

## **SOCIALDEALER Privacy Policy**

*updated November 1, 2018*

**SOCIALDEALER, LLC** and our affiliates (*Company, us or we*) have adopted this Privacy Policy, which applies to all users of our website <https://socialdealer.com/> and any websites specifically identified as belonging to us (collectively, *Site*).

We provide social media advertising, online reputation management, and social media content solutions for our business clients, primarily in the automotive industry (collectively, our *Services*). Our Privacy Policy applies only to personally identifiable information we collect on our own behalf. Information we collect on behalf of our clients or that they collect and store in one of our applications is subject to their own privacy policies and practices.

We are committed to protecting the privacy and personal information of users of our Site and Services. This Privacy Policy describes our policies and procedures for the collection, use and disclosure of your information and data on our Site and through our Services. You understand that by using the Site or Services you agree to the terms of this Privacy Policy.

### ***INFORMATION WE COLLECT AND HOW WE COLLECT IT***

The personally identifiable information we collect may include your name, address, zip code, phone number, email address, and other identifying information (*Personally Identifiable Information* or *PII*). We collect PII in a number of different ways and from a number of different sources. We collect PII you provide us through our Site or when using certain aspects of our Services. We may also collect PII you provide to our clients or our authorized vendors, as well as information we obtain from third party databases (collectively, our *Partners*). We collect certain information from or through social media platforms (such as Facebook, Google and Twitter), including user profile data, page details and page reviews, and post and post engagement details.

### ***HOW WE USE YOUR INFORMATION***

We use your PII to customize information and advertising that we believe may be of interest to you (such as targeted banner advertisements), to respond to your inquiries, and to notify our clients regards to actions they may wish to take (e.g., to respond to reviews or customer comments). We may also use your PII to provide you with marketing materials, as well as other information we believe may be relevant to you. If you that you do not wish to receive any such communications from us, you may unsubscribe by emailing us at [unsubscribe@socialdealer.com](mailto:unsubscribe@socialdealer.com), in the case of email communications, by using the built-in “unsubscribe” feature.

Your PII may be shared with our affiliates and Partners and may also be disclosed to third parties who work with us, our affiliates, or Partners, who may use that information to contact you. We may also work with third parties that provide certain functions on our behalf, such as analyzing data or authenticating contact information. We require our third party service providers to contractually commit to protecting your PII in accordance with both industry standards and applicable law. While we have implemented policies and procedures to protect PII, we cannot



control, and are not responsible for, the manner in which our Partners or other third parties use that PII.

We may also use your PII by combining it with non-personal information and aggregating it with information collected from others. We use this aggregated data in a number of ways, such as to improve the quality and value of our Services and to analyze and understand how our Services are used. In addition, we may provide aggregated data to our Partners so that they may understand how people use our Services or their own.

## **COOKIES**

We may use cookies to recognize you and optimize your experiences when visiting our Site and using our Services. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it. However, if you do not accept cookies, you may not be able to use all of the features of our Site or Services.

## **EXTERNAL LINKS**

Our Site or Services may contain links to other third-party websites. After you leave our Site, we have no control over the information collected from or about you. We are not responsible, and assume no liability, for the privacy policies and/or practices on any third-party websites. This Privacy Policy only governs information collected by us on our Site.

## **HOW WE PROTECT YOUR DATA**

We use safeguards that satisfy generally accepted industry standards to preserve the integrity and security of your PII. However, we cannot guarantee the security of information you provide us with certainty or warrant it will not be accessed, disclosed, altered, or destroyed by unauthorized persons. We will make all legally required disclosures of any breach of the security, confidentiality, or integrity of your PII, in the manner and within the time periods required by applicable law.

Your PII is collected and used by us within the United States. We make no representation that our Privacy Policy complies with the laws of any foreign jurisdictions. If you choose to provide us with PII from outside the United States, you do so at your own risk and are responsible for compliance with any applicable foreign laws.

## **COMPLIANCE WITH LAW ENFORCEMENT**

We cooperate with government and law enforcement officials, as well as private parties, to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties that we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process, including, but not limited to, subpoenas, to protect our property and rights or that of a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical or subject to legal action.



## **OUR POLICY TOWARDS CHILDREN**

Our Site and Services are not targeted to or intended for use by children. We are concerned about the privacy and safety of children when they use the internet. Accordingly, we will not knowingly request PII online from anyone under the age of 13 without prior, verifiable parental consent. Unfortunately, we cannot always determine the age of a visitor to our Site or user of our Services.

## **CORPORATE TRANSFER**

In the course of a corporate merger, acquisition, divestiture, asset sale, joint venture, bankruptcy, dissolution, reorganization, or any other similar transaction or proceeding, we may sell, divest, transfer, assign, share or otherwise engage in a transaction that involves some or all of our assets, including your PII.

## **CHANGES**

We may modify our Privacy Policy, at any time and for any reason, by posting the revised Privacy Policy on our Site. Your use of our Site or Services after any such posting indicates your acceptance of our modified Privacy Policy.

## **CONTACT US**

If you have any questions or concerns regarding your privacy when using our Site or Services, please contact us at [legal@socialdealer.com](mailto:legal@socialdealer.com). We will make every effort to respond promptly and address your concerns.

