

January 1, 2016

Amended on January 1, 2020

This Privacy Notice explains our data collection and privacy practices for users of the public pages of our website, us.dealertrack.com. If you do not agree to these practices, please do not continue to use this site. Your continued use of this site constitutes your agreement to the following terms. This Privacy Notice applies only to those pages of our site that are available to the general public. It does not apply to pages that require a subscription or password for access. As used in this notice, "site" means our public website and all of its pages.

We collect information about users of our site. This user information consists of your activity navigating through our site, your use of demonstration materials or interactive pages, and similar information. We also collect any information you provide to us—including non-public personal information such as name, employer, address, email address or other information—when you use this site, such as when you request information about our products or services. We reserve the right to share this data with affiliated and non-affiliated third parties for any purposes to the extent permitted by applicable law. If you do not want us to collect and use information, please do not provide it to us.

We collect anonymous traffic data on our site through the use of cookies, a small file containing a string of characters that uniquely identifies your browser. When you visit our site, we set one or more cookies in your browser. We use cookies to improve the quality of our service, including for storing user preferences, tracking site visits, and providing information to you while on our site. The Help feature on most Internet browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you set your browser to decline cookies, you may not be able to get the benefit of the features of this website or other websites that you visit.

Our servers may automatically record information that your Internet browser sends whenever you visit our site. These server logs may include information such as your Web request; the Internet Protocol (IP) address you use to connect your computer to the Internet; the full Uniform Resource Locator (URL) click stream to, through, and from our Web site, including date and time of your visit; browser type; and browser language.

We also use third party advertising companies to serve ads on our behalf across the Internet. These third-party companies employ cookies and web beacon (also referred to as retargeting pixels, 1x1gifs, or action tags) technology to measure and improve the effectiveness of ads for their clients. Web beacons may be used to deliver the cookie and compile statistics about our website, such as how many people visited a particular page or clicked on certain links. While your particular use of the site will not be revealed and no personally identifying information is collected through cookies or web beacons, this anonymous information may be used for online preference marketing purposes and our third party advertising companies may use the information about your visit to our website in order to provide ads about goods and services that may be of interest to you. This information may include the date/time of the banner ad shown, related cookie, and the first three octets of the IP address. We may also share aggregated statistics about the use of our website with third parties.

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. Because there is not yet an accepted standard for how to respond to a DNT signal, we do not currently respond to DNT signals on this website or on websites where we provide advertisements, content, or other services.

If you apply online for a job at Dealertrack or create an online profile for employment purposes, the personal information you provide will be used to process your application and communicate with you

regarding the status of the position or, in our discretion, for other potential positions. We may share the information you provide with third party service providers that perform services on our behalf in connection with filling open positions. These service providers are not authorized by us to use or disclose such information except as necessary to perform services on our behalf or to comply with applicable law. We also may transfer your information to an entity to which we sell or transfer all or a portion of our business or assets. In addition, we may disclose information about you if we are required to do so by applicable law or legal process or as may be requested by law enforcement or regulatory authorities. By creating an online profile for employment purposes, you represent that the information you submit is true, complete, and accurate in all respects. If you would like to update or delete your profile, you may do so at any time by logging into your account.

When you access our website on your mobile device, we may receive information about your location and your mobile device. We may use this information to provide you with location-based services, such as advertising, search results, and other personalized content. Most mobile devices allow you to turn off location services. Most likely, these controls are located in the device's settings menu. See your mobile device guide for additional details.

Our site may present links to other websites in a format that enables us to keep track of whether and how often these links have been followed. Once you leave our site by linking to another site, we assume no responsibility for the information collection or privacy practices of that site and you should read their privacy notice before providing any information.

We may periodically change the terms of this Privacy Notice. When we do so, we will post the revised date at the top of the page in the same manner as the date appears here. You should check here for changes in our practices when you visit our site.

If you have questions about our data collection, sharing, and privacy practices, please send us an email at privacy@dealertrack.com.

YOUR CALIFORNIA PRIVACY RIGHTS

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Statement of Dealertrack, Inc. and its subsidiaries (collectively, “we,” “us,” or “our”), a Cox Automotive, Inc. company, and applies solely to consumers who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

Dealertrack collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual consumer, household, or device (“personal information”). We have collected at least one of the following examples, taken directly from California Consumer Privacy Act, within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address,	YES

	account name, Social Security number, driver's license number, passport number, or other similar identifiers.	
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A 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. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	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).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C.	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student	YES

Section 1232g, 34 C.F.R. Part 99)).	identification codes, student financial information, or student disciplinary records.	
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from our customers or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our websites. For example, APIs to allows partners to forward leads(customer) information to Dealertrack, apply for credit on behalf of the customers, provide the payment breakdown (taxes, fees, products) and vehicle information for deals and provide dealership reporting solutions.
- From third-parties that interact with us in connection with the services we perform.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law
- Category D: Commercial information
- Category G: Geolocation data.
- Category I: Professional or employment-related information.
- Category J: Non-public education information

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.

- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information.

Your Rights and Choices

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

California Civil Code Section 1798.83 entitles California users to request information concerning whether a business has disclosed certain information about you to any third parties for the third parties' direct marketing purposes. California users who wish to request further information in compliance with this law or have questions or concerns about our privacy practices and policies may contact us as specified in the "How to Contact Us" section below.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected about you and retained, subject to certain exceptions in the CCPA. Once we receive and confirm your verifiable consumer request, we will delete your personal information from our records, unless an exception applies, and we will direct our service providers to similarly delete your personal information from their records.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a “verifiable consumer request” (defined below) to us by either:

- Calling us at 1-800-964-8735.
- Visiting: <https://us.dealertrack.com/content/dealertrack/en/dr fis-ccpa.html>

Only you or someone you authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

A verifiable consumer request must:

- Provide enough information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with enough detail that allows us to properly understand, evaluate, and respond to it.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not deny you goods or services, charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties, provide you a different level or quality of goods or services, or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Do Not Track

Online Tracking Policy for California Residents. As of the effective date of this Privacy Statement, there is no commonly accepted response for Do Not Track signals initiated by browsers, therefore we do not respond to them.

How to Contact Us

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: <https://us.dealertrack.com/>

Email: privacy@coxautoinc.com

Postal Address: Cox Automotive, Inc.

Attn: Scott Hilsen, Chief Compliance & Privacy Officer

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