

Privacy Notice

DSplus (“we,” “us,” or “our”) employs a powerful data-driven, integrated messaging platform, or “digital salesperson”, who leads a customer through the entire lifecycle of their automobile ownership journey. This Privacy Notice sets out how we collect, use, share, and protect any information we collect through this website (“Website”). This Privacy Notice also explains the measures we take to safeguard your information and describes how you may contact us regarding our privacy practices.

Introduction

Any data collected through this Website, including personal data (as defined under applicable data protection laws, referred to as “Personal Data”), will only be used for the purposes set out in this Privacy Notice. Notwithstanding, we may use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law.

Please read this Privacy Notice thoroughly. If you disagree with the way personal information will be used, please do not use this Website.

We may include links to other websites, including social media platforms. This Privacy Notice only covers this Website and does not apply to the data practices of other websites. We encourage you to read the privacy notices available on other websites you visit.

What Personal Data and Sensitive Personal Information do we collect and process through the Website?

The following table describes the categories of Personal Data and Sensitive Information we collect.

Category of Personal Data	Examples
Contact Information and Identifiers	First name, last name, e-mail address, telephone number; IP address
Internet or other electronic network activity information (Technical data)	Browsing history; search history; online interests, such as information about categories of consumer interests derived from online usage; and information on a consumer's interaction with the website
General Geolocation data	Non-precise location information from your device or IP address
Your verbatim communications to us	Information that you directly send us by using the Contact Us form on the website

Inferences	Information drawn from any of the information identified in this section to create an attribute about your preferences, characteristics, or behavior
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Categories of the sources of Personal Data and Sensitive Personal Data we may collect:

We may collect the Personal Data outlined above from the following categories of sources:

- Directly from you, for example, when you send us your questions or comments using the query form or make use of your privacy rights.
- Indirectly from you by using automated technologies, such as cookies, pixels, third party tags, scripts, log files and other means to automatically collect information about the use of our Website. Further information about our use of cookies can be found in this Privacy Notice.

Purpose of data collection

The following table provides information about our purposes for collecting your Personal Data and Sensitive Personal Data:

Our Purposes for collecting and using your Personal Data
To read and respond to your queries to us, sent using our online query form.
When you contact us through the data access request form
To contact you where you have indicated you wish to receive news from us.
Operating our Website, for example, operating, analyzing, improving, and securing our Website.
Other internal purposes, such as: internal research, internal operations, auditing, detecting security incidents, debugging, short-term and transient use, quality control, and legal compliance.
Legal purposes, such as: (a) comply with legal process or a regulatory investigation (e.g. regulatory authorities' investigation, subpoena, or court order); (b) enforce our Terms of Service, this Privacy Notice, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of other parties; and/or (d) protect the rights, property or personal safety of us, our platform, our customers, our agents and affiliates, its users and/or the public. Such disclosure may be for a business purpose, but may also be considered a "sale" under certain state privacy laws.
In the event of a corporate transaction including for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets, or for purposes of due diligence connected with any such transaction.
We may aggregate, de-identify and/or anonymize any information collected so that such information can no longer be linked to you or your device ("Aggregate/De-Identified

Information”). We may use Aggregate/De-Identified Information for any purpose, including without limitation for research and marketing purposes, and may also share such data with any other party, including advertisers, promotional partners, and sponsors, in our discretion, unless otherwise prohibited by applicable law

We use analytics services, such as Google Analytics, to help us understand how users access and use the Website.

With whom do we Share or Sell Personal Data or Sensitive Personal Data?

We may disclose your Personal Data collected and processed through this Website for various purposes related to our business. The disclosure may be to our clients, partners, or vendors.

Sharing Personal Data under the California Privacy Rights Act means to disclose your Personal Data to a third party for Interest-based Advertising.

Selling Personal Data means to disclose your Personal Data to a third party for an exchanged value and a purpose other than one of the listed business purposes below in this Privacy Notice.

The table below shows with whom we may Share or Sell your Personal Data, and whether we believe we have “sold” or “shared” a particular category of information in the prior 12 months.

