

Privacy Policy

Effective Date: May 11, 2023

ITOCHU Automobile America Inc. (“ITOCHU”) is committed to protecting the privacy and security of the information we collect and to being transparent about the ways in which we collect and process your information. This statement (the “Privacy Policy”) sets forth our policies and practices for handling the information we collect from or about you. It applies to the websites and online services that we operate and that link to this Privacy Policy (the “Websites”).

I. COLLECTION OF INFORMATION

We collect the following categories of information when you use our Websites:

- Information you provide directly to us.
 - **Contact Information**, including real name, email address, telephone or mobile phone number, postal address;
 - **Commercial information**, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
 - **Geolocation data**, including geolocation information derived from your IP address and other device information; and
 - **Correspondence you send to us.**
- Information we collect automatically. We collect internet, other electronic network activity information, and other information automatically from the devices and browsers that you use, including your Internet protocol (IP) address; time zone setting and location; browser type and version; browser plug in types and versions; Internet service provider; the date and time of your visit; and information about the links you click and pages you view.

Without this information, we are not able to provide you with all the requested services, and any differences in services are related to your information.

We may aggregate or de-identify the information described above. Aggregated or de-identified data is not subject to this Privacy Policy.

II. USE OF INFORMATION AND PURPOSE OF DATA PROCESSING

We use and otherwise process each of the categories of information identified above for the following business purposes:

Purpose/Activity	In jurisdictions that require a lawful basis for processing, the lawful basis for processing, including basis of legitimate interest
<p>To provide you with the information, products and services that you request from us; to manage accounts; and to manage our relationship with you, including providing you with the information, products and services that you request from us, and notifying you about changes to our terms or Privacy Policy.</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessity to comply with a legal obligation</p> <p>(c) Necessity for our legitimate interests (for instance, to keep our records updated)</p>
<p>To improve our Websites and to ensure that content is presented in the most relevant and effective manner for you and for your device; to administer our Websites, including troubleshooting, data analytics, testing, research, statistical and survey purposes; to keep our Websites, business and users safe and secure; to comply with applicable laws and regulations; and to protect or exercise our legal rights or defend against legal claims.</p>	<p>(a) Necessity for our legitimate interests (for instance, for running and protecting our business; for provision of administration and IT services; for network security and to prevent cybercrime and fraud; in the context of a business reorganisation or group restructuring exercise; to study how people use our Websites, to develop the Websites, to keep our Websites updated and relevant, to grow our business and to inform our communications strategy)</p> <p>(b) Necessity to comply with a legal obligation</p>

Where we need to collect information by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may cancel a product or service you have with us.

III. DISCLOSURE OF INFORMATION

We are committed to maintaining your trust, and we want you to understand when, with whom, and under what circumstances we may share the information we collect.

- Authorized third-party vendors and service providers. We may share contact information, commercial information, geolocation data, correspondence you send to us and data that we automatically collect with third-party vendors and service providers that provide services to us for a variety of business purposes, such as customer service, maintaining and securing accounts, verifying customer information, security and performance monitoring, research, data hosting, auditing, and data processing.
- Corporate affiliates. We may share contact information, commercial information, geolocation data, correspondence you send to us and data that we automatically collect with our corporate affiliates.

- *Business transfers.* We may share contact information, commercial information, geolocation data, correspondence you send to us and data that we automatically collect in connection with a substantial corporate transaction, such as the sale of a website, a merger, consolidation, asset sale, initial public offering, or in the unlikely event of bankruptcy.
- *Legal purposes.* We may disclose contact information, commercial information, geolocation data, correspondence you send to us and data that we automatically collect to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims or government inquiries, and to protect and defend the rights, interests, safety, and security of ITOCHU, our affiliates, users, or the public.
- *With your consent.* We may share information for any other purposes disclosed to you at the time we collect the information or pursuant to your consent.

ITOCU does not sell your information to third parties.

ITOCU does not process or share your personal information with third parties for cross-context behavioral advertising.

ITOCU does not use or disclose sensitive personal information.

