

# Joyride Privacy Policy

*Updated March 25, 2020*

Joyride Autos, Inc. (“Joyride”, “we”, “our”, “us”) operates the <https://www.joyrideautos.com> website and affiliated websites (“Website,” or collectively, “Websites”), online portals, and the products, services, and support tools associated with our customized unclaimed vehicle auction services (hereinafter collectively referred to as the “Services”).

Our Services are primarily designed to facilitate efficient management of the sale of vehicles through an auction process whereby companies and individuals purchase unclaimed vehicles through our vehicle auction services. Some of our Services, like our Websites, are designed to inform you about Joyride and the Services we can provide to you or your organization. This Privacy Policy informs you of our policies regarding the collection, use and disclosure of information – including your Personal Information, defined below – through the use of our Services, and the choices and rights you have regarding that information.

Our Privacy Policy is designed to advise you about how we obtain, use, and disclose the information that we collect and/or receive about you. It also explains your privacy rights, and how you can manage the privacy of your Personal Information. Please note that this Privacy Policy does not govern the practices of third parties, including our partners or affiliates, municipalities and tow providers that use our customized offerings, third party service providers, and/or advertisers, even when those services are branded as, or provided on behalf of Joyride. Information collected from you by others, such as third-party websites that you access through links on the Websites, are governed by those entities’ privacy policies and terms. Please read third parties’ privacy policies carefully.

## I. Definitions

- **Services:** As noted above, “Services” includes our Websites and those products, services, and support tools associated with our customized unclaimed vehicle auction services.
- **Personal Information:** Personal Information means information that identifies, relates to, describes, or could be reasonably associated or linked with a particular person or household. It also includes other information that may be associated with your Personal Information, such as your Usage Data (defined below), location, preferences or interests, if that information can be used to identify you, your household, or your device.

- **Usage Data:** Usage Data is data collected automatically either generated by the use of the Websites (for example, your IP address or the duration of a page visit when you visit our Websites).
- **Cookies:** Cookies are small files stored on your device (computer or mobile device).
- **Consumer:** Any individual who is the subject of the Personal Information collected and/or processed.

## II. Information Collection

We collect several different types of information for various purposes to provide and improve our Services.

### *a. Types of Data Collected*

- **Personal Information:** While using our Services, we may ask you to provide us with, or we may otherwise obtain, certain Personal Information that can be used to contact or identify you, such as:
  - Name
  - Mailing Address
  - Email address
  - Phone number
  - Other contact information
  - Driver's License number
  - Other government-issued ID number (for example, military ID, passport number, etc.)
  - Other unique identifier number
  - Vehicle Identification Number ("VIN")
  - Vehicle license plate number
  - Vehicle title Information
  - Payment card information, or other personal financial information (to facilitate payment of fees)

- Cookies or Usage Data (to the extent that they can identify you)
- Other information that you choose to provide to us that can identify you, and
- Any other information that may identify you.

Please note that Joyride does not directly collect, process, or store payment card information. Instead, any payment card information requested is collected and processed by our third-party payment processors, such as Square.

- **Usage Data:** We may also collect information that your browser sends whenever you access our Websites or online portals by or through a mobile device. This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data. At times, the combination of various types of data, including Usage Data, may enable you to be identified, and may therefore qualify as Personal Information.

When you access the Services with a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

- **Tracking & Cookies Data:** We may use cookies and similar tracking technologies to track the activity on our Services. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to analyze and improve our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Services that are accessible through our Websites. Session cookies are temporary, and are automatically deleted once you close your Internet browser.
- **Third Party Cookies.** Joyride allows third-party service providers and other companies to use cookies or other similar technologies on our Websites. These companies may collect your information, track your behavior on our Websites, and gather information about your use of our Websites and other online services over time and across different services. Additionally, some companies may use information collected to deliver targeted ads on behalf of us or other companies, including on other websites or online services. We are not responsible for the

functioning of cookies and other technologies used and placed by third parties on your device.

- **Other Technologies.** We collect many different types of information from other technologies to improve the quality of our Websites and the services we provide. For example, we may collect Usage Data and other information about the device you use to access our Websites, your operating system and/or mobile device type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. We may record the IP address of the device you use to connect to the Internet.