Category of Personal Data	Categories of Parties With Whom We Sold or Shared Your Data	“Sold” in the Last 12 Months	“Shared” in the last 12 Months
Contact Information and Identifiers	Affiliates, Analytics Partners, Service Providers	No	No
Internet or other electronic network activity information	Analytics Partners and Service Providers	Yes	No
Geolocation data	Analytics Partners and Service Providers	Yes	No
Your verbatim communications to us	Affiliates, Service Providers	No	No
Inferences	Analytics Partners, Service Providers	Yes	No

With whom do we disclose Personal Data or Sensitive Personal Data for a Business Purpose?

We may disclose your Personal Data or Sensitive Personal Data to our service providers that assist us with our business purposes. Our service providers are to only process your Personal Data in accordance with our instructions and only for the purpose listed below.

The table below shows with whom we disclose your Personal Data for the specific business purpose(s).

Category of Personal Data	Categories of Parties With Whom We Disclosed Your Data for a Business Purpose	Business Purpose for the Disclosure
Contact Information and Identifiers	Affiliates, Analytics Partners, Service Providers	Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes; undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the Controller, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the Controller
Internet or other electronic network activity information	Affiliates, Analytics Partners, Service Providers	Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes; undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the Controller, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the Controller
Geolocation data	Analytics Partners and Service Providers	Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes; undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured,

		manufactured for, or controlled by the Controller, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the Controller
Your verbatim communications to us	Affiliates, Analytics Partners, Service Providers	Depending on your request, we will rely on our legitimate business interest or the performance of pre-contractual measures to respond to individuals' queries and helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes.
Inferences	Analytics Partners and Service Providers	Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes; undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the Controller, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the Controller

Automated Decision Making and Profiling

When processing your Personal Data, we do not use processes that involve automated decision making or profiling.

How long do we keep your information?

We keep Personal Data for as long as is necessary for the purposes described in this Privacy Notice, complying with legal and regulatory obligations, protecting our or other's interests, and as otherwise permitted or required by law. When Personal Data is no longer necessary for or compatible with these purposes, it is removed from our systems in accordance with our internal retention policies. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Website or our services to you;

- Whether our processing of the Personal Data is consistent with what an average consumer would expect when the Personal Data was collected;
- Whether the Personal Data is processed for any other disclosed purpose(s) compatible with what is reasonably expected by the average consumer;
- Whether the Personal Data is relevant and useful to the provision of our services and our further processing is permitted by law;
- Whether the Personal Data has been de-identified, anonymized, and/or aggregated; and
- Whether there is a legal obligation to which we are subject.

Your rights and choices regarding your Personal Data

Please use this [link](#) if you want to make use of any of your below mentioned legal rights.

1. Where you are a US resident

Your Rights and Choices

Residents of certain US states, such as California, Virginia, Colorado, Connecticut, and Utah, have specific rights regarding their Personal Data. This section describes how to exercise those rights and our process for handling those requests. (To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.)

1.1 Right to request access to your Personal Data

You may request access to your Personal Data that we collect, use, disclose, or sell. In particular, you may request:

- the specific pieces of Personal Data that we process about you
- the categories of Personal Data we have collected about you;
- the categories of sources from which the Personal Data was collected;
- the categories of Personal Data about you we disclosed for a business purpose or sold or shared;
- the categories of third parties to whom the Personal Data was disclosed for a business purpose or sold or shared; and
- the business or commercial purpose for processing the Personal Data.

When exercising the right to access Personal Data, you have the right to obtain materials in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.

When we receive and verify your request to access your Personal Data, we will make best efforts to fulfill your request unless an exception applies. We will not disclose your government identification numbers, financial account numbers, health insurance or

medical identification numbers, account passwords, security questions and answer, or unique biometric data; however, to the extent we have this information, we will inform you that we have collected this information. You are permitted 2 access reports every 12 months.

1.2 Right to request deletion of your Personal Data

You may also request that we delete any Personal Data that we obtained about you. However, we may retain Personal Data for certain important purposes, as set out by applicable law.

