|  |  |
| --- | --- |
|  |  |

**Supplemental Privacy Notice for California Residents**

**You should read this Supplemental Privacy Notice together with the CDK Global** [Privacy Notice](https://everyauto.com/privacy_c.php) **(together, the “Privacy Notice”). This Supplemental Privacy Notice gives California residents the additional information required by the California Consumer Privacy Act of 2018 (the “CCPA”).**

1. **Your Rights**

The CCPA provides California residents with specific privacy rights, including the right to receive a privacy notice, the right to know what information we have collected about you during the past 12 months, and the right to know what categories of personal information we have shared with third parties. CCPA gives California residents with the right to opt-out of having their personal information sold.[[1]](#footnote-1) CCPA also gives California residents the right to request deletion of your personal information.

This notice provides information about the categories of information that we collect from California residents generally, the sources of the information, the purposes for which we use the information, and the categories of third parties to whom we disclose the information for business purposes. CDK Global does not sell personal information to any parties except to the provider of the vehicle listing or application you submitted on. To opt out, delete, or unsubscribe at any time, please visit <https://everyauto.com/data_privacy/request.php>

If you are a California resident, you may exercise your rights or authorize another person to act on your behalf by:

* Calling us at the toll free number: 1-877-927-4772
* Writing us at:

CCPA Rights Request

806 North Peoria Street

Floor 4

Chicago, IL 60642

Please note that we may need to verify your identity before we can fulfill your request. Visit our [data privacy and verification](https://everyauto.com/data_privacy/request.php) website for more information. If you are exercising access or deletion rights on behalf of another person, please either confirm that the person has authorized you to act as an agent us with or be prepared to provide proof that you have been designated as an authorized agent. Also, please understand that these rights are subject to some limitations, such as when we are retaining data to comply with our own legal obligations.

