

ROTOLO CHEVROLET PRIVACY POLICY

LAST UPDATED: JUNE 15, 2020

INTRODUCTION

This website is brought to you by Rotolo Chevrolet (collectively, "we," "us," or "our"). We respect the privacy of our users and those who visit our websites, mobile and other online applications and products and services (collectively referred to as "our website"). By using our website you consent to the use of your information and information about you in accordance with this Privacy Statement.

This Privacy Statement applies to information collected through our website and does not describe the collection, use and disclosure practices of any of our corporate affiliates or third parties. For information on the collection, use and disclosure practices of any company with whom you are doing business, whether or not affiliated with our website, please review their privacy policies.

This site is operated by our service provider, Sincro. As the operator of our website, Sincro may have access to information (including personal information) that you submit when you use our websites, as described in this Privacy Statement. Please visit <https://www.sincrodigital.com/privacy-statement> for more information about Sincro's privacy practices.

Rotolo Chevrolet and Chevrolet, a division of General Motors, are nonaffiliated third parties. Rotolo Chevrolet's privacy statement applies only to the Dealership website and not Chevrolet or General Motors Corporate website.

INFORMATION WE COLLECT

Information is gathered from our website by us, our service providers, advertisers, sponsors and partners.

DATA TECHNOLOGIES

Various technologies are used to automatically collect information, such as cookies, local shared objects, and web beacons (generally referred to as "Data Technologies"). "Cookies" are small identifiers sent from a web server that are stored on your device for the purpose of identifying your browser or storing information or settings in your browser. "Local shared objects," sometimes known as Flash cookies, may be used to store your preferences or display content based upon what you have viewed on various websites to personalize your visit. A "web beacon," also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies. Anonymous advertising identifiers are increasingly being used on mobile devices and otherwise in a manner similar to cookies. When we refer to Data Technologies, we are including all current and similar future technologies.

One or more Data Technologies may be used on our website and other websites and mobile applications (that may not be our website) by us, by another party on our behalf, or by third parties in accordance with their privacy policies. Data Technologies may be used by us and others, on our behalf and on their own behalf, to transmit information to you or about you and connect information about you from different sources, websites, devices, and mobile applications.

We may use a uniquely generated trackable toll-free telephone number on our website or in advertisements. This uniquely generated toll-free telephone number may be used to contact us. If you call us using one of these toll-free numbers, we (or a service provider acting on our behalf) may collect non-personally identifiable information about the call (e.g. date, time, duration), as well as personally identifiable information (e.g. your name, the number from which your call originated).

VIDEO

We may target and track the videos you view on our website. You consent to our tracking of your video viewing through the Site or third-party social media for up to two years or as permitted by applicable law.

PUBLICLY POSTED INFORMATION

Information that you make available to us and others via social media networks, forums, blogs, list serves, chat rooms or similar functionality is public information that we or others may share or use in accordance with the law. You should exercise caution when deciding to disclose any information in these areas, especially any personally identifiable information.

WE ARE NOT RESPONSIBLE FOR THE USE BY OTHERS OF INFORMATION YOU DISCLOSE IN A PUBLIC FORUM.

COMBINED INFORMATION AND INFORMATION FROM OTHER SOURCES

We may combine information that you provide to us with information we receive from our affiliates and other sources, as well as with other information that is automatically collected. The combined information may include information about your use of our website, your use of other websites, devices and mobile applications and information from our affiliates and other sources.

COLLECTION AND USE OF INFORMATION FROM CHILDREN

Our Services are not intended for children. We do not knowingly collect Personal Information from children and none of our Services are designed to attract children. No one under age 16 may provide any information to or on the websites. If you are under 16, do not use or provide any information on this website or on or through any of their features, register on our websites, make any purchases through our websites, use any of the interactive features of our websites or provide any information about yourself to us, including your name, address, telephone number, email address, or any screenname or username you may use. If we learn we have collected or received Personal Information from a child under 16 without verification of parental consent, we will delete that information as soon as possible. If you believe we might have any information from or about a child under 16, please contact us at the information provided in the "Contact Us" section provided at the end of this policy.

APPLICATIONS, WIDGETS AND SOCIAL MEDIA

We may include applications or widgets from social media providers that allow interaction or content sharing by their users. These widgets, such as a Facebook "Share" or "Like" button, are visible to you on the web page you visit. Integration between our website and social media networks such as Facebook, Twitter and others may allow social media networks in which you participate to collect information about you, even when you do not explicitly activate the network's application or widget. Please visit the applicable social media network's privacy policy to better understand their data collection practices and choices they make available to you. The privacy policy of the social media network controls the collection, use and disclosure of all personal information transmitted to that network.