When we receive and verify your request to delete your Personal Data, we will proceed to delete the data unless an exception applies. We will retain a record of your deletion request in order to keep your Personal Data deleted, unless and until you provide consent for the processing of your Personal Data post your deletion request.

1.3 Right to correct your Personal Data

If you believe we hold inaccurate personal information about you, you may request that we correct that information. We may ask for documentation showing that the information you submit is accurate and the Personal Data we hold is inaccurate. Once we receive your request, we will verify your identity and taking into account the type of personal information and the purposes of our holding that personal information we will make best efforts to complete your request. We may deny your request if we determine that the contested Personal Data is more likely than not accurate. Additionally, we may choose to delete your Personal Data in response to your request to correct your Personal Data if the deletion of your Personal Data would not negatively impact you.

1.4 Right to limit use of Sensitive Personal Data

You may request that we limit the use and disclosure of your Sensitive Personal Data. However, we may deny your request in part or in full under uses authorized by applicable law.

1.5 Right to nondiscrimination

We will not deny, charge different prices for, or provide a different level of quality of goods or services if you choose to exercise your privacy rights.

1.6 Right to Opt-out of the sale of your Personal Data.

Depending what information we have about you, and whether we have disclosed any of it to a third party in exchange for valuable consideration, we may have sold (as defined by US state laws) certain Personal Data about you, as described in the above table in Section II of

this Privacy Notice. If you would like to opt out, you may do so by clicking on the ‘Do Not Sell or Share My Personal Information’ link in the footer of this Website.

1.7 Universal Opt-Out Mechanisms

Our Website recognizes certain global opt-out of sale and share preference signals like the Global Privacy Control and the IAB CCPA privacy string/MSPA privacy string. This means that if you enact your choice to opt-out or opt-in through these signals, we will honor your choice upon receiving the signal related to your visit on our Website. We will apply your preference to the Personal Data we collected from our Website. If you have previously provided affirmative consent for the sale or share of your Personal Data, and your opt-out choice via the signal conflicts with such consent, we will ignore the opt-out choice via the signal.

1.8 Shine the Light

Customers who are residents of California may request (i) a list of the categories of Personal Data disclosed by us to third parties during the immediately preceding calendar year for those third parties’ own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please write us at the email or postal address set out in the “Further Information” section below and specify that you are making a “California Shine the Light Request.”

1.9 How to exercise your US state privacy rights

US residents may exercise their applicable privacy rights by sending an email to privacyofficer@publicisgroupe.com, submitting your request [here](#), or by contacting us at 1-833-983-0087.

For security purposes (and as required under US state laws), we will verify your identity—in part by requesting certain information from you—when you make a request to access, correct, or delete, your Personal Data. The verification process will utilize an email verification process, a telephone number verification process, and, if applicable, a request for any assigned ID number previously communicated to you.

If we are unable to complete your request fully for any reason, we will provide you additional information about the reasons why we could not comply with your request.

You may also designate an agent to make requests to exercise your rights under certain US state laws. We will take steps both to verify your identity and to verify that your agent has been authorized to make a request on your behalf by requesting your agent to provide us with a signed written authorization or a copy of a power of attorney executed by you.

Children

The Website is intended for general audiences and is not directed at children. We do not knowingly collect Personal Data (as defined by the U.S. Children’s Privacy Protection Act, or “COPPA”) from children. If you are a parent or guardian and believe we have collected Personal Data in violation of COPPA, contact us at privacyofficer@publicisgroupe.com. We will remove the Personal Data in accordance with COPPA. We do not knowingly “sell,” as that term is defined under the US state privacy laws, like CCPA or VCDPA, the Personal Data of minors under 16 years old without legally required affirmative authorization.

Data Security

We use a variety of methods, such as firewalls, intrusion detection software and manual security procedures, designed to secure your data against loss or damage and to help protect the accuracy and security of information and to prevent unauthorized access or improper use. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you. If you think that the Website or any Personal Data is not secure or that there has been unauthorized access to the Website or your Personal Data, please contact privacyofficer@publicisgroupe.com immediately.

