HUDSON AUTOMOTIVE GROUP PRIVACY POLICY

This Privacy Policy was last updated October 21, 2025.

Hudson Automotive Group ("**Hudson Automotive**," "**we**, "**us**," or "**our**") values and respects the privacy of its customers and websites users ("**user**," "**you**," or "**your**"). Hudson Automotive is committed to the privacy of your information. The purpose of this "**Privacy Policy**" is to provide you with information about Hudson Automotive's policies regarding the collection, processing, use, storage, and disclosure of information when you access our websites, including www.hudsonauto.com, as well as our Hudson Highway website, individual dealership websites, or any other sites controlled by the Hudson Automotive Group organization (collectively, the "**Sites**"), or when you otherwise engage with us. This Privacy Policy also describes the choices you can make about our use of your information, and how you may contact us if you have further questions about our use of your information.

This Privacy Policy does not apply to information we collect in connection with providing individual consumers a financial product or service (or in connection with a consumer seeking such financial products or services), such as by reviewing applications for financing. For example, this Privacy Policy does not apply to information we collect that is subject to the federal Gramm-Leach-Bliley Act ("**GLBA**") or Fair Credit Reporting Act ("**FCRA**") (collectively, "**Financial Information**"). Financial Information such as the foregoing is subject instead to our Financial Privacy Notice, which is provided to you at the time we collect such information.

This Privacy Policy also does not apply to our collection, use, or disclosure of information collected from job applicants, independent contractors, employees, or others associated with such persons in the employment or independent contractor context.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. IT CONTAINS IMPORTANT INFORMATION APPLICABLE TO YOU, REGARDING THE PRIVACY AND SECURITY OF INFORMATION COLLECTED, USED, OR DISCLOSED BY HUDSON AUTOMOTIVE.

We may update or modify this Privacy Policy at any time, by posting the updated version including the effective date of the updated version. Please review this Privacy Policy periodically for any updates or changes. This Privacy Policy is binding on all those who access our Sites or otherwise engage with us, whether acting as an individual or on behalf of an entity, including you and all persons, entities, or digital engines of any kind that harvest, crawl, index, scrape, spider, or mine digital content by an automated or manual process or otherwise. Please read this Privacy Policy carefully. Your continued use of the Sites or further engagement with us is considered your acceptance of these terms, and you agree to the terms of this Privacy Policy and the collection and use of information in accordance with this Privacy Policy. If you do not agree to be bound by this Privacy Policy or any subsequent modifications, you should not access our Sites or disclose any personal information to us. If we are required by law to obtain your consent for any new collection, use, or disclosure of your personal information after an update to this Privacy Policy, we will do so.

This Privacy Policy contains the following information, which you can access by scrolling down:

1. **How to Contact Us**
2. **Personal Information**
3. **Information We Collect**

4. **How We Use Information**
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1. How to Contact Us

If you have any questions or concerns or complaints about our use of your Personal Information (defined below), please do not hesitate to contact us through any of the methods below. Whichever way you elect to contact us, we may ask that you confirm and verify your identity.

Email: privacy@hudsonauto.com
Mail: Hudson Automotive Group, 100 Coastal Drive, Ste. 400, Charleston SC 29492

2. Personal Information

While using our Sites, we may ask you to provide us with certain information that identifies, relates to, describes, can reasonably be associated with, or can reasonably be linked to a you ("**Personal Information**").

We collect information from you both when you provide it voluntarily and also automatically when you access our Sites. We may also collect Personal Information from other sources, as described below.

We may collect Personal Information:

- Directly from you, through the Sites, social media pages, e-mail messages, or other digital services, or through forms, surveys or other correspondence;
- from other sources, such as public databases, vehicle manufacturers, third-party vehicle repair or service centers, social media platforms, marketing and advertising providers, ad networks, lead generators, data brokers, and companies that provide or sell lists of potential purchasers;
- from your vehicle, including telematics log data; and
- through your browser or device.

If we combine or associate information from other sources with Personal Information that we collect through the Sites, we will treat the combined information as Personal Information in accordance with this Privacy Policy.

We may also collect or create deidentified or aggregated information that is no longer reasonably capable of being linked to an identifiable person. Deidentified or aggregated information is not Personal Information. We will not attempt to re-identify the person associated with deidentified or aggregated information.

