

Impact Auto Auctions Ltd. Privacy Policy Highlights

Impact Auto Auctions Ltd. (“Impact Auto Auctions,” “we,” or “us”) understands that your time is valuable. Therefore, we have set out below some important highlights of the Privacy Policy applicable to our website <https://www.impactauto.ca/> as accessed through your browser or the AuctionNow mobile app (the “Site”) and your communications with us. You can obtain more information about how we collect, use, disclose and safeguard your personal information by reviewing our full Privacy Policy below.

What personal information do we collect?

We collect your personal information directly when you:

- Communicate with us via email, telephone, online, on social media or in person. In such circumstances, we may collect your name, email address, phone number, branch, stock number, service category and a recording of the conversation.
- Register for an Impact Auto Auctions account. The categories of personal information that we collect depends upon the type of your account. For example:
 - when you register for a free account, we collect your name and email address;
 - when you register for a public buyer account, we collect your name, date of birth, street address, phone number, fax number, cell number, photocopy of a piece of government issued photo ID with a signature, and password;
 - when you register for a licensed buyer account, we collect your name, company name, business license address, mailing address, phone number, fax number, cell number, photocopy of a piece of government issued photo ID with a signature, ID number, ID province or country, ID expiration date, business license, business license number, business license effective date and business license expiration date;
 - when you register additional sales representatives for licensed business buyer accounts, we collect the additional sales representatives’ name and applicable license type.
- Use your account. In order to login you are required to enter your email address or Login ID and password. Additionally, if you upload comments, feedback, or other information onto our Site, we will collect any personal information contained in such content.
- Register for and attend one of our tradeshow. In such circumstances, we may collect your name, telephone number, email address, buyer number, and the topics on which you would like to receive additional information.
- Make a payment to us. In such circumstances, we may collect payment information, shipping information and personal information to verify your account.
- Consign or sell a vehicle. In such circumstances, we may collect your name, business name, mailing address, email address, phone number, license dealer designation, other business license, vehicle owner information, taxpayer identification number and vehicle information.
- Request information from us, including our industry reports, contests, newsletters, clubs, activities, discussion lists or announcement lists. In such circumstances, we may collect your name, company name, email address, city and province.

- Complete a survey. When you complete a customer survey we may collect your name, mailing address, email address, phone number, company name, and job title and information about your customer experiences, preferences, and interests.
- Apply to be listed as a transportation vendor, export vendor or inbound tower. If you apply for any such designations, you will be required to complete an application, which may collect your name, company name, URL, mailing address, phone number, email address, years in business, and information about your services.
- Apply for employment with us. In such circumstances, we may collect a variety of personal information you include on your resume, including your name, mailing address, email address, phone number, work experience, education history, references, information about your applicable degrees, licenses, and certifications, veteran status. We me also collect information to determine whether you are 18 years of age or older, you are legally eligible to work in the country to which you are applying, you have a valid driver’s license, you or your relatives have ever worked for us or one of our affiliates, your pay expectations, and whether you are willing to relocate if required.

In some circumstances, we collect the above information on behalf of third parties that engage our services to sell vehicles on their behalf (including, without limitation, salvage providers and insurers) and/or that are authorized to use our Site to sell vehicles that are owned, possessed or controlled by them (collectively “Clients” and individually a “Client”).

We also collect information from your use of our Site automatically using cookies and other similar technologies. The information we collect can include IP address, domain name, referring web page, browser type, mobile device information, information about the way you use your device or the Site and your push notification settings.

Why do we collect personal information and how is it used?

We collect the information described above for a variety of reasons, including:

- To facilitate the use of our products and services using our Site by you and by other users, including to administer auctions;
- To facilitate and finalize sales transactions when you are the successful bidder on a vehicle;
- To conduct market research and analysis and to promote our goods and services;
- To analyze Site usage for the purposes of improving the Site and developing marketing campaigns;
- To provide you with customer service, including responding to your comments and questions, enhance the quality and types of customer service we provide to our customers and to assist with troubleshooting;

- To contact you to send you information about your account and for marketing and promotional purposes to the extent you consent to receiving such communications;
- To consider applicants for a position within our organization;
- To provide our products and services to our Clients;
- To ensure compliance with our legal and regulatory obligations; and
- As otherwise permitted by applicable laws.

