

## **CarSwipe PRIVACY POLICY**

**Effective date: December 1, 2016**

We at CarSwipe know you care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. By using or accessing the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.

Remember that your use of CarSwipe's Services is at all times subject to the Terms of Service, which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Service.

### **WHAT DOES THIS PRIVACY POLICY COVER?**

This Privacy Policy covers our treatment of personally identifiable information ("Personal Information") that we gather when you are accessing or using our Services, but not to the practices of companies we don't own or control, or people that we don't manage. We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information internally in connection with our Services, including to personalize, provide, and improve our services, to allow you to set up a user account and profile, allow auto dealerships and/or 3<sup>rd</sup> party business partners to contact you in, to fulfill your requests for certain products and services, and to analyze how you use the Services. In certain cases, we may also share some Personal Information with third parties, but only as described below.

As noted in the Terms of Service, we do not knowingly collect or solicit personal information from anyone under the age of 18. If you are under 18, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from anyone under age 18, we will delete that information as quickly as possible. If you believe that a child under the age of 18 may have provided us personal information, please contact us at [info@carswipe.com](mailto:info@carswipe.com).

### **Will CarSwipe ever change this Privacy Policy?**

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time as well, but we will alert you to changes by placing a notice in the app, by sending you an email, and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes.

### **What Information does CarSwipe Collect?**

#### **Information You Provide to Us:**

We receive and store any information you knowingly provide to us. For example, through the registration process and/or through your account settings, we may collect Personal Information such as your name, phone number, email address, device ID, and third-party account credentials (for example, your log-in credentials for Facebook or other third party sites). If you provide your third-party account credentials to us or otherwise sign in to the Services through a third party site or

service, you understand some content and/or information in those accounts (“Third Party Account Information”) may be transmitted into your account with us, and that Third Party Account Information transmitted to our Services is covered by this Privacy Policy. Certain information may be required to register with us or to take advantage of some of our features.

We may communicate with you if you’ve provided us the means to do so. For example, if you’ve given us your email address, we may send you promotional email offers on behalf of other businesses, or email you about your use of the Services. Also, we may receive a confirmation when you open an email from us. This confirmation helps us make our communications with you more interesting and improve our services. If you do not want to receive communications from us, please indicate your preference by unsubscribing at the bottom of the email and or through the settings menu in the application if option is available.

### **Information Collected Automatically**

Whenever you interact with our Services, we automatically receive and record information on our server logs from your browser or device, which may include your IP address, device identification, “cookie” information, the type of browser and/or device you’re using to access our Services, and the page or feature you requested. “Cookies” are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device’s acceptance of cookies, but this may prevent you from taking advantage of some of our features.

If you click on a link to a third party website or service, a third party may also transmit cookies to you. Again, this Privacy Policy does not cover the use of cookies by any third parties, and we aren’t responsible for their privacy policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Services, and those third parties may not honor “Do Not Track” requests you have set using your browser or device.

We may use this data to customize content for you that we think you might like, based on your usage patterns. We may also use it to improve the Services – for example, this data can tell us how often users use a particular feature of the Services, and we can use that knowledge to make the Services interesting to as many users as possible.

### **Do Not Track Policy**

Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time.

### **Will CarSwipe Share Any of the Personal Information it Receives?**

We do not rent or sell your Personal Information in personally identifiable form to anyone, provided certain Personal Information may be transferred in connection with business transfers, as described below. We may share your Personal Information with third parties as described in this section:

You acknowledge and agree to CarSwipe sharing Your Personal Information such as Your Name, Phone number, and email address with the dealership when you inquire about a car.

Information that’s no longer personally identifiable. We may anonymize your Personal Information so that you are not individually identified, and provide that information to our partners. We may also provide aggregate usage information to our partners, who may use such information to understand

how often and in what ways people use our Services, so that they, too, can provide you with an optimal online experience. However, we never disclose aggregate usage information to a partner in a manner that would identify you personally, as an individual.

