



## Privacy Policy Supplement for the Foureyes Tool

Last Updated and Effective Date:

August 21, 2025

This Foureyes supplement to the Dealer's Privacy Policy ("**Privacy Policy Supplement**") addresses how personal information is collected, used, disclosed, and otherwise processed by Foureyes, LLC and its subsidiaries and affiliates ("**Foureyes**") on behalf of the automotive dealers and dealer or automotive group customers that are using the Foureyes Tool (collectively, the "**Dealer(s)**").

The Dealer posting or linking to this Privacy Policy Supplement uses the Foureyes platform and tools (such as Foureyes' analytics and reporting system and/or Foureyes' customer communications hosted system) (collectively, the "**Foureyes Tool**" or the "**Tool**"). Foureyes is operating as a service provider/processor to the Dealer and processing personal information on the Dealer's behalf.

For information about data rights available under U.S. state privacy laws and the California Notice at Collection, please see the [State-Specific Privacy Addendum to the Dealer Privacy Policy Supplement](#).

Please also review the Dealer's Privacy Policy, Terms and/or any other applicable terms or agreement that may apply to your use of the Dealer's website or other services. If you have any questions, comments, or concerns, please contact the Dealer directly.

From time to time, Foureyes may update this Privacy Policy Supplement as described in the Changes to this Privacy Policy Supplement section below.

### **I. Scope of This Privacy Policy Supplement**

#### **(a) The Foureyes Tool**

This Privacy Policy Supplement applies to personal information that Foureyes collects, uses, discloses, and otherwise processes on behalf of the Dealer when you access, use or otherwise interact with the Dealer's website or otherwise communicate or engage with the Dealer where the Dealer has implemented the Foureyes Tool. **This Privacy Policy Supplement covers only processing via the Foureyes Tool and no other processing by the Dealer.** For information about how the Dealer processes personal information, please refer to the Dealer's privacy policy.

#### **(b) Out of Scope**

This Privacy Policy Supplement does not apply to processing activities by Foureyes that are not described in this Privacy Policy Supplement, including but not limited to processing activities for which Foureyes acts as a business/controller.

This Privacy Policy Supplement does not apply to the Dealer website or processing activities occurring on the Dealer website outside the scope of the Foureyes Tool. It also does not apply to Dealer communications occurring outside the Foureyes Tool or other processing activities performed by the Dealer. For information about how the Dealer processes personal information, please refer to the Dealer's privacy policy.

This Privacy Policy Supplement does not apply to or cover websites or resources that are not connected with the Foureyes Tool, with which Foureyes does not have a contractual relationship and over which Foureyes does not have control ("**External Websites**"). By clicking on links to External Websites, the operators of the External Websites may collect personal information. Foureyes is not responsible for the content or data collection practices of those External

Websites, and your use of External Websites is subject to their respective terms of use and privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

## 2. How the Foureyes Tool Works

The Foureyes Tool collects, generates and otherwise processes personal information when you interact with the Dealer's website, engage with the Dealer by phone, or fill out a form or interact with chat functionality on the Dealer's website, and/or receive and interact with email communications and/or SMS messages from the Dealer, where the Dealer's website and/or communications are connected with or sent and received through the Foureyes Tool. The Foureyes Tool collects information about your interactions with the Dealer's website, such as browsing activity and information entered into website fields, regardless of whether the form or other website action is submitted via a submit button or similar action. The Dealer can adjust the settings of the Foureyes tool to manage when and how data is collected. Note that because the Foureyes tool collects data in real time, any information you enter into forms on the Dealer's site may be collected and transferred to Foureyes, even if you do not submit the form to the Dealer. You can opt out of this collection by opting out of the Foureyes tool. For more information about how the Foureyes Tool works and your opt-out options, click [here](#) and see the Your Choices section of this Privacy Policy Supplement.

## 3. Personal Information Processed by the Foureyes Tool

As used in this Privacy Policy Supplement, "**personal information**" means any information that identifies or could be used to identify an individual person. For example, personal information may include name, email address, and IP address, or other unique identifier. It also includes other non-public information that is associated with such identifying information. Personal information does not include aggregated or anonymized information.