### ***Your Cookie Choices***

You are in control as to which cookies and other tracking technologies are collected by your browser or device. You may set your browser to block or refuse all cookies, to indicate when a cookie is being sent, or otherwise control what cookie your browser or mobile device accepts via your browser or mobile device settings. Additionally, you can choose to modify your settings and delete those cookies that are otherwise stored on your device at any time.

Please read the instructions provided by your browser or mobile device manufacturer to find out how you can control the placement of and/or remove cookies or other technologies. Please note, however, that limiting or disabling the use of cookies and other technologies may impact your ability to perform certain actions on, use certain functions of, and access certain content on our Websites.

#### **b. Personal Information Collected over the Last 12 Months**

Joyride has not collected any other Personal Information the last 12 months.

### **III. How We Collect Your Information**

Joyride collects and obtains your information in a few ways: there is information that you choose to give us, information we obtain through your use of our Services (including our Websites), and information we obtain from third parties.

#### **a. Information You Give Us**

At times, we may require you to provide certain information – including Personal Information – in order to use certain parts of our Websites, fulfill your requests to us, or provide you with certain Services. For instance, we may require you to provide your name, driver’s license or other identification, contact information, and other relevant information to identify you and determine that you are authorized to receive the services being provided.

Additionally, we collect any information you choose to share with us. We will collect your name, contact information, and any other information you provide to us if you contact us with questions or request information from us – for example, we will collect your name and email address if you choose to sign up for alerts about vehicle auctions in your area.

#### **b. Information We Obtain When You Use Our Services**

As noted above, we collect certain information from you through your use of our Services, such as Usage Data. For instance, in using our Websites, we may collect information about the device you use. We may collect IP address and other generic information about how you use our Websites or other Services (for example, aggregate metrics on how often certain pages on our Websites are accessed and viewed).

We also may collect information through the use of cookies or other technologies, as described above.

In other instances, you will need to provide certain information about yourself when using certain Services. For instance, when you use our web-based customer service chat feature, we will collect any and all information that you provide to us, including any Personal Information you choose to give to us.

#### **c. Information We Obtain from Other Sources / Third Parties**

We may also obtain information about you from towing companies and/or municipalities that utilize our Services. For example, Joyride may have access to VIN information about a vehicle you own from a municipality through the process of selling the vehicle at auction.

The categories of third parties from whom we receive Personal Information include:

- City / municipal governments
- Tow operators
- Impound lots
- Payment card processors

### **IV. Purposes for Collecting, Processing, and Using Your Information**

Joyride collects, processes (or asks our service providers to process on our behalf) and uses your information to provide the Services we make available to our partners and you. We therefore will collect and use your information for a variety of reasons, including:

- To perform contracted services with our partner municipalities and tow providers.
- To verify your identity, that you are authorized to receive the Services.

- Where you have otherwise given us your consent and permission to do so – for instance, if you provide us your email address to receive information about auctions in your area, or provide your information to us via our Website to fulfill search requests or ask us questions.
- To facilitate operating our Joyride Websites and other Services. These operational purposes may include but are not limited to:
  - Operating, maintaining and improving our Services, including the Websites;
  - Detecting security incidents; and
  - Helping law enforcement to prosecute individuals responsible for malicious, deceptive, fraudulent, or illegal activity involving Joyride, our Services, and/or our customers.
  - Assisting with fraud prevention, improving the security of our networks, and reporting suspected criminal activity to law enforcement.
- To comply with applicable laws, in response to a lawful and enforceable request by a law enforcement, judicial, or other public authority, or in connection with an applicable legal obligation.

## V. How We Disclose or Share Your Information

Joyride **does not** sell your Personal Information to any third party. However, Joyride may disclose your information in a number of ways as part of our Services. For instance, we may share your information with our third-party service providers that facilitate the functions of our Websites, such as our web hosting and cloud storage providers. We may also provide your Personal Information to service providers or contractors to perform functions on our behalf, including assisting us in providing our Services to you or our partners.

We may also disclose or share your information for the following purposes:

- To comply with a legal obligation.
- To protect and defend Joyride’s rights or property.
- To prevent or investigate possible wrongdoing in connection with the Services.
- To protect the personal safety of individuals or the public.
- To protect against legal liability.
- When there is a good faith belief that such action is necessary to investigate or protect against harmful activities to our guests, visitors, associates, or property (including the

Websites), or to others (including Joyride itself). This may include disclosures to law enforcement to investigate potential criminal activity or other civil violations.

