

Last Updated: [December, 14th 2018](#)

## Privacy Policy

We must protect your personal information entrusted to our hands. Kindly read through the Privacy Policy carefully, because this sets into motion our practices as regards to the information we get from you as well as the options to limit our use and disclosure of this information. Feel free to contact us anytime through [sales@Hi5Cars.com](mailto:sales@Hi5Cars.com).

### 1. Scope and Your Consent

This Privacy Policy ("Privacy Policy") covers the tools, features and other services (collectively, the "Services") offered by Hi5Cars.com, Inc., or its subsidiaries, (jointly as "Hi5Cars.com", "we" or "our") through any of our Hi5Cars.com websites, mobile sites and without limitations, including Hi5Cars.com (regarded together as "Sites"), with web-based and mobile applications ("Apps") that refer or link to this Privacy Policy. This Privacy Policy merges with the Hi5Cars.com [Terms of Use](#) ("Terms"). The capitalized terms that not defined in this Privacy Policy already specified in the Terms. This Privacy Policy covers: A. Data collected from the users of our services ("you" or "your"); and B. All information that the Business partners who work with us (as defined below) share with our platform or that we share with our Business Partners.

You agree and give your permission to be bound by this Privacy Policy anytime you access or make use of any one of our services that link directly or indirectly to this Privacy Policy.

This Privacy Policy does not make any provision for information practices that include:

- (i) Third-party individuals or corporate entities performing tasks on behalf of another Service Provider ("Service Providers");
- (ii) Our third-party business partners providing either websites, applications, other products and services that you may come across as you work through our Services ("Business Partners"); or
- (iii) Any other relevant third parties (collectively, Business partners and Service Providers, "Third Parties"), even when your access or encounter or interact with such Third parties through our Services. In an attempt to promote access

to only those Third Parties who have regard for your privacy, we are not responsible for those Privacy Policies or actions of Third parties. It is also your responsibility to read and understand the Third Parties' Privacy Policies.

## **2. Information Received or Collected**

Whenever you make use of the Services, Hi5Cars.com may get “Non-Personal Information” and certain “Personally Identifiable Information” (as defined below) (collectively, "Information") about you, your use of our Services or the use of the device and an application to access these Services.

- A. Non-Personal Information “Non-Personal Information” is any information which does not in any way enable the identification of an individual. Examples without limitation would be service usage information, content viewed, web traffic information, operating system information, your preferences, hardware, browser, device and keyboard language, etc.
- B. Personally Identifiable Information “Personally Identifiable Information” (or “PII”) is that information that makes up your identity. The following are the PII collected through services may without any limitation, include:
  - Name • Email address • Mailing address • Phone number(s) • The Login details • The Username or Social networking handle • Photographs (for profiles) • Date of birth • Social Security number • Driver's license state • Financial information • Employment information • Residency or credit proof of information (e.g., the utility bill, references and the copy of the paystub) • Insurance information

This specific information received by the Hi5Cars.com depends on which part of the Services you access. If at any time the Non-Personal Information connects to the PII, then we treat the Non-Personal Information as a PII.

## **3. How do we collect Information?**

We gather information supplied by you voluntarily or automatically through the Services or provided by Third Parties.

### **A. PII that is provided directly to us by You**

You can also choose on your own if to provide us with PII while the Services are in use, including, but without limitation, at the time the following activities are performed:

- Make use of our Interactive areas
- Make all submissions; provide the reviews, post comments or testimonials
- Submit online forms or request support or communication
- Begin or complete transactions through any of our services
- Start or receive a payment process
- Send or receive texts
- Make and save searches
- Append electronic signatures on agreements
- Communicate with any representative of Hi5Cars.com

Kindly take note that content that appears on these interactive areas, including all your submissions made to such areas, may be viewed publicly or by anyone who also uses the Services. In other words, if you ever upload or share any information on the interactive platforms, unless otherwise stated by Hi5Cars.com, such information may be non-confidential or may have become available publicly. This means that this information may be acquired, used or shared by the others. Therefore, we encourage you to proceed with great caution before attempting to post any sensitive or confidential material to such interactive areas.

