LAST UPDATED: March 4, 2026

INTRODUCTION AND OVERVIEW

PureCars Technologies, LLC ("PureCars", "us", "we" or "our") is committed to protecting the privacy and confidentiality of any Personal Information (as defined below) that we may collect. PureCars has created this privacy policy (this "Privacy Policy") to advise you about our information handling practices, such as the types of personal or other forms of protected information we collect, how we may use and disclose that information, and to inform you about the choices you have regarding such use and disclosure, and how you may exercise your privacy rights. This Privacy Policy is to be read and understood in conjunction with the PureCars Terms of Service, of which this Privacy Policy is a part, and any other terms or agreements that link to this Privacy Policy.

PureCars provides services and technical solutions to auto dealerships, including through TheAutoMiner, TruPayments, PureInsights, as well as other digital advertising services. When we act as a service provider, contractor, or processor to auto dealerships, we may collect, use, or disclose your information on behalf of our clients. This includes when dealerships use our Rylie AI Conversations tool. In those instances, we enter into contractual terms that restrict our collection, use, or disclosure of any protected information that we collect or receive, but the dealership's privacy policy will govern. We encourage you to read the privacy policies of third-party websites or applications, including the privacy policies of any dealerships that you visit. When dealerships use our pixels, our pixels will recognize Global Privacy Controls and or other commonly used opt-out signals from end-user devices. We explain more about this below.

We urge you to read this Privacy Policy carefully to understand our policies and practices for collecting, processing, and storing your Personal Information. The purpose of this Privacy Policy is to explain

our information handling practices when we are acting as a business or “controller” of your Personal Information.

By engaging with **www.purecars.com**, **www.theautominer.com**, **www.shopbypayment.com**, or our other digital properties or forms that link to this notice (collectively, our “Websites” and, individually, our “Website”) or otherwise providing PureCars with Personal Information by any means, you accept and agree to the practices described in this Privacy Policy. This Privacy Policy may change from time to time, as described in the section on Changes to This Policy. Your continued use of our Websites (following the posting of a revised Privacy Policy) means that you accept and agree to the revised terms, so please check the Privacy Policy periodically for updates.

By using our Websites, you hereby agree that you are at least eighteen (18) years of age and are bound by this Agreement.

APPLICABILITY

This Privacy Policy does not apply to protected forms of information that we may collect in our role as a processor or service provider.

This Privacy Policy applies to the collection, use, and disclosure of Personal Information that PureCars may collect from you or that you may otherwise provide to us when you:

- Visit our Websites.
- Attend our events, including sales or marketing events.
- Communicate with us, in our capacity as a business, via phone, email, text, and other forms of electronic messages, including interactive chat functions between you and our websites. It will not apply when we act as a service provider, vendor, or processor on behalf of auto dealerships, including when dealerships use our Rylie AI Conversations product.

- Interact with media on our Websites and our official pages on other third-party websites like Facebook, YouTube, X, LinkedIn, and Instagram. Those platforms may offer additional privacy terms, which we encourage you to read.
- Use our services, offline or online, unless we provide you with another Privacy Policy that notes that it supersedes this Privacy Policy.
- Interact with certain pixels, tracking technologies, and applications on third-party websites and services, including those on websites of auto dealerships, if those pixels, tracking technologies, or applications include links to this Policy or if we are the data owner.
- Interact with service providers, contractors, or processors that work on our behalf to offer, provide, and improve our Websites and services to our customers. We disclose these practices in this Privacy Policy.

LINKS TO THIRD-PARTY CONTENT

Our Websites may include links to third-party websites, plug-ins, services, social networks, applications, or embedded videos hosted, operated, or controlled by third parties. Clicking on those links, such as links to Facebook, Instagram, or another social media site, or enabling those connections may allow a third party to collect or share information about you. This Privacy Policy does not apply to those third-party services, and we cannot take responsibility for the content, privacy policies, or practices of third-party services. We encourage you to review the privacy policies of any third-party service before providing any information to or through them.

INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

This section describes how we collect information in our role as a business or controller. It does not apply to protected forms of

information that we may collect in our role as a processor or service provider.

INFORMATION YOU PROVIDE TO US

We receive and store information you provide directly to us. The types of information we may collect directly from you may include: name, username, email address, postal address, phone number, transactional information, as well as any other contact or other information you choose to allow car dealerships or manufacturers to provide to us or upload to our systems in connection with the use of our targeted advertising services (“Personal Information”).

