

PRIVACY POLICY

Last Updated: October 2019

1. INTRODUCTION

AGREEMENT AND PARTIES Carte Blanche (“Company,” “us,” or “we”) respects the privacy of the visitors to this Carte Blanche website (“website” or “site”). This privacy policy (“privacy policy” or “policy”) is an agreement between the Company and you, as the user of this website (“you”). This agreement tells you when this policy is effective, what information we collect from you, how we might use it, how you can review or change the personal information you provided to us, how we may change this policy, and the steps we take to ensure that your personal information is protected.

2. AGREEMENT TO TERMS OF PRIVACY POLICY AND TERMS OF USE

AGREEMENT TO TERMS. All activities in which you may engage on this website are voluntary. You are not required to provide any personal information to us unless you choose to access features on this site which require the information. If you do not agree with the terms of this policy or other terms of use on this website, then you should immediately exit this website and discontinue using the site. If you do not agree with the terms of our privacy policy and our terms of use posted at <https://www.carteblanchemembers.com/privacy-policy>, please do not provide us with personal information, and leave this website. The terms of use of this site are expressly incorporated herein by reference and made a part of this policy. By using the Company’s website, you signify that you agree to the terms of this privacy policy as well as to our terms of use.

3. EFFECTIVE DATE OF AND CHANGES TO PRIVACY POLICY

EFFECTIVE DATES. This privacy policy is effective as of October 2019, and will remain in effect except with respect to any of its provisions that are changed in the future, in which case the changes will become effective on the date they are posted on the website or we otherwise notify you of the changes. We reserve the right to change this privacy policy at any time. Changes, modifications, additions, or deletions will be effective immediately on their posting to this site. You should check this policy periodically as its terms may change from time to time. Your continued use of the site after we post any such modifications will constitute your acknowledgment of the modified policy and your agreement to abide and be bound by the modified policy. We will also revise the “last updated” date found at the beginning of this privacy policy when we post changes to it.

4. POLICY APPLICABLE TO ONLINE ACTIVITIES ONLY

DISCLAIMERS. The privacy policy does not extend to anything that is inherent in the operation of the Internet, and therefore beyond the Company’s control, and is not to be applied in any manner contrary to applicable law or governmental regulation. This online privacy policy only applies to information collected through this site. This privacy policy

does not apply to any information we may collect from you in any place other than this website.

5. PERSONAL INFORMATION WE MAY COLLECT

TYPES OF INFORMATION COLLECTED. We may ask you for certain information referred to on this site as “personal information,” which includes information that pertains to your identity. Such information may include, but is not limited to, items such as your name, address, date of birth, age, gender, e-mail address, telephone number, or credit card or debit card number. You may be required to provide personal information to access or use certain parts of our website or features of the site. If you do not provide the requested personal information, you may not be able to access or use the features of the site where such information is requested.

6. GENERAL INFORMATION WE MAY COLLECT

TYPES OF INFORMATION COLLECTED. There may be other instances in which we collect information from you that is more general in nature (“general information”). Such information may include your Internet Protocol (IP) address, which enables us to identify your computer or device on a Transmission Control Protocol/Internet Protocol (TCP/IP) network, which includes the World Wide Web. Your computer has an IP address, which is required in order for you to communicate with others via the Internet. Such general information, including the click stream data and cookies, as mentioned below, may be collected from you whenever you access the site, whether or not you provide us with any other personal information.

A set of website features may be accessible from web-enabled mobile devices. The intent is to provide screens that are optimized for the size of the screen and operating systems. On some devices, functionality may be limited. If you access this website through a mobile device, then we may collect information about your mobile device whether or not you provide us with any other personal information.

6.1. Your rights under the California Consumer Privacy Act of 2018 (CCPA):

You have the right to know what categories and specific pieces of personal information are collected about you. As such, you may submit a verifiable consumer request via the following methods:

- 1) By emailing us at info@righthondacb.com; or
- 2) By writing us at Carte Blanche, c/o Privacy Compliance Officer, 2025 S Figueroa St, Los Angeles, CA 90007

You have the right to know what personal information is sold, shared, or disclosed with third parties. You may submit a verifiable consumer request via the following methods:

- 1) By emailing us at info@righthondacb.com; or

2) By writing us at Carte Blanche, c/o Privacy Compliance Officer, 2025 S Figueroa St, Los Angeles, CA 90007

You have the right to opt-out of the sale of your personal information. You may opt-out by visiting this link <https://www.carteblanchemembers.com/privacy-policy> and following the directions.