3. Information We Collect

We may collect the following categories of Personal Information from you, depending on your interactions with us and the choices you make, as further described in the chart below:

Category	Data Types (Examples)	
Identifiers	Your contact information (name, postal address, email address, and phone number), Internet Protocol (IP) address, identification information (such as social security number, driver's license number, or state ID number) or other similar identifiers, and copies of your government-issued identification or military ID.	
Commercial Information	Products or services you have expressed interest in or purchased, insurance information, communication preferences, copies of communications with us.	
Financial Information	Bank account number, credit or debit card number, expiration date	
Internet / Electronic Network Activity	***Browser History***	Data about the webpages you visit, including without limitation web browser specifications, website visits before accessing our Sites, and website visits after leaving our Sites.
	Device, Connectivity, and Configuration Data	Data about your device and nearby networks, including internet connection information, computer equipment information, regional and language settings.
	Location Data	Data about your device's location, which is inferred from your internet connection data, your IP address, and your postal address.
Professional or Employment-Related Information and Education Information	Your employment and educational history such as schools attended, degrees earned, current and past employers, job titles, and dates of employment.	
Third-Party Social Network Services	If you choose to access, visit, and/or use any third-party social networking service(s) that may be integrated with our Sites, we may receive your Personal Information and other information about you and your computer, mobile, or other device that you have made available to those social networking services, including information about your contacts through those services. Some social networking services will facilitate registration or enhance or personalize your experience on our Sites. This includes if you "follow," "like," or link your social networking account to our Sites. Your decision to use a social networking service in connection with our Sites is voluntary. However, you should make sure you are comfortable with the information your third-party social networking services may make available by reviewing the privacy policies of those providers and/or modifying your privacy settings directly with those networking services.	

Category	Data Types (Examples)
Telematics Data	When we service your vehicle, we may collect information from the vehicle, including performance, usage, operation, and condition of your vehicle, including vehicle identification number; speed information; odometer readings; battery use management information; battery charging history; electrical system functions; software version information; infotainment system data; safety-related data and camera images.
Inferences	We may make inferences about you and your interests based on other Personal Information such as a likelihood to purchase score or services that you may find helpful.

4. How We Use Information

We process Personal Information for our business purposes as further detailed below:

- To provide sales and customer support such as responding to your questions and requests, processing your transactions, providing you with the products or services you requested or purchased, and keeping you informed about your account or orders with us.
- To confirm your identity, your age, the status of your legal right to drive and your insurance coverage.
- To determine if you are eligible for specific offers or payment methods.
- To process and manage warranty and service information.
- To communicate with you regarding our products or services.
- To provide you with advertising content in which we think you will be interested. As part of this customization, we may observe your behaviors on the Sites or on other websites.
- To allow you to participate in third-party interactive features of our Sites when you choose to do so.
- To provide, maintain, operate, personalize, evaluate, and improve our Sites and services.
- To perform business and marketing analytics and assess consumer trends and interests.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To prevent or investigate fraud.
- To investigate complaints and potential violations of our policies.
- To implement, maintain, develop, improve, and enforce our information security program.
- To comply with our legal obligations, protect our rights, and protect the rights of others.
- To work with our service providers who perform certain business functions or services on our behalf.

We do not use Personal Information to engage in profiling with legal or similarly significant effects.

5. Cookies and Other Similar Tools

Cookies. Cookies are small data files that are downloaded onto your computer or mobile device when you use our Sites, which are unique to your device or account. Cookies make it easier for you to use our Sites by saving your preferences so that we can use these to improve your next and subsequent visits to our Sites. Cookies help us learn which areas of our Sites are useful and which areas need improvement. They also help us and others engage in targeted advertising to you.

You can choose whether to accept cookies by changing the settings on your browser or device. Each browser has its own methods for doing this. For detailed instructions on how to disable, block or delete cookies in your browser, consult your browser's help files or visit How to Manage Cookies. Please bear in mind that if you choose to disable this function, your experience with our Sites may be impaired and some features may not work as they were intended. When we use cookies or other similar technologies, we may set the cookies ourselves or ask third parties to do so to help us.

Please note that our Sites are not set up to respond to Do Not Track (DNT) or Global Privacy Control (GPC) signals, but it does respond to browser cookies settings such as if you set your browser to reject cookies.

You may opt out of receiving targeted advertising from companies participating in the Digital Advertising Alliance ("DAA"). For more information about how to opt out of DAA participants' targeted advertising please visit the DAA AdChoices page. Please note that you may continue to receive online targeted advertised from other companies or online non-personalized advertising.

