

Privacy Policy

English | This statement is effective as of January 1, 2020.

Introduction

Thank you for your interest in CentralDispatch. When we refer to CentralDispatch within this Privacy Statement, we are referring to CentralDispatch, Inc. and its various subsidiaries and affiliates. We respect the privacy of our users when they use our websites, mobile and other online applications and products and services at CentralDispatch.com, movecars.com and jtracker.com, (collectively, the “Sites”). By using the Sites, you consent to the use of your information and information about you in accordance with this Privacy Statement. If you do not agree, do not access the Service.

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

CentralDispatch is a business-to-business vehicle logistics marketplace accessible to buyers and sellers of vehicles at wholesale, dealers, brokers, carriers, and to their duly authorized agents and representatives. Our Service is not intended for consumers. Services offered by the Sites are not directed to individuals under the age of eighteen (18). If you are under eighteen (18), you should not provide any personal information to us.

This Privacy Statement covers:

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The Information We Collect

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

Information You Provide. We may collect information that you choose to provide on the Site (which may include your name, address, telephone number, email address, dealer or company name, AuctionACCESS number(s), the last four digits of your social security number or other valid government-issued identification number and bank account, payment and other financial information) in a variety of ways, such as when you:

1. Register for one of our products or services;
2. Provide payment information or authorize electronic ACH transfers or other payments;
3. Make information available to us via social networking logins, such as Facebook or Twitter;
4. Participate in chats, web forums or other interactive sessions;
5. Subscribe to newsletters or provide feedback; and
6. Participate in surveys, sweepstakes or other promotions.

Automated Information. Information regarding your use of the Sites may be collected and/or aggregated through the use of automated means. This automatically collected information may include information such as:

1. Your IP address, the type of browser and operating system used;
2. Date and time you access the Sites and pages you visit, and if you linked from or to another website, the address of that website;

3. Email you open and links you click on within those emails; and
4. Your ISP or mobile carrier, and the type of handheld or mobile device that you used.

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 the Sites and other websites and mobile applications (that may not be the Sites) 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 the Sites or in advertisements. If you call one of these uniquely generated 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).

Videos. We may target and track the videos you view on the Sites. 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.

Location Information. We may collect physical location information that is sufficiently precise to allow us to locate a specific person or device (“Location Information”). We only collect Location Information with your permission (e.g., such as when you agree to provide it to us after initial access to or downloading our website). We may use Location Information and provide it to third parties to provide you with content and services that are relevant to a particular location, such as advertising, search results, auctions in the area, and directions.

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.

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 the Sites, your use of other websites, devices and mobile applications and information from our affiliates and other sources.

How We May Use the Information We Collect

We may use information we collect for the following purposes:

1. For everyday business purposes, such as establishing and managing your user account, providing products and services you request, and providing customer support;
2. To offer our other products or services and/or the products or services of others to you;
3. To communicate about, and administer your participation in, special events, programs, surveys, contests, sweepstakes and other offers or promotions;
4. To enable you to interact with the Sites and our users, dealers, and others through various means, such as through our message boards, blogs and social media;
5. To evaluate and improve our business, including developing new products and services and analyzing the effectiveness of products, services, applications and websites;
6. To diagnose and address technical and service problems;
7. To perform data analyses, including market and consumer research, trend analysis, demographic analysis and financial analysis;
8. To deliver content (including advertising) correlating to your interests and browsing and usage history, both within the Sites and on other websites and applications;
9. To comply with applicable legal requirements and our policies
10. To provide vehicle sale information, transaction data and other information and material to third parties directly involved in the sale (e.g., Private Store partners); and
11. to help sellers understand buyers' preferences for inventory and services;
12. To contact you via telephone, text or chat (and by using the Site and agreeing to the Terms of Use, you agree to be contacted by CentralDispatch by telephone, text or chat at any number or other contact information that you may provide or make available on or through the Site).

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 the Sites 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 the Sites and on third-party's websites and mobile applications. This process allows the Sites 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 the Sites 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 the Sites 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 www.aboutads.info/choices or www.networkadvertising.org/managing/opt_out.asp. Please note that even if you opt out, you will continue to receive advertisements, but they will not be tailored to your specific interests.

Information We Share

We do not sell or otherwise share information about you that we collect or receive, except as described below:

1. **Affiliates, Dealers, Franchisors and Manufacturers.** Information collected, including personal information and Data Technologies, may be shared with affiliates dealers, franchisors and manufacturers, and their agents and third-party service providers, who will use that information in accordance with their own privacy policies. Please visit www.CoxAutoInc.com for more information about our affiliates.
2. **Our Service Providers.** We may engage third parties to provide the services offered through or in connection with the Sites on our behalf. We require such providers to maintain information about you as confidential and to use the information only to perform the services specified by us in a manner consistent with this Privacy Statement.