**a. Categories of Third Parties that Receive Personal Information from Joyride**

We share or otherwise disclose Personal Information to the following categories of third parties:

- **Fulfillment Service Providers:** We employ third party fulfillment service providers, companies, individuals, and agents to facilitate and help us provide our Services. Such Fulfillment Service Providers perform tasks, services, or functions on our behalf, or assist us in analyzing how our Services are used or delivered. These third parties may include payment card processors, motor vehicle owner inquiry service providers, cloud-based storage and web-hosting providers, and other vendors that assist us in providing our Services. These third parties are granted access to your information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.
- **Other Joyride Affiliated Entities:** We may share or disclose your information to other entities that make up the Joyride organization.
- **Cities, Municipalities, and other Governments:** Joyride provides Services to local government entities that are looking to improve their vehicle towing and/or vehicle auctioning services. We may share information related to you with those government entities as part of those Services.
- **Tow Companies / Impound Facilities:** As part of our Services, Joyride provides information requested by cities, municipalities, or other local governments with the tow companies that tow vehicles on their behalf. That information may also be shared with the impound facilities that keep towed vehicles.

**b. Categories of Personal Information Disclosed**

Joyride has disclosed the categories of Personal Information as defined above to our Service Providers in the last 12 months for our business purposes.

**c. Categories of Personal Information Sold**

Joyride does not sell individuals' Personal Information .

Please note that a "sale" of Personal Information does not include those instances when such information is part of a merger, acquisition, or other transaction involving all or part of our business. If we sell all or part of our business, make a sale or transfer of assets, or are otherwise involved in a merger or other business transaction, we may transfer your Personal Information to a third party as part of that transaction. If such transaction materially affects

the manner in which your Personal Information is processed, we will notify you of such change prior to its implementation.

## **VI. Our Policy on “Do Not Track” Signals under the California Online Protection Act (CalOPPA)**

We do not support Do Not Track. Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable “Do Not Track” by visiting the “Preferences” or “Settings” page of your web browser. Joyride may track your online behavior over time and across web services. Joyride’s tracking of behavior for our website only anonymous information about the usage of the site. This tracking is currently supported through the Google Analytics services (<https://analytics.google.com/>).

Third parties may collect data that relates to you. We cannot control third parties’ responses to do-not-track signals or other such mechanisms. Third parties’ use of data relating to you and responsiveness to do-not-track signals is governed by their respective privacy policies.

## **VII. Your Data Protection & Privacy Rights**

**California residents:** Joyride has in place policies and procedures to facilitate your exercise of privacy rights available under applicable law. Joyride therefore informs you that, where applicable under relevant law, you may be entitled to the following:

- **Right to Access / Disclosure:** to have access to your Personal Information upon simple request – that is, you may receive a copy of such information upon receipt of a verifiable request, along with other information related to the collection or processing.
- **Disclosure of Direct Marketers:** to have access upon simple request, and free of charge, the categories and names/addresses of third parties that have received Personal Information for direct marketing purposes. Please see the “Your California Privacy Rights” section below for more information.
- **Right to Information About Collecting, Selling, Sharing, or Disclosing Personal Information:** upon receipt of a verifiable request, you may obtain a list of:
  - The specific pieces of your Personal Information Joyride holds;
  - The categories of Personal Information collected about you, sold to third parties, or disclosed to third parties for business purposes;
  - The categories of Personal Information sold within the last 12 months;
  - The categories of sources from which Personal Information is collected;
  - The business or commercial purpose for collecting or selling Personal Information; and



- The categories of third parties with whom Personal Information is shared, sold, or disclosed for a business purpose.
- **Right to Opt-Out of the Sale of Personal Information:** As noted elsewhere, Joyride does not sell individuals' Personal Information. California residents have the right to opt-out of the sale of their Personal Information under certain circumstances.
- **Right to Deletion / "Right to be Forgotten":** to obtain the deletion of your Personal Information in the situations set forth by applicable data protection law and upon receipt of a verifiable request.
- **Right to Non-Discrimination.** As defined under relevant law, you have a right to non-discrimination in the Services or quality of Services you receive from us for exercising your rights.

