

## Privacy Policy

Effective Date: January 1, 2020

SOUTHERN CALIFORNIA CHEVROLET DEALERS LOCAL MARKETING ASSOCIATION (“SCCDLMA,” “we,” “us” or “our”) respects the privacy of the information you have entrusted to us. This Privacy Policy (“Policy”) applies to both the online and offline collection of personal information by SCCDLMA. By using our website at [socalchevy.com](http://socalchevy.com) (the “Site”) and services (collectively, the “Services”), you acknowledge you have read and understand the terms and conditions of this Policy. If you do not agree to the terms and conditions of this Policy, please do not use our Services.

Your use of our Site and Services is also governed by our Terms of Use [www.socalchevy.com/terms-of-use/](http://www.socalchevy.com/terms-of-use/).

### INFORMATION COLLECTED

SCCDLMA respects the privacy of the information our customers entrust to us. This Notice of Collection of Personal Information applies to both the online and offline collection of your personal information. Below are the categories that we collect and the purposes for which the information is used. Our collection of personal data over the past twelve (12) months depends upon the manner in which a visitor uses the website, but would not include anything other than what is described below.

Below is a chart regarding the personal information we have collected about consumers during the last 12 months:

Category of personal information	Source(s)	Purpose(s) for collection	Disclosure to third parties
Full Name, Email Address, Phone Number, IP Address for Geolocation.	Website Information Request form(s) (the “Form(s)”) )	To facilitate communication between you and the Chevrolet dealer(s) you have identified on the Form, so that they may respond to your request(s).	Yes. We disclose your information to the dealer(s) identified on the Form(s) and as may be required by law.*
IP Address for Geolocation	Incoming Website Visit	To provide localized views of Chevrolet dealerships and their vehicle inventory to the website user.	Yes. To the dealers (see above) and as may be required by law.

\* We may share your personal information in the course responding to a valid request by law enforcement officers, governmental agencies, in order to comply with a subpoena, to enforce our own policies, or to protect our rights, property, or safety, or those rights of others. We may also share such information in the course of any

reorganization process including, but not limited to, mergers, acquisitions, and sales of all or substantially all of our assets.

Click [www.socalchevy.com/consumer-privacy-act/](http://www.socalchevy.com/consumer-privacy-act/) for our Notice at Collection of Personal Information, which lists the categories of personal information we collect from consumers and the purposes for collecting the information.

## COOKIES

We, and third parties we allow, use cookies and other similar technologies. Cookies are small text files placed on your device that uniquely identify your device and which a website can transfer to a consumer's hard drive to keep records of his or her visit to a website. We, or third parties, may use session cookies or persistent cookies. Session cookies only last for the specific duration of your visit and are deleted when you close your browser. Persistent cookies remain on your device's hard drive until you delete them or they expire. Different cookies are used to perform different functions, which are explained below:

- Essential. Some cookies are essential in order to enable you to move around our website and use its features, such as accessing secure areas of our website. Without these cookies, we cannot enable appropriate content based on the type of device you are using.
- Analytics. We use Google Analytics to measure how you interact with our website and to improve your user experience. To learn more about Google Analytics privacy practices and opt-out mechanisms, please visit the Google Analytics Security and Privacy Principles page at <https://support.google.com/analytics/answer/6004245?hl=en>.

Google also provides a complete privacy policy and instructions on opting-out of Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

- Targeted Advertising. We use cookies to compile information on our users' interaction with our website. We use this information to serve ads to you off of our website.

There are several ways to manage cookies. You can control the use of cookies at the browser level, by instructing your browser to accept cookies, disable cookies or notify you when receiving a new cookie. Please note that if you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be limited. The Network Advertising Initiative also offers a means to opt-out of a number of advertising cookies. Please visit [www.networkadvertising.org](http://www.networkadvertising.org) to learn more. Note that opting-out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted-out will no longer deliver ads tailored to your preferences and usage patterns.

## **COLLECTION AND USE OF INFORMATION FROM CHILDREN**

Our Services are not intended for children, and none of our Services are designed to attract children. We do not knowingly collect or use personal information from children, without the prior verifiable consent of a parental guardian for children under 13 or prior verifiable personal consent for children between the ages of 13 and 16. In the event that we learn that a person under the age of 16 has provided personal information to us, without such consent we will delete such personal information as soon as possible.

## **SALE OF PERSONAL INFORMATION**

SCCDLMA does not sell your personal information to Third Parties. If you have questions about the sale or disclosure of your personal information, please contact us using the contact methods provided at the end of this Privacy Statement.

## **COMMUNICATIONS OPT-OUT**

We provide you the opportunity to opt-out of marketing communications by clicking the “unsubscribe” link in email communications or by contacting us using the contact information provided below. We will process your request as soon as possible in accordance with applicable law, but please be aware that in some circumstances you may receive a few more messages until the unsubscribe is processed.

Additionally, we may send you information regarding our Services, such as information about changes to our policies and other notices and disclosures required by law. Generally, users cannot opt-out of these communications, but they will be primarily informational in nature, rather than promotional.