Subject to statutory exclusions, you have the right to request that we delete the personal information that we have collected about you. You may submit a request for deletion via the following methods:

1) By emailing us at info@righthondacb.com; or

2) Writing us at Carte Blanche, c/o Privacy Compliance Officer, 2025 S Figueroa St, Los Angeles, CA 90007

If you exercise your rights under the California Consumer Privacy Act of 2018 (CCPA), you have the right to not be discriminated against.

6.2. Click Stream Data

When you visit our website we may also collect “click stream data” (server address, domain name). This information can be combined with information you have provided to us by registering, for example, which will enable us to analyze and better customize your visits. We may use click stream data for traffic analysis or e-commerce analysis of our website, to determine which features of our site are most or least effective or useful to you.

6.3. Cookies

We may also use cookies to gather information about your visits to our website and enhance your experience. More information on how we use cookies is available in Section 11.

6.4. How We Respond to “Do Not Track” Disclosures

Under this Privacy Policy, we may share your information only under particular situations, as described in this Policy. Because we protect all users in this manner, we do not change our behavior in response to a web browser’s “do not track” signal.

6.5. Use of Social Media Tools

This website allows you to use your social media accounts to pre-populate certain fields. If you choose to use this feature, you are allowing us to access your personal information. We encourage you to review the privacy policy and any terms and conditions for the social media platform you select.

7. GENERAL INFORMATION ABOUT YOU

USE OF GENERAL INFORMATION. We will primarily use the personal information you provide and any general information we receive from you to provide products and services to you, including, but not limited to, the following:

A. To administer a content promotion survey or other site and to provide you with the relevant products or services (for example, to deliver a prize you may have won in a contest).

B. To send you information or materials via e-mail about products, offers, and news we think might interest you. This information may relate to products, offers, and news of the Company or its licensees or selected commercial partners. We send you this only if you have opted-in to receive e-mails from the Company. If you no longer wish to receive any e-mails from us, or if you want to modify your personal data or want your personal data to be deleted from our database, see Section 12.

C. To analyze visits to the website and learn about the interests of our visitors in aggregate and also on a personal level to better understand your interests and needs, so we can improve our products and services and deliver to you the type of content, features, and promotions that you are most interested in.

8. PROTECTION OF YOUR PERSONAL INFORMATION AND GENERAL INFORMATION

8.1. Security Measures

In order to protect both the personal information and the general information that we receive from you through our website, we have implemented various security measures, including:

Unique customer ID and password protected website

Password encryption and PII encryption

Password and PII residing on a secure server

Credit card transaction handled by an established third party banking institution

The website is secured over HTTPS

8.2. Risk of Interception

Please keep in mind, however, that whenever you give out personal information online there is a risk that third parties may intercept and use that information. While THE Company strives to protect your personal information and privacy, we cannot guarantee the security of any information you disclose online. By using this site, you expressly acknowledge and agree that we do not guarantee the security of any data provided to or received by us through this site and that any personal information, general information,

or other data or information received from you through the site is provided to us at your own risk, which you expressly assume.

9. NO USE OF THIS SITE BY PERSONS UNDER 18 PERMITTED

9.1 Registration Declined

The Company intends only persons who are 18 years or older to use this website. Personal registration information submitted by a person under the age of 18 will not be accepted. Any general information provided by a person under the age of 18 and gathered (for example, through the use of cookies) during his or her visit may be used as indicated in this policy (see Section 6). The Company is committed to protecting the privacy of children and has no intention of collecting personal data from children under the age of 18. We encourage parents and guardians of children under 18 to regularly check and monitor their children's use of e-mail and other activities online.

9.2. Notice Concerning Children

PLEASE NOTE: We are a general audience site, and do not direct any of our content specifically at children under 13 years of age. We understand and are committed to respecting the sensitive nature of children's privacy online. If we learn or have reason to suspect that a site user is under age 13, we will promptly delete any personal information in that user's account.

10. THIRD PARTIES

10.1. Sharing Information With Persons or Entities Who Manage This Website

The Company's global and local websites and the personal information and general information collected are managed and controlled by Fox Dealer Interactive, Inc. The servers that make the Company's global and local websites available are located in California. If you are located outside California, please note that the information you provide will be transferred to the Company in California, and by submitting the information you authorize this transfer. The Company has entered into an agreement with the hosting company in Texas to provide safeguards for the protection of your data that are consistent with this policy.

