

PRIVACY POLICY

We have adopted this Privacy Policy to evidence to you our commitment to your privacy when you visit our dealership websites (including any mobile device-ready version) and to explain to you what information we collect, how we can or do use your information and how your information is protected. If you have any questions or concerns regarding this policy, please contact us at 410-766-6300, or write to us at Gladding Chevrolet, Inc., 7327 Ritchie Highway, Glen Burnie, Maryland 21061, Attn: Chief Compliance Officer.

Information Collection and Use

We collect both anonymous information and personally identifiable information through our website.

Anonymous Information

Examples of the types of anonymous information that we collect from visitors to our site include internet protocol (IP) addresses, dates and times of visits, number of clicks, pages or products viewed, browser types and search engines. The anonymous information we collect is not linked to any of your personally identifiable information until you voluntarily provide that information to us, in which case some otherwise anonymous information may be connected to your personal account or personal information. Anonymous information is aggregated and used to administer and improve our website, to track and analyze visitor activity and usage, and for research and marketing purposes.

We and our third party advertising companies and vendors collect information through the use of "cookies" and other tools and technology used to track your activity and usage of our website. "Cookies" are small strings of text that are transmitted to your computer when you access our, or another's, website. They are then stored on your computer for future access by the cookie provider. Cookies are part of the flow of information between your computer and our, or other's, web servers, and are widely used on the world wide web for, among other things, customizing your interaction with this, and other, websites. We and our third party

advertising companies and vendors may use cookies or other tracking technologies to recognize you and your access privileges on our site, to facilitate the interaction between you and our site, to track your site usage, to understand the interests of our website visitors, to improve our site, to collect information about the geographic location of devices used by you, and to serve you with content and/or advertisements for products and services that are relevant and may be of interest to you based on your shopping habits, location and online activities. Your browser may allow you to reject or control cookies. If you block or reject cookies, certain features of our site may not function properly and not all of the tracking described above will stop. Some browsers have a "do not track" feature that lets you tell a website not to track you. These features are not yet uniform, so we are not presently set up to respond to those signals.

Personally Identifiable Information

When you voluntarily provide information to establish an account or on applications, forms, surveys, contests, sweepstakes and other features of our site, such as your name, password, street address, email address, phone numbers, social security number, date of birth, employment, income and residence information, we collect it. We collect information about your transactions with us or others. In order to serve you and respond to your requests, we receive information from third parties, such as consumer reporting agencies, credit references, employers and insurance agencies, such as your credit score, credit history, credit worthiness and information that we obtain to verify such things as your employment history or that your insurance coverage is in force.

We may combine previously anonymous information with information you provide to us and we may combine information you provide with information we receive about you from third parties. We also may combine information we collect offline with information collected through our site.

We use the information we collect to operate our site, to contact and serve you, to manage your account, to respond to your requests and to market and provide you with information about our products and services and those of third party financial companies with whom we have a joint marketing agreement. With respect to nonpublic personal information provided to us for the purposes of a financial service, please see the

section below titled "Financial Privacy Notice" for the applicable privacy policy.

Disclosure of Information to Others

We do not currently rent or sell your name, address, email address or other personal information to any third party. We may use and disclose some or all of your information to third parties as described in this policy. If we do, we require these third parties to keep your personally identifiable information secure in accordance with federal requirements, such as the Gramm Leach Bliley Act, where applicable.

Service Providers/Marketing Partners

We provide information to third parties who perform services on our behalf. For example, we share information with third party financial companies to process or administer transactions requested or authorized by you. We also share information with third party financial companies with whom we have joint marketing agreements and with other vendors who assist us in operating this site, servicing accounts, maintaining the security of our systems and records, administering and enforcing our accounts, processing your transactions, providing services to our dealerships or our customers and responding to customer inquiries and requests. Sometimes, outside firms are engaged to help us market our products and services. We provide information to these third party service providers to enable them to perform contracted-for services on our behalf. We require these third parties to keep your personally identifiable information secure in accordance with federal and other applicable requirements. They are not permitted to use your information for their own, or any other purposes. We may also share information if you are a winner of a sweepstakes, contest, or promotion, for example, by publishing a winner's list publicly.

