

# CONNECTWITHCHARLOTTE.COM WEB SITE PRIVACY STATEMENT

This statement sets forth Connect with Charlotte's ("CWC") Privacy Statement for its connectwithcharlotte.com site and describes the practices that CWC will follow with respect to the privacy of users of this site. From time to time, we may change this Privacy Statement. For example, as we update and improve our service, new features may require modifications to the Privacy Statement.

## **Types of Data and Collection Methods**

Through the site, we receive data that you actively submit as well as data that we track as follows:

*Data Actively Submitted by You:* When you request information, subscribe for a service, register as a user, respond to an online survey or otherwise actively send us data, we usually collect data such as your name, email address(es), mailing address(es), telephone number(s), and certain other personal information. In connection with chargeable services, we will also collect payment information (e.g., credit card number and related verification information). In each such instance, you will know what data we collect through the site, because you actively submit it.

*Data Passively Tracked by Us:* When you visit the site, we also passively track information on your computer and Internet connection, such as the IP address of your computer and/or Internet service provider, the date and time you access our Web sites, the Internet address of Web sites from which you link to our site, the computer technology you are using and your movements and preferences on our site. We use technology that many other Web sites employ, including, without limitation, "cookies" or small data files stored on your computer's hard drive (which is further described below), to collect information such as the aforementioned.

Please note that unless you also actively submit personal information such as your name or address, passively tracked data does not typically allow us to identify you personally (even though it can theoretically be done, we do not have the means or an interest to find out who you are, unless you identify yourself voluntarily through an active submission of data). To the extent permitted by applicable law, we reserve the right to combine passively tracked data with personal data that you actively submit.

If you received an email from us, Powered by The Trevi Group, Inc., (a) you have registered or subscribed to connectwithcharlotte.com database or (b) you have registered to our client's eMail Club which The Trevi Group represents on the connectwithcharlotte.com website or (c) you completed a customized survey for our Trevi Group clients and opt-in to receive eMarketing information (d) attended a meeting or an event and the client subscribed you to their database (e) showed interest in their organization and therefore the client subscribed you to their database (f) a subscriber forwarded the campaign to keep you informed.

## **Collection Purposes, Use of Data**

We collect passively tracked data primarily for the general purposes of administering, protecting and improving our site and our systems, to better understand the preferences of our site visitors, to identify server problems, to compile aggregated statistics about site usage, and to help personalize your experience of our site.

We collect actively submitted data primarily for the purpose for which you originally sent us the data (e.g., to post your vehicle for sale and/or for the purchase of a vehicle).

Our primary goal in collecting personal information is to provide you with a safe, smooth, efficient, and customized experience. We may use your personal information to provide the services and customer support you request, process transactions and send notices about your transactions, resolve disputes, collect fees, and troubleshoot problems, prevent potentially prohibited or illegal activities, customize, measure, and improve our services and the content and layout of our Web site, send you targeted marketing, service update notices, and promotional offers based on your communications preferences, and compare information for accuracy and verify it with third parties.

### **Information Collected for Tracking and Customization (Cookies)**

A cookie is a small file that a Web site transfers to your computer to allow it to remember specific information about your session while you are connected. Your computer will only share the information in the cookie with the Web site that provided it, and no other Web site can request it. There are two types of cookies, session and persistent. Session cookies last only as long as your Web browser is open. Once you close your browser, the cookie disappears. Persistent cookies store information on your computer for longer periods of time.

Cookies were designed to help a Web site operator determine that a particular user had visited the Web site previously and thus save and remember preferences that may have been set while the user was browsing the site. If you are simply browsing a CWC informational site, a cookie may be used to identify your browser as one that has visited the Web site before.

We may also make use of memory-based cookies in support of authenticating the user of certain CWC Web applications. Similarly, if you are a registered user of a Web site providing service to CWC clients (and have a user ID and password), we may use cookies so that we can provide personalized information based on preferences you have indicated while using the Web site. Although you have the ability to modify your browser to either accept all cookies, notify you when a cookie is sent, or reject all cookies, it may not be possible to utilize CWC services which require registration if you reject cookies.

### **Sweepstakes, Surveys and Other Promotions**

From time to time, we may offer sweepstakes or other promotions on our Web site or use a survey to measure customer satisfaction with our services. We may also employ third party research firms to conduct these surveys on our behalf. If you enter a sweepstakes or promotional contest, we'll ask you to provide information about yourself (such as your name, address, and email address). We need this information to contact you if you win. We may also use this information for marketing purposes and/or share this information with any co-sponsor of the contest or sweepstakes who is identified in the contest rules. We may also share this information with shipping or fulfillment companies or other third-party service providers that help administer our promotions. If you don't want us to collect the information requested in the contest or sweepstakes registration form or to provide it to co-sponsors, please do not enter the contest or sweepstakes. With regard to surveys, except as otherwise provided in this Privacy Statement, we will not share, without your consent, any personally-identifying information you submit in response to an CWC survey with any company other than the research firm conducting the survey. We may, however, take the information you provide and aggregate it on an anonymous basis with data collected from other survey participants and disclose that pool of anonymous information as we see fit, without identifying you personally.

