Privacy Policy of Bradleys Motors Websites

Dated: February 17, 2020

This Privacy Policy applies to our website, www.BradleysMotors.com and any other websites that display this Privacy Policy, and the services available through our websites (together, our "Sites"). This Privacy Policy is intended to disclose how Bradleys Incorporated ("Bradleys Motors" herein) collects, uses and discloses personal information about users of our Sites, as well as to explain the choices and right individuals have regarding their personal information.

I. The information we collect

We collect information directly from individuals online, as well as automatically from users using our Sites.

• Information collected directly

We may collect personal information about you—such as your name, address, telephone number, fax number, e-mail address, etc.—directly from you. For example, personal information may be collected when you fill out a 'Contact Us' form, sign up for our mailing lists, register for events we host or sponsor, submit information as part of certain online services, post comments on our blogs, or otherwise provide us information through the Sites. Generally, the information we collect includes your:

- Name, company name and title/position.
- Email address, phone number, mailing address and contact details.
- Contact preferences and interests.
- Business affiliations.
- For events, it may include dietary restrictions, requested accommodations and other event-related preferences.
- $_{\odot}$ Other information related to your request or inquiry.

Automatically-collected information

We use cookies, log files, pixel tags, local storage objects and other tracking technologies to automatically collect information when users access or use the services or visit our Site, such as an IP address, general location information, domain name, page views, a date/time stamp, browser type, device type, device ID, Internet service provider ("ISP"), referring/exit URLs, operating system, language, clickstream

data, and other information about the links clicked, features used, size of files uploaded, streamed or deleted, and similar device and usage information. For more information, see the "Cookies and similar devices" section below.

2. Our use of personal information

We use the personal information you provide to respond to your request or inquiry and in the ordinary course of conducting our business. Generally, we use the information (including personal information) that we collect online as follows:

• Providing support and services

To provide and operate our Sites, communicate with you about your use of the Sites, provide troubleshooting and technical support, respond to your inquiries, fulfill your orders and requests, process your payments, communicate with you, and for similar service and support purposes.

Responding to your requests

To respond to your inquiries, fulfill your orders and requests, and consider your request or application (eg, if you have submitted a resume or other application information online or by email, we will use it as part of the application review process).

Personalization

To tailor content we may send or display on the Sites, including to offer location customization and personalized help and instructions, and to otherwise personalize your experiences.

• Newsletters, mailing lists and direct marketing

For direct marketing purposes, including to send you newsletters, client alerts and information we think may interest you. If you are located in a jurisdiction that requires opt-in consent to receive electronic marketing messages, we will only send you such messages if you opt-in to receive them.

Analytics and improvement

To better understand how users access and use the Sites, and our other products and offerings, and for other research and analytical purposes, such as to evaluate and improve our services and business operations and to develop services and features.

• Protect our legal rights and prevent misuse

To protect the Sites and our business operations; to prevent and detect fraud, unauthorized activities and access, and other misuse; where we believe are necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party, or violations of our Terms of Use or this Privacy Policy.

• Comply with legal obligations

To comply with the law or legal proceedings. For example, we may disclose information in response to subpoenas, court orders, and/or other lawful requests by regulators and/or law enforcement, including responding to national security or law enforcement disclosure requirements.

• General business operations

Where necessary, for the administration of our general business, accounting, recordkeeping and legal functions.

• Anonymous and de-identified information

We create and use anonymous and de-identified information to assess, improve and develop our business, products and services, and for similar research and analytics purposes.

3. Disclosure of personal information

Bradleys Motors is B2B service company and any information that we collect or that you provide to us may be shared and processed by any Bradleys Motors employee or an authorized vendor entity. We will not rent or sell your personal information, nor will we share it with third parties, outside of the Bradleys Motors Firm, for their marketing purposes.

We may share personal information with the following categories of third parties:

- Third party service providers that provide services to us or to whom we outsource certain services, such as data hosting, software or technology services.
- Third party advertising and marketing firms in the employ of Bradleys Motors.
- Our professional advisers, such as lawyers and accountants.
- Government and/or regulatory authorities.
- Professional indemnity insurers.
- Regulators, tax authorities and/or corporate registries.