IV. ADVERTISING, COOKIES AND SIMILAR TECHNOLOGIES

When you use our Websites, we use cookies, pixel tags, local storage, and other similar technologies (collectively, “cookies”) to collect information from your browser or device. By using the Websites, you consent to our use of cookies and similar technologies.

The following types of cookies are used on our Websites:

- Essential cookies – These cookies enable you to use our Websites. These cookies are essential to enable you to browse our Websites and use certain features. Disabling them may prevent you from using certain parts of the Websites. These cookies also help keep our Websites safe and secure.
- Content cookies – These cookies gather information about your use of our Websites so we may improve your experience. They remember that you've visited our Websites and help us understand usage of our Websites.

Do-Not-Track Signals and Similar Mechanisms. Some mobile and web browsers transmit "do-not-track" signals. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.

V. YOUR RIGHTS AND CHOICES

You may be entitled, in accordance with applicable law, to object to or request restriction of processing of your information, and to request access to, rectification, erasure, and portability

of your information or more information about our information practices. Requests should be submitted in writing as set out [below](#). If you become aware of changes or inaccuracies in your information, you should inform us of such changes so that the information may be updated or corrected. Once we receive your request, we may verify it by requesting information sufficient to confirm your identity.

You may be entitled, in accordance with applicable law, to submit a request through an authorized agent or to appeal a refusal to take action on your request. To designate an authorized agent to exercise your rights and choices on your behalf, please e-mail us at info@itochuauto.com. You also may be entitled, in accordance with applicable law, to appeal a refusal to take action on your request; to do so, please see the instructions in our response to your request.

You may be able to refuse or disable cookies by adjusting your web browser settings. Some browsers have options that allow the visitor to control whether the browser will accept cookies, reject cookies, or notify the visitor each time a cookie is sent. Because each web browser is different, please consult the instructions provided by your web browser (typically in the “help” section). Please note that you may need to take additional steps to refuse or disable Local Shared Objects and similar technologies. If you choose to refuse, disable, or delete these technologies, some of the functionality of the Websites may no longer be available to you and any differences in service are related to the data. Deleting cookies may in some cases cancel the opt out selection in your browser. For additional information on how Google processes your information and what choices you may have, visit their site [here](#). Please check your device settings for additional information on how to opt out.

We will not discriminate against you for exercising your rights and choices, although some of the functionality and features available on the Websites may change or no longer be available to you. You may lodge a complaint with a supervisory authority if you believe our processing of your information is unlawful.

VI. INTERNATIONAL TRANSFERS

By using the Websites and providing us with information, you understand and agree that we may transfer and store your information on servers located outside your resident jurisdiction. To the extent you are a resident of (i) a country other than the United States, you consent to the transfer of such data to the United States for processing by us in accordance with this Privacy Policy and (ii) the United States, you consent to the transfer of such data to Japan for processing by us in accordance with this Privacy Policy.

VII. CHILDREN

We do not knowingly collect, sell, or share any information from children, as defined by applicable law, without parental consent or as otherwise permitted by applicable law.

VIII. DATA RETENTION, SECURITY, AND INTEGRITY

Information will be retained only for so long as reasonably necessary and proportionate for the purposes set out above and consistent with our retention policies, in accordance with applicable laws.

We maintain reasonable security measures to safeguard information from loss, theft interference, misuse, unauthorized access, disclosure, alteration, or destruction. We also maintain reasonable procedures to help ensure that such data is reliable for its intended use and is accurate, complete, and current. You should understand that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be 100 percent secure, accurate, complete, or current. Please note that information collected by third parties may not have the same security protections as information you submit to us, and we are not responsible for protecting the security of such information.

IX. CHANGES TO THE PRIVACY POLICY

We may modify this Privacy Policy from time to time. When we update the Privacy Policy, we will revise the “Effective Date” date above and post the new Privacy Policy. We recommend that you review the Privacy Policy each time you visit the Websites to stay informed of our privacy practices.

X. CONTACT INFORMATION

If you have any questions about this Privacy Policy or our practices or would like to exercise a right under applicable law, please e-mail us at info@itochuauto.com or via traditional mail addressed to 33533 W 12 Mile Rd., Suite 300, Farmington Hills, MI 48331.