10.2. Disclosing Information to Third Parties

WHO MAY HAVE ACCESS TO YOUR INFORMATION. Other than to the companies belonging to Carte Blanche for the purposes set out above, and except as described in this policy, we do not sell, trade, or otherwise transfer your personal information or general information to third parties without informing you in advance. We provide some of our services through contractual arrangements with affiliates, services providers, partners and other third parties (collectively, "service partners"). Our service partners may use your personal information to operate our sites and to deliver their services. For example, your data may be transferred to website hosting partners and other parties who assist us in designing and operating the website, executing services (such as for prize fulfillment), or

helping us analyze collected data. These parties will only use your data for the purpose of carrying out the work as agreed with us and will be required to keep the information confidential. We will encourage our service partners to adopt and post privacy policies. However, the use of your personal information by our service partners is governed by the privacy policies of those service partners and is not subject to our control. Please also see Paragraph 6.4 on how we will respond to “do not track” signals.

10.2.1. Categories of Data Collected

Vehicle Information – Vehicle Identification Number, Year, Make, Model, Odometer Reading

Personal Information – First Name, Last Name, Telephone, Email, Address, Payment Information

10.2.2. Categories of Data Shared or Disclosed With Third Parties:

Vehicle Information and Personal Information

10.2.3. Categories of Third Parties With Whom Data Is Shared or Disclosed and Purpose of the Sharing or Disclosure

Partner Dealerships, Third Party Providers, OEM and Manufacturers

10.2.4. Categories of Data Sold

Vehicle Information and Personal Information

10.2.5. Categories of Third Parties to Whom Data Is Sold and the Purpose of Such Sale

Dealerships, OEM and Manufacturers for the purpose of marketing, sales

10.3. Security

RELEASE OF INFORMATION. The Company will release personal or general information without your consent for security purposes, when required by law, or to prevent imminent harm to any person or entity. We will disclose personal or general information upon receipt of a court order or subpoena, or to cooperate with a law enforcement investigation, which may include responding to requests and court orders from jurisdictions outside the United States. We fully cooperate with law enforcement agencies in identifying those who use our services for illegal activities. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful, as determined in our sole discretion. Release of your personal data for security purposes, as described in this agreement to any person or entity under any circumstances shall be based on a determination made solely by us, exercising our own discretion, permission for which is expressly granted by you to us in accordance with this policy.

10.4. Links to Third Parties

PURPOSE OF LINKS. For your convenience and to improve usage of the website we may insert links to third parties on this site. This privacy policy does not apply to such third party websites. These links take you outside our service and off the Company's site and are beyond our control. This includes links from partners that may use the Company's logos as part of a co-branding agreement. The sites those links can take you to have their own separate privacy policy and although we seek to protect the integrity of our site, the Company is not liable for the content and activities of those sites. Your visits and access to such websites is at your own risk. Please note that those other sites may send their own cookies to users, collect data, or solicit personal information.

11. AUTOMATIC COLLECTION

COOKIES. A cookie is a small string of information that the website you visit transfers to your computer for identification purposes. Cookies can be used to follow your activity on the website and that information helps us to understand your preferences and improve your website experience. Cookies are also used for such activities as remembering your user name and password, if you use such a feature on this site. You can turn off all cookies, in case you prefer not to receive them. You can also have your computer warn you whenever cookies are being used. For both options you have to adjust your browser settings (such as Chrome, Safari, Firefox, Internet Explorer, or other browser). There are also software products available that can manage cookies for you. Please be aware, however, that when you choose to reject cookies, this choice may limit the functionality of the website you visit and you may lose access to some of its features.

12. DELETING OR MODIFYING PERSONAL INFORMATION

CHANGING YOUR INFORMATION. You may cancel your registration at any time, and you may opt out of receiving any e-mails from the Company.

12.1. Right to Opt-Out of the Sale of Personal Information

You have the right to opt-out of the sale of your personal information. You may opt-out by visiting this link [Do Not Sell My Personal Information](#) and following the directions.

12.2. Right to Request Deletion of Personal Information

Subject to statutory exclusions, you have the right to request that we delete the personal information that we have collected about you. You may submit a request for deletion via the following method:

- 1) By emailing us at info@righthondacb.com; or
- 2) By writing us at Carte Blanche, c/o Privacy Compliance Officer, 2025 S Figueroa St, Los Angeles, CA 90007

12.3. Update Your Contact Information

We encourage you promptly to update your contact and personal information when it changes.

13. QUESTIONS OR COMMENTS

CONTACT INFORMATION. If you have any questions or comments relating to our website or the privacy policy, send an e-mail to info@righthondacb.com or write Carte Blanche, c/o Privacy Compliance Officer, 2025 S Figueroa St, Los Angeles , CA 90007