

## General Statement

LotLinx has two separate marketing/advertising functions. Firstly, we market our customers' (auto dealers) inventory to shoppers currently searching the Internet with the intent to purchase, and secondly, we acquire clients that are interested in using the LotLinx Business Services (sometimes just referred to as "LotLinx AI Services").**[1]** We've divided up our two functions, below into their own sections to highlight the separate methods LotLinx uses to achieve their goals and communicate to you how we collect and use the information gathered under these two functions.

In addition to our primary functions, above, LotLinx may collect information on its primary website (www.lotlinx.com) and affiliated sites related to information inquiries, technical support, events and promotions, employment inquiries, and job applications. This Privacy Statement applies to personal information – information that identifies you or reasonably can be linked to information that identifies you – that LotLinx collects through your use or interaction with our websites, applications, social media, software, and other services provided by or on behalf of LotLinx (collectively "LotLinx General Services" or "General Services").

*Special Notice to citizens of the EU visiting any LotLinx or LotLinx-Affiliated Sites:* LotLinx does not offer products or services to citizens of the EU nor do we collect personal information, as that is defined under the European Union's General Data Privacy Regulation (GDPR). Independent third-parties may advertise on the LotLinx Site(s). LotLinx is not responsible for the privacy practices of these third parties, and we encourage you to visit their sites and read their privacy policies related GDPR policies.

## Summary

### INFORMATION WE COLLECT

The information we collect through our LotLinx AI and General Services *may* include all or some of the following:

- your contact information (name, postal or email address, phone number, etc.) (***only if you give that to us to sign up for services, request information, or make an inquiry***);
- information about the device you use to connect or interact with our General Services, including geo-location;
- details about your online activity, use and interaction with our General Services;
- your vehicle information;
- your shopping and other preferences; and
- social media details and any other information you choose to share.

### HOW WE COLLECT INFORMATION

We collect information about you from a variety of sources, including:

- details you choose to provide via our General Services;
- from our affiliates;
- from our business customers;
- from outside, third-party sources; and
- automatically, from devices that you use to connect or interact with to our AI or General Services.

## **HOW WE USE YOUR INFORMATION**

We may use the information we collect to:

- provide the AI Services;
- communicate with you;
- provide and promote our products and Services;
- market products and services of interest to you;
- operate our business;
- analyze the use of our products and services;
- facilitate employee recruitment; and
- comply with applicable laws, rules and our policies.

## **INFORMATION SHARING**

We may share the information we collect:

- within our enterprise;
- with our suppliers;
- with our affiliates, Dealers, Dealer Associations, and business customers;
- with our marketing partners;
- as we otherwise may notify you; and
- as LotLinx or its assets are acquired.

## **LotLinx Website and LotLinx Services**

LotLinx values the privacy of its dealer customers and users who respond to LotLinx' information on the Internet. This section of the privacy statement explains our policies and practices regarding the different ways LotLinx may collect and use dealer customer information and an online user's information when someone comes to our website or uses our Services. It is through this disclosure that we intend to provide you with a level of comfort and confidence in how we collect, use, and safeguard personal and other information we collect or that you provide through our website and those of our Affiliates, and how you can contact us if you have any questions or concerns. By using this or any of our branded or the LotLinx-specific sections of our affiliated sites, or our Services, you agree to the terms of this privacy statement. For

information regarding the enrollment in the LotLinx Services, see Terms and Conditions and Terms of Use Document.

### **LotLinx Adserving**

This privacy statement also explains our policies and practices regarding the different ways LotLinx may collect and use shopper intent information and an online user's information gathered through our adserving. By interacting with our adserver, you agree to the terms of this privacy statement.

### **Information About Our Organization and General Data Collection Practices**

#### **LotLinx Website and LotLinx Services**

This information applies to lotlinx.com (referred to herein as the "site" or "website"), which is operated and the content is controlled by LotLinx, Inc., and describes how information about shoppers searching online for vehicle inventory from our Dealer customers is collected and used. LotLinx also affiliates with websites owned and administered by third parties, including our vehicle dealer customers whose websites provide visitors with: (1) specific vehicle inventory; (2) financing information; (3) purchasing-related information such as available incentives, services, and dealership contacts; and (4) the ability to save and share certain content, including an individual's name, address, telephone number, and email. Only information provided on a LotLinx owned website is subject to the privacy policies in this privacy statement. When personally identifiable information is provided to our Dealer customers, independent Affiliates, and other third parties who are independent from LotLinx it will be subject to the privacy policies located on those third-party websites. We are not responsible for the privacy practices of these third parties, and we encourage you to read their privacy policies, which may apply to these third-party programs. Some third-party advertising companies may provide a mechanism to opt-out of their tracking or advertising.