### **B. Automatically Collected Information**

We and some Third Parties can also automatically receive Non-Personal information about you as well as your devices whenever you interact with our Services, this information at times may include, without restriction: Computer or Device OS information, Your IP address, Network information, Type of Browser and the language, Your device connection speed, The ID of your Mobile device, Model of the Device Hardware, The website that referred or the application used before and after accessing our Services, Components of Services used, Time of access and visit duration of each page or feature accessed, Viewed contents, Geographical location.

### **C. Information through Tracking tools**

On access to our Services, either the Third Party or we may decide to use technologies such as "cookies," a small text file (usually up to 4KB) created by a website that is stored in the user's computer either temporarily for that session only or permanently on the hard disk (persistent cookie). Cookies provide a way for the website to recognize you and keep track of your preferences, or other related technologies that monitor the use of the Services ("Tracking Tools"). These Tracking Tools are responsible for the collection of this Non-Personal Information, for instance, the pages you viewed within the particular Service and the duration of browsing and the PII (such as your login

details), including different properties and devices used. Among many other things, Tracking Tools enables Hi5Cars.com to automatically get specific features activated for you, to simplify your experience on the Services, and also make them more convenient and relevant. It also gives you the personalized, interest-based adverts that further described below. Note that Tracking Tools are widely usable across this industry.

#### **D. More on Tracking Tools**

When you make use of the Services, you agree to us setting and use of Tracking Tools, including temporarily and persistent cookies on your device and through the emails we might send you. Third parties have no access to Tracking Tools that are set by Hi5Cars.com on our Services except when extremely necessary to provide the Services. Hi5Cars.com and the Third Parties may make use of the following Tracking Tools:

- **Cookies:** These are the small data files that we store on your hard drive by the use of websites that may include the session cookies (these expire immediately when you close the browser) and/or the persistent cookies (these stay on your browser and used on subsequent visits to the Services; unless you delete them). Not only so, but Cookies also help to see which features or items of the Services have become popular in use, but it also counts the visits to these Services and helps to improve them and tailor the use of the Services and associated advertisements so that they can be more relevant to users. If you need more details on cookies, [CLICK HERE](#). The web browser's ability to accept cookies can be turned off, only that specific activities of the Services may no longer work if you do.
- **Unique Identifiers:** these are used to collect information about your usage of the Services based on individual information such as length of time you spend on a particular page, the pages viewed during the log-in period, etc. This information is used to evaluate, assess and improve the Services.
- **Web Beacons:** Web beacons otherwise known as clear GIFs or directly pixel tags are the small graphic images embedded in every web page or email that collects information on the use of the Services or specific correspondences sent. This collected information by Web beacons permits us to analyze the number of people using the Services or that open our emails.

- **Analytics and other Technologies:** The use of different technologies and analytic services helps analyse your use of the Services and collect and store all necessary information such as your frequency of visit to the site, the features you are interested in, the pages you visit, the emails you open, other websites and applications you use before and after visiting the website. All this information is useful for our Services improvement. These Services may also use the cookies with the first party and third-party cookies, and other usable Tracking Tools. For instance, the Google Analytics use cookies to notify, maximize, resell and promote ads that relate to how you visit the Services section. Google's ability to share and use these collected data is subject to the [Google Analytics' Terms of Use](#) and [Google Privacy Policy](#). You may also find some additional information about the use of Google Analytics [here](#). As a user, you have an option to opt-out of the page [here](#) or the Google Analytics Opt-out Browser Add-on by clicking [here](#). Conversely, you may choose to opt out of some cookies by just visiting Network Advertising Initiative to disconnect from the page [here](#).
- **Mobile Device Identifiers (“MDI”):** MDI’s are located on your mobile device and used to track your usage of the Services and allows collection of Non-Personal Information such as usage and traffic data. Like other Tracking Tools, they help us to learn more about your preferences and internet behaviour in order to improve your experience with us.
- **Information Transfer between Jurisdictions**

Our Services are hosted in the US and are directed mainly at residents of the United States. At the moments, we only buy and sell vehicles in the United States. If you might be accessing our Services from other regions such as Asia, the European Union or other areas where the laws and regulations govern the use of personal data collection are different. Therefore, be advised that you are consenting to such transfers of your PII to the United States already, through the continuous use of our Services. You also agree to such transfers by the agreement to this Privacy Policy and the Terms of Service.