ADVERTISING NETWORKS

Advertising that is customized based on predictions generated over time from your visits across different websites, devices and mobile applications is sometimes called "online behavioral" or "interest-based" advertising. We may partner with advertising networks, which are companies that deliver targeted advertisements to consumers and generate statistics and metrics related to the delivery of interest-based advertisements. They may utilize information collected through a variety of Data Technologies to provide customization, auditing, research and reporting for us, our affiliates and other advertisers. This data collection takes place both on our website and on third-party's websites and mobile applications. This process allows our website and third parties to deliver targeted advertising, enhance

marketing programs and help track the effectiveness of such efforts. Our advertising networks also may use this information for determining or predicting the characteristics and preferences of their respective advertising audiences and measuring the effectiveness of their advertising in accordance with their privacy policies.

We do not provide information that is directly associated with a specific person (such as name and address) to an advertising network when you interact with or view a customized advertisement. However, when you view or interact with an advertisement, the advertiser may make an assumption that you are interested in the subject matter of the advertisement.

Some companies disclose when they are using interest-based advertising programs on our website to deliver third-party ads or collecting information about your visit for these purposes and give you the ability to opt-out of this use of your information. You may see an icon in or around third-party advertisements on our website that use interest-based advertising programs and on pages where data is collected and used for online interest-based advertising. Clicking on this icon will provide additional information about the companies and data practices that were used to deliver the ad. You can opt out of delivery of targeted advertising to you by multiple companies by visiting <http://www.aboutads.info/choices>, http://www.networkadvertising.org/managing/opt_out.asp and <http://www.ghosteryenterprise.com>. Please note that even if you opt out, you will continue to receive advertisements, but they will not be tailored to your specific interests.

YOUR CHOICES

You are entitled to make certain choices about how we communicate with you.

1. You may choose not to provide personal information, even though that may impact your ability to register or receive a particular product or service.
2. If you do not want to receive marketing communications, you can click the “unsubscribe” link in email communications or contact us using the contact information 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 types of communications, but they will be primarily informational in nature rather than promotional.

3. If you do not want to receive internet-based advertisements, you can opt-out as discussed in the “Advertising Networks” section above.
4. You have a number of choices regarding certain Data Technologies. Most web browsers automatically accept cookies, but you can usually modify your browser's setting to decline cookies if you prefer. You may also render some web beacons unusable by rejecting their associated cookies and disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or opting out at Evidon.com or the website of the technology provider. If you choose to decline cookies or similar technologies, however, please note that certain features may not function properly or at all as a result. You may be able to adjust the use of advertising identifiers on mobile devices through the settings on your device. Finally, if you do not want to use a uniquely generated telephone number, you may choose not to call us.
5. If you do not want to use Location Information, you can decline our initial invitation to provide that information, or opt-out by changing the location services setting on your mobile device. However, please note that certain features may not function properly or at all as a result if you opt-out.

YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits California residents who visit our website or otherwise use our Services to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. Such requests can be made twice a year. To make such a request, please send an email to Denise Krempa at dkrempa@rotolochevy.com.

As of January 1, 2020, California residents have the following additional rights under the California Consumer Privacy Act:

- You have the right to request information about: (1) the categories and specific pieces of Personal Information we have collected about you; (2) the categories of sources from which such Personal Information is collected; (3) our purpose(s) for collecting such Personal Information; and (4) the categories of third parties with whom we share such Personal Information. You can exercise that right by filling out the form at the conclusion of this Privacy Policy or by emailing dkrempa@rotolochevy.com or by calling the toll-free number in the Contact Us section below.
- You have the right to request information about our sale or disclosure for business purposes of your Personal Information to third parties.
- You have the right to opt-out of the sale of your Personal Information to third parties. You can exercise that right by filling out the form at the conclusion of this Privacy Policy or by emailing dkrempa@rotolochevy.com or by calling the toll-free number in the Contact Us section below.
- You have the right to request the deletion of your Personal Information to the extent that California law does not otherwise allow us to retain such Personal Information (for example, we may be allowed to retain Personal Information needed to complete a transaction, perform a contract between you and us, comply with legal obligations including document retention requirements, information needed to perform warranty repairs or issue recalls, etc.). You can exercise that right by filling out the form at the conclusion of this Privacy Policy or by emailing dkrempa@rotolochevy.com or by calling the toll-free number in the Contact Us section below.
- You have the right not to be discriminated against for exercising any of these rights.