#### **LotLinx Adserving**

LotLinx serves ads on behalf of our clients (automotive dealers). These dealers may collect information, both personally identifiable information and non-identifiable information. Please be sure to view their websites privacy policies.

#### **Online Tracking Information**

#### **LotLinx Website and LotLinx Services**

We may collect information about your use of our Services (such as IP address and browser type), as well as the type of devices you use to connect to the Services by automated means, including tracking. Vendors acting on our behalf may use cookies, pixel tags, web beacons or other similar technologies to operate their services. Most browsers can be configured not to

accept cookies, however, this may prevent you from having access to some functions or services on our sites. When you visit this site, or our third-party advertising partners, analytics providers may collect information about your online activity over time and across websites. This information may include identifiers that may permit those parties to serve tailored ads to your device. For more information about third-party advertising partners' collection and use of such data for interest-based advertising purposes (and opting out of such use), see "Interest-Based Online/Behavioral Advertising" below. Because there is not yet a common understanding of how to interpret web browser-based "Do Not Track" ("DNT") signals other than cookies, LotLinx does not currently respond to undefined "DNT" signals to its US websites.

LotLinx will never use nor allow an Affiliate to use identifiable customer Data gathered via pixel tracking for cross targeting.

### **LotLinx Adserving**

We may collect information about your use through the display of our ads (such as IP address and browser type), as well as the type of devices you use to view the ads by automated means, including tracking. Vendors acting on our behalf may use cookies, pixel tags, web beacons or other similar technologies to operate their services. Most browsers can be configured not to accept cookies, however, this may lead to poorer less relevant ads being displayed. When you visit this site, or our clients' sites, analytics providers may collect information about your online activity over time and across websites. This information may include identifiers that permit us to serve tailored ads to your device. For opt out of our tailored ads  
<http://ads.lotlinx.com/cookies.php>

### **Personally-Identifiable Information We Collect from You**

#### **LotLinx Website and LotLinx Services**

When you visit our website [www.lotlinx.com](http://www.lotlinx.com) we will not collect any personally identifiable information about you unless you provide it to us voluntarily, requesting information about the LotLinx products and services, or making another direct inquiry. For purposes of this Privacy Statement, "personally identifiable information" is information that identifies you as an individual, for example your name, street address, telephone number, e-mail address and credit card number. If you opt not to provide us with personally identifiable information you can still access our website, however in order to use certain functionalities on the site, activate or use a service, or have a request to enroll in services fulfilled or receive product information you may need to provide personally identifiable information to LotLinx.

### **LotLinx Adserving**

We do not collect personally identifiable information through our ads, nor do we use *personally identifiable* information to target you.

## **How We Use the Personally-Identifiable Information We Collect**

### **LotLinx Website and Dealer Customer Marketing Efforts**

When you use our Services, we use your information to serve your interests. LotLinx may authorize access to your information within our Company, by our employees, other personnel, and contracted vendors to fulfill our obligations to you and to operate the business. Our affiliates and vendors may access and use your information for the purposes we describe in this Privacy Statement, including as necessary to provide functionality, products, and services in connection with the Services. We may allow our affiliates and vendors to have access to aggregate statistics – that are not linked by us to any specific consumer – about consumer behavior, sales, traffic patterns, and related Services information to improve the service and provide you with valuable insights.

### **Other (Non-Personally Identifiable) Information We Collect from Site Visitors:**

This site collects other “non-personally identifiable information” from site visitors. We collect information on an aggregate [or anonymous] basis that may include information such as tracking the site pages that are visited, the amount of time spent on our site, clicks, mouse movements, scrolls, and page views. This also may include aggregate data provided by a third-party that surveys site visitors on our behalf.

### **LotLinx Adserving**

We do not collect or use personally identifiable information in our adserving function.

## **How We Use the Aggregate or Non-Personally Identifiable Information We Collect**

### **LotLinx Website and Dealer Customer Marketing Efforts**

Non-Personally identifiable information collected on this site may be used to improve website design and make the user experience more customer friendly.