Manufacturers, Government Agencies and Successors

We are required to report sale-related information to the manufacturers of our vehicles and parts, and to government agencies. We share information with consumer reporting agencies, consistent with applicable laws. We may share information in connection with a proposed or actual sale of part

or all of our dealerships or certain of their assets. We also disclose information about you to third parties in certain other circumstances, as permitted by law, or to process a transaction that you have requested.

Audits/Judicial Proceedings

We will share information as required to comply with the law, or when we have a reasonable belief that disclosure is necessary to protect or defend our rights and/or to comply with a judicial proceeding, subpoena, court order or legal process. We may also share information at the request of a government agency or investigatory body, or for purposes of investigating or preventing fraud or unlawful activity.

Security

The security of your information and that of our other customers and potential customers is very important to us and we take commercially reasonable steps to protect the personally identifiable information that we collect through our website. For example, we maintain physical, electronic, and procedural safeguards that comply with federal standards and are generally used by our industry to guard your non-public personal information. Nevertheless, given the nature of the Internet and the fact that network security measures are not foolproof, we do not guaranty the absolute security of your information, nor do we guaranty that the information you provide will not be intercepted while you transmit it from your computer or device, over the Internet, or along third party networks, to our systems.

However, when our site intends to receive and transfer certain types of sensitive information (such as social security numbers), that information is encrypted and is protected with 128-bit or greater SSL encryption software, an industry standard for reputable organizations. While on a secure page, such as our credit pre-approval application form, you will note that the website address will begin with https://.

Financial Privacy Notice

FACTS	WHAT DOES GLADDING CHEVROLET, INC. DO WITH YOUR PERSONAL INFORMATION?
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Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> ▪ Social Security number and income ▪ account balances and payment history ▪ credit history and employment information When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons we choose to share; and whether you can limit the sharing.

Reasons we can share your personal information	Do we share?	Can you limit this sharing?
For our everyday business purposes – Such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes- To offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes- Information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes- Information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For our nonaffiliates to market to you	No	We don't share

Questions?	Call 410-766-6300
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Who we are

Who is Providing this Notice?	GLADDING CHEVROLET, INC.
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What we do

How does Gladding Chevrolet, Inc. protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
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How does Gladding Chevrolet, Inc. collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▪ apply for financing ▪ give us your income information or provide employment information ▪ provide account information or give us your contact information <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies</p>
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Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes- information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
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Definitions

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>Our affiliates include companies with a J.B.A. name such as dealerships and financial companies.</i>
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Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>We do not share with nonaffiliates so they can market to you.</i>
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Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.
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| | <ul style="list-style-type: none">▪ Our joint marketing partners include finance companies. |
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Links

Our website contains links to other sites that are maintained or supported by persons we have no control over – even the manufacturers of the products we sell. We are not responsible for the privacy practices of such other sites. We encourage you to be aware of when you leave our site using a link provided on our site and that you read the privacy statements of each website that may collect personal information. This Privacy Policy applies solely to information collected by our website.

Notification of Changes

We may change this Privacy Policy at any time, and from time to time we likely will, as new laws are passed and new technology becomes available. We will post those changes to our policy so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it. We will use, share, and disclose all information in accordance with the privacy policy in effect at the time the information was collected.

Minors

We do not knowingly allow anyone under the age of 18 to participate in any services offered on our website which require the submission of user information. If we learn that a user is under 18 and has submitted user information to us, we will delete that information as promptly as possible. If you learn of such information being collected by us, please contact our Chief Privacy Officer at the address provided in the introduction of this Privacy Policy.

Your Consent

As a condition to using our site, we require your approval to collect data. By using our website or submitting information to us online, you agree that we may collect and use this information as stated in this Privacy Policy at the time we collect the information. In addition, if we make any material

changes in our privacy practices that affect your personally identifiable information already stored in our database, we apply those changes to the personally identifiable information in our possession only as permitted by applicable law.

Other Information

This Privacy Policy applies to all visitors and customers of our website. We may delete any or all of your information at any time without notice to you for any reason or no reason unless otherwise required by law to retain it. This Privacy Policy replaces any previous policy on this topic and any statements or disclosures to you about our information practices pertaining to our website.

Adopted: May 18, 2016