Is personal information shared or disclosed?

In connection with the purposes set forth herein, we may share your personal information with:

- Our Clients, when you are the successful bidder on a vehicle that is owned, possessed or controlled by such Clients;
- Without limiting the above, your name, contact information, Account information, owner information, license information, photocopy of government issued photo ID, and billing information will be disclosed to our Client, Manitoba Public Insurance (“MPI”), when you are the successful bidder on a vehicle owned, possessed or controlled by MPI, so that MPI can evaluate and complete the transaction. Information disclosed to MPI will be subject to MPI’s own policies and practices regarding collection, use, retention, protection, disclosure, disposal and other processing of personal information;
- Other businesses within our corporate group located in the United States and the United Kingdom;
- Our third party service providers as applicable to your use of our products and services, including some analytics partners, platform service providers, transportation vendors and our Marketing Alliance Partners;
- Other users of our Site who can view content that you upload publically;
- Government entities and other third parties: (a) if you consent; (b) to comply with a valid subpoena, legal order, court order, warrant, legal process, or other legal obligation; (c) to enforce or apply any of our terms and conditions, policies, or other agreements; (d) to exchange information with other companies and organizations for the purposes of fraud protection and credit risk reduction; or (e) as necessary to pursue available legal remedies or defend legal claims; and
- Third party purchasers in the event of a potential reorganization, merger, sale, joint venture, assignment, transfer or other disposition of our business.

Information that is collected, stored or otherwise processed by or on behalf of our public sector Clients may also be disclosed in response to an “access to information” request, pursuant to applicable legislation.

How do we protect personal information?

- We have implemented technical and organizational measures designed to assist in maintaining the security and confidentiality of personal information, including for the purpose of: safeguarding against anticipated threats to the confidentiality, integrity, and availability of your personal information; and protecting your personal information against accidental or unlawful destruction, loss, alteration, and unauthorized access or disclosure.
- In the event our customer support representatives need to access your account in order to assist with a trouble shooting issue, we will issue you a password reset as a security precaution to secure your account credentials.
- When we share your personal information with our third party service providers we enter into contracts with them to ensure that they maintain a comparable level of security over such information.

What are the risks?

- Users that bid on and/or purchase vehicles owned, possessed, or controlled by Impact Auto Auctions’s public sector Clients should be aware that such information may be accessible to third parties, including members of the public, pursuant to legislation governing freedom of information and access requests.
- Whenever personal information is processed, there is a risk that such information could be lost, misused, modified, hacked, breached, and/or otherwise accessed by an unauthorized third party.
- Although we take steps to safeguard the personal information under our control, "perfect security" does not exist online or elsewhere. Accordingly, we cannot guarantee the security of information posted or transmitted using our Site. Despite our use of encryption and other safeguards, there is a possibility that a third party may unlawfully intercept or access information.

What are your choices?

- You may cease using our Site and related products and services at any time.
- You may opt-out of any use or disclosure of your personal information that is not required for us to provide our products and services (e.g., for our marketing activities);
- You may also request to access, modify or delete your personal information in our possession, subject to certain limitations.

- If you believe that your account or any information you provided to us is no longer secure, notify us immediately at helpdesk@impactauto.ca.

Impact Auto Auctions Ltd. Privacy Policy

Effective: September 18, 2020

Your privacy is important to Impact Auto Auctions Ltd. (“Impact Auto Auctions,” “we,” or “us”). We developed this Privacy Policy to provide you with information on how we process your personal information when you communicate with us or visit and use our website at <https://www.impactauto.ca/> as accessed through your browser or the AuctionNow mobile app (the “Site”), including when you complete forms, and when you utilize our other offerings (e.g., newsletters, discussion lists, and announcement lists). This Privacy Policy applies only to the Site, and not to any other websites, mobile applications, platforms or activities.

