

PRIVACY POLICY

Effective Date: 20 day of March 2019

PLEASE READ THE FOLLOWING CAREFULLY

THIS STATEMENT PROVIDES GENERAL INFORMATION ABOUT THE PRIVACY STATEMENT OF THIS WEBSITE AND ITS RELATED APPS (MOBILE OR OTHERWISE). YOUR USE OF THIS SERVICE CONSTITUTES ACCEPTANCE BY YOU OF THIS PRIVACY STATEMENT.

AAAautomotive has created this privacy statement ("Statement") in order to demonstrate its firm commitment to the privacy of the details that you provide to us when using www.aaautomotive.biz, as the data controller for the purposes of the GDPR (General Data Protection Regulations EU 2016/679). **PROMOTING ONLINE VISIBILITY** is committed to protecting the privacy and security of your personal information. The Information you share with **AAAautomotive** allows us to provide you with the best experience with our products and services. We have dedicated a Global privacy program that protects all the personal information we collect and helps to ensure that personal information is handled properly. Please read the privacy policy below to learn how we collect, use and disclose personal information.

We believe your business is no one else's. Your Privacy is important to you and to us. So we'll protect the information you share with us. To protect your privacy, **AAAautomotive** follows different principles in accordance with worldwide practices for customer privacy and data protection.

- We won't sell or give away your name, mail address, phone number, email address or any other information to anyone.

- We'll use state-of-the-art security measures to protect your information from unauthorized users.

Therefore, to provide you with our services we need (and sometimes are obliged by the law) to collect your personal data. This Privacy Policy (the "Policy") informs Users (a "User", "You") of our policies regarding the processing of Personal Information we receive from Users of www.aaautomotive.biz.

This website, our related websites and any mobile site or mobile application that link to this privacy policy (collectively, the "site", "sites") are owned and operated by **AAAautomotive** with its principal place of Business .

The Personal Information on the www.aaautomotive.biz, is collected, controlled and processed by the following entities:

AAAautomotive

Phone: (800)324-9044

E-mail: aaautomotive@aaautomotive.com

1. INFORMATION WE MAY COLLECT ABOUT YOU

1.1 We are required to collect some information on you before you can use Our Services. Our records may include all or some of the following information about you:

1.1.1 Your name, address, email address, telephone number, payment card details, etc.;

- 1.1.2 Details of your correspondence with **AAAautomotive** and any other information you have given to us;
- 1.1.3 Details of your transactions and other activities carried out on Our Services;
- 1.1.4 Details of your visits to our websites and/or Apps including, but not limited to, traffic data, location data, IP address, device ID, web logs, page views, ad data and other similar data, whether this is required for our own purposes or otherwise; and
- 1.1.5 Your response to marketing campaigns from us or through our third parties.

2. HOW WE MAY USE INFORMATION ABOUT YOU

2.1 AAAautomotive may use information held about you in the following ways:

- 2.1.1 To help us identify you and any accounts you hold with us;
- 2.1.2 To enable us to comply with legal and regulatory requirements;
- 2.1.3 To provide you with our products and services;
- 2.1.4 To make our websites and services easier to use by removing the need for you to enter repeatedly the same information;
- 2.1.5 To operate and improve our websites, Apps and services and to notify you of any changes to our websites, our products and services and/or Apps which may affect you;
- 2.1.6 To perform research and analysis aimed at improving our products and services;
- 2.1.7 To enable us to offer you products and services customized to your preferences;
- 2.2 Subject to any applicable preferences, to enable us and our partners to send you promotional offers relating to our products and services; and
- 2.3 To carry out profiling and analysis based upon behaviour in order to:
 - 2.3.1 provide tailored marketing and offers
 - 2.3.2 comply with legal and regulatory obligations
 - 2.3.3 to manage risk and prevent fraud
- 2.4 We may anonymise the personal information that we hold about you so that it can no longer be associated with you, in which case we may use such information without further notice to you. This is so that we can compile, analyse and disclose to third parties aggregated metrics, data and trends related to the use of PROMOTING ONLINE VISIBILITY's offerings.

3. LEGAL BASIS FOR PROCESSING

- 3.1 Our lawful basis for processing personal data include:
 - 3.1.1 To fulfil a contract we have with you.
 - 3.1.2 When it is our legal duty to do so.
 - 3.1.3 When it is in our legitimate interest.
 - 3.1.4 When you consent to it.

4. **SHARING YOUR INFORMATION**

- 4.1 Subject to relevant data processing agreements, and in full compliance with data protection regulation, **AAAautomotive** may share your personal data with:
- 4.1.1 Members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, together with their employees or agents;
 - 4.1.2 Third party marketing services;
 - 4.1.3 To verify your identity and risk profile;
 - 4.1.4 To monitor your account for security purposes;
 - 4.1.5 To offer you services on our platform;
 - 4.1.6 To process your payments;
 - 4.1.7 Law enforcement agencies or regulators in accordance with legal requirements; and
 - 4.1.8 To potential purchasers or investors.

