

Effective Date: November 26, 2018

DealerCONNECT Privacy Statement

INTRODUCTION

Welcome to FCA 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. The DealerCONNECT Privacy Statement ("Privacy Statement") explains and summarizes how FCA collects, uses, and protects 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 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 information if it must be shared.
- What kind of security measures FCA takes to protect your information from accidental loss or disclosure.
- 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 LLC family of companies, FCA partners or their respective subsidiaries, employees, and supplemental workers. Vendors and suppliers are companies who perform services for FCA 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 information, 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 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 visitors 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 (EU) or other regions with laws governing data collection and use that may differ from United States (U.S.) law, including those whose privacy laws may be more stringent 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.

PRIVACY SHIELD

FCA complies with the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union and Switzerland to the United States, respectively. FCA has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. The definitions, policies, and procedures described in this Privacy Statement apply to personal data transferred pursuant to Privacy Shield certification by FCA. This section describes how FCA complies with the specific Privacy Shield principles not covered in other sections of this policy. If there is any conflict between the policies covered in this Privacy Statement and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov>.

Data Collection and Use. Privacy Shield Personal Data includes Personal Information data that is collected from consumers, our workforce, vendors, suppliers and others in connection with the manufacture, distribution and sale of automobiles and related goods and services in the EU/ European Economic Area (EEA) and/or Switzerland. This data covered includes manually processed information: location, recruitment and job applications, website or application usage, product registration and support, and other human resource information.

In addition, Privacy Shield Human Resources Personal Data is collected from potential and hired employees, vendors, suppliers and dealership employees and is used for internal purposes, including system access, payroll and benefits, training, security, reporting, and global corporate directories.

Notice and Consent. To the extent that FCA collects personal data directly from individuals in the EU and Switzerland, and as provided under the Privacy Shield, FCA will provide those individuals with notice and a clear, conspicuous, and readily available mechanism for requesting that their personal data not be used for specific purposes or disclosed to certain third parties. FCA will obtain affirmative express consent for the disclosure of any sensitive information to a third party or if used for a purpose other than those for which it was originally collected or subsequently authorized.

To the extent that FCA acts solely as a data processor when processing personal data on behalf of data controllers, FCA acts only on the instructions of its controller and does not control or share such personal data without direction from the controller. In those instances, and to the extent provided for by applicable law, FCA may rely on its data controller to satisfy the notice and consent principles under EU and EU Member State law, and will act on the instructions of those controllers.

Access. EU and Swiss Data Subjects have the right to access personal data about them that is covered by this Privacy Shield Policy. Personal data can be corrected, amended, or deleted by EU and Swiss Data Subjects, subject to certain limitations permitted by the Principles.

Onward Transfer. FCA may share EU and Swiss personal information with the types of third parties indicated above and in a manner that is consistent with our Privacy Statement and the Privacy Shield Principles. FCA will maintain written contracts with those third parties to whom it discloses Personal Data, and will require those third parties to:

- Provide the same level of protection as the Privacy Shield Principles to that Personal Data; and
- Contractually agree that data will only be processed for limited and specified purposes consistent with the consent given by the individual.

FCA also requires that the recipient will provide the same level of protection as the Privacy Shield Principles and that the recipient will notify FCA if it makes a determination that it can no longer meet those obligations.

To the extent provided by the Privacy Shield principles, FCA remains responsible and liable under the Privacy Shield if the third party agents that it engages processes the personal information on its behalf in a manner inconsistent with the Privacy Shield principles, unless FCA is able to prove that is not responsible for the event giving rise to the damage.

Recourse, Enforcement and Liability. In compliance with the Privacy Shield Principles, FCA commits to investigate and will attempt to resolve complaints about your privacy and the collection or use of your personal information within 45 days. European Union and Swiss citizens with inquiries or complaints regarding this Privacy Statement should first contact our Data Protection Office by sending an email to dprivacy@fcagroup.com.

FCA commits to cooperate with the panel established by the European Union Data Protection Authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC). FCA will comply with the advice given by such authorities with regard to data transferred from the EU and Switzerland. Pursuant to the Privacy Shield Principles, if you do not receive timely acknowledgement of your complaint or if your complaint is not satisfactorily addressed, please contact the DPA at http://ec.europa.eu/justice/data-protection/bodies/index_en.htm.

If your dispute remains fully or partially unresolved after taking the above actions, under certain and limited conditions, you may invoke last resort binding arbitration by a "Privacy Shield Panel" composed of arbitrators designated by the U.S. Department of Commerce and the European Commission. An individual's decision to invoke this binding arbitration option is entirely voluntary.

It should be noted that FCA is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

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 for assistance.

CHANGES TO THIS PRIVACY STATEMENT BY FCA

In the future, we may change our Privacy Statement. Your continued use of this 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 send an email to dprivacy@fcagroup.com or write to us at:

FCA LLC
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