

IAS Marketplace Privacy Policy

1. Overview

Welcome to the IAS Marketplace. This Privacy Policy explains what information Integrated Auction Solutions, LLC (“IAS”) collects about users of the IAS Marketplace, affiliated websites, and affiliated mobile applications (collectively, the “Service”) and what we do with that information. Please read this policy carefully. By using the Service, you agree to be bound by the terms and conditions of this Privacy Policy. Your consent to IAS’s use and disclosure of information as described in this Privacy Policy remains valid after your relationship with IAS terminates. This Privacy Policy only applies to our collection of information through the Service. It does not apply to information you may provide to IAS through other means, such as over the telephone or at a live auction.

We reserve the right to change this Privacy Policy from time to time. If we decide to change this Privacy Policy at some point in the future, we’ll post the changes here and update the version to reflect the date of the amendment. By using our Service 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 Policy, as amended.

If you have questions about this Privacy Policy, please contact us at support@integratedauctionsolutions.com.

2. Types of Information We Collect

In order to make our Service more useful, IAS collects three types of information about its users and their transactions: (1) personally identifying information voluntarily supplied by those users; (2) non-personally identifying information about users’ transactions; and (3) tracking information automatically gathered as our users use the Service.

a. Personally Identifying Information

First, we collect personally identifying information that you give us. “Personally identifying information” is information that lets us know the specifics of who you are, such as your first and last name, email address, mailing address (including zip code), employer, job title and department, telephone and facsimile numbers, billing or payment information, and other identifying information. When you engage in certain activities, such as registering for an account, searching for vehicles for sale, or submitting bids, we may ask you to provide certain information about yourself. This information allows us to make our Service more useful to you by providing information tailored to your individual preferences and needs. It also helps us and our vendors to process your transactions.

b. Transaction Information

Second, we collect information about the transactions proposed and entered into by users of our Service. This includes information about vehicles posted for auction and information regarding the

ultimate sale of such vehicles. It will not include personally identifying information of our users themselves.

c. Tracking Information

Third, when you use the Service, IAS or third parties acting on our behalf use cookies, web beacons (also known as pixel tags), and other technology to automatically collect information about your computer system configuration and your activity as you use our Service. For example, each time you use the Service, our servers automatically log information about your computer's operating system, Internet Protocol ("IP") address, access times, browser type and language, and the website you visited before navigating to our site. Your IP address is a number that is used by computers connected to the Internet to identify your computer so that data (such as the web pages you request) can be sent to your browser.

Cookies are small data files stored on your hard drive by a website. Among other things, cookies enable us to recognize you when you return to our Service and maintain your web session while you browse throughout the Service. We may also use cookies to measure usage of particular features of our Service, to analyze demand for different types of inventory, to count visitors to our web pages, to pre-populate forms, to analyze the preferences and needs of our users, and to deliver tailored content and communications. Our cookies are linked to personally identifying information and we use them to collect and store information about your individual usage, preferences and activity patterns on our Service, including records of your page views, vehicle searches, and bidding and transactional history. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some aspects of the Site may not function properly if you elect to disable cookies.

Web beacons are 1-pixel-by-1-pixel image files that may be embedded in our web pages or emails. We use web beacons to deliver cookies, count visits, and understand usage and campaign effectiveness. We also use web beacons to tell if an email has been opened and acted upon.

3. How We Use the Information We Collect

We use the information collected through our Service, including personally identifying information, in several ways, including:

- to operate and improve our Service and facilitate wholesale vehicle transactions;
- to respond to your comments and questions and provide customer service;
- to contact you to request feedback about your experience with our Service or to learn about your individual preferences and interests;
- to send you information related to our services, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages;

- to communicate with you about upcoming events and other news about products, features and services offered by IAS, our affiliates, and selected third parties;
- to conduct market analysis, traffic flow analysis, and related reporting;
- to customize or personalize your online experience, for example by pre-populating forms and displaying relevant content;
- to customize or personalize advertising, including advertising for our Service and affiliated services that you may see on third-party websites; and
- to help dealership franchisors understand their franchisee representatives' preferences for inventory and services.