Web Beacons and Embedded Scripts. Web beacons are small graphic images, also known as "tracking pixels," "Internet tags," or "clear gifs," embedded in web pages and e-mail messages. Web beacons may be used to count the number of visitors to the Sites, facilitate marketing, to monitor how users navigate the Sites, and to count content views. An embedded script is programming code designed to collect information about your interactions with the Sites.

This information may be collected and reported in the aggregate. We may use this information to improve our current Sites offerings, develop new products or services, and target information to you that may be helpful and useful to you based upon your use of our Sites.

Google Analytics. One tool we use is Google Analytics. For more information about Google Analytics, including how it collects and processes Personal Information and Usage Data, please review Google's Safeguarding Your Data disclosure.

6. Disclosing Information

We may disclose deidentified or aggregated information to third parties at our discretion. We may disclose your Personal Information to certain third parties whom we engage to help us run our business and perform services on or through the Sites, including under the following circumstances:

- with Hudson service providers and business partners when necessary to perform services on Hudson's behalf or on your behalf, such as the circumstances noted in this Privacy Policy, and with Hudson's third-party service providers to provide services such as website hosting, data analysis and storage, payment processing, information technology and related infrastructure, information security, customer service, maintenance or related services, e-mail and other communication delivery, business and marketing

analytics, credit card processing, auditing, marketing, accounting, legal advising, and other similar services;

- with other third-party business partners (such as manufacturers, finance, leasing, registration, and insurance companies) to the extent that they are involved in the purchase, lease, or service of your products to allow you to take advantage of those services if you elect to utilize them;
- with automobile manufacturers and distributors with whom Hudson has a franchise relationship for marketing, data analysis, audits, identifying customer and industry trends, determining the effectiveness of promotional campaigns, managing warranty and recall obligations, and reporting to other franchised dealers;
- with companies that provide targeted advertising services;
- with other third parties you authorize, such as third-party service centers or providers, if you choose to utilize them, third-party sponsors of contests and similar promotions, if you elect to participate, and your social media account provider (use of the information Hudson shares will be governed by the social media account provider's privacy policy);
- with other third parties when required by law (including, but not limited to, subpoenas) when Hudson believes in good faith that the law requires it, such as in response to a lawful request by governmental authorities conducting an investigation, including to comply with law enforcement requirements; to verify or enforce Hudson's policies and procedures; to respond to an emergency; to prevent or stop activity Hudson may consider to be, or to pose a risk of being, illegal, unethical or legally actionable; or to protect the rights, property, safety, or security of Hudson's products and services, Hudson, third parties, visitors, or the public, as determined by us in Hudson's sole discretion;
- in other circumstances, such as with a third party in connection with any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of Hudson's business, assets, or stock (including in connection with any bankruptcy or similar proceedings); or
- with your authorization

Hudson Automotive does not disclose Personal Information to public and government authorities absent a court order or other legally enforceable request.

Hudson Automotive does <u>not</u> sell Personal Information to third parties.

7. Acknowledgement

To the extent that you provide or transmit any information, including, but not limited to, any Personal Information and any information that identifies any other individual (including without limitation name, email address and/or telephone number), to Hudson Automotive or our third-party service or data providers, licensors, or distributors ("**Representatives**"), you warrant that (a) you are providing or obtaining only your own information or the information of others which you are authorized to provide to third parties and/or obtain from third parties on their behalf; and (b) the use of such information by Hudson Automotive and its Representatives will not infringe upon or misappropriate the intellectual property rights or otherwise violate the rights of any third parties.

8. How We Safeguard Your Information

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. Any transmission of Personal Information is at your own risk. By using our Sites or otherwise providing us Personal Information, you acknowledge and accept these risks. As a result, we cannot guarantee or warrant the security of any information you disclose or transmit to us or that is otherwise provided to us, and we cannot be responsible for the theft, destruction, or inadvertent disclosure of information. It is your responsibility to safeguard any passwords, ID numbers, or other special access features associated with your use of the Sites. Any transmission of information is at your own risk.

9. Transfer of Data; Special Notice to Non-U.S. Users

Your information, including Personal Information, may be transferred to – and maintained on – computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer. The Sites are intended solely for individuals located in the United States. By using this Sites, you represent that you are located in the United States and you consent to the general use and disclosure of your Personal Information as described in this Privacy Policy.

10. Policy on Children's Information

Our Sites are not created for anyone under the age of 18 ("**Children**" or "**Child**"). By using the Sites, you represent that you are at least 18. If you do not meet this age requirement, you must not access or use our Sites.