INFORMATION WE AUTOMATICALLY COLLECT

As you navigate through and interact with our Websites or interact with certain PureCars pixels or other tracking technologies on dealership websites, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions or other interactions, and patterns, including:

- Details of your visits, including traffic data, location data, logs, and other communication data and the resources that you access and use.
- Information about your device and internet connection, including your IP address, operating system, and browser type.

PureCars tracking technologies may collect additional information, including personal information of visitors to dealership websites, such as when PureCars provides cross-context behavioral or targeted digital advertising or similar services to dealerships.

OTHER PERSONAL INFORMATION SOURCES

Like many businesses, we also collect information through our service providers or other third parties or technologies, including through cookies, server logs, and similar technologies. These include:

- Advertising networks.
- Affiliated companies.
- Business partners.
- Chat services or other technologies.
- Data analytics providers.
- Data brokers.
- Internet service providers.
- Operating systems and platforms.
- Service providers, such as technical, payment, and delivery services.
- Social networks.

We may collect the following data elements from third-party sources, which may require various levels of consent

- Identifiers. For example, your name, alias, address, phone numbers, IP address, email address, telephone number, account name, account log-in information, unique personal identifier (including cookies, beacons, and/or pixel tags), government- issued identifier (in limited circumstances), or other identifiers, such as social media handles.
- California Customer Records. For example, your name, signature, billing address, driver's license, tax identification number, telephone number, and payment card details, including card number, expiration date and security code. Some information included in this category may overlap with other categories.
- Protected Classification Characteristics Under California or Federal Law. For example, your signatures, military or veteran status, physical disabilities, gender, age, or other background information.
- Commercial Information or Internet Activity. For Example, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

- Biometric Information. For example, facial images, voice recordings or keystroke patterns or rhythms, or call center recordings. On a limited basis, this may include biometric information for purposes of uniquely identifying an individual, if enabled and with the individual's consent.
- Internet or Other Electronic Network Activity Information. For example, information related to Website or device usage, meaning browsing history, search history, or details about your interactions with our Website or pixel, including through use of what is now commonly known as "session replay" technologies, which may include data relating to the full Uniform Resource Locators (URLs), clickstream information to, through, and from our Website (including date and time), services viewed or searched for page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), or methods used to browse away from the page. This also includes information about your device and potentially any connected third-party devices. For example, internet speed, IP address, storage information, error rates, length of connection time, the browser or device you are using, data from cookies, pixel tags or other online tools. This may include your operating system, hardware model, and mobile carrier.
- Geolocation Data. This may include precise geolocation information if you agree to provide this. This would be to fulfill certain services like locating a nearby dealership.
- Sensory Data (Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information). For example, audio, video, and still-image recordings, photographs, or audio or visual recordings. We provide notice before collection for call recordings.
- Professional or Employment-Related Information. For example, prior education, work history, resume, and information about your skills and qualifications for certain positions.
- Non-Public Education Information Protected Education Information. For example, your education history.
- Inferences Drawn from Other Personal Information. We may use Information from the categories described in this list to create a

profile about you, to personalize your experience, to reflect your preferences, behavior, and attitude. This may include sensitive personal information that you choose to provide to us directly or to these third parties who have your consent to provide it to us. This may include precise geolocation, racial or ethnic origin, religious or philosophical beliefs, biometric information used for purposes of identifying you, or information about a genetic or medical condition that you want us to know about as you use our products or services.

If we combine or connect non-personal, demographic, or technical information with Personal Information so that it directly or indirectly identifies an individual, we treat the combined information as Personal Information. Please consider what information you may share with our Websites and across the web.

If we collect these data elements in our role as a controller or business, we allow you to opt-out of collection by a request via **Your Privacy Choices form**. You may also call us at our toll-free telephone number: (877)860-0086.

HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any Personal Information: (1) to present our Websites and their contents to you; (2) to provide you with information, products, or services that you request from us; (3) to fulfill any other purpose for which you provide it; (3) to carry out our obligations and enforce our rights arising from any contracts entered into between you and us; (4) to notify you about changes to our Websites or any products or services we offer or provide; (5) to manage interest-based advertisements on behalf of dealerships; (6) to help diagnose problems with equipment, administer and operate our Websites; (7) to compile statistical data for analysis, research, optimization, performance and development; (8) in any other way we may describe when you provide the information; (9) to comply with our legal obligations; or (10) for any other purpose with your consent.

