

SOUTHEAST TOYOTA DISTRIBUTORS, LLC

PRIVACY POLICY

Last modified: February 26, 2020

We take your privacy seriously. Our primary goal in collecting information from and about you is to help personalize your interactions and experiences with us and our authorized Toyota dealers. This policy explains what information about you we may collect, when we may collect it and how we may use and share it.

Applicability

This Privacy Policy applies to explore.setbuyatoyota.com and the related mobile site (collectively, the “Website”), both of which are owned by Southeast Toyota Distributors, LLC (“SET”). As used in this Privacy Policy, “we” or “us” means SET and “you” or “your” means you as a user of or visitor to the Website. Your access to and use of this Website means that you consent to the terms of this Privacy Policy to the fullest extent permitted by law.

- **Personal Information:** When we refer to “personal information,” we mean information that can be used to directly identify you as an individual. Personal information may include your name, physical address, email address, demographic information, location and home or mobile phone number.
- **Usage Information:** When we refer to “usage information,” we mean information about you that is automatically or passively collected when you visit or use the Website. Usage information may include the type of browser, operating system, device or computer you are using to access the Website, as well as data about the pages within the Website you visited and for how long, the preceding page views, and your use of features or applications on the Website. Usage information may also include information about emails we send to you as part of a promotion or marketing program. Usage information is generally non-identifying, but if we associate it with you as a specific and identifiable person, we treat it as personal information.
- **Dealers:** When we refer to “dealers”, we mean our authorized Toyota dealerships. SET shares your personal information with a dealer as described below. Please be aware that each dealer is a separate legal entity, and is subject to applicable privacy laws in their handling of your information. SET does not control and is not responsible for their legal compliance.
- **Toyota:** When we refer to “Toyota”, we mean Toyota Motor North America, Inc. and its affiliated entities.

Information We Collect

● Information You Provide to Us

We collect personal information when you voluntarily provide it to us through your use of the Website, such as when you request to have a local dealer contact you; schedule a vehicle service appointment; participate in a survey, customer testimonial, promotional offer or other program we make available to you; or utilize tools accessible through the Website (including tools provided by third parties), such as the finance, comparison and research features.

You are not required to submit any personal information in order to visit the Website; however, in order to take advantage of certain services available on the Website, you must provide us with personal

information. These services include, for example, sending you new vehicle information alerts, promotions, newsletters and mailed brochures, as well as fulfilling your requests for additional information, local dealer contact and service appointments.

- **Information Automatically Collected**

Whenever you visit or interact with the Website or an email we send to you, we, and our third party advertisers and service providers, may utilize the following to collect usage information:

- **Device Identifier.** We may automatically collect your IP address or other unique identifier for the computer, mobile phone, tablet or other device you use to access the Website. If you visit the mobile website or are directed to the mobile Website via a QR Code that you scanned, we collect additional usage information in connection with the device identifier, including the mobile device's service provider and operating system. If you are viewing the mobile Website, we may collect and use certain GPS data to determine your location.
- **Cookies or Web Beacons.** We may utilize cookies or web beacons (data files placed on your computer or device when you visit the Website) to remember your preferences and make your visit to and use of the Website more enjoyable and meaningful to you. Cookies may also be used to associate you with social networking sites like Facebook and Twitter and, if you so choose, enable interaction between your activities on the Website and your activities on such social networking sites (if we provide such ability). Certain types of cookies called persistent cookies may stay on your device or computer until either (a) they expire, (b) they are overwritten with newer cookies, or (c) you manually remove them. We may use these persistent cookies to customize your experience on the Website. Additionally, if we use a third party to activate and/or deliver a service or site functionality to you, this third party may place a persistent cookie on your computer to collect personal information from you in order to activate and deliver the service, or facilitate the processing of a request by you.
- **Tracking Options.** At this time, the Website does not respond to undefined "do not track" signals sent by your browser or device. However, you may refuse or delete cookies. To learn how you may be able to reduce the number of cookies you receive from us or delete cookies; please refer to your browsers help menu or other instructions related to your browser. If you disable or opt out of receiving cookies, please be aware that some features and services on our Website may not work properly. In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests.
- **Analytics software and pixel tags.** We may use spotlight and banner ads, web beacons and pixel tags, which are site instrumentation tools that help us determine, for instance, whether you have viewed a page and, if so, how many times, when and for how long. Emails or electronic newsletters we send may use these tools to gather email metrics such as how many of the emails are opened, if they were printed or forwarded, the type of device from which they were opened, and the city, state, and county associated with the applicable IP address.
- **Session logs.** When you visit the Website, the server on which the Website runs automatically generates a "session log." We use session logs to help us determine how people travel through our Website to help us to structure our pages so that the information most frequently visited is easier to find. Additionally, by tracking page visits, we can also determine if the information we're providing is being used. Session logs also provide information about the IP address from which you accessed the Website, the website that referred you, the pages you visited and the date and time of those visits. We may also use third-party click tracking analytics tools such as Adobe Analytics and Google Analytics to capture clickthrough statistics.