#### **4. Hi5Cars.com’s Use and Sharing of Information data**

##### **A. To Provide the Services**

The first essence of the information we collect and share with Third Parties is to manage, recreate, maintain all our Services in the following ways:

- Customizing, refining and implementing our business and Services
- A higher understanding of the needs and interests of our users including you who utilizes our services
- Attending to requests, you make about our Services, including responses to support claims and to process or promote transactions made on the Services
- Initiating and completing payments
- Obeying the relevant laws, regulations, subpoena, governmental requests or other legal processes and obligations
- Dispute resolutions or technical or security issues
- Promise to enforce our agreements, including this Private Policy and the Terms of Use and investigating potential violation
- Protection, investigation and deterring against fraud, unauthorized, harmful or illegal activity. Or otherwise perceived to be necessary as a means of protection of rights, and property or safety of Hi5Cars.com, its representatives, you or the general public
- Research and Statistical analysis performance
- Processing and storing of data through the Hi5Cars.com affiliated partners or authorized Third parties for reasonable business purposes which includes and applicable to their affiliates, that provide us with the services requested
- Some other necessary commercial reasons, including but not limited to insurance, service contracts, financing and other products offers that connected to sale or purchase of our vehicles

If your PII is theoretically shared for a reason otherwise not stated in this Privacy Policy, we will reach to your express approval before its disclosure.

## **B. Marketing and Advertisements**

We may also use your data to send information about our products and services to our Business Partners, which may involve new products or promotional offers. More so, we may provide your data to our Business Partners so that they may reach out to you directly about the product or services if we suppose you would be interested. Some of such advertisements may appear from Third Parties called "Ad networks". These "Ad networks" may have ad servers, ad technology vendors, ad agencies, and research firms. We do not give PII to any ad network for a use that is not related to the Services.

The use of these Service means you agree to provide such marketing materials which may include;

- Direct Marketing: this involves sending information directly to you or through Hi5Cars.com or our Business Partners through the telephone, email, text, mail or any suitable method for the reason of offering products or Services of interest to you
- Advertisements: these refer to the ads and commercials from either the Third parties or us. Kindly note that clicking on any Third-party ad may transfer you to a website of that Third party or you may get other messages, or information or offers from other advertisers or other Third parties. These advertisers or Third parties may use their Tracking Tools to collect data to further send you other adverts for legitimate business interests.
- Interest-Based Advertisements: These are content-based advertisements that have customized to your interest. They also stem from your activities on our Services and other related sites based on the information gathered either by the Third Parties or us through Tracking Tools. These advertisements may be directed to our Services or other Services, apps or sites. To know or understand more about these types of advertising methods and opt out of data collection, please click on the link [here](#) to opt out or use by Digital Advertising Alliance (DAA) member companies or [here](#) to opt out of a group and the use by NAI member companies. For mobile disconnection, visit the NIA mobile choices page [here](#), or you may download the Ghostery mobile app

At any point, you are free to withdraw your consent to receive any marketing tool or materials by merely following the opting out instructions for removing yourself from our mailing list available for commercial materials. More so, we also provide the ability to remove you from any marketing-related email just by clicking on such link in the email received. Kindly note that when such removals are done, you may still get adverts while browsing the web but those less relevant to you or your interests. Furthermore, many network advertisers give you the chance to review and manage these interest categories when they have compiled them from your online browsing activities. These interest categories can help users to tell the types of targeted advertisement they allow to receive. Also note that if you decide to opt out of targeted adverts, we may

still track the use of our Services for analytics, security and other needs for our operations.

### **C. Uses and Disclosure of Non-Personal Information**

Non-Personal data informs us how you interact with the Services. This information is also derived from PII, but, if so, we tend to anonymize or combine the PII so that it doesn't determine the individual from whom it had been derived. Non-Personal data permits us and Third Parties, we tend to work with, the way you typically interact with different elements of the Services so that we will analyze and improve them. We tend to use Non-Personal data for:

- Business analysis
- Selling and advertising
- Facilitating assortment of information regarding your interaction with the Services
- Fighting spam/malware
- alternative business functions (e.g., by coverage on trends within the usage of our Services)

Hi5Cars.com could transfer and disclose Non-Personal data to 3rd Parties at its discretion.