1. **CCPA Right to Know Disclosures**

| **Category and Sources of Personal Information** | **Representative Data Elements** | **Purpose for Collecting and Sharing the PI** | **Categories of Third Parties to whom this type of Personal Information is Disclosed for a Business Purpose** | **Categories of Third Parties to whom this type of Personal Information is Sold** | **Information about Your Rights and Choices** |
| --- | --- | --- | --- | --- | --- |
| **Contact Information**  We collect this type of information from:   * You * Third parties, such as companies that help us maintain the accuracy of our data and data aggregators that help us complete and enhance our records | Data elements in this category include:   * Full name * Street address * Email address * Telephone number | We use this type of information to identify you and communicate with you, including:   * To send transactional messages (such as account statements or confirmations) * To send marketing communications, survey and invitations * To personalize our communications and provide customer service * For our Everyday Business Purposes[[2]](#footnote-2) | We may disclose this type of information to our Affiliates and to:   * Service Providers, including to social media companies such as Facebook which use the data only to identify which of our customers use their platforms so that we can deliver ads to you on the platform * Third parties who assist us with address hygiene and fulfillment * Other third parties (including government agencies) as required by law, *such as pursuant to legally binding subpoenas, court orders, and similar instruments).* | We sell this personal information to the following categories of third parties: Vehicle inventory and auto finance aggregators  You can opt-out of these sales by visiting our data privacy and verification website | You can opt-out of having your contact information used by CDK Global for direct marketing. To do this, visit our [marketing opt-out page.](https://everyauto.com/data_privacy/request.php)  We will also delete your personal information from our marketing analytics files or de-identify it, so that it cannot be associated with you. We will retain a record of your marketing choice.  CDK Global cannot delete the contact information associated with your transactions with us, as these are needed for CDK Global’s internal business purposes and to comply with law. We will retain your information in accordance with our records retention program and securely delete it at the end of the retention period. |
| **Government-issued identification information numbers**  We collect this type of information from:   * You * Third parties, such as consumer reporting agencies, which verify the information you provided | Data elements in this category include:   * Social security number | We use this type of information:   * To identify you * For customer verification, credit and reference checks * For our Everyday Business Purposes | We may disclose this type of information to our Affiliates and Service Providers and to:   * Consumer reporting agencies * Lawyers, auditors, consultants and others who provide professional services to CDK Global * Other third parties (including government agencies) as required by law | We sell this information to the following categories of third parties: auto finance aggregators  You can opt-out of these sales by visiting our data privacy and verification website | CDK Global cannot delete these data elements, as these are needed for CDK Global’s internal business purposes and to comply with law. We will retain your information in accordance with our records retention program and securely delete it at the end of the retention period. |
|  |  |  |  |  |  |
| **Unique Identifiers**  We assign a visitor ID to you when you complete an inquiry.  We collect this type of information from:   * You, when you interact with us using your visitor ID * Third parties, such as ad delivery companies who place cookies containing advertising IDs on your devices for us | Data elements in this category include:   * Visitor ID * Device identifier * Advertising ID | We use this type of information:   * To identify you or your device, including to associate you with different devices that you may use * For record-keeping and reporting, including for data matching * For metrics and analytics, * To track your use of products, services, websites, including for ad delivery and personalization * For our Everyday Business Purposes. | We may disclose this type of information to our Affiliates and Service Providers and to:   * Third parties who assist with our information technology and security programs * Third parties who assist with fraud prevention, detection and mitigation * Lawyers, auditors, consultants and others who provide professional services to CDK Global * Other third parties (including government agencies) as required by law | We do not sell this personal information. | To decline or block your visitor ID, reference our cookie policy [here](https://everyauto.com/privacy_c.php).  CDK Global cannot delete other unique identifiers, as these are needed for CDK Global’s internal business purposes and to comply with law. We will retain your information in accordance with our records retention program and securely delete it at the end of the retention period. |
| **Online & Technical Information**  We collect this type of information from:   * You and from your computer or devices when you interact with our platforms, websites and applications. For example, when you visit our websites, our server logs record your IP address and other information. * Automatically, via technologies such as cookies, web beacons, when you visit our website or other websites. * Third parties, including computer security services and advertising partners   We also associate information with you using unique identifiers collected from your devices or browsers. | Data elements in this category include:   * IP Address * MAC Address, SSIDs or other device identifiers or persistent identifiers * Online user ID * [Encrypted] password * Device characteristics (such as browser information) * Web Server Logs * Application Logs * Browsing Data * Viewing Data (TV, Streaming) * First Party Cookies * Third Party Cookies * Flash Cookies * Silverlight Cookies * Web beacons, clear gifs and pixel tags | We use this type of information:   * For system administration, technology management, including optimizing our websites and applications, * For information security and cybersecurity purposes, including detecting threats * For recordkeeping, including logs and records that maintained as part of Transaction Information * To better understand our customers and prospective customers and to enhance our Relationship Information, including by associating you with different devices and browsers that they may use * For online targeting and advertising purposes * For our Everyday Business Purposes | We may disclose this type of information to our Affiliates and Service Providers and to:   * Third parties who assist with our information technology and security programs, including companies such as network security services who retain information on malware threats detected * Third parties who assist with fraud prevention, detection and mitigation * Third party network advertising partners * Lawyers, auditors, consultants and others who provide professional services to CDK Global * Other third parties (including government agencies) as required by law | We do not sell this personal information. | To request deletion of online targeting data visit our [privacy policy](https://everyauto.com/privacy_c.php)  CDK Global cannot delete other online and technical data, as these are needed for CDK Global’s internal business purposes and to comply with law. We will retain your information in accordance with our records retention program and securely delete it at the end of the retention period. |
| **Geolocation data**  We collect this type of information automatically from your mobile device [and/or vehicles]. | Data elements in this category include:   * Precise location (*e.g.,* from mobile devices), including routes taken and time spent traveling | We use this type of information:   * Provide the information, products or services requested * For information security and fraud prevention * To provide you with relevant local vehicle listings * For our Everyday Business Purposes | We may disclose this type of information to our Affiliates and Service Providers and to:   * Third parties who assist with our information technology and security programs * Third parties who assist with fraud prevention, detection and mitigation * Lawyers, auditors, consultants and others who provide professional services to CDK Global * Other third parties (including government agencies) as required by law | We do not sell this personal information. | CDK Global cannot delete location data, as these are needed for CDK Global’s internal business purposes and to comply with law. We will retain your information in accordance with our records retention program and securely delete it at the end of the retention period. |
| **OTHER CATEGORIES**  *Employment and residential status* | Data elements in this category include:  Employer  Job Title  Gross Monthly Income  Time at job  Rent/Own residence  Monthly rent/mortgage  Time at residence | We use this type of information:   * To confirm program qualification for finance aggregator * For our Everyday Business Purposes | We may disclose this type of information to our Affiliates and Service Providers and to:   * Lawyers, auditors, consultants and others who provide professional services to CDK Global * Other third parties (including government agencies) as required by law | We sell this personal information to the following categories of third parties: auto finance aggregators  You can opt-out of these sales by visiting our data privacy and verification website |  |

1. Personal information of children under 16 cannot be sold without affirmative consent. CDK Global does not sell any personal information of children under 16 unless it has obtained with affirmative consent as required by CCPA. [↑](#footnote-ref-1)
2. **Everyday Business Purposes**encompasses the Business Purposes (as defined in the CCPA) and following related purposes for which personal information may be used:

   * To provide the information, product or service requested by the individual or as reasonably expected given the context in which with the personal information was collected (such customer credentialing, providing customer service, personalization and preference management, providing product updates, bug fixes or recalls, and dispute resolution)
   * For identity and credential management, including identity verification and authentication, system and technology administration
   * To protect the security and integrity of systems, networks, applications and data, including detecting, analyzing and resolving security threats, and collaborating with cybersecurity centers, consortia and law enforcement about imminent threats
   * For fraud detection and prevention
   * For legal and regulatory compliance, including all uses and disclosures of personal information that are required by law or for reasonably needed for compliance with company policies and procedures, such as: anti-money laundering programs, security and incident response programs, intellectual property protection programs, and corporate ethics and compliance hotlines,
   * For corporate audit, analysis and reporting,
   * To enforce our contracts and to protect against injury, theft, legal liability, fraud or abuse, to protect people or property, including physical security programs
   * To de-identify the data or create aggregated datasets, such as for consolidating reporting, research or analytics,
   * To make back-up copies for business continuity and disaster recovery purposes, and
   * For corporate governance, including mergers, acquisitions and divestitures.

   [↑](#footnote-ref-2)