

# DealerCONNECT PRIVACY STATEMENT

## INTRODUCTION

Welcome to the FCA US LLC ("FCA") DealerCONNECT portal. At FCA, we believe it is important to protect the privacy of the users of the portal, which includes our dealership personnel and FCA employees. We strive to be transparent with our practices. This DealerCONNECT Privacy Statement ("Privacy Statement") explains and summarizes how FCA collects and uses your information, including the personal information that you may provide to us through the DealerCONNECT portal. We may update this Privacy Statement from time to time, so please check back with us periodically.

This Privacy Statement explains the information practices of FCA including:

How FCA uses the Personal Information you share with us and that we learn about you because of our relationship.

How FCA uses "cookies" and related information collected automatically when you use our Website or Applications.

What Personal Information, if any, FCA may share about you and the conditions we use to protect your Personal Information if it must be shared.

What kind of security measures FCA takes to protect your information from accidental loss or disclosure and how FCA will inform you in the event of a security breach. The process through which you can access Personal Information you share with FCA and have that Personal Information corrected, restricted or removed from our records. Other things you should know about FCA and privacy.

DealerCONNECT is provided as a tool by FCA to provide information and services for dealership personnel and FCA employees to facilitate the sale of vehicles, parts, and other merchandise as well as to provide our customers with a pleasant service experience. As with other electronic resources provided by FCA, DealerCONNECT constitutes a valuable business asset and is the property of FCA or its third-party vendors. FCA will maintain records of your use and transactions conducted while you are on the DealerCONNECT portal.

## SCOPE

DealerCONNECT is a FCA restricted-access Internet web site that contains a variety of content and provides a virtual doorway to certain external web sites and to other data and applications on the FCA internal network. This Privacy Statement applies only to the DealerCONNECT portal and not to external websites. You will know that you are on DealerCONNECT and that this Privacy Statement applies whenever you see the URL "<https://dealerconnect.chrysler.com>" or "<https://dealerconnect.com>" in your computer's browser window and the "DealerCONNECT" label at the top of your screen.

## **COLLECTED INFORMATION AND USE**

**Active Information Collection.** The DealerCONNECT portal is primarily designed to be a doorway to other resources for you. DealerCONNECT requires you to actively enter some information, such as your SID.

**Passive Information Collection.** As you navigate DealerCONNECT, information may be passively collected from you (that is, without you actively providing the information) using various technologies. Such passive information collection methods allow collection of a variety of information, including the Internet Protocol (IP) address (a unique identifier assigned to a computer on the Internet), various navigational data, the type of web browser and operating system you are using, the date and time you visit DealerCONNECT, the specific pages you visit on DealerCONNECT and how long you spend there..

In particular, like many Internet web sites, DealerCONNECT utilizes cookies and related technologies. Cookies are small lines of text/data that are written onto your computer by the website. FCA or others acting on our behalf may use cookies, pixel tags, web beacons or other similar technologies in connection with the operation of our Websites or Applications. These technologies may collect and store non-Personal Information. We utilize these technologies to research and understand how our Websites and Applications are used and to personalize your online experience with FCA. At the end of your visit, session cookies used by FCA are removed. However, in some instances some FCA cookies may persist. It is possible that Cookies placed by FCA or its vendors or suppliers (as applicable) in connection with the operation of the Website or application may remain stored on your computer until you remove them. You may set your browser to notify you when you receive a cookie or to refuse receiving it. You should be aware that this may interfere with or make you unable to use certain functionality on websites using cookies.

**Use and Disclosure of Information:** Information collected from you while you are on DealerCONNECT is used for a variety of purposes, including supporting the particular activity in question (e.g., a survey); compiling aggregated statistics; creating profiles by dealership role (e.g., by country of residence, location, job type, and so on) to provide helpful information about DealerCONNECT usage and employee interests; enhancing DealerCONNECT content; supporting marketing and research efforts; and providing you with information that may be of interest. Information passively collected from you while you are on DealerCONNECT is combined with, linked to, or stored with other information, including your SID and other personally identifiable information. FCA reserves the right to monitor, disclose, transfer, or otherwise use information collected from you while you are on DealerCONNECT to the full extent permitted by law.

## **YOUR CONSENT**

Your use of DealerCONNECT is governed by this Privacy Statement, the DealerCONNECT Terms of Use, and other applicable FCA Policies. Whenever you submit information while you are on DealerCONNECT, you consent to the collection, use, and disclosure of that information in accordance with this Privacy Statement and the Terms of Use. You are solely responsible for your interactions with external web sites and third parties to which DealerCONNECT provides you access (such as by clicking on a link). Linked sites outside of DealerCONNECT may appear in a separate browser window while the DealerCONNECT browser window remains open in the background. We recommend that you read the privacy policies of external web sites you visit to determine how these sites collect, use, and disclose information that you provide.

