

## Privacy Policy

Southeast Toyota places the highest priority on protecting and keeping your personal information secure. We are committed to keeping your personal business confidential and disclosing to you how we collect, use and share your nonpublic information. We collect nonpublic personal information about you from applications and other forms, cookies, or through our transactions and transactions through affiliates and others. We may disclose non-public information about you as allowed by law to our affiliates and non-affiliated third parties, including dealerships that you have requested information from, financial service providers (such as lending institutions), non-financial companies (such as marketing service providers), third party vendors that provide other related functions for us for the purpose of executing functions related to your intended purchase or lease of a vehicle, and governmental entities when required by law. We restrict access to nonpublic personal information about you only to those employees who need this information in order to provide products or services to you. We maintain high standards of physical, electronic, and procedural safeguards to protect your nonpublic personal information. We believe the "opt-out" allowed by federal regulation does not apply to your relationship with us because all disclosures that may be made to third parties fall within an authorized exception provided by law, or will be made in connection with a transaction executed at your request. Toyoguard is offered as an accessory on new Toyota vehicles and is not transferable. See Dealer for details.

### Changes to Privacy Policy

We are updating our Privacy Policy to the following:

## **SOUTHEAST TOYOTA DISTRIBUTORS, LLC**

### **PRIVACY POLICY**

Last modified: September 15, 2016

The protection and proper use of information we collect about you is a responsibility we take seriously. Our primary goal in collecting information about you is to help personalize your interactions and experiences with us and our authorized Toyota dealers. This policy explains what information about you we may collect, when we may collect it and how we may use it.

#### **Applicability**

This Privacy Policy applies to SET.BuyToyota.com, Explore.setbuyatoyota.com, Comprauntoyota.com and Southeast.BuyToyota.com and the related mobile site (collectively, the "Website"), all of which are owned by Southeast Toyota Distributors, LLC ("SET"). As used in this Privacy Policy, "we" or "us" means SET and "you" or "your" means you as a user of or visitor to the Website. Your access to and use of this Website means that you consent to the terms of this Privacy Policy to the fullest extent permitted by law.

When we refer to "personal information," we mean information that can be used to identify you as an individual. Personal information may include your name, physical address, email address, demographic information, location and home or mobile phone number.

When we refer to "usage information," we mean information about you that is automatically or passively collected when you visit or use the Website. Usage information may include the type of browser,

operating system, device or computer you are using to access the Website, as well as data about the pages within the Website you visited and for how long, the preceding page views, and your use of features or applications on the Website. Usage information may also include information about emails we send to you as part of a promotion or marketing program. Usage information is generally non-identifying, but if we associate it with you as a specific and identifiable person, we treat it as personal information.

When we refer to “dealers”, we mean our authorized Toyota and Scion dealerships. Please be aware that each dealer is a separate legal entity and while SET shares your personal information with a dealer as described below and encourages its dealers to fully comply with all applicable privacy obligations, SET is not responsible for dealers’ compliance with applicable law and their use of your personal information.

When we refer to “Toyota”, we mean Toyota Motor Sales, USA, Inc. and its affiliated entities.

## **Information We Collect**

**Information You Provide to Us:** We may collect personal information that you voluntarily provide us through your use of the Website. The types of personal information we collect may vary depending on your use of the features of the Website. For example, we may collect the personal information you provide when you fill out a request to have a local dealer contact you or when you schedule a vehicle service appointment or when you participate in a survey, customer testimonial, promotional offer or other program we make available to you. We may collect the personal information you provide when you utilize tools accessible through the Website, such as the finance, comparison and research features, which include tools provided by third parties you can access through the Website.

You are not required to submit any personal information in order to visit the Website; however, in order to take advantage of certain services available to you on the Website, you must provide us with personal information in order to provide the service or Website feature to you. These services include, for example, sending you new vehicle information alerts, promotions, newsletters and mailed brochures, as well as fulfilling your requests for additional information, local dealer contact and service appointments.

**Information Automatically Collected:** Whenever you visit or interact with the Website or an email we send to you, we, and our third party advertisers and service providers on our behalf, may utilize the following to collect usage information:

***Device Identifier.*** We may automatically collect your IP address or other unique identifier for the computer, mobile phone, tablet or other device you use to access the Website. If you visit the mobile Website or are directed to the mobile

Website via a QR Code that you scanned, we collect additional usage information in connection with the device identifier, including the mobile device’s service provider and operating system. If you are viewing the mobile Website, we may collect and use certain GPS data to determine your location.