HOW WE DISCLOSE YOUR INFORMATION

We may disclose personal information we collect from you: (1) to our affiliated companies or subsidiaries to the extent allowed by law; (2) to contractors, service providers, and other third parties we use to support our business; (3) to fulfill the purpose for which you provide it; (4) to a buyer or other successor in the event of a sale or transfer of some or all of our business or assets; (5) for any other purpose disclosed by us when you provide the information; (6) to comply with any court order, law or legal process, including responding to any government or regulatory request; (7) to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections; (8) if we believe disclosure is necessary or appropriate to protect the rights, property or safety of us, our clients or others; (9) at your direction; or (9) with your consent.

CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

This Privacy Policy attempts to be transparent with our information collection, handling, use, disclosure, and security practices. We strive to provide you with choices regarding certain Personal Information uses, particularly around cross-context behavioral or targeted marketing and advertising. We may choose or be required by law to provide different or additional disclosures relating to the processing of Personal Information about residents of certain states. To exercise any of your privacy rights, please refer to our Privacy Rights Request submission form. Based on the applicable laws of your state, you may have the right to request access to the Personal Information we collect from you, change that information, or delete it in some circumstances. To request to access, change, or delete your Personal Information, please submit a request through our **Your Privacy Choices form**. You may also call us at our toll-free telephone number:

(877)860-0086. The following choices also offer you control over your information:

- ***Tracking Technologies and Advertising.*** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Websites or certain cookies or tracking technologies we control on dealership sites may then be inaccessible or not function properly. In addition, cookies may be browser-specific and may need to be set separately on each device.
- ***Disclosure of Your Information for Third-Party Advertising.*** If you do not want us to share or disclose your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by checking the relevant box located on the form on which we collect your data or visit our **Your Privacy Choices** webform. We also accept Global Privacy Control signals.
- ***Promotional Offers.*** You will not receive unsolicited emails, phone calls, or mailings from PureCars. However, if you would like to opt out of promotional offers, you will have the choice to unsubscribe to any email, text, or mail. Please either reply with unsubscribe or STOP or use the instructions in the promotional offer you receive. To opt-out from dealership or seller communications, please contact the dealership or seller directly – they may need to text you for reasons unrelated to our services so we cannot opt you out of those communications.
- ***Online Account Holders.*** Depending on how you interact with us, you may be able to review and change your Personal Information by logging into our Website and visiting your account profile page.

THIRD-PARTY USE OF TRACKING TECHNOLOGIES

Some content or applications, including advertisements, on our Websites are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Websites. They may associate the information collected with your Personal Information or they may collect information, including personal Information, about your online activities over time and across different websites or other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

Please be aware and considerate any time you interact with social media content or connect your social media account through social login. When required by applicable law, we obtain consent before placing or using analytics, cookies, or similar technologies. You may manage your preferences at any time by submitting a request.

We may use third party analytics such as Google Analytics or similar analytics services. For information on how Google processes and collects your information regarding Google Analytics and how you can opt-out, please see https://support.google.com/analytics/answer/6004245?hl=en or the Google Analytics Opt-out Browser Add-On https://tools.google.com/dlpage/gaoptout.You may also opt out of Google's use of cookies for advertising, including DoubleClick cookies, by visiting Google's Ads Settings at https://myadcenter.google.com/.

- We do not always control third parties' collection or use of your information to serve interest-based advertising. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.
- These third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network

Advertising Initiative (“NAI”) on the NAI’s website or members of the Digital Advertising Alliance (“DAA”) on the DAA’s website. For information about these opt-out programs and to opt-out of the use of website browsing data for interest-based advertising by companies that participate in these programs, click the following: **NAI Opt Out** or **DAA Opt Out**. To opt out of the use of information collected from the mobile applications on your device to serve ads that are targeted to your interests, consult the settings on your device. You can also click the preference icon that may appear on some of our advertising served through use of these technologies.

The following advertising partners offer opt-out features that let you opt-out of use of your information for interest-based advertising directly with them:

- Google: https://myadcenter.google.com/
- Amazon, Google, Facebook, https://optout.aboutads.info/
- NinjaCat: https://app.retention.com/optout/

YOUR PRIVACY RIGHTS

Depending how you interact with us and where you live, you may have different privacy rights.