We do not knowingly collect Personal Information from anyone under 18, and we do not target the Sites to Children. If you are a parent or guardian and know that your Child has provided us with Personal Information, contact us through one of the methods listed under "***How to Contact Us***" above. If we become aware that we have collected Personal Information from Children without verification of parental consent, we take reasonable steps to remove that information from our servers.

11. Links to Other Websites

Our Sites may contain links to third-party websites that are not operated or maintained by Hudson Automotive. If you click on one of those links, you will be taken to websites we do not control. By providing a link to a third-party website, we are not endorsing or attempting to associate with any other entity, their content or services, or the persons or entities associated with those websites. This Privacy Policy does not apply to the information practices of those third-party websites. You should read the privacy policies of third-party websites carefully. We are not responsible for the content, privacy policies, actions or security of third-party websites.

12. Your Options Regarding Marketing Communications

You can opt out from receiving future marketing communications from us at any time by using the unsubscribe function in the email or text you receive from us, or by contacting us as set forth under "***How to Contact Us***"

above. Additionally, for Financial Information subject to our Financial Privacy Notice, you may opt-out of certain marketing communications by visiting our Opt-Out link at www.hudsonauto.com/privacy-notice-opt-outs. Please allow sufficient time for your preferences to be processed. Even if you opt out of receiving marketing messages, we may still contact you for transactional and business purposes. If you later opt back into getting marketing communications from us, we will remove your information from our opt-out databases.

13. State Privacy Rights

If you are a resident Kentucky or Tennessee, you have additional rights to access and control your Personal Information and this section applies to you. Exemptions may apply.

Right to Access

You have the right to request that we provide you with access to your Personal Information in our possession or control and provide a copy of it to you in a portable and readily usable form.

Right to Deletion

You have the right to request that we delete any Personal Information we have collected about you. Please understand that we are not required to honor a deletion request if a legal exemption applies.

Right to Correct

You have the right to request that we correct inaccurate Personal Information we maintain about you. After you request to correct inaccurate Personal Information, we will provide instructions explaining how to provide us with optional documentation to support your request. If you provide documentation, we will consider it.

We may decline to correct your Personal Information if we determine based on the totality of the circumstances that your Personal Information on file is more likely than not accurate. We may also decline to correct your Personal Information if we determine that your request is fraudulent. We may decide to delete your allegedly inaccurate Personal Information instead of correcting it.

Right to Opt Out of the Sale or Sharing of Personal Information

You have the right to request that we do not sell or share your Personal Information to others. Please note that opting out of the sale or sharing of Personal Information will not impact any sale or sharing of your Personal Information that may have occurred prior to the date of your opt-out request.

You may opt out of cookies, pixels, and other online tracking tools used on our Sites that constitute the selling or sharing (for targeted advertising purposes) of your Personal Information via our cookie management tool, available on the privacy banner when you visit our site. Contact us if you cannot locate it.

Right to Appeal

You have the right to appeal our decision to deny, in full or in part, your exercise of consumer rights by submitting a request to appeal. If we deny your appeal, we will provide you with a written explanation of the reasons for our decision. If you are not satisfied with our explanation for the denial of your appeal, you may contact your state Attorney General to submit a complaint about the appeal results.

Non-Discrimination Notice

We will not discriminate against any consumer for exercising their privacy rights under law or this Privacy Policy.

Submitting a Consumer Rights Request

You may submit your request(s) by sending an email to privacy@hudsonauto.com. If you email us, please include at least your full name, email address, phone number, and a description of the request you would like to make.

After you submit your request, we may contact you to obtain additional information necessary to verify your identity. For example, we may require you to verify certain information in our files or submit a signed declaration under penalty of perjury verifying your identity. We will not process certain requests without verifying your identity, so please respond promptly. If you do not timely respond to our requests for information, we may deny your request.

We will process verified requests within 45 days of receipt, subject to any applicable exemptions and extensions permitted by law up to 90 days. We will process appeals within 60 days of receipt. We will retain a copy of your request for at least two years.

Authorized Agents

If you are an authorized agent submitting a request for another person, you must provide a written authorization from the consumer (along with proof of your identity) or a copy of a lawful power of attorney. You may provide this documentation via email to privacy@hudsonauto.com after submitting the request. We may contact you or the consumer on whose behalf you claim to act to verify your authorization.

Non-Discrimination Notice

We will not discriminate against any consumer for exercising their privacy rights under law or this Privacy Policy.

14. California "Do Not Track"

Do Not Track is a web browser privacy preference that causes the web browser to broadcast a signal to websites requesting that a user's activity not be tracked. At this time, our Site does not respond to "do not track" signals.