Authorized Agent. If you use an authorized agent to exercise your California Privacy Rights, we will require your authorized agent to provide written proof that they have authority to act on your behalf as well and may require you to verify your identity before we respond to the authorized agent's request. Please note that an "authorized agent" has the meaning given to it in Chapter 20 of the California Consumer Privacy Act Regulations Section 999.326.

Verification of Requests. The dealership will need to verify your identity before it can respond to any request for information or deletion request provided above. The extent of verification needed from you will vary depending on the type and sensitivity of the Personal Information collected by the dealership, the risk of harm to the consumer, and whether the request seeks to obtain Personal Information, delete Personal Information, or opt-out of the selling of Personal Information. The verification process may require you to identify a certain amount of your Personally Identifiable Information in order to verify your identity.

The dealership has collected and disclosed for a business purpose the following information from consumers in the preceding 12 months:

Categories and Sources of Personal Information	Representative Data Elements	Purpose for Collection and Sharing the PI	Categories of Third Parties to whom this type of Personal Information is Disclosed for a Business Purpose
<p>Contact Information</p> <p>We collect this type of information from:</p> <ul style="list-style-type: none"> • You 	<p>Data elements in this category include:</p> <ul style="list-style-type: none"> • Current and previous names • Current and previous mailing addresses • Email address • Phone number 	<p>We use this type of information to identify you and communicate with you, including:</p> <ul style="list-style-type: none"> • For our Everyday Business Purposes[1] • To provide customer service 	<p>We may disclose this type of information to:</p> <ul style="list-style-type: none"> • Automobile Manufacturers • Digital Marketing Agencies working with the dealership, dealer group, and/or automotive manufacturers • Other third parties (including government agencies) as required by law, such as pursuant to legally binding subpoenas, court orders, and similar instruments
<p>Government-issued identification information numbers</p> <p>We collect this type of information from:</p> <ul style="list-style-type: none"> • You 	<p>Data elements in this category include:</p> <ul style="list-style-type: none"> • Social security number • Driver’s license number • Passport number 	<p>We use this type of information:</p> <ul style="list-style-type: none"> • For our Everyday Business Purposes • For customer verification, credit and reference checks 	<p>We may disclose this type of information to our Service Providers and to:</p> <ul style="list-style-type: none"> • Consumer reporting agencies • Other third parties (including government agencies) as required by law
<p>Unique Identifiers</p> <p>We collect this type of information from:</p> <ul style="list-style-type: none"> • You, when you interact with our website using your devices. • You, when you create an account 	<p>Data elements in this category include:</p> <ul style="list-style-type: none"> • Device type identifier (e.g. Desktop, Mobile) • Cookie ID • Account ID, created at sign-up (account-enabled websites only) 	<p>We use this type of information:</p> <ul style="list-style-type: none"> • To identify you or your device, including to associate you with different devices that you may use • For record-keeping and reporting, including for data matching • For metrics and analytics • To track your use of products, services, websites, including for ad delivery and personalization 	<p>We may disclose this type of information to our Affiliates and Service Providers and to:</p> <ul style="list-style-type: none"> • Third parties who assist with our information technology and security programs • Third parties who assist with fraud prevention, detection and mitigation • Other third parties (including government agencies) as required by law