***Cookies or Web Beacons.*** We may utilize cookies or web beacons (data files placed on your computer or device when it is used to visit the Website) in order to remember your preferences and make your visit to and use of the Website more enjoyable and meaningful to you. Cookies may also be used to associate you with social networking sites like Facebook and Twitter and, if you so choose, enable interaction between your activities on the Website and your activities on such social networking sites (if we provide such ability). Certain types of cookies called persistent cookies may stay on your device or computer until either (a) they expire, (b) they are overwritten with newer cookies, or (c) you manually remove them. We

may use these persistent cookies in order to customize your experience on the Website. Additionally, if we use a third party to activate and/or deliver a service or site functionality to you, this third party may place a persistent cookie on your computer to collect personal information from you in order to activate and deliver the service, or facilitate the processing of a request by you.

At this time, the Website does not respond to undefined “do not track” signals which may be sent by your browser or device. However, you may refuse or delete cookies. To learn how you may be able to reduce the number of cookies you receive from us, or delete cookies that have already been installed in your browser’s cookie folder, please refer to your browser’s help menu or other instructions related to your browser. If you do disable or opt out of receiving cookies, please be aware that some features and services on our Website may not work properly because we may not be able to recognize and associate you. In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests.

**Analytics software and pixel tags.** We may use spotlight and banner ads, web beacons and pixel tags which are site instrumentation tools that help us to determine, for instance, whether a page has been viewed or not by you and, if so, how many times, when and for how long. Emails or electronic newsletters we send may use these tools to gather email metrics such as how many of the emails are opened, if they were printed or forwarded, the type of device from which they were opened, and the city, state, and county associated with the applicable IP address.

**Session logs.** When you visit the Website, the server on which the Website runs automatically generates a “session log.” We use session logs to help us determine how people travel through our site. This helps us to structure our pages so that the information most frequently visited is easier to find. Additionally, by tracking page visits, we can also determine if the information we're providing is being used. Session logs also provide usage information about the IP address from which you accessed the Website, the website that referred you, the pages you visited and the date and time of those visits. We may also use third-party click tracking analytics tools such as Adobe Analytics and Google Analytics to capture clickthrough statistics.

**Interest-Based Advertising OR Online Behavioral Advertising:** We may collect data using pixel tags or web beacons from Third-Party Advertising Platforms to understand your online behavior while exploring our sites in order to serve more relevant advertisements that may include video, banner or social media advertisements on non-SET sites.

**Information Provided by Third Parties:** In addition to information we may collect through your use of or visit to the Website, we may collect information about you from third parties. For example, we may utilize social media management services to collect information that you post on social media sites, as well as publicly available information that you post on other pages made available through those sites. Additionally, if you are on another website and you opt-in to receive information from us, that website will submit to us your email address and other information about you so that we may contact you as requested. You may also choose to participate in a third party application or feature (such as one of our Facebook or Twitter applications or a similar application or feature on a third party website) through which you allow us to collect (or the third party to share) information about you such as lists of your friends, “likes”, comments you have shared, groups and location. Services like Facebook Connect may give you the option to post information about your activities on our Website to your profile page to share with others within your network. In addition, we may receive information about you if other users of a third party website give us access to their profiles and you are one of their “connections” or information about you is otherwise accessible through your “connections” web page, profile page, or similar page on a

social networking or other third party website or interactive service. We also may use data providers to associate personal information about you that is in our databases.

### **How We May Use the Information We Collect**

Without limitation, the information we collect about you may be used by us or by those third parties with whom we share your information as listed below:

- To fulfill a request by you for information or action (e.g., brochure fulfillment, lead generation, send marketing or promotional materials including e-mails or other information, sweepstakes entries, save or share content)
- To respond to your comments
- To offer you opportunities to purchase products or services that we believe may be of interest to you
- To make the user experience more customer friendly
- To generate aggregate site analytics that improve our site layout, content, product offerings and services
- To administer the Website, help diagnose problems with our servers, analyze trends, track users' web page movements, help identify you, and gather broad demographic information for aggregate use
- To personalize your experience while visiting the Website (such as allowing us to select which ads or offers are most likely to appeal to you, based on your interests, preferences, location, or demographic information)
- To match personal data collected in connection with the Website with data about you that we collect through other sources
- To comply with legal requirements
- To tailor content, advertisements and offers we serve you, including targeted or customized advertisements to you when you visit other, non-SET sites
- To measure effectiveness of our campaigns by identifying the individuals who open or act upon a message we send and by identifying other metrics about such campaigns
- To enable you to participate in promotional activities, such as sweepstakes, contests, games, special events, blogs and chats, including when these programs are made available through an affiliated or unaffiliated business partner
- For customer satisfaction, marketing, consumer research and other legitimate business purposes
- For purposes disclosed at the time you provide your information or otherwise with your consent