### **Third Party Invitations**

You may also find on our site invitations to participate in surveys conducted by our advertisers, whose privacy practices we don't control. These invitations will usually link to an online survey form that is hosted either by the advertiser conducting the survey or by a third-party research firm

working on the advertiser's behalf. When you access an advertiser's survey through our Web site, use and disclosure of any information you submit will be governed by the advertiser's privacy policy (or by the privacy policy of the advertiser's research firm), which may differ from ours. If you can't find the applicable privacy policy via a link either from the advertiser's survey invitation or from the online survey form, you should contact the advertiser directly for more information.

Connectwithcharlotte.com has clients on the website that have hired other companies to execute their email marketing program. We have allowed our clients to have an eMail club link on the company's profile page or website and you may have registered or subscribed to the client's database.

### **Disclosures of Personal Information**

While we are not in the business of selling or renting your information to telemarketers and do not share your personally identifiable information with others, we may share your information within the affiliated companies of CWC. We may also share your information with agents and service providers who use the data only on our behalf and for our purposes. We may enter into alliances, partnerships or other business arrangements with third parties who may be given access to personal information including your name, address, telephone number and email for the purpose of providing you information regarding products and services that we think will be of interest to you. In connection with alliances, partnerships or arrangements, we may also provide certain information to third parties if we have determined that the information will be used in a responsible manner by a responsible third party. For example, some of our partners operate stores or provide services on our site, while others power offerings developed by us for your use. We may also share your information as required by law or in the interest of protecting or exercising our or others' legal rights, e.g., without limitation, in connection with requests from law enforcement officials and in connection with court proceedings, to protect and defend our rights and property, our site, the users of our site, and/or our affiliated parties, or to act under circumstances to protect the safety of users of our site, us, or third parties. We may share or transfer your information in connection with a prospective or actual sale, merger, transfer or other reorganization of all or parts of our business. Also, we reserve the right to fully use and disclose any information collected via the site that is not in personally identifiable form.

### **Opt-Out**

In connection with promotions or other projects, we may ask you specifically whether you have objections against a certain kind of data use or sharing. If you opt-out under such circumstances, we will respect your decision. Each marketing campaign contains an easy unsubscribe link as well as a link to change your profile information. This can automatically update your account or remove you from the connectwithcharlotte.com database or from any client that is being represented and powered by The Trevi Group eMail Marketing Division. You may also opt-out of receiving further commercial email or to unsubscribe from services, by contacting us at [support@trevigroup.net](mailto:support@trevigroup.net). If you receive unwanted or unsolicited email Powered by The Trevi Group, please forward a copy of that email with your comments to [abuse@trevigroup.net](mailto:abuse@trevigroup.net) for review. Please note that our affiliates and other data recipients have their own data privacy policies, which may differ from ours and you would have to contact them separately with respect to opt-out requests.

### **Access**

If personal information you have submitted through the site is no longer accurate, current, or complete, and you wish to update it, please send an email at [support@trevigroup.net](mailto:support@trevigroup.net) Upon appropriate request we will usually be glad to update or amend your information, but we reserve the right to use information obtained previously to verify your identity or take other actions that we believe are appropriate.

## **Interaction with Children**

The Children's Online Privacy Protection Act (COPPA) governs information gathering online from or about children under the age of 13. Verifiable consent from a child's parent or guardian is required before collecting, using or disclosing personal information from a child under the age of 13. However, this site is intended for adults in the United States. We do not intentionally or knowingly collect personally-identifiable information from children under the age of 13 and we request that individuals under the age of 13 not submit any personal information on the Site.

## **Security**

Transmissions over the Internet are never 100% secure or error-free. As a result, while we strive to protect your personally identifiable information, we cannot ensure or warrant the security of any information you transmit to us or receive from us. This is especially true for information you transmit to us via e-mail. We have no way of protecting that information until it reaches us. Once we receive your transmission, we make our best effort to ensure its security on our servers. Furthermore, we take reasonable steps to protect your personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. This includes, among other things, using industry standard techniques such as firewalls, encryption, intrusion detection and site monitoring. However, it is your responsibility to safeguard any password and User ID you use to access the site and to notify us at [support@trevigroup.net](mailto:support@trevigroup.net) if you ever suspect that this password or User ID has been compromised. You are solely responsible for any unauthorized use of the site conducted via your password and User ID.

Internally, we will restrict access to your personally identifiable information to employees who need access to the information in order to do their jobs. These employees are limited in number and are committed to our privacy policies.

We will review our security arrangements from time to time as we deem appropriate.

## **Linking Policy and Disclaimer of Endorsement**

CWC links to many Web sites created and maintained by other public and/or private organizations. CWC provides links to these Web sites as a service to our users. The presence of a link is not a CWC endorsement of the Web site.

When users follow a link to an outside Web site, they are leaving CWC and are subject to the privacy and security policies of the owners / sponsors of the outside Web site(s). CWC is not responsible for the information collection practices of non-CWC Web sites.

## **Effective Date, Amendments**

This statement is effective as of May 1, 2008. We reserve the right to change this statement from time to time and in our sole discretion. We reserve the right to change, modify, add or remove portions of this statement at any time, but will alert you that changes have been made by indicating on the statement the date it was last updated. When you visit the site, you are accepting the current version of this statement as posted on the site at that time. We recommend that users revisit this statement on occasion to learn of any changes.

## **Contact Us**

Please feel free to contact us with any comments, questions, complaints or suggestions you might have regarding the information practices described in this statement. You may send us an email at [support@trevigroup.net](mailto:support@trevigroup.net).