“Personal information” is information relating to an identified or identifiable natural person.

By using the Site and/or voluntarily providing your personal information to us, you are consenting to this Privacy Policy.

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CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time as we add new products, services, and apps; as we improve our current offerings and technologies; as our business and relationships evolve; and as laws change. It is our policy to post any changes we make to our Privacy Policy on the Site. Any changes will become effective upon our posting of the revised Privacy Policy on the Site. If we make material changes to how we treat the personal information that falls within the scope of this Privacy Policy, we will notify you by email (to the email address specified in your account) or through a notice on the Site. The date this Privacy Policy became effective is identified at the top of the first page.

APPLICABILITY OF THIS PRIVACY POLICY

This Privacy Policy applies to how we process your personal information when you visit or use our Site, whether through a desktop, laptop, tablet, mobile device (including through the AuctionNow mobile app) or otherwise, or when you communicate with us.

We may reference or provide links to third party websites or services and we are not responsible for and do not control the content, security, or privacy practices employed by such third party websites or services. This Privacy Policy does not apply to any such third party websites or services; please refer to

the privacy statements or policies for such third party websites or services for information about how they collect, use, disclose and protect personal information.

As a resource to our visitors, our Site contains offerings from other companies that you can link to through our Site (such as Automotive Finance Vendors, Licensed Brokers, Transportation/Shipping Vendors, and Inspection Vendors). When you click on such a link on our Site, you will be taken to the website of the other company, and its privacy practices will govern your use of that website and your interactions with that company.

We are not responsible for and do not control the content, security, or privacy practices employed by such third party websites or services. This Privacy Policy does not apply to any such third party websites or services; please refer to the privacy statements or policies for such third party websites or services for information about how they collect, use, disclose and protect personal information.

CATEGORIES OF PERSONAL INFORMATION WE COLLECT AND WHY

We collect the following personal information from you when you visit our Site and use our products and services:

When you register for and use your account

We offer various types of Impact Auto Auctions accounts, including Free Accounts (no transaction privileges), Public Buyer Accounts, and Licensed Business Buyer Accounts.

When you create and use any type of account, you will be asked to enter your name, email address or Login ID and password.

Impact Auto Auctions uses your email address or Login ID and password for the purpose of enabling you to securely log in to your Impact Auto Auctions account. The legal ground for using this information for this purpose is our legitimate interest in protecting the security of your Impact Auto Auctions account, or consent (express or implied, as appropriate) where required by applicable law.

We may also use your email address, name, and mailing address for market research purposes, or for sending you information about your Impact Auto Auctions account, which may include material changes to this Privacy Policy. The legal ground for using this information for these purposes is our legitimate interest in conducting market research to improve our products and services and Impact Auto Auctions' legitimate interest in providing you with information about your Impact Auto Auctions account, or consent (express or implied, as appropriate) where required by applicable law.

When you register for any account, we collect the following categories of personal information:

- **Free Accounts.** When you register for a Free Account we collect your name, email address or Login ID and password. Free Accounts can only view information on our Site and cannot otherwise transact.

We use the above-noted information for the purpose of permitting you to have a Free Account, which allows you to browse and search our nationwide inventory, add vehicles to your Watch List, attend auctions online as a non-bidding guest, manage email alerts and preferences, and

for our internal recordkeeping purposes. The legal ground for using this information for this purpose is our legitimate interest in offering and providing services to guests who are interested in reviewing our inventory and attending auctions as non-bidding guests, or consent (express or implied, as appropriate) where required by applicable law.

- [Public Buyer Accounts](#). When you register for a Public Buyer Account we collect your name, date of birth, street address, phone number, fax number, cell number, photocopy of government issued photo ID with signature (ID), ID number, ID province or country, ID expiration date.