The Foureyes Tool collects the following types of personal information on behalf of the Dealer:

### (a) Information You Provide

- **Contact Information:** The Foureyes Tool collects contact information that you provide in your interactions with the Dealer and/or the Dealer's website, such as by entering information into a contact form or communicating with the Dealer by phone, email or chat. This includes information such as your name, personal phone number, home address, and email address. Note that when entering contact information into the website, this information may be collected even if you do not click a submit button or take a similar action.
- **Customer Profile:** When you interact with the Dealer website, the Foureyes Tool generates a unique visitor ID number and visitor traffic number and creates a user profile. The Foureyes Tool collects information that a user provides through the Dealer website and interactions with the Dealer, as described in this Privacy Policy Supplement, and includes that user-provided information in the user profile. The Foureyes Tool also combines information collected automatically (described below) with user profile information for the same individual.
- **Chat and Phone Communications:** The Foureyes Tool collects information that you enter into or through a chat feature or functionality made available on the Dealer website and/or information provided through phone communications with the Dealer. This information may include contact information and the content of any chats that you provide, including any inquiries or requests and your chat history.
- **SMS messaging and Marketing Emails:** The Foureyes Tool collects your contact information and the content of your email communications with the Dealer. If you provide the Dealer with consent to receiving text messages, the Foureyes Tool may collect the phone number that you provide and your messaging history including any information

included in those messages. Mobile information will not be shared with third parties for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with third parties.

#### **(b) Information Collected Automatically**

- **Log data:** This may include your Internet Protocol (“IP”) address, browser type and settings, the date and time of your request, and how you interact with our Services.
- **Device information:** This may include your browser type and version, browser settings, time zone, unique device identifiers, available plugins, information about your approximate location (as determined through your IP address), mobile, computer, and/or device hardware information (e.g., operating system version, hardware model, IMEI number, and other unique device identifiers, MAC address, and device settings), device event information, log information, and crash data.
- **Usage information:** This may include features that you use, clickstream data, access dates and times, and how you interact with the Dealer website. This information may also include the traffic source for the visit, referring / exit pages and URLs, how you interact with links on the Dealer website, landing pages, and pages viewed. The Foureyes Tool also may collect the date and time you open an email communication or click on any links in an email sent via the Foureyes Tool, and the Foureyes Tool may associate this information with the email address we already have from you.

#### **(c) Information from Third Party Sources**

The Foureyes Tool may access or receive information from third-party sources that the Dealer connects or uploads to the Foureyes Tool. These third-party sources of information may include the Dealer’s internal and/or third-party business operations and marketing systems and other third-party service providers to the Dealer, such advertising or analytics vendors.

#### **(d) Sensitive Personal Information**

The Foureyes Tool does not intentionally collect personal information that is considered sensitive under privacy laws, such as genetic data, health information, race or religious information, about users to provide the Services.

### **4. How The Foureyes Tool Uses Personal Information**

The Foureyes Tool uses the personal information collected in the following ways:

- To provide the Foureyes Tool and related services to the Dealer;
- To assist the Dealer in establishing and managing a business relationship with you;
- To send marketing communications, including emails and SMS messages, on the Dealer’s behalf;
- To analyze use of the Dealer website and communications;
- To conduct research and analytics related to the Dealer’s website and marketing activities, such as to understand how they are being used and where improvements may be needed;
- To personalize and improve user experience on the Dealer’s website and when interacting with the Dealer through personalized communications;
- To compile aggregate and anonymized data for Foureyes’ own use; and
- For Foureyes’ own legal and compliance obligations.

### **5. How the Foureyes Tool Discloses Personal Information**

On behalf of the Dealer, Foureyes transmits, discloses, grants access, makes available or provides personal information to or with the following types of third parties.

- **OEMs and their Digital Program Operators:** Foureyes partners with various automotive manufacturers and their affiliates (“OEMs”) as a part of their respective certified marketing

programs and discloses personal information collected and generated through the Foureyes Tool with them, as set out under Foureyes' agreements with the Dealers and OEMs. Foureyes also discloses personal information to the third-party operators that provide the OEM with digital marketing and sales program technology platforms and program management ("**Digital Program Operators**"), according to Foureyes' agreements with the OEMs and the relevant Digital Program Operators.

- **Connected Data Partners:** If the Dealer has established a relationship with a third-party partner that connects data with the Foureyes Tool ("**Connected Data Partner**"), Foureyes discloses personal information with the relevant Connected Data Partner, as set out under Foureyes' agreements with the Dealer and the Connected Data Partner.
- **Foureyes' Service Providers:** Foureyes discloses personal information with its own service providers that help Foureyes to provide the Foureyes Tool.
- **Third Parties Related to Legal and Compliance:** Foureyes may disclose personal information as required to meet its own legal and compliance requirements, as described in Foureyes' own privacy policy.