5. **MARKETING AND OPTING OUT**

- 5.1 Subject to appropriate, applicable consent we may contact you via email, SMS, Telephone or post.
- 5.2 These marketing messages will provide you with information about our own products and services.
- 5.3 If you do not want to receive offers from us, you can stop the delivery of promotional emails, postal mail and other types of promotional communications from PROMOTING ONLINE VISIBILITY by:
- 5.3.1 Changing your marketing preferences in your PROMOTING ONLINE VISIBILITY account, if you are an existing customer;
 - 5.3.2 Following the specific instructions in any email that you receive;
 - 5.3.3 Contacting us via aaaautomotive@automotive.com and asking to be removed from our marketing lists; or
 - 5.3.4 Via your browsers and applications, where you can control notification settings.

6. **MONITORING AND USE OF COOKIES**

- 6.1 **AAAautomotive** may obtain information about your use of its Services by using web beacons and by placing a cookie, which is a small file, on your mobile device and/or computer's hard disk. We use two types of cookies:
- 6.1.1 Functionality Cookies - these cookies recognize you whenever you visit our websites or Apps and remember your user preferences. They also speed up access to our websites and the Apps (so you do not have to login each time).
 - 6.1.2 Advertising Cookies - these cookies are used to build a profile about you so that our marketing and advertising campaigns are more relevant to you.
- 6.2 Using our Services will constitute acceptance of use of Cookies.
- 6.3 Many web browsers automatically accept cookies, others may not. However, you can change your browser settings to either accept or reject cookies, according to your preference. If you do not accept

cookies, you may lose some of the functionality of our websites and/or Apps. If you need more information about cookies such as what they do, how they work and how to enable/disable them, please go to www.aboutcookies.org.

- 6.4 Please note that our advertisers and other partners may also use cookies, over which we have no control. **AAAautomotive** may monitor and record its communications with you (such as telephone conversations and emails) for the purposes of quality assurance, training, fraud prevention and compliance.

7 **DATA SECURITY**

- 7.1 **AAAautomotive** takes the security of your data very seriously. We will take appropriate security measures against unlawful or unauthorised processing of your information, and against the accidental loss of, or damage to, your information. Our objectives are:

7.1.1 Confidentiality - only authorised people can access the information.

7.1.2 Integrity - information should be accurate and suitable for the purpose for which it is processed.

7.1.3 Availability - authorised users should be able to access the data if they need it for authorized purposes.

8. **DATA RETENTION**

8.1 We will only retain data for the necessary time to complete the task that the data was collected for, or to meet our legal obligations.

8.2 You may request that your Personal Data be anonymised in the following circumstances:

8.2.1 Where the Personal Data is no longer necessary in relation to the purpose for which it was originally collected/processed.

8.2.2 When you withdraw consent, if consent is being used as the Legal Basis for Processing.

8.2.3 If you object to the Processing and there is no overriding Legitimate Interest or Legal Obligation to continue the Processing.

8.2.5 The Personal Data was unlawfully processed.

8.2.6 The Personal Data has to be erased to comply with a legal obligation.

9. **THIRD PARTY WEBSITES**

9.1 Our websites and the Apps may, from time to time, contain links to the websites of our partners; networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

10. **INFORMATION WE MAY COLLECT ON YOUR CUSTOMERS**

10.1 When you create an account with **AAAautomotive** and are an Agency Client, Our records may include all or some of the following information about your customers:

10.1.1 Their name, address, email address, telephone number; and

- 10.1.2 Aggregated metrics, data and trends.
- 10.1.3 Sharing your Customers' information
- 10.2 We may share your Customer's information with:
 - 10.2.1 Members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, together with their employees or agents
 - 10.2.2 To offer you services on our platform
 - 10.2.3 We will not share your Customer Data with other customers or third parties.
- 10.3 How we may use information about your Customers;
 - 10.3.1 **AAAautomotive** may use information held about your Customers in order to compile, analyse and disclose to third parties aggregated metrics, data and trends related to the use of **AAAautomotive's** offerings provided that these metrics, data and trends do not contain uniquely identifiable data about your customers.
 - 10.4 We may retain the data from your customers that we have anonymised and which we have used to identify aggregated metrics, data and trends for as long as those metrics, data and trends are necessary and relevant in informing third parties or our other customers of marketing trends.

11. CONTACT

- 11.1 We welcome your questions and comments relating to this Privacy Policy. We can be contacted via email at aaautomotive@aaautomotive.com

Phone: (800)324-9044

- 11.2 If you are unhappy with how we have used your personal information then please let us know, so we can launch an investigation. You also have the right to complain to the Information Commissioner's Office.