We use the above-noted information for the purposes of verifying that you meet the requirements to upgrade to a Public Buyer Account, which provides you with a Buyer Number and permits you to browse and search our nationwide inventory, add vehicles to your Watch List, attend auctions online, bid online, manage email alerts and preferences, access public auctions, on site.

We also may use your name, date of birth, and address for purposes of meeting our regulatory obligations. The legal ground for using this information for these purposes is our legitimate interests in offering and providing services to Public Buyers; permitting Public Buyers to bid and make purchases; and complying with applicable legal requirements. Notwithstanding the above, we will obtain consent (express or implied, as appropriate) where required by applicable law.

- [Licensed Business Buyer Accounts](#). When you register for a Licensed Business Buyer Account, we collect your name, company name, business license address, mailing address, phone number, fax number, cell number, photocopy of government issued photo ID with signature (ID), ID number, ID province or country, ID expiration date, business license (BL), BL number, BL effective date, BL expiration date and tax identification number (e.g., social insurance number or employer identification number).

We use the above-noted information for the purpose of verifying that you meet the requirements to upgrade to a Licensed Business Buyer Account, which provides you with a Buyer Number and permits you to browse and search our nationwide inventory, add vehicles to your Watch List, attend auctions online, manage email alerts and preferences, access all auctions where your license permits you to bid, bid online, on site, and via proxy at Impact Auto Auctions branches where your license permits you to bid, buy instantly via Buy Now, add bidders to your account, and for our internal recordkeeping purposes.

We also may use your name, date of birth, and address for purposes of meeting our regulatory obligations. The legal ground for processing this information for these purposes is our legitimate interests in offering and providing services to Licensed Business Buyers; permitting Licensed Business Buyers to bid and make purchases; and complying with applicable legal requirements. Notwithstanding the above, we will obtain consent (express or implied, as appropriate) where required by applicable law.

- [Additional Sales Representatives for Licensed Business Buyer Accounts](#). When additional sales representatives are added to a Licensed Business Buyer Account, we will also collect the

additional sales representatives' first name, last name and applicable license for authentication (dealer license or letter of employment).

We use the above-noted information for purposes of verifying that the new bidder meets the requirements to act as an authorized bidder on a Licensed Business Buyer Account and for our internal recordkeeping purposes.

We also may use the names, dates of birth, and addresses of the Licensed Business Buyer Account owner and the new bidder for purposes of meeting our regulatory obligations.

The legal ground for using this information for these purposes is our legitimate interests in permitting multiple bidders to make purchases on a Licensed Business Buyer Account at the Impact Auto Auctions branch where your license permits you to bid; protecting the security of Licensed Business Buyer Accounts; and complying with applicable legal requirements. Notwithstanding the above, we will obtain consent (express or implied, as appropriate) where required by applicable law.

When you communicate with us

When you interact with our representatives via email, telephone, online, on social media, or in person, we may collect personal information, including your name, email address, phone number, branch, stock number, and service category. We also may create event logs that are useful in diagnosing server and app performance-related issues, and capturing information relating to support or service issues.

Note, however, that if you contact us on one of our social media platforms, your interactions with us are governed by this Privacy Policy, as well as the Privacy Policy of the social media platform you use.

We may also record and review conversations with customer support representatives in order to improve customer service, subject to applicable laws, and analyze any feedback provided through voluntary surveys.

With your consent, which we obtain from you verbally when you contact us by telephone, our customer support representatives may log in to your Impact Auto Auctions account, if appropriate, to reproduce an issue and help troubleshoot and resolve your issue. As a security precaution, our customer support representatives will issue you a password reset after being asked to log in to your customer account.

We use this information to respond to your comments and questions, provide you with customer service, and to monitor and enhance the quality and types of customer service we provide to our customers. The legal ground for using this information for these purposes is our legitimate interest in providing quality support and customer service, or consent (express or implied, as appropriate) where required by applicable law. The legal ground for logging in to your Impact Auto Auctions account, if necessary is to help troubleshoot and resolve your issue, is your consent, which you may withdraw at any time.

