



PRIVACY POLICY

ADESA CANADA AND OPENLANE CANADA

1. **Commitment to Privacy Protection.** ADESA Canada and OPENLANE Canada (collectively, "**Auction**" or "**we**" or "**our**") are committed to your right to privacy and to keeping your personal information private. We have therefore developed this Privacy Policy to ensure that your rights are protected.
2. **Limiting Collection of Information.** The collection of personal information is limited to that which is necessary for the purposes identified in this Policy. Information is collected by fair and lawful means.
3. **Information Collected.** The information that we collect and maintain falls into two categories:
 - (i) information that you supply about you and your business when you register with the Auction and when you use our services; (ii) tracking information gathered as users navigate through our websites (adesa.ca and openlane.ca). Third party providers or websites featured on or linked to via our websites may also be gathering information through processes that we do not control.
 - a. *Supplied Information.* The information you provide may identify you and your business and includes, but is not limited to, information such as driver's license number, criminal record, birth date, dealer registration number, vehicle purchases and sales (e.g., type of vehicle, quantity, price, vehicle identification number, odometer reading, year, make, model, date of purchase, vehicle disclosure information, and bidding, purchase and/or sales data and patterns), banking information, and financial and tax information. Some of the information collected may be personal information.
 - b. *Tracking Information.* We use "cookie" technology to help visitors move faster through our web sites. When you sign on to our web sites, a cookie is sent to your computer. A cookie is a string of information that is sent by a web site and stored on the hard drive or temporarily in your computer's memory. This leads to quicker navigation and a generally more positive experience searching for the information you desire. We also use tracking and clickstream methodologies to understand the movements and preferences of our customers and visitors to our websites. Our web servers and analytic tools (including those from third party companies) may automatically collect limited information about your geographic information, your computer configuration when you request pages from our services, including your ISP, your routing information, the type of browser software you use, the operating system you are running, the resolution of your computer monitor, the website that referred you and your IP address.

4. **Purpose of Collecting the Information.** We collect, use and disclose personal information for the following purposes:

- a. To process your application(s) and related documents required to become a registered Auction customer and to make decisions regarding the acceptance or rejection of your application(s);
- b. To ensure that Auction's facilities are used by registered customers and authorized sellers only;
- c. To verify the information that you provide to Auction;
- d. To verify, evaluate and/or monitor your creditworthiness;
- e. To assist with the collection of any amounts owing by you to Auction;
- f. To contact you in response to any purchases, requests, complaints or comments you may have;
- g. To contact you to provide you with information regarding Auction's business and sales, including advertising. We may contact you using any of the contact information provided. We may also use services provided by third parties, such as social media sites, that allow us to serve our advertisements to you when you are visiting the third party's site. To do this, we may share information with the third party so that they can serve our ads to you on their site. These third parties are not permitted to use the information we provide for any other purpose. If you do not want us to use or share your information in this way, please contact us at 888-526-7326 or CustomerConnectionCanada@adesa.com;
- h. To help Auction to develop, evaluate and improve its sales and marketing strategies and techniques;
- i. To provide third parties with the information necessary to permit that third party to conduct business with Auction and/or effectively provide you with services.
- j. To respond to reasonable inquiries from regulatory, investigative authorities and law enforcement agencies (some of the information provided may be personal Information);
- k. To maintain and update Auction's banned dealer list. Auction may provide its banned dealer list (which includes the name and address of the banned dealer, names of all individual representatives of the banned dealer whose privileges have been suspended, and the reasons for the suspension) to third parties including third party auctions;
- l. We collect, use and disclose aggregated and individual sales data including sale location, pricing, odometer reading, vehicle condition, vehicle description and vehicle identification number information to assist us and third parties in evaluating market trends, to prepare data analyses, and to prepare market report and valuation products.
- m. Auction may share personal and/or aggregated information that you have provided to us with other business divisions within the KAR Auction Services, Inc. ("KAR") group of companies. Auction shares credit and sale information with its affiliate companies.

5. **Limiting Use, Disclosure and Retention.** Personal information shall not be used or disclosed for purposes other than those for which it was collected as set out in this Privacy Policy, except with your consent or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes or as required by law.
6. **Consent.** Whenever possible, Auction will seek your consent to use and disclose your personal information at the same time it collects such personal information. By providing personal information to Auction, by conducting business at Auction or by using Auction services you are consenting to the collection, use and disclosure of personal information for the purposes set out in this Privacy Policy.
7. **Accuracy and Corrections.** Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used. If you would like to update personal information previously submitted to Auction, request to have outdated personal information removed, or withdraw consent to the use or disclosure of your personal information, please contact us by phone at 905-897-9855 and ask to speak to Auction's legal counsel.
8. **Protections.** Auction has safeguards in place through the use of firewalls and password protected computers to control access to your personal information.
9. **Ownership.** All material contained on ADESA.ca and OPENLANE.ca is the property of the Auction or its licensors, and is protected under the appropriate jurisdiction's copyright laws and international conventions. Except as explicitly provided by Auction, you may not transmit, display, reproduce, distribute, modify, create-derivative works from, or otherwise exploit any of the materials on the Auction's web sites. You may not use automated means, such as but not limited to scrapers or spiders, to collect and/or index any information contained on the Auction web sites. No materials or intellectual property from the Auction web sites may be (a) reproduced, stored, distributed, or incorporated into another website, without the prior written consent of the Auction. All requests for permission should be sent to CustomerConnectionCanada@adesa.com. www.ADESA.ca, www.OPENLANE.ca, the logo of www.ADESA.ca and www.OPENLANE.ca, and the names and logo of some of the services of the Auction are registered trademarks of the Auction. The names and logos of other products and services contained on the Auction web sites may be trademarks of third parties. The written consent of any owner of a mark is required prior to use of such mark. All contents of the ADESA web site are: Copyright 2010 ADESA, Inc. and/or its licensors. All rights reserved. All contents of the OPENLANE web site are: Copyright 2012 OPENLANE, Inc. All rights reserved.
10. **Amendments to Policy.** Auction reserves the right to modify or amend this Privacy Policy at any time and for any reason. Any changes to this Privacy Policy will be preceded by a notice posted on Auction's websites at ADESA.ca and OPENLANE.ca.

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