpa@frankmotors.com.

12. MARKETING COMMUNICATIONS

If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out by contacting us by email at ccpa@frankmotors.com or by following the instructions in any such email you receive from us. We will try to comply with your request as soon as reasonably practicable. If you opt out of receiving marketing emails from us, we may still send you important administrative messages, from which you cannot opt out.

13. UPDATING YOUR PERSONAL INFORMATION

In certain circumstances, you may be able to review and request changes to your personal information on the Website or by contacting us at ccpa@frankmotors.com.

14. CHANGES TO THIS PRIVACY POLICY

The Privacy Policy may be revised from time to time. The “Last Updated” legend at the bottom of this page indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Statement on any of our Websites. Your use of the Services following these changes means that you accept the revised Privacy Statement.

15. CONTACT US

If you have any questions or concerns about this Privacy Policy or our privacy practices, please contact us at ccpa@frankmotors.com.

16. PRIVACY RIGHTS OF CALIFORNIA RESIDENTS

The California Consumer Privacy Act (“CCPA”) affords California consumers certain rights over their personal information (subject to certain exceptions). This section of our Privacy Policy outlines those rights and explains how such rights may be exercised. This section also summarizes our data collection and sharing practices, as required by the CCPA. Terms used but not defined shall have the meaning ascribed to them in the CCPA. For purposes of this section of the Privacy Policy only, “personal information” generally means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

We Do Not Sell Personal Information

We do not sell personal information to third-parties. We also do not share any personal information with third-parties for the third-parties’ marketing purposes.

We Do Not Knowingly Collect the Personal Information of Children

The Website is not designed to solicit information from individuals under the age of 16. We do not knowingly collect or store any personal information from anyone under the age of 16. If we become aware that we have collected or stored personal information from an individual under age 16, we will remove his or her personal information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to ccpa@frankmotors.com.

Summary of Collection and Disclosure of Personal Information

The below chart lists the categories of personal information that we have collected about California consumers in the 12 months preceding the Last Updated date below as well as the categories of third-parties with whom we shared that category of personal information.

Category of Personal Information	Categories of Third-Parties To Whom Information Was Disclosed
<p>Identifiers</p> <p>Examples: real name; alias; postal address; telephone numbers; unique personal identifier; online identifier; Internet Protocol Address; email address; account name, social security number, driver’s license number, passport number and other similar identifiers.</p>	<p>CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Car Manufacturers, Parts and Service Companies, Government Agencies, Lead Generation Companies, Vehicle History Report Companies, Social Media Companies, Management Companies, Affiliate Companies, Credit Reporting Companies, and Third-parties Designated by the Consumer.</p>

<p>Any categories of personal information described in subdivision (e) of Section 1798.80</p> <p>Examples: name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p>	<p>CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Car Manufacturers, Parts and Service Companies, Government Agencies, Lead Generation Companies, Vehicle History Report Companies, Social Media Companies, Management Companies, Affiliate Companies, Credit Reporting Companies, and Third-parties Designated by the Consumer.</p>
<p>Characteristics of protected classifications under California or federal law</p> <p>Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<p>CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Car Manufacturers, Parts and Service Companies, Government Agencies, Lead Generation Companies, Vehicle History Report Companies, Social Media Companies, Management Companies, Affiliate Companies, Credit Reporting Companies, and Third-parties Designated by the Consumer.</p>
<p>Commercial Information</p> <p>Examples: records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Car Manufacturers, Parts and Service Companies, Government Agencies, Lead Generation Companies, Vehicle History Report Companies, Social Media Companies, Management Companies, Affiliate Companies, Credit Reporting Companies, and Third-parties Designated by the Consumer.</p>
<p>Internet or other electronic network activity information</p> <p>Examples: browsing history; search history; and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.</p>	<p>Advertising Networks, Data Analytics Companies</p>