### **LotLinx Adserving**

Non-Personally identifiable information collected through our ad serving may be used to improve ads and make the more customized to the user.

## **Methods to Collect Information and Interest-Based/Online Behavioral Advertising**

## **LotLinx Website and LotLinx Services**

We may affiliate with sites that use third-party click tracking analytics tool (such as Adobe, DoubleClick, Efficient Frontier, Keynote, Google Analytics and ClickTale) to capture click through statistics.

This site may use spotlight ads/web beacons/GIF/pixel tags which are site instrumentation tools that help us to determine, for instance, whether a page has been viewed or not and, if so, how many times. Emails or electronic newsletters we send may use tools (e.g., pixel tags or web beacons) to gather email metrics and information to improve the reader's experience such as how many of the emails are opened, if they were printed or forwarded, the type of device (e.g., mobile or PC) from which they were opened, and the city, state, and county associated with the applicable IP address. In general, any electronic image viewed as part of a webpage, including an ad banner, can act as a web beacon.

This website may generate a "session log" when you visit our site. We use session logs to help us determine how people travel through our site. In this way, we can structure our pages so that the information most frequently visited is easier to find. By tracking page visits, we can also determine if the information we're providing is being used. The only data gathered is the Internet Protocol (IP) address from which you came (which contains no personal information), the website that referred you, the pages you visited and the date and time of those visits.

## **LotLinx Adserving**

Autos.lotlinx.com generates a "session log" when you pass through our tracking service. We use session logs to help us determine how frequently people pass through our service. In this way, we can structure our ads so that the information most frequently visited is easier to find. By tracking you, we can also determine if the information we're providing is relevant to you. The only data gathered is the Internet Protocol (IP) address from which you came (which contains no personal information), the website that referred you, the pages you visited the date and time of those visits, and what VIN you were interested in.

## **Interest-Based/Online Behavioral Advertising**

### **LotLinx Website and LotLinx Services**

Interest-Based/Online Behavioral Advertising. On some pages of our site we may allow third-party advertising partners to set web tracking tools (e.g., cookies and web beacons) to collect anonymous, non-personally identifiable information regarding your activities on those pages (e.g., your IP address, page(s) visited, time of day). We may also share such information we have collected with third-party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering future targeted advertisements to you when you visit other sites within their networks. This

practice is commonly referred to as “interest-based advertising” or “online behavioral advertising.”

Pages of our website that collect information that may be used by such advertising partners for interest-based advertising purposes are identified by a link to AdChoices on the page.

Opting out (site pages). If you do not want your browsing while on such pages to be used for interest-based advertising purposes, you may click on the AdChoices link to opt-out of such uses by the listed advertising partner(s). Even if you opt-out through this service, we may still collect non-personally identifiable information regarding your site activities and use it for non-interest-based advertising purposes as described in this privacy statement.

Opting out (advertisements). Advertisements on third-party sites that contain the AdChoices link and that link to this privacy statement may have been directed to you based on anonymous, non-personally identifiable information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt-out of the advertising partners’ use of this information for interest-based advertising purposes. Even if you opt-out through this service, we may still collect and use information from the advertisements for non-interest based advertising purposes, such as to determine the effectiveness of the advertisements.

### **LotLinx Adserving**

Interest-Based/Online Behavioral Advertising. On our click tracking we may allow third-party advertising partners to set web tracking tools (e.g., cookies and web beacons) to collect anonymous, non-personally identifiable information regarding your activities on those pages (e.g., your IP address, time of day). We may also share such information we have collected with third-party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering future targeted advertisements to you when you visit other sites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising.”

Pages of our website that collect information that may be used by such advertising partners for interest-based advertising purposes are identified by a link to AdChoices on the page.

Opting out (advertisements). Advertisements on third-party sites that contain the AdChoices link and that link to this privacy statement may have been directed to you based on anonymous, non-personally identifiable information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt-out of the advertising partners’ use of this information for interest-based advertising purposes. Even if you opt-out through this service, we may still collect and use information from the advertisements for non-interest based advertising purposes, such as to determine the effectiveness of the advertisements.

You may also opt out of all our advertising by visiting <http://ads.lotlinx.com/cookies.php>.

## **Sharing Your Information**

### **LotLinx Website and LotLinx Services**

This site does not share, sell, or rent personally identifiable information with independent companies for their own use.