### **5. Third Parties**

We could share data with Third Parties, and that they could share data with us. Unless we tend to tell you otherwise, our Service suppliers don't have any right to PII that we tend to share with them and necessary to help us to offer products or services requested or accessed by you. You consent to our sharing of data, which can contain PII, with Third Parties, such as, while not limited to:

- Social media networks
- Payment processors
- Credit check and finance Service suppliers
- Vehicle inspectors
- Vehicle history suppliers
- Shipping suppliers
- Net hosting services
- Analytics and advertising Service suppliers
- Sales management tools
- Selling and promotion partners
- Enforcement or legal authorities or bodies consistent to a subpoena or judicial writ; but, if permissible, we tend to enable you a chance to object to the subpoena or legal warrant before we offer the requested data

Some specific Third Parties, while not limited to:

- Microsoft Azure, whose privacy policy are often found [here](#),
- Google Analytics, whose privacy policy are often seen [here](#) and [here](#),
- Route One LLC, whose privacy policy are often found [here](#),
- PayPal, whose privacy policy are often found [here](#)
- Facebook, whose privacy policy are often seen [here](#)



Chase, whose privacy policy are often found here • Bank of America, whose privacy policy are often found [here](#)

We use commercially affordable efforts to interact with Third Parties who share our commitment to protecting your data, and who post a privacy policy governing their assortment, process and use of data. However, we don't manage these Third Parties and are not responsible for their practices, products, or services. Please browse their terms of use and privacy policies to perceive their practices. Please note that some Third Parties who receive your data might be outside of the same data protections laws as your jurisdiction.

## **6. Transaction Information**

If you buy or sell through the Services or otherwise use the Services during a transaction, we tend to request your financial information, not limited to:

- Credit/Debit Card Information • Financial Institution Information • Account type • Routing number • Account number

This data is collected and hold on by our third-party Payment Process corporations, use and storage of that data are ruled by the Payment Processor's terms of service and privacy policy that are applicable. We may, from time to time, request and receive your financial information from Payment Processor usable for the following purposes:

- finishing transactions, you initiate through the Services • Enrolling you in discount, rebate, and alternative programs during which you have chosen to participate • protect against or distinguish fallacious transactions • Otherwise as needed to manage and operate our business

If you fill out an application through our Services, we tend to collect and store your application details that eventually might be shared with Hi5Cars.com Business Partners or Service suppliers, such as, while not limited to, Route One LLC, 700 Credit, LLC and which can contain, but not limited to, all of the following Information:

- Name • Social Security Number • Email & Mailing address • Phone number • Date of birth • Driver's license number • Employment & Income data

On submission of your information, you have given authority to Hi5Cars.com to move such information to the Service Providers or Business Partners, and to use that data by their various privacy policies.

## **7. How to Limit our Information Collection and Use**

There are several ways of restricting the collection and use of data. These include:

- The provided information to Hi5Cars.com can be restricted: you may choose not to share any of specific detail with us. However, if you decide to do it, some services and features might be restricted from access
- Closing your Account(s): a total closure of your account(s) on our services implies that you will be limiting us in the use and collection of information
- Choice of Tracking Tools: you can also decide to unregister for our offered collection of some Tracking Tools described in the segment that is titled “Marketing and Advertisements”. There is a chance to clean up your browser cookies from the hard drive of the computer or any other device in use. You may also restrict the acceptance of cookies or warning prompts before storing the cookie. There is an ability to clean or disable the other Tracking Tools in the Browser settings of the computer or devices in use. However, kindly note that if you clean this accessibility or clean the Tracking Tools, then your experiences may be limited with our Services
- Do Not Track: there might be a “Do Not Track” option on your Browser that allows you to send a signal to our website Operators and such web applications and the services without which such operators can track some of the online activities. We do not support the Do Not Track option presently. More so, we do not promise and cannot guarantee anything about the Third Parties' reactions when this signal is set in your browser.

## **8. Accessing your detailed information**

When you register, you can access the data that is related with the designated account by logging into the available Services.

