

Privacy Statement

This Privacy Statement is effective as of January 1, 2017.

Introduction

Thank you for your interest in the Volvo 360 website (together with any successor or mirror website and any related mobile or tablet application, the “Site”), which is operated by RMS Automotive, LLC (“RMS Automotive”) for and on behalf of its customer, Volvo Car USA, LLC (“Volvo”). All references in this Privacy Statement to “we” or “our” refer to RMS Automotive. We respect the privacy of our users when they use the Site. By using the Site, you consent to the use of your information and information about you in accordance with this Privacy Statement.

This Privacy Statement applies to information collected through the Site and does not describe the collection, use and disclosure practices of any of our corporate affiliates or third parties (including Volvo). For information on the collection, use and disclosure practices of any other company with whom you are doing business, whether or not affiliated with RMS Automotive, please review their respective privacy policies.

Services offered by the Site are not directed to individuals under the age of eighteen (18). If you are under eighteen (18), you should not provide any personal information to us.

This Privacy Statement covers:

- Information We Collect
 - Information You Provide
 - Automated Information
 - Data Technologies
 - Videos
 - Location Information
 - Publicly Posted Information
 - Combined Information and Information from Other Sources
- How We May Use the Information We Collect
- Applications, Widgets and Social Media
- Advertising Networks
- Information We Share
 - Affiliates and Dealers
 - Our Service Providers
 - Corporate and Asset Transactions
 - Other
- Your Choices
- Your California Privacy Rights
- Access and Correction
- Links
- Data Security
- Disputes
- Updates to this Privacy Statement
- How to Contact Us

Information We Collect

Information is gathered from the Site by us, our service providers, advertisers, sponsors and partners.

Information You Provide. We may collect information that you choose to provide on the Site (which may include your name, address, telephone number, email address, dealer or company name, AuctionACCESS number(s), government ID and bank account, payment and other financial information) in a variety of ways, such as when you:

1. register your account;
2. purchase a vehicle or engage in any other transaction on or through the Site.
3. provide payment information or authorize electronic ACH transfers or other payments;
4. subscribe to newsletters or provide feedback; and
5. participate in surveys, sweepstakes or other promotions.

Automated Information. Information regarding your use of the Site may be collected and/or aggregated through the use of automated means. This automatically collected information may include information such as:

1. your IP address, the type of browser and operating system used;
2. date and time you access the Site and pages you visit, and if you linked from or to another website, the address of that website;
3. email you open and links you click on within those emails; and
4. your ISP or mobile carrier, and the type of handheld or mobile device that you used.

Data Technologies. Various technologies are used to automatically collect information, such as cookies, local shared objects, and web beacons (generally referred to as "Data Technologies.") "Cookies" are small identifiers sent from a web server that are stored on your device for the purpose of identifying your browser or storing information or settings in your browser. "Local shared objects," sometimes known as Flash cookies, may be used to store your preferences or display content based upon what you have viewed on various websites to personalize your visit. A "web beacon," also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies. Anonymous advertising identifiers are increasingly being used on mobile devices and otherwise in a manner similar to cookies. When we refer to Data Technologies, we are including all current and similar future technologies. One or more Data Technologies may be used on the Site and other websites and mobile applications (that may not be the Site) by us, by another party on our behalf, or by third parties in accordance with their privacy policies. Data Technologies may be used by us and others, on our behalf and on their own behalf, to transmit information to you or about you and connect information about you from different sources, websites, devices, and mobile applications.

Location Information. We may collect physical location information that is sufficiently precise to allow us to locate a specific person or device ("Location Information"). We only collect Location Information with your permission (e.g., such as when you agree to provide it to us after initial access to or downloading of the Site). We may use Location Information and provide it to third parties to provide you with content and services that are relevant to a particular location, such as vehicle transport charges, available services in the area and directions.

Publicly Posted Information. Information that you make available to us and others via social media networks, forums, blogs, list serves, chat rooms or similar functionality is public information that we or others may share or use in accordance with the law.