For example, federal laws governing auto loans and leases may give you privacy rights or you may live in a state that gives residents the right to request:

- **To know or access** what Personal Information we have collected or processed about you, including:
  - the categories of Personal Information;
  - the categories of sources from which we collected it;
  - the business or commercial purpose for collecting or sharing Personal Information;
  - the categories of third parties to whom we disclose Personal Information; and

    - the specific pieces of Personal Information we have collected about you, also called the right to data portability, meaning you may have the right to download your Personal Information and transfer it to another business.
- **To delete** certain Personal Information that we have collected, subject to certain exceptions.
- **To correct** inaccurate Personal Information that we maintain about you, taking into account the nature of the information and the purpose for collection.
- **To opt-out of sharing**, if we share your Personal Information. We may also process requests we receive on behalf of dealerships if we have reasonable information to act on the request, to the extent allowed by our terms with the dealership or as required by law. The right to opt-out of sharing includes the right to opt out of Personal Information processing for targeted advertising, personal data sales, or advertising for cross-context behavioral advertising purposes. It also includes the right to opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects. We only engage in cross-context behavioral or targeted advertising through cookies or pixels, including certain pixels services, we provide on auto dealership websites. We do not otherwise share Personal Information when we act as a service provider on behalf of our clients. We also do not engage in profiling in furtherance of decisions that produce legal or similarly significant effects. To opt-out of sharing, we will rely on you to set your preferences regarding cookies and other tracking technology within any browser you use to access this site. You may also submit a request via **Your Privacy Choices form**. You may also call us at our toll-free telephone number: (877)860-0086. We have also signed our PureInsights pixel so that we recognize Global Privacy Control or other common opt-out signals if an auto dealership website uses our technology on their site. Please note that we do not control whether other pixels or tracking technologies on an auto dealership's website recognize Global Privacy Control. In addition, because we do not use any personal information collected by our Websites for targeted advertising, personal data sales, or cross-context

behavioral advertising purposes, our Websites do not recognize Global Privacy Control.

- **To limit the use or disclosure** as that term is defined under applicable law, if we use or disclose sensitive Personal Information for reasons other than those set forth under the law. We do not use or disclose sensitive Personal Information for reasons other than the limited purposes allowed under the various comprehensive privacy laws. We do not have actual knowledge of sharing Personal Information of individuals under 18. If you feel otherwise, please submit a request via our **Your Privacy Choices form** or call our toll-free telephone number: (877)860-0086.
- **To non-discrimination.** We will not discriminate against you for exercising any of your privacy rights under applicable laws. Unless permitted by law, we will not deny you goods or services; charge (or suggest you may receive) different prices for goods or services, including through granting discounts or other benefits, or imposing penalties; or provide (or suggest you may receive) a different level or quality of goods or services. However, we may offer you certain financial incentives permitted by consumer privacy laws that can result in different prices, rates, or quality levels. Any permitted financial incentive we offer will reasonably relate to your Personal Information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time. Currently, we do not provide any financial incentives, such as loyalty programs, but we may offer prizes or discounts in exchange for Personal Information of business prospects at industry events or in exchange for watching a demo of our product. You will always have the choice to not participate in these incentive offerings or to opt out according to the terms presented at the time of the offer.
- **To appeal** certain decisions regarding consumer rights requests.

- California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Websites that are California residents to

request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please call our toll-free telephone number: (877)860-0086

- If you are a resident of Nevada, you may apply limits to the sale of certain personal information to third parties for resale or licensing purposes, subject to applicable law. PureCars does not sell your personal information. You are entitled to register your preference for limits on such sales in the future by call our toll-free telephone number: (877)860-0086.

Some of these rights are only given to individuals when acting as "Consumers," as that term is defined under the relevant law. If you interact with us in a business-to-business capacity, for example, you may not have all of the same rights as a Consumer.

EXERCISING YOUR PRIVACY RIGHTS

Currently, we are only able to respond to requests if we collect your information in our role as a business or a controller, which includes when we handle targeted advertising for auto dealerships. If we collect your information in our role as a service provider or processor, we will ask that you contact the business or controller – likely the car dealership – that collected your information.

- To submit a request to exercise any privacy rights, please submit a request through our **Your Privacy Choices form** or by calling our toll-free telephone number: (877)860-0086. To appeal a decision regarding a consumer rights request, please use our Your Privacy Choices form.

Upon receiving your request, we may need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type

of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use Personal Information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. If, however, we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity, and for security or fraud-prevention purposes. We delete verification information in accordance with consumer privacy laws.