When you register for and attend one of our Tradeshows, Buyer Forums or Buyer Seminars

When you register for and attend one of our tradeshows or an industry tradeshow, Buyer Forums, or Buyer Seminars, we may collect your name, telephone number, email address, Buyer Number, and the topics upon which you would like to receive additional information.

We use this information for the purpose of planning for and hosting its tradeshows and industry tradeshows, Buyer Forums, and Buyer Seminars, and marketing Impact Auto Auctions' goods and services.

The legal ground for using this information for these purposes is our legitimate interest in effectively marketing our goods and services, or consent (express or implied, as appropriate) where required by applicable law. We also use this information for the purposes of sending you marketing communications and allowing our Marketing Alliance Partners (also known as Authorized Representatives and Licensed Brokers) to follow up with you (via email or telephone) to assist you with purchasing vehicles from Impact Auto Auctions and making necessary transportation and shipping arrangements. The general legal ground for using this information for this purpose is our legitimate interest in providing our customers and our potential customers with marketing materials to effectively promote Impact Auto Auctions' products and services, and to follow up with potential customers who may need assistance purchasing vehicles from Impact Auto Auctions and arranging for transportation and shipping services, or consent (express or implied, as appropriate) where required by applicable law.

If you provide your consent to receive marketing communications and allow our Marketing Alliance Partners (also known as Authorized Representatives and Licensed Brokers) to follow up with you (via email or telephone), the legal ground for processing your personal information for this purpose is your consent, which you may withdraw at any time.

When you purchase a product or pay your annual account fee

When you purchase a product from Impact Auto Auctions or pay your annual account fee, we may collect your name, email address or Login ID, password, and/or Buyer Number.

For purchases, you will have the option to use your AFC Financing Account, if applicable, or INTERAC payment portal for purchasing products, or Moneris Solutions only for credit card payment of inaugural fees. Please click [here](#) for the AFC Privacy Policy, [here](#) for the INTERAC Privacy Policy, and [here](#) for the Moneris Solutions Privacy Policy. In the event that you use your AFC Financing Account we use a shopping cart feature that safeguards your order information using industry standard SSL (Secure Socket Layer) encrypted connections, which encodes the information transferred between you and the server, rendering it unreadable to anyone trying to intercept the information.

We use your name, email address or Login ID, password, and Buyer Number for the purposes of enabling you to securely log in to your Impact Auto Auctions account to make a payment and allowing us to process your transaction and notify you of your purchase status. If you decide to transport a vehicle using Impact Auto Auctions Transport, we also collect your shipping address. The legal grounds for using this information for these purposes are: (1) our legitimate interest in protecting the security of payments made to your account; (2) our legitimate interest in communicating with you about your

purchase status; and (3) that the use of the information in this manner is necessary to carry out the contract between Impact Auto Auctions and you. Notwithstanding the above, we will obtain consent (express or implied, as appropriate) where required by applicable law.

If you choose to transport a vehicle using Impact Auto Auctions Transport, we use your shipping address for the purpose of obtaining a quote for transportation services, scheduling transportation, and tracking shipment of your vehicle. The legal ground for using this information for these purposes is our legitimate interest in providing customers with convenient and reliable vehicle transportation services, or consent (express or implied, as appropriate) where required by applicable law.

When you consign or sell a vehicle

When you consign or sell a vehicle, we may collect your name, business name, mailing address, email address, phone number, designation as a licensed dealer, other business license, vehicle owner, as well as information concerning your vehicle (*e.g.*, VIN number, mileage, value of your vehicle, and vehicle zip code/postal code).

We use the above-noted information for the purpose of permitting you to consign or sell your vehicle. The legal grounds for using this information is that it is necessary for the performance of a contract between Impact Auto Auctions and you, and our legitimate interest in complying with applicable legal requirements. Notwithstanding the above, we will obtain consent (express or implied, as appropriate) where required by applicable law.