Information from Other Sources and Combined Information. We may receive information about you from Volvo or from other customers and third parties with which we have a commercial relationship. We may combine information that you provide to us with the information we receive from Volvo and other sources, as well as with other information that is automatically collected. The combined information may include information about your use of the Site, your use of other websites, devices and mobile applications and your dealings with Volvo and other third parties.

How We May Use the Information We Collect

We may use information we collect or receive for the following purposes:

1. for everyday business purposes, such as establishing and managing your user account, providing products and services you request, and providing customer support;
2. to offer our other products or services and/or the products or services of others to you;
3. to communicate about, and administer your participation in, special events, sales, programs, surveys, contests, sweepstakes and other offers or promotions;
4. to enable you to interact with the Site and other dealers and third parties (including Volvo) through various means;
5. to evaluate and improve our business and the business of our affiliates, including developing new products and services and analyzing the effectiveness of products, services, applications and websites;
6. to diagnose and address technical and service problems;
7. to perform data analyses, including market and consumer research, trend analysis, demographic analysis and financial analysis;
8. to deliver content (including advertising) correlating to your interests and browsing and usage history, both within the Site and on other websites and applications;
9. to comply with applicable legal requirements and our policies and the policies of Volvo;
10. to provide vehicle sale information, transaction data and other information and material to Volvo; and
11. to contact you via telephone, text or chat. We will obtain your consent to contact you when and in the manner required by law.

Advertising Networks

Advertising that is customized based on predictions generated over time from your visits across different websites, devices and mobile applications is sometimes called “online behavioral” or “interest-based” advertising. We may partner with advertising networks, which are companies that deliver targeted advertisements to consumers and generate statistics and metrics related to the delivery of interest-based advertisements. We or these advertising networks may utilize information collected through a variety of Data Technologies to provide customization, auditing, research and reporting for us, our affiliates and other advertisers. This data collection takes place both on the Site and on third party websites and mobile applications. This process allows the Site and third parties to deliver targeted advertising on the Site or on third party sites, enhance marketing programs and help track the effectiveness of such efforts.

Our advertising networks also may use this information for determining or predicting the characteristics and preferences of their respective advertising audiences and measuring the effectiveness of their advertising in accordance with their privacy policies.

We do not provide information that is directly associated with a specific person (such as name and address) to an advertising network when you interact with or view a customized advertisement. However, when you view or interact with an advertisement, the advertiser may make an assumption that you are interested in the subject matter of the advertisement.

Some companies disclose when they are using interest-based advertising programs on the Site to deliver third party ads or collecting information about your visit for these purposes and give you the ability to opt-out of this use of your information. You may see an icon in or around third party advertisements on a website that uses interest-based advertising programs and on pages where data is collected and used for online interest-based advertising. Clicking on this icon will provide additional information about the companies and data practices that were used to deliver the ad. You can opt out of delivery of targeted advertising to you by multiple companies by visiting www.aboutads.info/choices, www.networkadvertising.org/managing/opt_out.asp and www.ghosteryenterprise.com. Please note that even if you opt out, you will continue to receive advertisements, but they will not be tailored to your specific interests.

Information We Share

We do not sell or otherwise share information about you that we collect or receive, except as described below:

1. **Affiliates.** Information collected, including personal information and Data Technologies, may be shared with our affiliates, and their agents and third party service providers, who will use that information in accordance with their own privacy policies. Please visit <http://www.coxautoinc.com/> for more information about certain of our affiliates.
2. **Customers.** We may share information about you, including personal information, vehicle sale and other transaction data and Data Technologies, with Volvo and our other customers and commercial partners who will use that information in accordance with their own privacy policies.
3. **Our Service Providers.** We may engage third parties to provide the services offered through or in connection with the Site on our behalf. We require such providers to maintain information about you as confidential and to use the information only to perform the services specified by us in a manner consistent with this Privacy Statement.
4. **Corporate and Asset Transactions.** If we sell all or substantially all of our business or sell or transfer all or a material part of our assets, or are otherwise involved in a merger or transfer of all or a substantial part of our business (including any sale or transfer that may take place as part of or in connection with any bankruptcy or insolvency proceeding), we may transfer some or all of the information we have collected or received, including personal information, to the party or parties involved in the transaction as part of that transaction.
5. **Other.** We may access or disclose information, including personal information, to:
 - (a) protect or defend our interests and the legal rights or property of RMS Automotive and our affiliates;
 - (b) protect the rights, interests, safety and security of users of the Site or members of the public;
 - (c) protect against fraud or for risk management purposes; or
 - (d) comply with prudent legal practice as we may determine, and applicable law or legal process.