## **THIRD-PARTY LINKS**

Our Site contains links to other sites. SCCDLMA is not responsible for the privacy practices or content of such other sites. If you have any questions about how these other sites use your information, you should review their policies and contact them directly.

## **YOUR CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section 1798.83 permits visitors to the Services who are California residents to request certain information, once a year, regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send us an email using the contact information provided below and put “Shine the Light Request” in the subject line of your email. We do not disclose your information to third parties other than to those shown in our [Notice at Collection of Personal Information](#) [www.socalchevy.com/consumer-privacy-act](http://www.socalchevy.com/consumer-privacy-act) which lists the categories of personal information we collect from consumers and

the purposes for collecting the information.

From January 1, 2020 California Consumers have the following additional rights:

**Right to know**

- You have the right to request information about the categories and specific pieces of personal information we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such information, and the categories of third parties with whom we share such information. Please see above.
- You have the right to request information about our sale or disclosure for business purposes of your personal information to third parties in the preceding 12 months. Please see above.

**Right to delete**

- You have the right to request the deletion of your personal information. Please note that notwithstanding your request, California law permits us to retain certain categories of personal information for numerous purposes, including to complete a transaction, to perform a contract, and to comply with a legal obligation. You may submit a request to delete your personal information by using our toll-free telephone number or emailing us. See CONTACT US below

**Right to opt-out of the sale of your personal information**

- We do not sell your personal information

**Right to non-discrimination**

- You have the right to not be discriminated against for exercising any of these rights.

We do not sell or knowingly collect the personal information of minors under 16 years of age.

If you would like to exercise one or more of the rights above, please contact us using the contact information provided below. You may designate an authorized agent to make a request on your behalf. Such authorized agent must be registered with the California Secretary of State.

We may deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf.

We may need to confirm your verifiable consumer request before completing your request, and, for example, may ask for you to confirm data points we already have about you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

#### **NOTICE REGARDING PUBLIC POSTING AREAS**

Please note that any information you include in a message you post to any public posting area is available to anyone with Internet access. If you do not want people to know your email address, for example, do not include it in any message you post publicly. PLEASE BE EXTREMELY CAREFUL WHEN DISCLOSING ANY INFORMATION IN PUBLIC POSTING AREAS. SCCDLMA IS NOT RESPONSIBLE FOR THE USE BY OTHERS OF THE INFORMATION THAT YOU DISCLOSE IN PUBLIC POSTING AREAS.

#### **SECURITY**

We implement reasonable security measures to ensure the security of your personal information. Please understand, however, that no data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, SCCDLMA cannot ensure or warrant the security of any information you transmit to us and you understand that any information that you transfer to us is done at your own risk. If we learn of a security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Services or providing personal information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Services. We may post a notice via our website if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

#### **ASSIGNMENT**

In the event that all or part of our assets are sold or acquired by another party, or in the event of a merger, you grant us the right to assign the personal information collected via the Services.

#### **CHOICE OF LAW**

This Policy has been made in and shall be construed in accordance with the laws of the State of California, without giving effect to any conflict of law principles. Any disputes or claims shall be

resolved by a State of California court located in the County of Los Angeles, State of California and you agree and submit to the exercise of personal jurisdiction of such courts for the purpose of litigating any such claim or action. Such a dispute shall also be governed by our [Terms of Use](#) [www.socalchevy.com/terms-of-use/](http://www.socalchevy.com/terms-of-use/).

## **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to change this Policy from time to time. When we do, we will also revise the “Effective Date” at the top of this Policy. If we make material changes to the Policy, we will notify you by placing a prominent notice on our website and/or by sending you an email at the email address we have on file for you. We encourage you to periodically review this Policy to keep up to date on how we are handling your personal information.

## **HOW WE RESPOND TO DO NOT TRACK SIGNALS**

We treat user-enabled privacy controls, such as a browser plugin or privacy setting, that communicates or signals the consumer’s choice to opt-out of the sale of their personal information, as a valid request to opt-out. We do not sell your personal information.

## **ADDITIONAL FORMATS, ACCESSIBILITY AND LANGUAGES**

Click [here](#) [insert link] to print a copy of our Notice at Collection of Personal Information.

Click [here](#) [insert link] to print a copy of this Privacy Policy.

Those with disabilities may access our Notice at Collection of Personal Information in an alternate format by clicking [here](#) [insert link].

Those with disabilities may access this Privacy Policy in an alternate format by clicking [here](#) [insert link].

In addition to English, our Notice at Collection of Personal Information is available in the following languages: Spanish [insert a link ].

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## **CONTACT US**

If you have any questions, comments or concerns about our privacy practices or this Policy, please contact us at:

SCCDLMA, C/O Fox Dealer Interactive, Inc., 150 South Arroyo Parkway, Pasadena, CA 91105.  
Website: <https://socalchevy.com>.

Toll-free telephone number: 866-235-6692.

Email: [support@foxdealer.com](mailto:support@foxdealer.com). Please include CCPA Request in subject line.