Personally-identifiable information that you provide to us in the course of requesting information about a product or service through this website may be gathered and stored in one or more of our corporate databases. For site visitors in the U.S. personally identifiable information may be used for purposes of contacting you for things like promotional offers, marketing programs, or other communications from this website or other LotLinx programs and services.

We may share personally identifiable information that we collect about you with other companies within the LotLinx family of companies or subsidiaries. Our “family of companies” is the group of companies related to us by common control or ownership. We share information within this “family” as a normal part of conducting business and offering products and services to our customers.

Vendors, contractors or partners of this site who have access to your personally identifiable information in connection with providing services for this site are required to keep the information confidential and are not permitted to use this information for any other purpose than to carry out the services they are performing for this site.

This site may share personally identifiable information with subcontractors. Subcontractors are restricted from using this data in any other way other than to provide these services to LotLinx and they may not share or resell this data.

This site will disclose your personally identifiable information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to a legitimate court or other regulatory order or other legal; (b) protect and defend the rights or property of LotLinx; or, (c) act under exigent circumstances to protect the personal safety of users of LotLinx.

### **LotLinx Adserving**

We do not share, sell, or rent personally identifiable information with independent companies for their own use in our Adserving activities.

### **Access to and Control Over the Use of Your Personally Identifiable Information**

To correct or update your personally identifiable information you may contact us at:

Legal Department legaladmin@lotlinx.com or LotLinx, Inc. 200 W. Madison, 13th Floor, Chicago, IL 60606 Attention: Legal Department.

You will be asked for name and address so that we may be able to process your changes. We will use reasonable efforts to correct any factual inaccuracies in your information.

The scope of access available for this request is for information stored in the database that holds the data for this site. Any personally identifiable information that has been collected from you on other websites will not be accessible or changeable through the processing of this request.

### **Security of Your Information**

Safeguarding information of visitors to our website is important to us. We use systems, policies and procedures to maintain accuracy of information and to protect information from loss, misuse or alteration. The site uses “Secure Socket Layers” or SSL to protect your data. SSL is encryption technology to safeguard your personally identifiable information against misuse by unauthorized individuals.

Vendors, contractors or partners of this site who have access to your personally identifiable information in connection with providing services for this site are required to keep the information confidential.

### **Consent to Processing**

By visiting this site or using the LotLinx Services and by providing your personally identifiable information to us, you understand and consent to the collection, use, processing, transfer, and disclosure of your personally identifiable and non-personally identifiable information globally — including to the United States – in accordance with this Privacy Statement. Therefore, by visiting this site or using the LotLinx AI or General Services and by providing such information, you consent to the transfer of such information across country borders, and to the use, processing, and disclosure of such information in global locations. Your consent shall be deemed to include your consent to transfer of the personally identifiable or non-personally identifiable information to locations that may have different levels of privacy protection

### **Additional Data Collection Practices and Use of Information**

Information that you provide directly to LotLinx, including your contact details, demographic information, job application or resume, and other information you may choose to share in order to better interact with the LotLinx General Services may be used in the following ways by LotLinx:

- To complete your purchase of the LotLinx AI Services and Products, we may use your information to process payments, or send you communications regarding Services and Products.
- If you request support or other information we may use your information to respond to your inquiry and follow up with you periodically with updated information, AI Service updates or changes, and training and informational opportunities relevant to interaction with LotLinx.
- We may use your information to inform you about current promotions, events, and other marketing communications we believe would be of interest to you. You will always have the choice to direct us not to send you email marketing communications by opting out via our “Unsubscribe” link that is provided in emails you receive from LotLinx.
- We may use the information submitted on job applications, resumes and similar documents for the purpose of considering your interest in employment with LotLinx. We may keep your information on file for future consideration.
- We may be required by law, or internal data retention policies, to maintain your information for a certain period of time, or to notify you of a security breach.

We do not share the Additional Data collected with third parties except if necessary to fulfill your request or inquiry. We never sell Additional Data to third parties.

### **Retention of Information**

LotLinx retains information and data collected for as long as allowable under retention policies and law, in accordance with the standards outlined in this Privacy Statement.

### **Right to Revise**

LotLinx reserves the right to change our Privacy Statement at any time in the future, and we will post the new Privacy Statement in advance of the date it becomes effective. You agree to the new Privacy Statement by continuing to use the Services or when you visit our site(s). Effective 4/19/2018.

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