3. **Corporate and Asset Transactions.** If we sell all or substantially all of our business or sell or transfer all or a material part of our assets, or are otherwise involved in a merger or transfer of all or a substantial part of our business (including any sale or transfer that may take place as part of or in connection with any bankruptcy or insolvency proceeding), we may transfer all information we have collected and stored, including personal information, to the party or parties involved in the transaction as part of that transaction.
4. **Access to Databases.** In addition to all of the disclosures described above, we may also allow others to search some of our databases and to analyze the data they find there or aggregate it with other data, either for their business purposes or ours.
5. **AuctionACCESS Information.** We may also collect your AuctionACCESS number and use it to link your registration information with the information maintained by AutoTec, LLC in your AuctionACCESS membership profile. To create an AuctionACCESS profile and learn more about what types of information AutoTec, LLC collects about its members and discloses to Manheim and other wholesale auction operators, please visit <https://www.auctionaccess.com>. AutoTec, LLC is not affiliated with CentralDispatch and collects information about its members under its separate privacy policy using processes that we don't control. Supplying registration information is voluntary; however, users who don't supply the information necessary to register for the Service may not be able to take advantage of the majority of features and content available through the Service.
6. **Other.** We may access or disclose information, including personal information, to:
 1. Protect or defend our interests and the legal rights or property of CentralDispatch and our affiliates;
 2. Protect the rights, interests, safety and security of users of the Sites or members of the public;
 3. Protect against fraud or for risk management purposes; or
 4. Comply with prudent legal practice as we may determine, and applicable law or legal process.

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 might impact your ability to register or open an account on the Sites or receive a particular product or service.
2. If you do not want to receive marketing email from the Sites, you can follow the unsubscribe link provided in those emails.
3. If you do not want to receive interest-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 the website of the technology provider. If you choose to decline cookies or similar technologies, however, please note that certain features on the Sites 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 to not call us.

5. If you do not want us to use Location Information, you can decline our initial invitation to provide that information or opt out by changing the location services settings on your mobile device. However, please note that certain features may not function properly or at all as a result if you opt out.

Data Transfers

We may transfer the personal information we collect about you to countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information.

Links

The Sites may contain links to websites not operated by us, as well as third party widgets and applications discussed above. Once you leave the Sites, 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 the Sites or the privacy practices of those websites or applications.

Data Security

We use commercially reasonable administrative, technical, personnel, and physical security measures designed to safeguard information about you in our possession against loss, theft and unauthorized use, disclosure or modification. Of course, despite these measures, we cannot guarantee perfect security of networks, servers and databases we operate or that are operated on our behalf.

Disputes

If you choose to visit the Sites, your visit and any dispute regarding privacy is subject to this Privacy Statement and the Visitor Agreement or Terms of Use applicable to each Site, including limitations of liability, arbitration and dispute resolution provisions and provisions relating to governing law or jurisdiction or venue that may be included in any of the foregoing.

Updates to this Privacy Statement

We may update this Privacy Statement to provide clarification or notice of changes to our practices. We will provide you with notice of material changes by posting notice of the changes on the Site, or by providing you with notice by email or when you log into your account on the Site. By using our Sites on or after the effective date of any such amendment, you agree that your use, and any dispute over privacy, is governed by this Privacy Statement, as amended.

How to Contact Us

If you have any questions or comments about this Privacy Statement, or if you would like us to update information we have about you or your preferences, please contact us by email at privacy@coxautoinc.com.

YOUR CALIFORNIA PRIVACY RIGHTS

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Statement of CentralDispatch and its subsidiaries (collectively, “we,” “us,” or “our”), a Cox Automotive, Inc. company, and applies solely to consumers who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual consumer, household, or device (“personal information”). We have collected the following categories of personal information from consumers within the last twelve (12) months:

The following examples are taken directly from California Consumer Privacy Act, (CentralDispatch) collects at least one of the example items from each category.

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some	YES

	personal information included in this category may overlap with other categories.	
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from our customers or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our website (www.Centraldispatch.com). For example, from submissions through our website portal or website usage details collected automatically.
- From third-parties that interact with us in connection with the services we perform.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category D: Commercial Information.
- Category F: Internet or other similar network activity.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have sold the following categories of personal information:

In the preceding twelve (12) months, we have not sold any personal information.

Your Rights and Choices

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

California Civil Code Section 1798.83 entitles California users to request information concerning whether a business has disclosed certain information about you to any third parties for the third parties' direct marketing purposes. California users who wish to request further information in compliance with this law or have questions or concerns about our privacy practices and policies may contact us as specified in the "How to Contact Us" section below.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected about you and retained, subject to certain exceptions in the CCPA. Once we receive and confirm your verifiable consumer request, we will delete your personal information from our records, unless an exception applies, and we will direct our service providers to similarly delete your personal information from their records.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a "verifiable consumer request" (defined below) to us by either:

- Calling us at 800-928-7869
- Visiting [Centraldispatch.com](https://www.centraldispatch.com)

Only you or someone you authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

A verifiable consumer request must:

- Provide enough information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with enough detail that allows us to properly understand, evaluate, and respond to it.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not deny you goods or services, charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties, provide you a different level or quality of goods or services, or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Do Not Track

Online Tracking Policy for California Residents. As of the effective date of this Privacy Statement, there is no commonly accepted response for Do Not Track signals initiated by browsers, therefore we do not respond to them.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: Centraldispatch.com

Email: privacy@coxautoinc.com

Postal Address: Cox Automotive, Inc.

Attn: Scott Hilsen, Chief Compliance & Privacy Officer

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