When you request access to our industry information and our services

When you request access to our industry reports, submit a form to learn more about our services, or register for our contests, newsletters, clubs, activities, discussion lists, or announcement lists, we may collect your name, company name, email address, city, and province.

We use this information for the purpose of permitting you to access our industry reports, learn more about our services, or register for our contests, newsletters, clubs, activities, discussion lists, or announcement lists. The legal ground for using this information for these purposes is our legitimate interest in permitting you to have access to the information and services that you request, or consent (express or implied, as appropriate) where required by applicable law.

When you complete a customer survey

When you complete a customer survey we may collect your name, mailing address, email address, phone number, company name, job title, IP address and information about your customer experiences, preferences, and interests.

The above-noted information that you choose to provide to us will be processed, analyzed, and used in reports and other analyses of consumer experiences and preferences for the purposes of improving and marketing our goods or services, or for any other uses we disclose to you at the time the information is collected. The legal ground for processing your personal information for these purposes is our legitimate interests in obtaining feedback from our customers in order to help us improve and market

our products and services for the benefit of our customers and our business, or consent (express or implied, as appropriate) where required by applicable law.

When you upload content to our Site

If you upload comments, feedback, or other information to our Site, we will collect any personal information contained in such content. Please keep in mind that whenever you voluntarily disclose personal information online in a forum accessible by others, for example through email, a newsgroup, discussion lists, or elsewhere, that personal information can be collected and used by others. If you post personal information online that is accessible to the public, you may receive unsolicited messages from other parties in return. Please exercise caution whenever you post information online.

We use your videos, comments, feedback, and other information for the purpose of providing our users with the opportunity to share such content with other users. The legal ground for using this information for this purpose is our legitimate interest in enabling our users to provide comments, feedback, and other information they desire to share with us and other viewers of our Site, or consent (express or implied, as appropriate) where required by applicable law.

When you apply to be listed as a transportation vendor, export vendor or inbound tower

If you apply to be listed as a resource for buyers in need of transportation and/or shipping services, or as a tower looking for inbound towing opportunities, you will be asked to complete an application, which may collect your name, company name, URL, mailing address, phone number, email address, years in business, and information about your services.

We use the above-noted information for the purpose of determining whether you are eligible to be listed as a resource for buyers looking for transportation/shipping services, or as a tower looking for inbound towing opportunities. The legal ground for using this information for these purposes is our legitimate interest in providing buyers with reliable transportation/shipping resources; identifying reliable vendors for inbound towing opportunities; and complying with applicable legal requirements. Notwithstanding the above, we will obtain consent (express or implied, as appropriate) where required by applicable law.

When you apply for a position with us

If you choose to upload a copy of your resume and/or complete an online application for employment, we may collect a variety of personal information, including your name, mailing address, email address, phone number, work experience, education history, references, information about your applicable degrees, licenses, and certifications, veteran status, whether you are 18 years of age or older, whether you are legally eligible to work in the country to which you are applying, whether you have a valid driver's license, whether you or your relatives have ever worked for Impact Auto Auctions or one of our affiliates, your pay expectations, and whether you are willing to relocate if required.

We use the above-noted information for the purpose of permitting you to be considered for open positions that we are seeking to fill. The legal ground for using this information for this purpose is our legitimate interest in analyzing resume and application information in connection with identifying

qualified candidates to fill open positions at Impact Auto Auctions. Notwithstanding the above, we will obtain consent (express or implied, as appropriate) where required by applicable law.

Use of Personal Information for Marketing Purposes

When you register for an account, use the Site on your mobile device, search for vehicles, place bids, purchase products, request information, complete a customer survey, or otherwise provide us with personal information, we may process your personal information for marketing purposes if you agree to this use of your information.

The electronic marketing communications you receive from Impact Auto Auctions may be based on your location (i.e., based on information provided at the time of registration), and other indicators, such as your bidding behavior and typical purchases (*e.g.*, location, vehicle type, mileage).