- **Interest-Based Advertising or Online Behavioral Advertising.** We may collect data using pixel tags or web beacons from third-party advertising platforms. These data help us understand your online behavior while exploring our sites and allow us to serve you more relevant advertisements, which may include video, banner or social media advertisements on non-SET sites.
- **Information Provided by Third Parties**

In addition to information we may collect through your use of or visit to the Website, we may collect information about you from third parties. For example, we may utilize social media management services to collect information that you publicly post on social media sites. Additionally, if you are on another website and you opt-in to receive information from us, that website will submit to us your email address and other information about you so that we may contact you as requested. You may also choose to participate in a third party application or feature (such as on Facebook or Twitter or a similar application or feature on a third party website) through which you allow us to collect (or the third party to share) information about you such as lists of your friends, “likes”, comments you have shared, groups and location. Services like Facebook may give you the option to post information about your activities on our Website to your Facebook profile page to share with others within your network. In addition, we may receive information about you if other users of a third party website give us access to their profiles and you are one of their “connections” or information about you is otherwise accessible through your “connections” web page, profile page, or similar page on a social networking or other third party website or interactive service. We also may use data providers to associate personal information about you that is in our databases.

How We May Use the Information We Collect

Without limitation, the information we collect from and about you may be used by us or by those third parties with whom we share your information as listed below:

- To fulfill a request by you for information or action (e.g., brochure fulfillment, lead generation, send marketing or promotional materials including e-mails or other information, sweepstakes entries, save or share content)
- To respond to your comments
- To offer you opportunities to purchase products or services that we believe may be of interest to you
- To make the user experience more customer friendly
- To generate aggregate site analytics that improve our site layout, content, product offerings and services
- To administer the Website, help diagnose problems with our servers, analyze trends, track users’ web page movements, help identify you, and gather broad demographic information for aggregate use
- To personalize your experience while visiting the Website (such as allowing us to select which ads or offers are most likely to appeal to you, based on your interests, preferences, location, or demographic information)
- To match personal data collected in connection with the Website with data about you that we collect through other sources

- To comply with legal requirements
- To tailor content, advertisements and offers we serve you, including targeted or customized advertisements to you when you visit other, non-SET sites
- To measure the effectiveness of our campaigns by identifying the individuals who open or act upon a message we send and by identifying other metrics about such campaigns
- To enable you to participate in promotional activities, such as sweepstakes, contests, games, special events, blogs and chats, including when these programs are made available through an affiliated or unaffiliated business partner
- For customer satisfaction, marketing, consumer research and other legitimate business purposes
- For purposes disclosed at the time you provide your information or otherwise with your consent **Who**

We May Share Your Information With

We may share your information with the following third parties:

- With our service providers, including our vendors and subcontractors, in the course of their performance of work on our behalf (or on behalf of our partners). These entities can include service providers that host or operate the Website, analyze data, process transactions and provide customer service, as well as our or our partners' advertisers, sponsors or other third parties that participate in or administer our promotions, contests, sweepstakes, surveys or provide marketing or promotional assistance
- With our affiliates, partners, associations, advertisers or other third parties to provide you with targeted advertising, product information and promotional and other offers
- With other companies within the Southeast Toyota Distributors, LLC family of companies or subsidiaries. Our "family of companies" is the group of companies related to SET by common control or ownership. We share information within this "family" as a normal part of conducting business and offering products and services to our customers
- With Toyota and our authorized dealers

We will also share your personal information with third parties (a) as required by law or in response to a law enforcement request, such as in connection with a subpoena, law enforcement or regulatory request or investigation, litigation, dispute resolution or similar legal process; (b) when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others; (c) to verify or enforce this Privacy Policy or other applicable policies; (d) to address fraud, security or technical issues; (f) to respond to any emergency situation; and (g) in the event of a merger, acquisition, or similar transaction, as well as an insolvency, bankruptcy, or receivership.

We do not sell your personal information for any reason.

Special Provisions Related to Credit and Financing Information

Through the Website, we provide the ability for you to submit an application for credit in connection with the purchase or lease of a vehicle from one of our authorized Toyota dealers. We collect the information you provide on the application and then pass it to the individual Toyota dealerships that you have selected, at which point the dealership will pass along your information to various lending institutions in order to process your request for financing. As a result of your application for credit, personal information

about you will be collected from a variety of sources including:

- Application Information. This information includes the information you provide on your application and other forms such as names, addresses, telephone numbers, birthday, social security numbers, level of family income, employer's name, and employer's address.
- Credit Reports. This information includes information from consumer reporting agencies.
- Marketing partners and publicly available databases. As a third party marketing vendor for Toyota dealerships in the Southeast, we receive non-public information; which is used to help us and your dealer serve you.

The individual Toyota dealership uses this information to evaluate your applications, locate a lender, provide you with high quality service, deter fraud and, with your consent, inform you of offers for other individual Toyota dealership services offered by your Toyota dealership or by third parties. The dealer may also use this information to confirm your identity when you call to inquire about your account. Additionally, the dealer will disclose your information to the following entities solely for the purpose of locating a vehicle that meets your criteria and obtaining credit for the purchase or lease of such vehicle. Outlined below is the information shared with each type of third party and as appropriate, your options.

- Information Sharing with Service Providers -- In order to provide quality service, the individual Toyota dealer contracts with service providers to perform essential roles in processing your application. We may disclose some or all of the information we collect to these service providers on the dealer's behalf. These service providers have entered into a contract with lending institutions that forbids them from using information provided by the individual Toyota dealer for any purpose other than providing the service for the individual Toyota dealer. The individual dealer takes security precautions to monitor the use of the information and prevent the use of the information for any other purpose.
- Information Sharing With Merchants - The individual Toyota dealer does not share any information with unrelated merchants for the purpose of extending offers of goods and services without your consent.
- Information Sharing with Partners - The individual Toyota dealer offers its products in conjunction with other dealerships, financial institutions and other businesses. By completing a credit application for the purpose of obtaining credit for the purchase of a vehicle, you agree to the sharing of information with those third parties solely for that purpose. The information shared may include your name, address, phone number, e-mail address, and personal financial information.
- Credit Reports and Other Uses of Information -- In applying for credit, you agree that your credit report may be obtained from one or more credit reporting agencies (i.e., Equifax, PO Box 4472, Atlanta, GA 30302; Experian, PO Box 2002, Allen, TX 75013; and Transunion, PO Box 99506, Chicago, IL 60693.) in connection with your application and the administration of such application. You also authorize the dealer to exchange credit information concerning you or your use of the account with (and answer questions and requests from) others, such as lenders and credit reporting agencies.

Notwithstanding the above, once passed to the dealer and to lending institutions, your information will be treated by the dealer pursuant to the dealer's and the lending institutions' own privacy policies. We are not responsible for any use by them of your information or of the accuracy of any information provided by you or other sources in the process of evaluating your application for credit, nor are we responsible for any credit-related decision they may make or not make.

