

Privacy Policy for Clients

Your privacy is very important to us. We want to make your experience with Gart Sutton and Associates, Inc. (GSA) as enjoyable and rewarding as possible, and we hope you will use our selection of information, tools, and opportunities with complete confidence.

GSA has created this Privacy Policy to demonstrate our firm commitment to privacy and security. This Privacy Policy describes how GSA collects information from users of GSA services, how we use the information we collect and the choices you have concerning the collection and use of such information. Please read this Privacy Policy carefully.

The law gives you certain privacy rights. GSA gives you more.

- We do not sell or share specific client information with any outside entity.
- We value your privacy as if it were our own.
- **This policy includes information about:**
 1. Protecting information about you from companies outside of GSA
 2. Making the security of information a priority
 3. Collecting information
 4. Managing information
 5. GSA services and businesses

This policy covers client information, which means personally identifiable information about a client or a client's current or former relationship with GSA. This policy applies to all GSA employees, associates, services and businesses.

1. Protecting information about you from companies outside of GSA

GSA does not sell or share any specific client information with companies, businesses, or services outside of GSA who may want to use your client information for their own gains, or who may want to offer you their own products and services. You don't need to take any action for this benefit.

2. Making the security of information a priority

Keeping client information secure is one of our most important responsibilities. We maintain physical, electronic and procedural safeguards to protect client information. Employees are authorized to access client information only when they need it to provide you with products and services or to maintain your accounts. Our employees and associates are bound by a code of ethics that requires confidential treatment of client information and are subject to disciplinary action if they fail to follow this code.

3. Collecting information

We collect and use various types of information to provide you with reporting and consulting services, service your accounts, save you time and money and better respond to your needs. Client information is categorized in the following three ways:

- **Application Information** — information that you provide to us on applications and through other means. Examples include your dealership name, address, and contact information.
- **Financial and Operational Information** — specific information you enter into our online financial and operational reporting system as well as information we may gather during any contracted consulting services provided to you. Examples include your financial reports, number of employees, services employed, payment history, parties to transactions.
- **Other General Information** — information from outside sources, such as data from public records, that is not assembled or used for the purpose of determining your eligibility for a product or service.

4. Managing Information

We manage how and when information is shared:

- Within GSA
- With companies and associates that work for us
- In other situations

Managing information within GSA

GSA has employees and independent contractors. All of our employees and independent contractors are required to comply with this policy.

GSA may share all three categories of client information among our employees and associates under particular circumstances where it will benefit you. For example, if you hire GSA to provide consulting services to your business, sharing this information with our employees and associates could save you time and money regarding the contracted services, since you may not need to furnish the same information twice.

Managing information with companies that work for us

We may share any of the three categories of client information outlined in this policy with companies that work for us. All companies that act on our behalf are contractually obligated to keep the information we provide to them confidential and to use the client information we share only to provide the services we ask them to perform for you and us. These companies may include those that provide technical services such as programming or web site maintenance. These companies might assist us, for example, in processing your financial information into monthly reports, mailing account statements and fulfilling your service requests.

In addition, we may share any of the three categories of client information with our own employees and associates or with companies that work for us in order to provide marketing support and other services.

Disclosing information in other situations

GSA may share aggregated or averaged and non-identifying information about our clients collected through the registration process and input by our clients, as well as through our online surveys, focus groups, and services. For example, **non-specific** client information may be disclosed in connection with trend reports, industry averages, and industry benchmarks. Client information may also be disclosed to companies that process your requests for products or services. With your consent we may share any of the three categories of customer information outside of GSA in situations such as when you agree to participate in a specific survey, study or focus group. ***Unless required by law, GSA will never disclose your identity in relation to your data without your prior consent.***

You may have other privacy protections under state laws; we will comply with applicable state laws with regard to our information practices.

Special Cases

It is GSA's policy not to use or share the personal information in ways unrelated to the ones described above without also providing an opportunity to opt out or otherwise prohibit such unrelated uses. However, GSA may disclose personal information or information regarding use of the services if, for any reason, in our sole discretion, we believe that it is necessary to do so, including: to satisfy laws, regulations or other legal requests for such information; to disclose information that is necessary to identify, contact or bring legal action against someone who may be violating our Acceptable Use Policy or other policies; to operate the services properly; or to protect GSA, our services, our employees or our members.

5. GSA Businesses and Services

- Consulting Services
 - Dealership needs analysis and assessments
 - Development of functional action plans
 - Specialized training programs, materials and facilitation
- Best Operators ClubSM
- Best Operators OnLineSM

Keeping up to date with our Privacy Policy

As required by law, GSA will provide notice of our Privacy Policy annually, as long as you maintain an ongoing relationship with us. To receive the most up-to-date Privacy Policy, you can visit our website at: www.gartsutton.com or call us at 949-706-9620 or 208-922-5995.