We use your email address, mobile device number, location (city, province, postal code), buyer type (public vs. nonpublic), and other contact and demographic data to send you periodic marketing materials, including but not limited to birthday and anniversary cards, mobile notifications of our auctions, and other electronic marketing communications and publications for the purpose of notifying you of Impact Auto Auctions' products and services, product updates, special offers, and other issues.

The general legal ground for using your email address and other contact data for this purpose is our legitimate interest in providing our customers and our potential customers with marketing materials to effectively promote Impact Auto Auctions' products and services, or consent (express or implied, as appropriate) where required by applicable law.

The legal ground for processing your email address and other contact data for this purpose is your consent, which you may withdraw at any time through the Unsubscribe link at the bottom of each electronic marketing communication, by updating your Buyer profile, or by updating your preferences in our Profile Center or Subscription Center. Buyers will also have the opportunity to opt-out of receiving push notifications through Impact Auto Auctions.

Personal information that is processed when we use cookies and similar technologies to collect Usage Data:

Impact Auto Auctions' web servers collect personal information pertaining to users of our Site and the mobile devices and programs from which they access our Site ("Usage Data"). Usage Data can include IP address, domain name, referring web page, browser type, mobile device type, device operating system, device settings, and information about the way you use your device or the Site (such as session time, pages visited, links or ads clicked, and whether a user is new or returning). Mobile applications collect device identifiers, and also may request permission to access certain features and display push notifications.

Usage Data is collected and used as follows:

- Cookies and tags (a.k.a. web beacons or clear gifs) on our Site collect data regarding your use of the Site.
- Conversion tracking (track clicks to sales from search results or ads), including Google AdWords Conversion Tracking cookies are used to measure and optimize our ads in Google

Search or selected Google Display Network sites. Learn more about Google’s privacy policy [here](#). You can opt-out of Google AdWords by visiting [Google’s Ads Settings](#).

- Third-party website analytics tools, including Google Analytics, help us gather and analyze information about the pages that you visit on our Site. Such third parties may use technologies such as cookies, web server logs and web beacons. For more information, see "[How Google uses data when you use our partners' sites or apps](#)". We use this information to evaluate and improve the customer experience and the convenience of our Site, and to help us evaluate your Site usage including for the purpose of developing advertising campaigns.

Impact Auto Auctions does not track individual user’s online activities over time across third party websites (and thus does not monitor your browser’s Do Not Track indicator).

For more information on the types of cookies we collect, to control cookie settings and/or to disallow, delete and otherwise manage cookies, please visit our “Privacy Preference Center” with additional information about the different types of cookies used and your options for setting controls. You may also send an email to privacy@iaai.com. Additionally, if you reside in the European Union or other jurisdiction that requires us to obtain your consent to use cookies on our Site, then you will have an opportunity to manage your cookie preferences on our Site.

We collect Usage Data as set out above for the purpose of helping us manage and administer our Site, improving the content of our Site, measuring the effectiveness of our advertising, Site administration and analytic purposes, providing aggregate or statistical reviews of user Site traffic patterns, personalizing content, providing social media features, and customizing and improving the user experience and functionality of our Site. The legal ground for processing this data for these purposes is our legitimate interest in conducting analytics and understanding how users interact with our Site, so we can enhance the user experience and functionality of our Site, or consent (express or implied, as appropriate) where required by applicable law.

If you do not want Usage Data collected through the use of these technologies, there is a simple procedure in most browsers that allows you to automatically decline many of these technologies, or to be given the choice of declining or accepting them. However, while this may provide you with enhanced anonymity, it may affect the functioning of our website.