<p>Inferred and Derived Information</p> <p>We create inferred and derived data elements by analyzing online and behavioral data. We collect this information from:</p> <ul style="list-style-type: none"> • You when you interact with our websites and advertising. 	<p>Data elements in this category include:</p> <ul style="list-style-type: none"> • Propensities, attributes and/or scores generated by internal analytics programs and used for advertising and website personalization 	<p>We use this type of information:</p> <ul style="list-style-type: none"> • To personalize content • To better understand you and to understand our customers generally • For internal business purposes, such as quality control, training and analytics • For our Everyday Business Purposes 	<p>We may disclose this type of information to our Affiliates and Service Providers and to:</p> <ul style="list-style-type: none"> • Third parties with whom we have joint marketing arrangements • Lawyers, auditors, consultants and others who provide professional services to us • Other third parties (including government agencies) as required by law
<p>Online & Technical Information</p> <p>We collect this information from:</p> <ul style="list-style-type: none"> • You and your computer or devices when you interact with our platforms, websites and applications. For example, when you visit our websites, our server logs record of your IP address and other information. • Automatically, via technologies such as cookies, web beacons, when you visit our website or other websites. • Third parties, including computer security services and advertising partners. • We also associate information with you using unique identifiers collected from your devices or browsers. 	<p>Data elements in this category include:</p> <ul style="list-style-type: none"> • IP Address to determine general location (zip code) • Device characteristics such as form factor, OS and browser info • Unique anonymized website user identifier • Customer account name; vehicle “Price Watch” and “Save” history • Browsing data such as website pages visited and action taken • First Party Cookies • Third Party Cookies • Web beacons, clear gifs, and pixel tags • Location of vehicle (GPS)-with your consent 	<p>We use this type of information:</p> <ul style="list-style-type: none"> • For website content personalization • For system administration, technology management, including optimizing our websites and applications, • For information security and cybersecurity purposes, including detecting threats • For recordkeeping, including logs and records that are maintained as part of Transaction Information • To better understand our customers and prospective customers and to enhance our Relationship Information, including by associating you with different devices and browsers that they may use • For online targeting and advertising purposes • For our Everyday Business Purposes 	<p>We may disclose this type of information to our Affiliates and Service Providers and to:</p> <ul style="list-style-type: none"> • Service Providers, including to social media companies such as Facebook which use the data only to identify which of our customers use their platforms so that we can deliver ads to you on the platform • Ad Exchanges to allow delivery of ads tailored to your preference • Lawyers, auditors, consultants and others who provide professional services to us • Other third parties (including government agencies) as required by law

<p>Credit Application Information</p> <p>We collect this type of information from:</p> <ul style="list-style-type: none"> • You when you complete a credit application on the website. 	<p>In addition to Contact Information, data elements in this category may include:</p> <ul style="list-style-type: none"> • Social Security Number • Date of Birth • Residence type, monthly payment, and time at residence • Employment information, including current and former employers, occupation, monthly income, and time on job 	<p>We use this type of information:</p> <ul style="list-style-type: none"> • For our Everyday Business Purposes 	<p>We may disclose this type of information to our Affiliates and Service Providers and to:</p> <ul style="list-style-type: none"> • Third parties with whom we have joint marketing arrangements • Lawyers, auditors, consultants, and others who provide professional services to us • Other third parties (including government agencies) as required by law
<p>Personal Information Listed in the California Consumer Records statute (Cal. Civ. Code § 1798.80(e))</p> <p>We collect this type of information from:</p> <ul style="list-style-type: none"> • You • Third-party service providers, including advertising companies and analytics providers 	<p>Data elements in this category include:</p> <ul style="list-style-type: none"> • Phone number • Insurance information • Bank account number • Credit or debit card number • Other financial information, including information relating to consumers' vehicle financing or lease terms • Signature 	<p>We use this type of information:</p> <ul style="list-style-type: none"> • For our Everyday Business Purposes • For recordkeeping, including logs and records that are maintained as part of Transaction Information 	<p>We may disclose this type of information to our Affiliates and Service Providers and to:</p> <ul style="list-style-type: none"> • Lawyers, auditors, consultants, and others who provide professional services to us • Other third parties (including government agencies) as required by law
<p>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))</p> <p>We collect this information from:</p> <ul style="list-style-type: none"> • You 	<p>Data elements in this category include:</p> <ul style="list-style-type: none"> • Information regarding whether you were or would soon be a college graduate 	<p>We use this type of information:</p> <ul style="list-style-type: none"> • To confirm eligibility for a manufacturer or lender rebate and to apply for and process any such rebate, if applicable 	<p>We may disclose this type of information to:</p> <ul style="list-style-type: none"> • Manufacturer or lender for processing rebate, if applicable