### **Who We May Share Your Information With**

Without limitation, we may share your information with the following third parties:

- With our service providers, including our vendors and subcontractors, in the course of their performance of work on our behalf (or on behalf of our partners). These can include service providers that host or operate the Website, analyze data, process transactions and provide customer service, as well as our or our partners' advertisers, sponsors or other third parties that participate in or administer our promotions, contests, sweepstakes, surveys or provide marketing or promotional assistance
- With our affiliates, partners, associations, advertisers or other third parties to provide you with targeted advertising, product information and promotional and other offers
- With other companies within the Southeast Toyota Distributors, LLC family of companies or subsidiaries. Our "family of companies" is the group of companies related to SET by common control or ownership. We share information within this "family" as a normal part of conducting business and offering products and services to our customers
- With Toyota and our authorized dealers

We will also share your personal information with third parties (a) as required by law or in response to a law enforcement request, such as in connection with a subpoena, law enforcement or regulatory request or investigation, litigation, dispute resolution or similar legal process; (b) when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others; (c) to verify or enforce this Privacy Policy or other applicable policies; (d) to address fraud, security or technical issues; and (f) to respond to any emergency situation.

We do not sell your personal information for any reason.

### **Special Provisions Related to Credit and Financing Information**

Though the Website, we provide the ability for you to submit an application for credit in connection with the purchase or lease of a vehicle from one of our authorized Toyota dealers. We collect the information you provide on the application and then pass it to the individual Toyota dealerships that you have selected, at which point the dealership will pass along your information to various lending institutions in order to process your request for financing. As a result of your application for credit, personal information about you will be collected from a variety of sources including:

- Application Information (The information you provide on your application and other forms such as names, addresses, telephone numbers, birthday, social security numbers, level of family income, employer's name, and employer's address);
- Credit Reports (Information from consumer reporting agencies);
- Marketing partners and publicly available databases (As a third party marketing vendor for Toyota dealerships in the Southeast, we receive non public information which is used to help us and your dealer serve you).

The individual Toyota dealership uses this information to evaluate your applications, locate a lender, provide you with high quality service, deter fraud and, with your consent, inform you of offers for other individual Toyota dealership services that may be offered by your Toyota dealership or by third parties. The dealer may also use this information to confirm your identity when you call to inquire about your account. Additionally, the dealer will disclose your information to the foregoing entities solely for the purpose of locating a vehicle that meets your criteria and obtaining credit for the purchase or lease of such vehicle. Outlined below is the information shared with each type of third party and as appropriate, your options.

- Sharing Information with Service Companies -- In order to provide quality service, the individual Toyota dealer contracts with service providers for essential roles in processing your application. We may disclose some or all of the information we collect to these service providers on the dealer's behalf. These service providers have entered into a contract with lending institutions that forbids them from using information provided by the individual Toyota dealer for any purpose other than providing the service for the individual Toyota dealer customers. The individual dealer takes security precautions to monitor the use of the information and prevent the use of the information for any other purpose.
- Information Sharing With Merchants - The individual Toyota dealer does not share any information with unrelated merchants for the purpose of extending offers of goods and services without your consent.
- Information Sharing with Partners - The individual Toyota dealer offers its products in conjunction with other dealerships, financial institutions and other businesses. By completing this credit application for the purpose of obtaining credit for the purchase of a vehicle, you agree to the sharing of information with those third parties solely for that purpose. The information shared may include your name, address, phone number, e-mail address, and personal financial information.
- Credit Reports and Other Uses of Information -- In applying for credit, you agree that your credit report may be obtained from one or more credit reporting agencies (i.e. Equifax, PO Box 4472 Atlanta, GA 30302; Experian, PO Box 2002, Allen, TX 75013; and Transunion PO Box 99506,

Chicago, IL 60693.) in connection with your application and the administration of such application. You also authorize the dealer to exchange credit information concerning you or your use of the account with (and answer questions and requests from) others, such as lenders and credit reporting agencies.

Notwithstanding the above, once passed to the dealer and to lending institutions, your information will be treated by the dealer pursuant to the dealer's and the lending institutions' own privacy policies. We are not responsible for any use by them of your information or of the accuracy of any information provided by you or other sources in the process of evaluating your application for credit, nor are we responsible for any credit-related decision they may make or not make.