Your Choices

You are entitled to make certain choices about how we communicate with you.

1. You may choose not to provide personal information, even though that might impact your ability to register or open an account on the Site or receive a particular product or service.
2. If you do not want to receive marketing email from the Site, you can follow the unsubscribe link provided in those emails.
3. If you do not want to receive interest-based advertisements, you can opt out as discussed in the "Advertising Networks" section above.
4. You have a number of choices regarding certain Data Technologies. Most web browsers automatically accept cookies, but you can usually modify your browser's setting to decline cookies if you prefer. You may also render some web beacons unusable by rejecting their associated cookies and disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or opting out at Ghosteryenterprise.com or the website of the technology provider. If you choose to decline cookies or similar technologies, however, please note that certain features on the Site may not function properly or at all as a result. You may be able to adjust the use of advertising identifiers on mobile devices through the settings on your device. Finally, if you do not want to use a uniquely generated telephone number, you may choose to not call us.
5. If you do not want us to use Location Information, you can decline our initial invitation to provide that information, or opt out by changing the location services settings on your mobile device. However, please note that certain features on the Site may not function properly or at all as a result if you opt out.

Your California Privacy Rights

California Civil Code Section 1798.83 entitles California users to request information concerning whether a business has disclosed certain information about you to any third parties for the third parties' direct marketing purposes. California users who wish to request further information in compliance with this law or have questions or concerns about our privacy practices and policies may contact us as specified in the "How to Contact Us" section below.

Online Tracking Policy for California Residents. As of the effective date of this Privacy Statement, there is no commonly accepted response for Do Not Track signals initiated by browsers, therefore we do not respond to them.

Access and Correction

Access to information that we collect and maintain about you may be available to you. For example, if you created a password-protected account within the Site, you can access that account to update the information you previously provided. Additionally, if you believe that information we maintain about you is inaccurate, subject to applicable law, you may request that we correct or amend the information by contacting us as indicated in the "How to Contact Us" section below.

Links

The Site may contain links to websites not operated by us, as well as third party widgets and applications discussed above. Once you leave the Site, we suggest that you review the applicable privacy policy of the third party website or application. We are not responsible for the content or use of any websites or applications other than on the Site or the privacy practices of those websites or applications.

Data Security

We use commercially reasonable administrative, technical, personnel, and physical security measures designed to safeguard information about you in our possession against loss, theft and unauthorized use, disclosure or modification. Of course, despite these measures, we cannot guarantee perfect security of networks, servers and databases we operate or that are operated on our behalf.

Disputes

If you choose to visit the Site, your visit and any dispute regarding privacy is subject to this Privacy Statement and any applicable [Terms of Use](#) ([link](#)) including any limitations of liability, arbitration and dispute resolution provisions and provisions relating to governing law or jurisdiction or venue that may be included in any of the foregoing.

Updates to this Privacy Statement

We may update this Privacy Statement to provide clarification or notice of changes to our practices. If we make changes, we will revise the date at the top of this Privacy Statement. We will provide you with notice of material changes by posting notice of the changes on the Site, or by providing you with notice by email or when you log into your account on the Site.

How to Contact Us

If you have any questions or comments about this Privacy Statement, or if you would like us to update information we have about you or your preferences, please contact us by email at privacy@RMSautomotive.com.