We may combine any information that we collect automatically through our Service with personally identifying information that we or any of our affiliated companies collect about you or any company with which you are associated. We may also link the information that we collect about you through the Service to notes about you that customer service and sales representatives working for us or our affiliates may record in our customer relationship management (“CRM”) database. These notes may include information about your employment responsibilities, contact and inventory preferences, remarketing activity, and your comments and feedback as a customer. We share our CRM database with our affiliated companies, so any information we collect about you through the Service may be combined with information about your relationships with affiliated services. We use this information to improve our Service, to help us understand your preferences and needs as a wholesale vehicle buyer or seller and to provide you with a better, more personalized experience.

4. Information Sharing

IAS reserves the right to disclose to third parties personally identifying information and other information that we collect about you for a variety of reasons and purposes, such as providing you with information about products and services that we believe may be of interest to you and the dealerships or other companies that you represent. More specifically, we reserve the right to share information that we collect about you in the following circumstances:

Affiliates. We may share information about you, including personal information, with our corporate affiliates, who will use it in accordance with their privacy policies. Please visit Cox Automotive Inc. for more information about our affiliates.

Dealership Franchisors. If you are an employee or a representative of a franchised dealership, we may share any information we collect about you with your dealership's franchisor—either for our own business purposes, or for the franchisor to use for its own business and marketing purposes and subject to its separate privacy policies, which may differ from ours. For example, we may share with your dealership's franchisor a list of their franchised dealers who searched for or bid on particular types of vehicle inventory or who attended or registered for particular sale events.

Service Providers, Vendors and Consultants. We may share any information we collect about you with any third-party vendors, consultants, or service providers that we engage to perform services on our behalf and that need access to the information to carry out their work for us.

Aggregate Information. We may combine information that we collect about you with information that we collect about other users of our Service or affiliated services in a form that does not identify you personally. We may use such aggregated information and disclose it to third parties as we see fit.

Legal Obligations, Public Safety and Other Disclosures. We may occasionally release information about our users as authorized by law when we deem such release to be appropriate to comply with law, respond to legal process or a valid law enforcement request, enforce our User Agreement, or protect the rights, property, health or safety of users of our Service, our customers, the public, IAS, our affiliates, or any third party.

Business Transfers. As our business grows, we may buy or transfer various assets. In the event that we transfer assets relating to the Service to another company, information about our users may be among the transferred assets. We reserve the right to disclose and/or transfer personally identifying information to a third party in the event of a proposed or actual purchase, sale, lease, merger, foreclosure, amalgamation or any other type of acquisition, disposal, transfer, conveyance, or financing of all or any portion of IAS or our affiliates.

Marketing Purposes. We may disclose information, including personally identifying information, such as your name, email, and postal address, to our affiliates so that they may market to you directly regarding upcoming events and other news about products, features, and services that may be of interest to you and the companies that you represent.

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.

IAS reserves the right to disclose to third parties non-personally identifying information, including transaction information and tracking information, for any purpose whatsoever, including but not limited to the above purposes.

5. Links and Features Offered in Conjunction with Other Providers

To make our Service more valuable to our users, we may feature some products and services that come from other providers through cooperative arrangements with other companies. We may share with these companies such information as is necessary for them to provide the products or services. Our Service may include links to other services, and may provide access to products and services offered by third parties, whose privacy policies and practices we don't control. When you access another website or purchase products or services or conduct other transactions through our Service, use of any information you provide is governed by the privacy policy of the operator of the site you're visiting or the provider of such products or services. If you can't find the privacy policy of

any of our provider partners via a link either from their site's homepage or from the pages on which the products or services are offered, you should contact the provider directly for more information.

6. Security

Information that we gather on our Service is stored within IAS-controlled databases (or databases hosted on our behalf) on servers maintained in protected environments. We use commercially reasonable efforts to ensure that personally identifying information is protected against loss, theft, and unauthorized access, including physical, organizational, and technological safeguards.

However, no physical or electronic security system is impenetrable. We cannot guarantee the security of our servers or databases, nor can we guarantee that information you supply won't be intercepted while being transmitted to us over the Internet.

7. Retention and Storage of Personal Information

For the purposes set out in this Privacy Policy, personally identifying information may be transferred to, processed, stored and accessed by us, one of our affiliates, or an unaffiliated service provider in the United States, Canada, or other jurisdiction where we have operations. Courts and other authorities in these jurisdictions may, in certain circumstances, be entitled to access your personally identifying information. By using the Service, you consent to this transfer, processing, storage, and access of your personally identifying information inside and outside of the jurisdiction in which you reside.