## 6. Your Choices—Opting Out of the Foureyes Tool

### (a) Opting Out of Data Collection by the Foureyes Tool

You may choose to opt out of data collection by the Foureyes Tool. To opt out, click [here](#). For more information about opting out and how it works, please click [here](#).

### (b) Opting Out of Marketing Emails and SMS Messages Sent Via the Foureyes Tool

- **Email Opt-Out:** To stop receiving promotional email communications sent via the Foureyes Tool on the Dealer's behalf, click on the "unsubscribe" link in the communication or send an email to [support@foureyes.io](mailto:support@foureyes.io).  
**Please note that the opt out applies only to email communications sent via the Foureyes Tool and only for the particular Dealer whose communications you've opted out of.** You may continue to receive other marketing emails sent by the Dealer or the Dealer's third-party service providers or agents, and you may continue to receive marketing emails from other Dealers that use the Foureyes Tool. To opt out of other marketing communications sent by the Dealer, please see the Dealer's privacy policy for the relevant opt-out information. To opt out of email communications sent by the Foureyes Tool on behalf of other Dealers, you will need to submit a separate opt-out request with Foureyes for each Dealer.  
If you opt-out of marketing emails sent via the Foureyes Tool, the Dealer will still send you transactional emails, such as responses to your requests.
- **SMS Opt-Out:** To stop receiving SMS marketing communications sent via the Foureyes Tool on the Dealer's behalf, you can opt out at any time by responding with an opt-out notice in the SMS communication.

Please be aware that the Dealer may engage in targeted advertising through its third-party advertising partners. The Foureyes Tool does not serve targeted ads, and Foureyes does not directly engage in targeted advertising on the Dealer's behalf. For information about the Dealer's targeted advertising activities and your options, please see the Dealer's privacy policy.

## 7. Your Privacy Rights and U.S. State Privacy Disclosures

Depending on the state where you reside, you may have certain privacy rights provided under applicable law. For more information, please see the [State-Specific Privacy Addendum to the Dealer Privacy Policy Supplement](#).

## **8. How Long Foureyes Retains Personal Information**

Foureyes retains personal information for the purposes stated in this Privacy Policy Supplement, as directed by the Dealer and as required or permitted under applicable law. To determine how long we keep personal information, we consider the amount, nature, and sensitivity of personal information, the reasons for which we collect and process the information, and applicable legal requirements.

## **9. How Foureyes Protects Personal Information**

At Foureyes, we take our responsibility to protect the security and privacy of personal information seriously. The Foureyes Tool has implemented what Foureyes believes to be reasonable and appropriate administrative, technical, and physical data security measures designed to prevent personal information from being lost, used, accessed, altered, or disclosed in an unauthorized or unlawful way.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure, and we cannot and do not guarantee that personal information is completely secure and safe from such risks. If you have reason to believe that your information is no longer secure, please contact the relevant Dealer.

## **10. "Do Not Track" Preferences**

Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. There is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, the Foureyes Tool does not currently alter its practices when a "Do Not Track" signal from a visitor's browser is sent, except as specifically required by law. For information about "Do Not Track" please visit [All About DNT](#). For information about Global Privacy Controls/Opt-Out Preference Signals, see the Dealer's privacy policy and the [State-Specific Privacy Addendum to the Dealer Privacy Policy Supplement](#).

## **11. Children's Privacy**

The Foureyes Tool does not knowingly collect personal information from children younger than the age of 18 or under the age of majority without the consent of a parent or legal guardian, as required under applicable law. If you learn or believe that a child under the age of 18 or under the age of majority has provided us with personal information, please contact the relevant Dealer.

## **12. Changes to this Privacy Policy Supplement**

Foureyes may update this Privacy Policy Supplement from time to time. When Foureyes updates this Privacy Policy Supplement, we will revise the "Last Updated and Effective Date" at the top of this Privacy Policy Supplement and post a link to the updated Privacy Policy Supplement. Changes to this Privacy Policy Supplement are effective when they are posted. If Foureyes makes any material changes, the Dealer may provide you with notice as required under applicable law. Please review this Privacy Policy Supplement periodically to ensure you are aware of any such changes.