<p>Protected Classification Characteristics Under California or Federal Law</p> <p>We collect this type of information from:</p> <ul style="list-style-type: none"> • You 	<p>A photocopy/scan of government issued identification reveals personal information. For example:</p> <ul style="list-style-type: none"> • Driver’s license card- includes image, date of birth, physical description, and gender • Permanent resident card- includes image, date and place of birth • Social security card- includes social security number • Passport- includes image, date, and place of birth and nationality 	<p>We use this type of information:</p> <ul style="list-style-type: none"> • For our Everyday Business Purposes • To confirm identity • To confirm consumers are licensed to drive our vehicles or take delivery of a vehicle purchased or leased from us • Confirm eligibility for a manufacturer or lender rebate and to apply for and process any such rebate 	<p>We may disclose this type of information to:</p> <ul style="list-style-type: none"> • Automobile manufacturer or lender for processing applicable rebate • Other third parties (including government agencies) as required by law
<p>Commercial Information</p> <p>We collect this type of information from:</p> <ul style="list-style-type: none"> • You • Third parties, such as vehicle manufacturer and/or advertising companies 	<p>Data elements in this category include:</p> <ul style="list-style-type: none"> • Vehicle information • Ownership information • Current lease or finance terms 	<p>We use this type of information:</p> <ul style="list-style-type: none"> • For our Everyday Business Purposes • Appraise consumers’ vehicles • Send informational and marketing communications • Process warranty, insurance, or service contract claims • For recordkeeping, including logs and records that are maintained as part of Transaction Information 	<p>We may disclose this type of information to:</p> <ul style="list-style-type: none"> • Payment processors, delivery services and warranty, insurance or service contract administrators, if applicable to transaction • Automobile manufacturers • Other third parties (including government agencies) as required by law

[1] **Everyday Business Purposes** encompasses the Business Purposes (as defined in the CCPA) and following related purposes for which personal information may be used:

- To provide the information, product or service requested by the individual or as reasonably expected given the context in which the personal information was collected.
- For identity and credit management, including identity verification and authentication, system and technology administration.
- To protect the security and integrity of systems, networks, applications and data, including detecting, analyzing and resolving security threats.
- For fraud detection and prevention.
- For legal and regulatory compliance.
- For corporate audit, analysis and reporting.

- To enforce our contracts and to protect against injury, theft, legal liability, fraud or abuse, to protect people or property, including physical security programs.
- To de-identify the data or create aggregated datasets, such as for consolidating reporting, research or analytics.
- For corporate governance, including mergers, acquisitions, and divestitures.

WE DO NOT SELL YOUR PERSONAL INFORMATION.

IF YOU WOULD LIKE TO EXERCISE ONE OR MORE OF THESE RIGHTS, PLEASE CONTACT US USING THE CONTACT INFORMATION PROVIDED BELOW OR COMPLETE AND SUBMIT THE FORM AT THE CONCLUSION OF THIS PRIVACY POLICY.

HOW WE RESPOND TO DO-NOT-TRACK SIGNALS

Some browsers incorporate a “Do Not Track” (DNT) feature that, when turned on, signals to websites and online services that you do not want to be tracked. Because there is not yet an accepted standard for how to respond to a DNT signal, we do not currently respond to DNT signals on this website or on websites where we provide advertisements, content, or other services.

ACCESS AND CORRECTION

Access to information that we collect and maintain about you may be available to you. For example, if you created a password-protected account within our website, you can access that account to update the information you previously provided. Additionally, if you believe that information we maintain about you is inaccurate, subject to applicable law, please contact us to request that we correct or amend your information.

EXTERNAL THIRD-PARTY LINKS

Our website may contain links to websites not operated by us, as well as third party widgets and applications discussed above. Once you leave our website, we suggest that you review the applicable privacy policy of the third-party website or application. We are not responsible for the content or use of any websites or applications other than on our website or the privacy practices of those websites or applications.

DATA SECURITY

We implement reasonable security measures to maintain the security of your Personal Information. Please understand, however, that no data transmission over the Internet can be guaranteed to be 100% secure. Consequently, our dealership cannot ensure or warrant the security of any information you transmit to us and you understand that any information you transfer to us electronically 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, if at all, in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

DISPUTES

If you choose to visit our website, your visit and any dispute regarding privacy is subject to this Privacy Statement and our Visitor Agreement, including limitations on damages, resolution of disputes, and application of the law of the state of California.

UPDATES TO THIS PRIVACY STATEMENT

We may update this Privacy Statement to provide clarification or notice of changes to our practices. If we make changes, we will revise the date at the top of this Privacy Statement. We will provide you with additional notice of material changes by posting notice of the changes for thirty (30) days before we implement those changes. We encourage you to periodically revisit our Privacy Statement to check for any changes.

CONTACT US

If you have any questions concerning this Privacy Statement or our privacy practices, you may contact us using the following methods:

e-mail dkrempa@rotolochevy.com

visit Denise Krempa at Rotolo Chevrolet at 16666 South Highland Ave, Fontana, CA or

call Denise Krempa at (855) 324-4721

or Click on the button below to indicate your preference