Please contact us using the means listed in the "Contact Us" Section below in relation to exercising these rights. Note that we may ask you to verify your identity – such as by requiring you to provide information about yourself – before responding to such requests.

## **Your California Privacy Rights Regarding Direct Marketing Information**

California residents have the right to request information from a company regarding the manner in which it shares certain categories of Personal Information with third parties for their direct marketing purposes, in addition to the rights set forth above. Joyride does not share individuals' Personal Information for direct marketing purposes.

Under California law, you have the right to send us a request at the designated address listed below in the "Contact Us" section to receive the following information:

1. the categories of information we disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year;
2. the names and addresses of the third parties that received the information; and
3. if the nature of the third party's business cannot be determined from their name, examples of the products or services marketed.

To make such a request, please provide sufficient information for us to determine if this applies to you, and attest to the fact that you are a California resident. Please also provide a current California address for our response. You may make this request in writing to us at the below address. Any such request must include "California Privacy Rights Direct Marketing Information Request" in the first line of the description, and include your name, street address, city, state and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through the address provided for this purpose below.

Note that responsive information may be provided in a standardized format that is not specific to you.

## **VIII. Links to Other Sites**

Our Privacy Policy is designed to advise you about how we collect, use, protect, and disclose the information that we collect and/or receive about you. However, our Websites may contain links to other sites that are not operated by us. Please note that this Privacy Policy does not govern the practices of third parties, including our partners, third party service providers, and/or advertisers, even when those services are branded as, or provided on behalf of, Joyride. Information collected from you by others, such as third-party websites that you access through links on the Websites, are governed by those entities' privacy policies. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## **IX. Children's Privacy**

All of our Services, including our Websites, are intended for adult audiences, and are not meant to address anyone under the age of 18 ("Children"). As such, Children under 18 may not use our Websites or any other Services. If you are under 18, do not attempt to register for or use any of our Services, including our Websites, and do not provide us any Personal Information about yourself.

We do not knowingly collect Personal Information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has violated this Privacy Policy and provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from children without verification of parental consent, we will take steps to remove that information from our servers.

## **X. Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. While we reserve the right to make changes to our Privacy Policy at any time and at our sole discretion, we will notify you of any changes by posting the new Privacy Policy on this page. We will let you know via a prominent notice on our Website prior to any material changes becoming effective and will update the "effective date" at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **XI. Submitting a Verifiable Request Regarding Exercise of Your Rights under the California Consumer Privacy Act**

As mentioned above, California residents have certain rights to access, delete, or otherwise exercise rights regarding their Personal Information under the California Consumer Privacy Act of 2018 (“CCPA”). Joyride will respond to an individual’s “verifiable request” to exercise his or her rights under the CCPA – that is, where Joyride has received a request purporting to be from a particular individual, and Joyride has been able to verify the individual’s identity. The need to verify an individual’s identity is critical to protecting your information, and to ensuring that your information is not shared with anyone pretending to be you or someone who is not authorized to act on your behalf.

You may submit a verifiable request via our request webform and our toll-free number, listed in the “Contact Us” section below. Joyride will ask you to provide information about yourself so that we can verify your identity as part of this process. This information may include your name, your address, information related to your vehicle, and any other information deemed necessary by Joyride to reasonably verify your identity, to ensure that your information is not shared with anyone impersonating you.

We may ask for additional information if we have difficulty confirming your identity. We will not share your information or honor other requests in those situations where we are unable to confirm that a request for your information is a “verifiable request.”

## **XII. Contact Us**

If you have any questions about this Privacy Policy, our practices, your Personal Information, or your rights and choices under applicable laws, please contact us:

### **In the U.S.:**

- By telephone: 888-578-4696
- By visiting this page on our website: <https://joyrideautos.com/privacy-policy-request>

### **In the EU:**

- By visiting this page on our website: <https://joyrideautos.com/privacy-policy-request>

## **XIII. Difficulty Accessing Our Privacy Policy?**

Individuals with disabilities who are unable to usefully access our privacy policy online may contact us at the above-listed contact information to inquire how they can obtain a copy of our policy in another, more easily readable format.