<p>Geolocation data:</p> <p>Examples: the geographic location (latitude and longitude) of an Internet-connected device such as a cell phone, tablet or computer or any other device connected to the internet and used to visit our Websites or use our Software.</p>	<p>Advertising Networks, Data Analytics Companies</p>
<p>Audio, electronic visual, thermal, olfactory of similar information</p> <p>Examples: information from voicemail messages and/or recorded phone calls, video surveillance at our dealership</p>	<p>CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Call Center Companies, Social Media Companies, Management Companies, and Affiliate Companies.</p>
<p>Professional or employment-related information</p> <p>Examples: job history, current employer, prior employers, dates of employment, salary and bonus information.</p>	<p>CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Car Manufacturers, Parts and Service Companies, Government Agencies, Lead Generation Companies, Vehicle History Report Companies, Social Media Companies, Management Companies, Affiliate Companies, and Third-parties Designated by the Consumer.</p>
<p>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))</p> <p>Example: Information regarding whether a consumer is or will soon be a college graduate</p>	<p>CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Car Manufacturers, Parts and Service Companies, Government Agencies, Lead Generation Companies, Vehicle History Report Companies, Social Media Companies, Management Companies, Affiliate Companies, and Third-parties Designated by the Consumer.</p>

<p>Inferences drawn from other personal information</p> <p>Examples: information used to create a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<p>CRM Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Advertising Networks, Data Storage Companies, Data Analytics Companies, Call Center Companies, Financial and Lending Institutions, Car Manufacturers, Parts and Service Companies, Government Agencies, Lead Generation Companies, Vehicle History Report Companies, Social Media Companies, Management Companies, Affiliate Companies, and Third-parties Designated by the Consumer.</p>
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Right to Know/Access Personal Information Collected, Disclosed, or Sold.

A consumer has the right to request that we disclose the following information to the consumer or his or her authorized agent:

- (1) The categories of personal information that we have collected about that consumer;
- (2) The categories of sources from which the personal information was collected;
- (3) The business or commercial purpose for collecting or selling the personal information;
- (4) The categories of third parties with whom we share the personal information; and/or
- (5) The specific pieces of personal information we have collected about that consumer.

To submit a verifiable consumer request for this information, please click [here](#) or call us at 888-853-1712. When submitting such a request, please indicate that you are making a Right to Know request and provide the consumer’s full name, address, telephone number, date of birth, and email address. Once you submit a request, we will use the information you provide to attempt to verify the consumer’s identity by comparing the information provided to the information collected and/or maintained by us. We will respond to your request according to the time periods mandated by the CCPA.

Authorized agents may also request this information on a consumer’s behalf. If you are an authorized agent making a Right to Know request on behalf of a consumer, then please state so in your request and provide both the information listed above concerning the consumer and your full name, address, telephone number and email address. If you are a parent or legal guardian making the request on behalf of your minor child, please also state so in your request.

Right to Request Deletion of Personal Information

A consumer has the right to request that we delete any personal information about the consumer that we have collected or that we maintain. To submit a verifiable consumer request for deletion of information, please click [here](#) or call us at 888-853-1712. When submitting such a request, please state that you are making a Right to Deletion request and provide your full name, address, telephone number, date of birth, and email address. We will use that information to attempt to verify the consumer’s identity by comparing the information provided to the information collected and/or maintained by us. We will respond to your request according to the time periods mandated by the CCPA.

Authorized agents may also request this information on a consumer’s behalf. If you are an authorized agent making a Right to Know request on behalf of a consumer, then please state so in your request and provide both the information listed above concerning the consumer and your full name, address, telephone number and email address. If you are a parent or legal guardian making the request on behalf of your minor child, please also state so in your request.

Right to Not Be Discriminated Against

California consumers have the right not to receive discriminatory treatment from us for the exercise of the privacy rights conferred by CCPA.

Authorizing an Agent to Exercise Your Rights

California consumers have the right to designate an authorized agent to exercise the CCPA rights. To designate an authorized agent, you must either provide the agent with an executed power of attorney or provide the authorized agent with written permission, signed by you, to exercise your CCPA rights. The agent must also be registered with the California Secretary of State.

Individuals with Disabilities

If you have a disability and need access to our Privacy Policy in a different format, please contact us at ccpa@frankmotors.com. You may also download a copy of our Privacy Policy here.

Last Updated: January 1, 2020

Effective Date: January 1, 2020