Blogs/Public Areas

If we make blogs, chat rooms, bulletin boards and similar features available for your use on the Website, please remember that these areas are public and the information you disclose there is not confidential and can be viewed by others. The information presented in these areas of the Website reflects the views of the individual users who have posted such comments/materials and does not necessarily reflect the view of SET, our dealers or Toyota. We may, but shall have no obligation to, monitor the use of these areas and to remove postings that we determine, in our sole discretion, to be inappropriate.

Referrals

For some features on the Website, you may be able to submit information about other people to us. For example, if you wish to invite your friends to participate in a program offered on the Website or forward particular content from the Website to your friends, you will be asked to submit your friends' email addresses. Our use, sharing and protection of your friends' information will also be subject to the terms of the program and this Privacy Policy.

ADVERTISING/BEHAVIORAL TARGETING; HOW TO OPT-OUT.

We may use third party ad network providers to help present ads on the Website, as well as other service providers to evaluate and provide us with information about the use of the Website and content viewed. We do not share personal information with these providers (unless, of course, you give us permission). Such providers may place and access persistent cookies, pixel tags, or similar technologies on your device to serve you ads or other content personalized to your interests which they infer from your precise location and/or your browsing history on the Website and other sites you have visited. In doing so, the provider collects or has access to information such as your usage information. The use of persistent cookies, pixel tags, or similar technologies by these providers is subject to their own privacy policies, not ours.

If you prefer to not receive targeted advertising, you can opt-out of some network advertising programs. To do so, please visit the NAI Opt-Out Page located here <http://optout.networkadvertising.org/> and/or the DAA Opt-Out Page located here <http://www.aboutads.info/choices/>. The DAA OptOut Page provides a tool that identifies its member companies that have cookies on your browser and provides links to those companies. Please note that it may take up to a week to process your request. Please note that even if you choose to opt-out, you will still see advertisements while you're browsing online. However the advertisements you see may be less relevant to you and your interests.

Additionally, many network advertising programs allow you to view and manage the interest categories they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive.

Security Measures

We are committed to keeping your personal information secure. We have appropriate technical, administrative and physical procedures in place to protect personal information from loss, misuse, or alteration. We limit access to Information to individuals who have a business need consistent with the reason the information was provided.

While we employ such procedures to protect your information, we cannot guarantee that the information you submit to the Website will be confidential or will not be transmitted to or intercepted by a third party. NEITHER SET, ITS AFFILIATED COMPANIES, TOYOTA OR ANY AUTHORIZED TOYOTA DEALER SHALL BE RESPONSIBLE FOR ANY HARM THAT YOU OR ANY PERSON MAY SUFFER AS A RESULT OF YOUR USE OF THIS WEBSITE OR ANY INFORMATION YOU SUBMIT OR OTHERWISE TRANSMIT TO OR THROUGH THIS WEBSITE.

Children

This Website is not intended for and does not knowingly collect personal information from children under the age of 13. If you are under the age of 13, please do not submit your email address or any other personal information to us through the Website.

Links to Other Websites

This Website includes links to other websites, such as the sites for Toyota and Toyota dealer advertising associations, our authorized dealers' websites or websites operated by the SET family of companies such as SETF.com. These websites are not under our control, even though they may use similar markings, including the Toyota name or logo, or reference this Website. Such other websites have their own privacy policies and may place their own cookies on your computer. We do not control any cookies placed on your computer by third parties whose advertising or links appear on our Website. You are encouraged to review these sites' privacy and other policies when you visit them.

Changes To This Privacy Policy

We reserve the right to change this Privacy Policy at any time in our discretion. If we make changes, we will post the new Privacy Policy on this Website. Your continued use of this Website after any changes represents consent to the new Privacy Policy to the fullest extent permitted by law. We encourage you to periodically review this Privacy Policy.

Contacting Us

If you have any questions, comments, or concerns about this Privacy Policy, please email us at setdealersystems@jmfamily.com or write to us at: Southeast Toyota Distributors, LLC Attn: Legal Department, 120 Jim Moran Boulevard, Deerfield Beach, FL 33442.

END OF PRIVACY POLICY