California Privacy Rights:

Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal customer information which we share with our affiliates and/or third parties for

marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to the following address: Hi5Cars.com, Inc., 1410 Beach Channel Dr. Far Rockaway, NY 11691

## **9. Modifying or Deletion of your PII**

If at any point in time, you decide to deactivate your account or edit your PII, send an email to sales@Hi5Cars.com, and we promise to do our best to ensure your submitted request, subject to applicable rules, regulations, court orders and laws. Also, note that if you don't give us the instruction otherwise, and as stated in the Privacy Policy, we may use the collected information further after you might have deleted your account, as long as it is reasonably required and for the actual purpose of collection of such information, including but not limited to the analytics and analysis of the future. To comply with all the business and legal requirements or obligations, to settle disputes or to reinforce all our Privacy Policy or the Terms of Services and to restore a deleted account, as permitted under applicable regulation and privacy laws. More so, the Account public activity before the deactivation of the report may still be in store on our servers, and this may remain available for public access. This anonymous information and aggregate may as well stay in our storage servers for an indefinite period.

## **10. Commitment we have towards Data Security**

To maintain the integrity and the security of the information you share with the Services and us and prevent illegal access, we utilize managerial, technical and physical procedures through the internal processes and technologies that are industry acceptable.

These include:

- Taking steps that are reasonable in the verification of identities of the user that login into the account and services. You are however responsible for keeping the unique password secret as well as the Account information at all times.
- The maintenance of PII behind secured network facilities that is available to only a few persons who have exclusive access rights to the items and systems to retain such information safe and secure.

- Data encryption of sensitive financial data such as the information on your credit card through the Secure Socket Layer (SSL) Technology before transmitting through the internet.
- Implementation of different types of technical standard security procedures or tools. E.g. Using Microsoft Azure Cloud Servers

Kindly note that although there are some risks while passing information over the internet or other means of electronic storage, we cannot assure you of illegal access or the use of the PII will never happen. We will not be responsible or liable for any unlawful entry, hacking or security breach or theft, corruption, deletion, loss, damage or destruction of your data or your information details.

### **11. Privacy Policy Changes**

Hi5Cars.com has the right to update or change its Privacy Policy anytime, or due to any reason, so check the policy more often. If we adjust our Privacy Policy, we will post a notification on the Services. By the discretion of Hi5Cars.com, there can be an amendment of this Privacy Policy so that it can fulfil the legal requirements. These amendments can also become effective immediately as the law requires without any notice whatsoever. These changes are with a direct effect on the indicated date on top of the page (“Last Updated”). When you then accept to use these services on or after the indicated date noted, it will mean that you receive all the updated-modifications.

Hi5Cars.com also has the right to terminate whether temporarily or permanently the processes of different sorts of the services without giving any prior notice at any time. All the gathered information (both ours and yours) accessible through the platform for application of the required Services might be deleted or removed. So, ensure that you have a copy of all the submitted information to Hi5Cars.com. Also, we will not be responsible to either you or any third party for amendment, termination, suspension of any of our Service or any glitch occurring.

### **12. Minor’s Privacy**

We have no intention; neither do we deliberately collect PII from minors that are still under age eighteen (18). We, however, keep the right to inquire an age proof at any stage to verify that minors are not making use of our Services. Kindly send us an email [sales@Hi5Cars.com](mailto:sales@Hi5Cars.com) in case of any questionable reasons

that we might have collected PII from a particular minor whose age is under eighteen (18) years.

### **13. Business Transfers**

If there is an occurrence of a "merge ahead" (meaning, if there is a choice to buy or sell assets), your information is one of the business assets. Also, if we or any of our assets have been picked up, or if we terminate the business or find ourselves in bankruptcy, then the information is usually one of the assets transferred or received by a third party. You, therefore, agree that such transactions can happen and when they do, the acquirer or asset owner may decide to keep using the information including the PII, as set in this Policy.

### **14. Interpretation**

The heading and subheading of this Privacy Policy including the summaries that are inside this Privacy Policy are placed strategically for ease and may not affect the understanding of this Privacy Policy. The uses of "for example", "including" or "such as" as used in this Privacy Policy should be read as being subsequently followed by "without limitation" wherever it is proper.

### **15. Any Questions?**

In case you like to make inquiries or ask further questions, please send us an email at [sales@Hi5Cars.com](mailto:sales@Hi5Cars.com).