**Advertisers:** Though we do not currently have advertisers, we may allow advertisers and/or merchant partners (“Advertisers”) to choose the demographic information of users who will see their advertisements and/or promotional offers and you agree that we may provide any of the information we have collected from you in a form that is not personally identifiable to an Advertiser, in order for that Advertiser to select the appropriate audience for those advertisements and/or offers. For example, we might use the fact you are located in Florida to show you ads or offers for Florida businesses, but we will not tell such businesses who you are. Or, we might allow Advertisers to display their ads to users with similar usage patterns to yours, but we will not disclose usage information to Advertisers except in aggregate form, and not in a manner that would identify you personally. Note that if an advertiser asks us to show an ad to a certain audience or audience segment and you respond to that ad, the advertiser may conclude that you fit the description of the audience they were trying to reach.

**Affiliated Businesses:** In certain situations, businesses or third party websites we might be affiliated with may sell or provide products or services to you through or in connection with the Services (either alone or jointly with us). You can recognize when an affiliated business is associated with such a transaction or service, and we will share your Personal Information with that affiliated business only to the extent that it is related to such transaction or service. One such service may include the ability for you to automatically transmit Third Party Account Information to your Services profile or to automatically transmit information in CarSwipe to your third party account; for example, the results of a particular question. We have no control over the policies and practices of third party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, please review all such business’ or websites’ policies.

**Agents:** We might employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.

**Business Transfers:** We may choose to buy or sell assets, and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or acquired by a third party.

**Protection of CarSwipe and Others:** We reserve the right to access, read, preserve, and disclose any information that we [reasonably] believe is necessary to comply with the law or any court order; enforce or apply our Terms of Service and other agreements; or protect the rights, property, or safety of CarSwipe, our employees, our users, or others.

### **Is Personal Information about me secure?**

Your account is protected by a password for your privacy and security. If you access your account via a third party site or service, you may have additional or different sign-on protections via that third party site or service. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password and/or other sign-on mechanism appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

### **What Personal Information can I access?**

**You may access, and, in some cases, edit or delete the following information you've provided to us:**

name and password

email address

user profile information, including images you have uploaded

THE INFORMATION YOU CAN VIEW, UPDATE, AND DELETE MAY CHANGE AS THE SERVICES CHANGE. IF YOU HAVE ANY QUESTIONS ABOUT VIEWING OR UPDATING INFORMATION WE HAVE ON FILE ABOUT YOU, PLEASE CONTACT US AT [CONTACT@CARSWIPE.COM](mailto:CONTACT@CARSWIPE.COM).

UNDER CALIFORNIA CIVIL CODE SECTIONS 1798.83-1798.84, CALIFORNIA RESIDENTS ARE ENTITLED TO ASK US FOR A NOTICE IDENTIFYING THE CATEGORIES OF PERSONAL INFORMATION WHICH WE SHARE WITH OUR AFFILIATES AND/OR THIRD PARTIES FOR MARKETING PURPOSES, AND PROVIDING CONTACT INFORMATION FOR SUCH AFFILIATES AND/OR THIRD PARTIES. IF YOU ARE A CALIFORNIA RESIDENT AND WOULD LIKE A COPY OF THIS NOTICE, PLEASE SUBMIT A WRITTEN REQUEST TO [CONTACT@CARSWIPE.COM](mailto:CONTACT@CARSWIPE.COM).

### **WHAT CHOICES DO I HAVE?**

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

You may be able to add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may delete your account by sending us an email request to [contact@carswwipe.com](mailto:contact@carswwipe.com). Some information may remain in our records after your deletion of such information from your account. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

### **What if I have questions about this policy?**

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to [info@carswipe.com](mailto:info@carswipe.com) and we will try to resolve your concerns.

**Special Rules For Children.** Because of federal law, we are not permitted to knowingly collect any personal information from a child under the age of thirteen without the consent of that child's parent or guardian. The statements in this Privacy Policy about our collection and use of personal information also apply to our treatment of personal information from children under the age of thirteen. Some elements of our Services (e.g., shop, ticketing, and auctions) require the submission of a payment card number along with personal information in connection with a purchase; other elements of our Services (e.g., fantasy baseball) require the submission of

personal information to access or use the Services. Except in certain cases where limited contact information may be collected and not retained, these elements of our Services are not available to children under the age of thirteen. If a child who we know to be under the age of thirteen and for whom we have not received parental consent attempts to utilize a service on our Services which is not available to children, he/she will not be able to access it and may receive a message which relays that he/she is not eligible for such feature.