We may not agree to all requests. For example, we may not be able to accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. We may not be able to delete information if we have a legal requirement to maintain information

AUTHORIZED AGENT

Certain privacy laws allow you to have an authorized agent submit a request on your behalf. If you are in a state that allows submissions from authorized agents, an authorized agent may submit a request on your behalf using our **Your Privacy Choices form**. If you are using an authorized agent to exercise your rights, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

GEOGRAPHIC LOCATION OF DATA STORAGE AND PROCESSING

Our services are targeted to individuals located inside the United States, and we maintain significant operations in the United States. As such, our services collect information and process and store that information in databases located in the United States. If you are engaging with our services from a country outside the United States, you should be aware that you may transfer personally identifiable information about yourself to the United States, and that the data protection laws of the United States may not be as comprehensive as those in your own country. By engaging with our services and submitting any personally identifiable information you consent to the transfer of such personally identifiable information to the United States.

DATA RETENTION

We will only retain your Personal Information, in a form that permits us to identify you, for as long as necessary to fulfill the purposes we collected it for. If you have not made a deletion request, typically, this may be two years after the last date the information is used in connection with the provision of a product or service to you, unless such information is necessary for business operations or for other legitimate business purposes, is otherwise required to be retained by law or regulation, or where targeted disposal is not reasonably feasible due to the manner in which the information is maintained. In some cases, we retain personal information for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule, or regulation. Afterwards, we may retain some information in a depersonalized or aggregated form but not in a way that would identify you personally. In accordance with our routine record keeping, we may delete certain records that contain information you have submitted to us. We are under no obligation to store such information

indefinitely and disclaim any liability arising out of, or related to, the destruction of such information.

DO NOT TRACK

While some internet browsers offer a “do not track” or “DNT” option that lets you tell websites that you do not want to have your online activities tracked, these features are not yet uniform and there is no common standard that has been adopted by industry groups, technology companies or regulators. Therefore, we do not currently commit to responding to browsers’ DNT signals with respect to our websites. DNT is different from Global Privacy Control, which may notify websites of consumers’ privacy preferences regarding the sale or sharing of Personal Information, or the use of sensitive Personal Information.

DATA SECURITY

We have implemented commercially reasonable and appropriate administrative, physical, and technical security measures designed to secure your Personal Information from accidental loss and from unauthorized access and disclosure. The use of, and access to, your personal information by us is restricted to employees and contractors who need to know that information to provide services to you. We maintain physical, electronic, and procedural safeguards to limit access to personal and other forms of nonpublic personal information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to us through our Websites or other electronic means. We are not responsible for the circumvention of any privacy settings or security features. Any electronic transmission of personal information is at your own risk. You agree that we will not have any liability for misuse, access, acquisition, deletion, or disclosure of your information.

CHILDREN'S PERSONAL INFORMATION

The Services are intended only for users over the age of eighteen (18). If we become aware that a user is under sixteen (16) (or a higher age threshold where applicable) and has provided us with personal information, we will take steps to comply with any applicable legal requirement to remove such information. We do not knowingly collect any personal information from children under the age of eighteen (18). If you are under the age of eighteen (18), please do not submit any personal information through our Site or our services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Privacy Policy by instructing their children never to provide personal information through the Websites or our services without their permission. If you have reason to believe that a child under the age of eighteen (18) has provided personal information to us through our Websites or our services, please contact us via the information in the Contact Us section below so that we can delete this information.

DIFFICULTY ACCESSING OUR PRIVACY POLICY

Individuals with disabilities who are unable to usefully access our Privacy Policy online may contact us to inquire how they can obtain a copy of our policy in another, more easily readable format

CHANGES TO THIS POLICY

We reserve the right to change, modify or amend this Privacy Policy at any time to reflect changes in our products and service offerings, accommodate new technologies, regulatory requirements, or other purposes. This Privacy Policy may be updated, from time to time, to reflect changing legal, regulatory, or operational requirements. We encourage you to periodically review this page for the latest information on our privacy practices.

If there are any material changes to this Privacy Policy, you will be notified by our posting of a prominent notice on the Site prior to the change becoming effective. If we are required by law to do so, we will seek your consent prior to those material changes becoming effective.

If you do not accept any changes made to this Privacy Policy, please discontinue use of the site and our services.

CONTACT US

If you need to access this Privacy Policy in an alternative format due to having a disability or if you have questions regarding this Privacy Policy or your Privacy Rights, please contact our Privacy Officer at:

PureCars Privacy Officer

PureCars Technologies, LLC
931 Monroe Drive NE
Suite A102 #359
Atlanta, GA 30308

Call us at: (877)860-0086
Your Privacy Choices form