

Privacy Policy of **John Hine Temecula Subaru**

Effective Date: January 1, 2020

Introduction

John Hine Temecula Subaru respects your privacy. We have created the following Privacy Policy to let you know what personal information we collect when you visit our website, purchase our product, use our services, and visit our facility, why we collect it and how it is used and disclosed. This Privacy Policy applies to personal information we collect online as well as in person. As used in this policy, “personal information” and “information” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a natural person who resides in California (or a household having one or more California members), where the information is not excluded from coverage under the California Consumer Privacy Act (CCPA). Information excluded from CCPA coverage may be subject to separate privacy policies we maintain in compliance other applicable laws .

We value your right to privacy. This policy therefore details all of the following:

- What types of information we collect
- What we will do with information we collect
- What types of information we will share with third-parties
- How we will maintain your personal information
- What you can do to manage your personal information

This policy may change from time to time to reflect our internal needs, customer feedback, or changes in law or regulation. We will post any changes on our website.

What information do we collect?

We gather the following categories of information when:

- You provide us with information about yourself in-store, by phone, or online in order to access our goods or services that may include, but it not limited to:
 - Contact information such as your name, postal address, email address, and phone number
 - Information regarding your vehicle, including its service history, mileage, and use
 - Information regarding your consumer preferences, such as type of vehicle, service needs, and replacement parts
 - Your payment information, including payment card, bank account, or other payment method
- You use our website. Details regarding the types of information we collect and use is detailed below in the “Online Data Collection and Use” section.

- You apply for credit and we receive information from third-parties regarding your creditworthiness. This information may include:
 - Your driver's license number
 - Your social security number
 - Your credit history
 - Your employment
 - Your income
 - Your financial assets
 - Your personal references
- You use a courtesy loaner vehicle equipped with a GPS tracker and we receive location and driving data related to the use of the vehicle
- You enter the premise of our dealership and your image is captured by security video surveillance
- You create an account on our website and we receive your username, IP address, and password

Online Data Collection and Use

Personally Identifiable Information: Personally Identifiable Information is any information that may be used to identify an individual, including, but not limited to, a first and last name, home or other physical address, an email address, phone number or other contact information. We collect Personally Identifiable Information from you only when you choose to make it available to us, and may include, without limitation, your street address, the city where you live, your zip code, your first and last name, your payment card number and card expiration date when you place an order for our products, your billing address, your phone number, your email address, and information from third-parties provided in a credit report.

Non-Personally Identifiable Information: We also collect information about your interactions with the Website in a manner and format that does not identify you as an individual ("Non-Personally Identifiable Information"). We may collect, use, and disclose Non-Personally Identifiable Information as set forth below.

Analytics Information: We use third-party analytics tools to help us measure traffic and usage trends for the website. These tools collect information sent by your browser as part of a web page request, including the web pages you visit, your browser add-ons, your browser's width and height, and other information that assists us in improving the Website. The third-party analytics services may aggregate the data they collect with data they collect from other websites to enhance their offering of analytical services, but will not use any information they collect for any directed marketing purposes.

Cookies Information: When you visit the Website, we may (or we may authorize a trusted third party partner to) send one or more cookies - a small text file containing a string of alphanumeric characters - to your computer that uniquely identifies your browser and lets us help you log in faster and enhance your navigation through the website. A cookie may also

convey information to us about how you use the Website (e.g., the pages you view, the links you click and other actions you take on the Website), and allow us or our business partners to track your usage of the Website over time.

A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the website. Persistent cookies can be removed by following your web browser's directions. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Website may not function properly if the ability to accept cookies is disabled.

Log File Information: Log file information is automatically reported by your browser each time you access a web page. When you use our Website, our servers automatically record certain log file information. These server logs may include anonymous information such as your web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the Website, domain names, landing pages, pages viewed, and other such information.

Clear Gifs/Web Beacons Information: When you use the Website, we may employ clear gifs (also known as web beacons) which are used to anonymously track the online usage patterns of our users. In addition, we may also use clear gifs in HTML-based emails sent to our users to track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of our Website.

Device Identifiers: When you access the Website by or through a mobile device (including but not limited to smart-phones, iPads or tablets), we may access, collect, monitor and/or remotely store one or more "device identifiers," such as a unique device identifier ("UDID"). Device identifiers are small data files or similar data structures stored on or associated with your mobile device, which uniquely identify your mobile device. A device identifier may be data stored in connection with the device hardware, data stored in connection with the device's operating system or other software, or data sent to the device by the Company. A device identifier may convey information to us about how you browse and use the Website. The device identifier information that we collect does not itself collect or transmit any Personally Identifiable Information to us, however, a device identifier may be used in conjunction with other information in a manner that may constitute Personally Identifiable Information. A device identifier may remain persistently on your device, to help you log in faster and enhance your navigation through the Website. Some features of the Website may not function properly if use or availability of device identifiers is impaired or disabled.

Location Data: When you utilize the Website by or through a mobile device, we may access, collect, monitor and/or remotely store "location data," which may include GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your mobile device. We may also use various technologies to determine location, such as sensor data from your device that may, for example, provide information on nearby Wi-Fi access points and

cell towers. Location data may convey to us information about how you browse and use the Website. The location data that we collect does not itself contain or transmit any Personally Identifiable Information to us, however, location data may be used in conjunction with other information in a manner that may constitute Personally Identifiable Information.