Use of cookies, other tracking technology, social media and social media plug-ins

Cookies are small pieces of text or code sent to your device when you visit the Website. Cookies are used to optimize the viewing experience, count visitors to a webpage, troubleshoot any problems, keep websites secure, and better serve content. The following cookies are used on the Website:

- Strictly Necessary cookies are required for the website to function and cannot be switched off in our systems. Some of these cookies are only set in response to requests made by you, such as setting your preferences, logging in or filling out forms. They may also be set for certain security purposes and network management. You can manage these types of cookies using your browser settings, but it may affect your ability to use our website.
- Performance cookies allow us to engage in certain activities, such as counting visits and identifying traffic sources that assist us in measuring the performance of our website. They help us to know which pages are the most and least popular and see how visitors move around the website. If you do not allow these cookies we will not know when you have visited our website and will not be able to monitor our website’s performance.
- Targeting cookies are used to collect information about your browser, device and website visit and use such formation to provide you with personalised experiences and advertising on this website and others across the internet. If these cookies are disabled, your data will not be shared with third parties for this purpose. If you are located in the United States, local law may provide you with the right to opt-out of

the sale or sharing of your personal information to third parties. You may exercise your right to opt out of this activity by disabling social media cookies in the Cookie Preference Center. See the “Your rights and choices regarding your Personal Data” section of this Notice for further information about exercising your consumer rights under local law.

Overall, cookies help us provide you with a better Website, by enabling us to monitor which pages you find useful and which you do not. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the Website.

If you follow us on social media (for example, through our accounts on LinkedIn, Twitter, Facebook, or Instagram), we will also collect Personal Data about you in order to understand our followers better and understand the public response to our products and services. We may use this information to engage in social listening to identify and assess what is being said about us publicly to understand industry trends and market sentiment. Any information you provide to us when you engage with our content (such as through our brand page or via Facebook Messenger) is treated in accordance with this Privacy Notice. Also, if you publicly reference us or our Website on social media (such as by using a hashtag associated with us in a tweet or post), we may use your reference on or in connection with our Website.

We provide social media plug-ins on the Website to allow you to easily share content from our Website through social media, and in doing so, we may receive your Personal Data from the social media platform that you have authorized to share with us. When you share content using these buttons, a new page will pop up from the relevant social media platform. If you’re already logged into your account on that social media platform, then you will probably be automatically logged into this pop-up page, so that you don’t have to log in again. If, however, you are not logged in (or if you are not registered with the social media platform), the page will ask you for your information.

We have no control over how social media platforms use your Personal Data and they may independently collect information about you when you leave our Website. The information collected and stored by those parties remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services and devices, and whether they store information in the U.S. or elsewhere. We encourage you to read the privacy notices on the various social media platforms you use.

Find out more about how these social media platforms use your Personal Data:

- [Facebook](#)
- [Twitter](#)
- [YouTube](#) (Google’s general privacy policy)

- [Instagram](#)
- [LinkedIn](#)

Financial Incentive

We do not offer any financial incentives related to our collection of your Personal Data.

Notification of changes

Any changes to this Privacy Notice will be promptly communicated on this page and you should check back to see whether there are any changes. Continued use of the Website after a change in the Privacy Notice indicates your acknowledgment and acceptance of the use of Personal Data in accordance with the amended Privacy Notice.

If you wish to save a copy of this text you can do so by clicking [here](#) to download a PDF.

Further Information

This Privacy Notice has been designed to be accessible to people with disabilities. If you experience any difficulties accessing the information here, please contact us at privacyofficer@publicisgroupe.com.

If you consider that we are not complying with this Privacy Notice, if you have any questions in relation to this Privacy Notice, or have questions about your rights and choices, please contact privacyofficer@publicisgroupe.com.

If you have any questions about our data practices or you wish to exercise your rights or know about the contractual protections in place, please contact the Publicis Chief Data Privacy Officer at privacyofficer@publicisgroupe.com.

Updated April 10, 2024

Prior Version [here](#)