## **WHEN FCA MAY SHARE COLLECTED INFORMATION**

FCA may share your Personal Information within our enterprise to fulfill our obligations to you and operate our business consistent with this Privacy Statement and applicable data protection law. We may also share your Personal Information with third parties in certain situations, including:

**FCA Affiliates, Vendors and Suppliers.** "Affiliates" include FCA dealers, companies that are part of the FCA US LLC family of companies, FCA partners or their respective subsidiaries, employees, and supplemental workers. Vendors and suppliers are companies who perform services for FCA US LLC or its dealers. To the extent it is necessary for these groups to provide their products and services to us and provide products and services you have requested, these third parties may have access to or process your Personal Information. FCA may sometimes permit our authorized service providers to have access to aggregate statistics about our customers, sales, traffic patterns, and related Website or Application information. These transfers of aggregate statistics do not involve Personal Information.

**Enabling Services.** FCA offers a variety of services and functions through its Websites and Applications. Personal Information that is collected through a Website or Application may be used and/or disclosed to third parties in order to enable us to provide functionality or services to you. For example, some FCA Websites and Applications allow you to interface with third party websites or applications. To facilitate that connection, we may use your Personal Information and/or disclose your Personal Information to third parties. When we provide location based services enabled through a third party, we may share data with those services in order to provide the related location based service or functionality.

**Mergers, Acquisitions, and Insolvency.** If FCA should ever file for bankruptcy or merge with another company, or if FCA should decide to buy, sell, or reorganize some part or all of its business, FCA may be required to disclose your Personal Information, including to prospective or actual purchasers in connection with one of these transactions.

**As Required by Law and Other Extraordinary Disclosures.** FCA may be required to disclose your Personal Information if it: (i) believes it is reasonably necessary to comply with legal

process (such as a court order, subpoena, search warrant, etc.) or other legal requirements of any governmental authority, (ii) would potentially mitigate our liability in an actual or potential lawsuit or investigation, (iii) is otherwise necessary to protect our rights or property, or (iv) is necessary to protect the legal rights or property of others.

## **SECURITY**

Data transmissions over the Internet cannot be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. Once we receive your transmission, we make reasonable efforts to ensure security on our systems. FCA uses secure server software (e.g. SSL) and firewalls to protect your information from unauthorized access, disclosure, alteration, or destruction. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of such firewalls and secure server software.

If FCA learns of a security system's breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using this Website or Application, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues. FCA may post a notice on our Website(s) or through an Application if a security breach occurs.

## **SPECIAL NOTICE TO INTERNATIONAL DEALERCONNECT USERS**

Because FCA operates globally, we may transfer your Personal Information within our global operations to fulfill our obligations to you, but always subject to the limitations of applicable data protection law and this Privacy Policy. Privacy laws differ across the globe. To help DealerCONNECT Portal users whose native language may not be English understand our privacy practices, we may provide special information that may be applicable to these individuals in different languages. FCA entities outside the United States may have supplemental privacy policies that apply in those countries. If you are visiting from Canada, the European Union or other regions with laws governing data collection and use that may differ from U.S. law, including those whose privacy laws may be stricter than U.S. law, please note that you are transferring your personal data to FCA in the United States. By providing your personal data you consent to that transfer.

FCA complies with the U.S.-EU and U.S.-Swiss Safe Harbor Frameworks and adheres to the Safe Harbor privacy principles. Information on both Safe Harbors may be found at <http://www.export.gov/safeharbor/>.

## **ACCESSING YOUR PERSONAL INFORMATION, MAKING CHANGES, OR REQUESTING DELETION OF PERSONAL INFORMATION**

Dealership personnel have the ability to access, correct, or remove information that has been obtained through the DealerCONNECT portal. If there are any questions in this regard, please contact your dealership system coordinator. For instructions on changing any of your privacy preferences, accessing your information, updating your information or for any privacy or data-protection-related question please write to [dprivacy@fcagroup.com](mailto:dprivacy@fcagroup.com) for assistance.

## **CHANGES TO THE PRIVACY STATEMENT**

In the future, we may change our Privacy Statement. Your continued use of the Website or Application following a change in the Privacy Statement represents consent to the new Privacy Statement to the fullest extent permitted by law. We encourage you to periodically review this Privacy Statement.

## **CONTACTING FCA**

If you have any questions, comments or concerns about this Privacy Statement, please email us at [dprivacy@fcagroup.com](mailto:dprivacy@fcagroup.com) or write to us at:

FCA US LLC

Attn: Data Protection Office

CIMS 485-02-12

1000 Chrysler Drive

Auburn Hills, MI 48326