### **Blogs/Public Areas**

If we make blogs, chat rooms, bulletin boards and similar features available for your use on the Website, please remember that these are public and the information you disclose there is not confidential. Any information posted in these areas of the Website can be viewed by others. The information presented in these areas of the Website reflects the views of the individual users who have posted such comments/materials and does not necessarily reflect the view of SET, our dealers or Toyota. We may, but shall have no obligation to, monitor the use of these areas of our Website and to remove postings that we determine, in our sole discretion, to be inappropriate.

### **Referrals**

For some features on the Website, you may be able to submit information about other people to us. For example, if you wish to invite your friends to participate in a program offered on the Website or forward particular content from the Website to your friends, you will be asked to submit your friends' email addresses. Our use, sharing and protection of your friends' information will also be subject to the terms of the program and this Privacy Policy.

### **ADVERTISING/BEHAVIORAL TARGETING; HOW TO OPT-OUT.**

We may use third party ad network providers to help present ads on the Platforms, as well as other service providers to evaluate and provide us with information about the use of the Platforms and viewing of our content. We do not share Personal Information with these providers (unless, of course, you give us permission). Such providers may place and access persistent cookies, pixel tags, or similar technologies on your Device to serve you ads or other content personalized to your interests which they infer from your precise location and/or your browsing on the Platforms and other sites you have visited. In doing so, the provider collects or has access to non-Personal Information such as your Usage Information. The use of persistent cookies, pixel tags, or similar technologies by these providers is subject to their own privacy policies, not ours.

If you prefer to not receive targeted advertising, you can opt-out of some network advertising programs that use your information. To do so, please visit the DAA Opt-Out Page located here <http://www.aboutads.info/choices/>. Please note depending on the opt-out device, it may take up to a week from time of submission to process a suppression opt-out. Please note that even if you choose to remove your information (opt-out), you will still see advertisements while you're browsing online. However the advertisements you see may be less relevant to you and your interests. Additionally, many network advertising programs allow you to view and manage the interest categories they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive. The DAA Opt-Out Page provides a tool that identifies its member companies that have cookies on your browser and provides links to those companies.

### **Security Measures**

We are committed to keeping your personal information secure. We have appropriate technical, administrative and physical procedures in place to protect personal information from loss, misuse, or alteration. We limit access to Information to individuals who have a business need consistent with the reason the information was provided.

While we employ such procedures to protect your information, we cannot guarantee that the information you submit to the Website will be confidential or will not be transmitted to or intercepted by a third party. NEITHER SET, ITS AFFILIATED COMPANIES, TOYOTA OR ANY AUTHORIZED TOYOTA DEALER SHALL BE RESPONSIBLE FOR ANY HARM THAT YOU OR ANY PERSON MAY SUFFER AS A RESULT OF YOUR USE OF THIS WEBSITE OR ANY INFORMATION YOU SUBMIT OR OTHERWISE TRANSMIT TO OR THROUGH THIS WEBSITE.

### **Children**

This Website is not intended for children under the age of 13. We do not knowingly collect personal information from children that young. If you are under the age of 13, please do not submit your email address or any other personal information to us through the Website.

### **Links to Other Websites**

This Website includes links to other websites, such as the sites for Toyota and Toyota dealer advertising associations, our authorized dealers' websites or the websites operated by the SET family of companies such as SETF.com. These websites are not under our control, even though they may use similar markings including the Toyota name or logo on their sites or reference this Website. Such other websites are not obligated by our privacy policies and may place their own cookies on your computer. We do not control any cookies placed on your computer by third parties whose advertising or links appear on our Website. You are encourage to review these sites' privacy and other policies when you visit them.

### **Changes To This Privacy Policy**

We reserve the right to change this Privacy Policy at any time in our discretion. If we make changes, we will post the new Privacy Policy on this Website. Your continued use of this Website after any changes represents consent to the new Privacy Policy to the fullest extent permitted by law. We encourage you to periodically review this Privacy Policy.

### **Contacting Us**

If you have any questions, comments, or concerns about this Privacy Policy, please email us at [setdealersystems@jmfamily.com](mailto:setdealersystems@jmfamily.com) or write to us at:

Southeast Toyota Distributors, LLC  
Attn: Legal Department  
120 Jim Moran Boulevard  
Deerfield Beach, FL 33442

**END OF PRIVACY POLICY**