In addition, we may disclose personal information to other third parties under the following circumstances:

Business transfers

As part of any merger, sale and transfer of our assets, acquisition or restructuring of all or part of our business, bankruptcy, or similar event, including related to due diligence conducted prior to such event where permitted by law.

• Legally required

If we are required to do so by law (eg, to law enforcement, courts or others, eg, in response to a subpoena or court order).

• Protect our rights

Where we believe it necessary to respond to claims asserted against us, comply with legal processes (eg, subpoenas or warrants), enforce or administer our agreements and terms, or for fraud prevention, risk assessment, investigation, and to protect the rights, property or safety of the Bradleys Motors Firm, our clients and customers, or others.

We may also share aggregate or de-identified information with third parties for research, marketing, analytics and other purposes, provided such information does not identify an individual.

4. Cookies and similar devices

We and our service providers use cookies, pixels, log files and other mechanisms to gather information about your use of our Sites.

Cookies

Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Site, while others are used to enable a faster log-in process or to allow us to track your activities while using our Site. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

• Clear GIFs, pixel tags and other technologies

Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (also referred to as web beacons, web bugs or pixel tags), in connection with our services to, among other things, track the activities of users of our services, help us manage content, and

compile statistics about usage of our services. We and our third party service providers also use clear GIFs in HTML emails to our customers, to help us track email response rates, to identify when our emails are viewed, and to track whether our emails are forwarded.

• Log files

Most browsers collect certain information, such as your IP address, device type, screen resolution, operating system version, and internet browser type and version. This information is gathered automatically and stored in log files.

• Third party analytics

We also use automated devices and applications, such as Google, Bing and Facebook Analytics to evaluate the use of our services. We use these tools to gather nonpersonal data about users to help us improve our services and user experiences. These analytics providers may use cookies and other technologies to perform their services and may combine the information they collect about you on our Sites with other information they have collected for their own purposes. This Policy does not cover such uses of data by third parties.

• Do-not-track signals

Our Site does not respond to do-not-track signals. For more information about donot-track signals, please click <u>here</u>. You may, however, disable certain tracking as discussed above (eg, by disabling cookies) and as set out in our Cookie Policy.

5. Direct marketing

As noted, we may send periodic promotional emails to you, and where required by law, we will obtain your consent to do so. You may opt out of such communications at any time by following the opt-out instructions contained in the email or email us at info@bradleysmotors.com. If you opt out of receiving emails about recommendations or other information, we think may interest you, we may still send you emails about your account or any services you have requested or received from us.

6. Access and correction

If you would like to review the personal information, we have collected about you via the Sites, or request that we update or delete it, please contact us at info@bradleysmotors.com

7. Third party websites and links

Our Site may contain links to other sites whose information practices may be different than ours. Visitors should consult the other sites' privacy notices as we have no control over information that is submitted to, or collected by, these third parties.

8. Co-sponsored events

Bradleys Motors may posts information about programs and events that are sponsored by or co-sponsored by other firms or organizations. Should you choose to register electronically for any of these events or submit your information to these third parties, Bradleys Motors has no control over the third-party sponsors' use of this information, and this Privacy Policy will not apply.

9. Our commitment to security

We employ security measures to prevent unauthorized access to information that we collect online. However, we cannot guarantee the security of your personal information.

10. How to contact us

If you have any questions or concerns about the Privacy Policy for Bradleys Motors or its implementation, you may contact us at info@bradleysmotors.com. If at any time you decide that we should no longer hold any of your personal information, or you wish to change the use to which any such information can be put, please let us know by emailing us at info@bradleysmotors.com.

II. Revisions to our Privacy Policy

We reserve the right to revise this Policy or any part of it from time to time. Please review the Policy periodically for changes. If we make material changes, we will endeavor to provide notice ahead of such changes, such as by email or through a notice on www.bradleysmotors.com.