To make choices about how this website tracks your usage and learn more about cookies, clear gifs/web beacons and related technologies, you may wish to visit the Network Advertising Initiative's online resources, at [//www.networkadvertising.org](http://www.networkadvertising.org).

How Personally Identifiable Information is Used: Personally Identifiable Information we collect is used to provide you with our services, including offers of products, services, and credit. We may also collect your first and last name, your physical address, email address and phone number to provide you quality customer service. Your information may be used to administer a contest, promotion, survey or other website feature or to send periodic emails. The email address you provide for order processing, may be used to send you information and updates pertaining to your request, in addition to receiving occasional company news, updates, related product or service information, etc. If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

We will retain your Personally Identifiable Information for as long as you are an active customer, as needed to provide you services, or until you request that we delete your data. We will retain and use your Personally Identifiable Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

How Non-Personally Identifiable Information is Used: We use or may use cookies, log file, device identifiers, location data and clear gifs information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the website; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our Website; (d) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (e) and diagnose or fix technology problems reported by our users or engineers that are associated with certain IP addresses.

How Is Your Information Shared or Disclosed?

Personally Identifiable Information: We share you information with our trusted third party service providers who assist us in operating our Website, conducting our business, servicing you, and marketing to you so long as those parties agree not to (1) sell personal information, (2) retain, use or disclose personal information for a need other than to perform business services, and (3) retain, use or disclose personal information outside of the direct business relationship. The CCPA defines a "sale" as disclosing or making available to a third-party personal information in exchange for monetary or other valuable consideration. While we do not disclose personal information to third parties in exchange for direct monetary compensation, we do disclose or make available personal information to motor vehicle

manufacturers and others for marketing purposes and may receive services or benefits from them, including identifiers; customer records; commercial information; internet or other electronic network usage data; and profiles and inferences.

We may also disclose Personally Identifiable Information if required to do so by law or in the good faith belief that such action is necessary to: (1) conform to the edicts of the law or comply with legal process served on us; (2) protect and defend our rights or property (3) act in urgent circumstances to protect the personal safety of users of the Website or the public. We may at any time buy or sell/divest the company, or any combination of its products, services, assets and/or businesses. Personally Identifiable Information such as customer names and email addresses, and other user information related to the Website will likely be one of the items transferred in these types of transactions. We may also transfer or assign such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions or similar transactions or proceedings.

Non-Personally Identifiable Information: We may share Non-Personally Identifiable Information, including information obtained through tools such as cookies, log files, device identifiers, location data and clear gifs (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) and sales and service information, such as types of vehicles sold, locations of purchasers, and whether a sale is a loyalty or conquest sale, with our third-party business partners for the purpose of analyzing and understanding our sales, marketing, and communication effectiveness. We may also aggregate or otherwise strip data of all personally identifying characteristics and may share that aggregated, anonymous data with our third party business partners.

Online Advertising: We may also share Non-Personally Identifiable Information with our business partners to deliver online advertisements ("ads") for our products/services that may be of interest to you. These advertisements may appear on our own Website and on other websites. We do not sell, rent, or share your Personally Identifiable Information with these business partners for such parties' own marketing purposes.

How do we protect your information?

We use security policies, procedures, and tools which are intended to safeguard the personal information we collect. However, security of information, especially when transmitted through the Internet, can never be guaranteed. We are not responsible for any interception or interruption of any communications through the Internet or otherwise, or for changes to or losses of data. Users of our Services are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our website.

Children's Online Privacy Protection Act Compliance

We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act), we do not collect any information from anyone under 13 years of age. Our website, products and services are all directed to people who are at least 13 years old or older.

California Consumer Privacy Act Rights

Notice at Collection. We are required to notify California residents, at or before the point of collection of their personal information, the categories of personal information collected and the purposes for which such information is used. Please see our Pre-Collection Privacy Notice at this web page: <https://www.temeculasubaru.com/privacy.htm>

Right to Know: California residents are entitled to ask us for a notice describing (1) the categories of personal information we have collected in the preceding 12 months, (2) the categories of sources of that information, (3) the business or commercial purpose for collecting that information, (4) the categories of third parties and affiliates the information is shared with, (5) whether the information was sold, and (6) whether we sell the information of minors under 16 (we do not). If you would like a copy of this notice, you may submit a request by emailing us at ccpa@temeculasubaru.com or place a request by calling: 951-553-2000. We will contact you to verify the request and will ask that you provide information that matches the identifying information you provided that we already maintain. Please allow up to 45 days for us to provide this notice.

Data Portability: California residents have the right to request a copy of the specific pieces of personal information that we have collected about them in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily useable format that allows the individual to transmit this information to another entity without hindrance. If you would like a copy of this notice, you may submit a request by emailing us at: ccpa@temeculasubaru.com or place a request by calling: 951-553-2000. We will contact you to verify the request and will ask that you provide information that matches the identifying information you provided that we already maintain. Please allow up to 45 days for us to provide this notice.

Right to Request Deletion: California residents are entitled to request the deletion of their personal information collected or maintained by us. If you would like some or all of the personal information we have collected and maintained about you deleted, you may submit a request by emailing us at ccpa@temeculasubaru.com or place a request by calling this number: 951-553-2000. We will contact you to verify the request and will ask that you provide information that matches the identifying information you provided that we already maintain. Please allow up to 45 days for us to provide this notice.

Right to Opt-Out: California residents have the right to opt-out of the sale of their personal information. If you would like your personal information to be deleted, you may submit a request by emailing us at ccpa@temeculasubaru.com or place a request by calling this number: 951-553-2000. We will contact you to verify the request and will ask that you provide

information that matches the identifying information you provided that we already maintain. Please allow up to 45 days for us to provide this notice.

Authorized Agent: You have the right to designate an authorized agent to exercise your privacy right under California law. Any person seeking to exercise the privacy rights of another must either (1) provide written permission from the individual granted to the agent to act in this manner AND verify their own identity to us, or (2) provide a copy of power of attorney pursuant to Probate Code section 4000 to 4465.

Discrimination and Incentives. The CCPA prohibits discrimination against those who exercise their rights under the CCPA and imposes requirements on any financial incentives offered to California residents related to their Personal Information. A business may offer financial incentives for the collection, sale or deletion of California residents' personal information, provided it is not unjust, unreasonable, coercive or usurious, and is made available in compliance with applicable transparency, informed consent, and opt-out requirements. California residents have the right to be notified of any financial incentives offers and their material terms, the right to opt-out of such incentives at any time, and may not be included in such incentives without their prior informed opt-in consent.

Shine the Light. Under California's Shine the Light law Civil Code Section 1798.83), California residents with whom we have an established business relationship are entitled to request and receive, free of charge, once per calendar year, information about customer information obtained online that we shared, if any, with other businesses for their own direct marketing uses in the previous calendar year. You may call 951-553-2000 or email us at ccpa@temeculasubaru.com to request a copy. We will provide the requested information to you at your email address in response. Please be aware that not all information sharing is covered by the "Shine the Light" law requirements and only information on covered sharing will be included in our response.

Your Consent

By using our website, you consent to this privacy policy.

Changes to our Privacy Policy

If we decide to change our privacy policy, we will post those changes on this page, send an email notifying you of any changes, and/or update the Privacy Policy modification date above.

Contacting Us

If you have questions about this policy, please contact us by email at ccpa@temeculasubaru.com or by postal mail to: John Hine Temecula Subaru
42050 DLR Drive
Temecula, Ca 92591

Pre-Collection Privacy Notice of **John Hine Temecula Subaru**

The purpose of this notice is to tell you 1) the categories of personal information to be collected from you, 2) the business and commercial purposes for collecting that information, 3) about your right to opt-out of the sale of your personal information, and 4) how to find our privacy policy. As used in this notice, “Personal Information” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a natural person who resides in California (or a household having one or more California members), where the information is not excluded from coverage under the California Consumer Privacy Act (CCPA). Information excluded from CCPA coverage may be subject to separate privacy policies we maintain in compliance other applicable laws .

1. THE CATEGORIES OF PERSONAL INFORMATION ABOUT YOU WE MAY COLLECT ARE AS FOLLOWS:	2. EACH OF THE CATEGORIES OF INFORMATION IN COLUMN 1 IS COLLECTED FOR EACH OF THE FOLLOWING BUSINESS OR COMMERCIAL PURPOSES:
<ul style="list-style-type: none"> •Identifiers such as name, address, telephone number, IP address, email address, account name, social security number, driver’s license number, state identification card, financial information, other similar identifiers, and your image, signature, and other personal identifiers. •Characteristics of protected classifications under California or Federal law • Commercial information, including records of vehicles, parts, accessories, and other personal property, products or services purchased, or other purchasing or consuming histories •Internet or other electronic network activity information including, but not limited to browsing history, search history, and information regarding a consumer’s interaction with an Internet website •Geolocation data •Professional or employment information •Education Information •Inferences drawn from the above categories, such as consumer preferences, characteristics, attitudes, predispositions 	<ul style="list-style-type: none"> •To provide products and services to you or in connection with a transaction involving you •To perform a contract between us and you •To respond to any requests or questions from you •To improve products and services •To comply with legal obligations •For product recall and related purposes; •To protect against fraudulent or illegal activity •For auditing purposes •To market to you •To communicate with you about our affiliates •To contact you regarding a past or potential future transaction •To maintain an account with you •To provide, support, personalize, and develop our Websites •To comply with the requirements of law, including the California Consumer Protection Act
3. We sometimes share information with unaffiliated third parties we collaborate with or that provide offers to you. This may or may not be considered a “sale” under California law. If you’d like to opt-out under the CCPA of sale by us of your personal information, please click here: [“Do Not Sell My Info”] or visit https://www.temeculaSubaru.com/privacy.htm	4. Our Privacy Notice covers additional legally required disclosures about your personal information. Please review our Privacy Notice at: https://www.temeculaSubaru.com/privacy.htm