INFORMATION PROCESSED ON BEHALF OF CLIENTS

Impact Auto Auctions also collects, stores and otherwise processes personal information on behalf of third parties that own vehicles sold on our Site (“Clients”), and/or that are licensed to use our platform. Such information is used for the purposes of providing our products and services to our Clients. In addition, certain personal information is shared with such Clients, as described below under “Third-Party Recipients of Personal Information”. Impact Auto Auctions is not responsible for the actions or omissions of its Clients with respect to their handling of personal information or otherwise.

THIRD-PARTY RECIPIENTS OF PERSONAL INFORMATION

In connection with the purposes set forth in this Privacy Policy, we may share your personal information with:

Our Clients: When a user accesses or uses our Site for the purposes of purchasing or bidding on a vehicle that is owned, possessed or controlled by a Client, that user's information will be shared with the Client as follows:

- When a user is the successful bidder on a vehicle that is owned, possessed or controlled by Manitoba Public Insurance ("MPI"), we will provide MPI with the following information regarding that user:
 - Contact information, including name, company name, email address(es), phone number(s), fax number, mailing address, language, and preferred method of communication;
 - Account profile information, including bidder number, date of registration and registration renewal (where applicable), buyer type, and suspended status (where applicable);
 - Owner Information (i.e., owner of user's business), including owner's name, drivers' license, phone number, and mailing address;
 - License information and personal Identification information, including dealer license, RIN, and photocopy of government issued photo ID (e.g., driver's license or passport); and
 - Billing information, including credit limit, GST or HST number, authorized payment method, and buyer fee exemption (where applicable).

Information disclosed to MPI will cease to be under the control of Impact Auto Auctions, and will be handled by MPI in accordance with its own privacy policies and practices. Users that bid on MPI vehicles are encouraged to review MPI's privacy policy, which can be viewed here, and/or to contact MPI with any questions regarding MPI's handling of their information. Users should also be aware that information about them that is within the custody or under the control of MPI may be accessible to third parties, including members of the public pursuant to *The Freedom of Information and Protection of Privacy Act*, CCSM c F175 (Manitoba). **Please note that MPI is an independent, third party, and Impact Auto Auctions is not responsible or liable for any actions or omissions of MPI.**

- For all other Clients, only the successful bidder's name, company name, address, GST or HST number and the sale amount will be disclosed to the Client.

Access to Information Requests: Information collected by or on behalf of our public sector Clients may also be disclosed to third parties or the public in response to an access request, pursuant to applicable legislation.

Our affiliates: Your personal information may be shared with any member or affiliate of our corporate group located in the United States and the United Kingdom.

Other users of our Site: Your personal information may be shared with other users of our Site when you upload videos, comments, feedback and other content onto public areas of our Site.

[Select business partners and third-party service providers](#): Your personal information may be shared with our business partners, third-party service providers, contractors and sub-contractors, including:

- [Electronic payment vendors](#): We use electronic payment vendors to process credit card data, online payments and financing.
- [Third-party advertising and analytics partners](#): We also share information about your use of the Site with our advertising and analytics partners, including our Marketing Alliance Partners, which use such information to assist us with developing marketing campaigns. We also share your name and email address with such marketing partners, to facilitate delivery of marketing messages that you have agreed to receive.
- [Third-party service providers in connection with our Site](#): We share the personal information we collect with third-party service providers that provide services related to maintaining and upgrading our Site, including database managers/developers, and web developers/hosting companies that assist us with certain processing activities, such as storing/backing up data, enhancing/maintaining databases, publishing content, and otherwise developing/offering a variety of products/services. If you use our Site, your personal information, including name, contact information and any stored biographical/firm information within Impact Auto Auctions' database, may be stored and processed through some of our third-party Site vendors. We also use third party providers to distribute organizational emails.
- [Third-party transportation vendors](#): If a buyer chooses to transport a vehicle using Impact Auto Auctions Transport services, Impact Auto Auctions shares the buyer's contact information, including shipping address with our third-party transportation vendors for the purpose of obtaining quotes, scheduling transportation, and tracking shipments.
- [Governmental entities and third parties in connection with legal obligations, remedies and claims](#): We may disclose personal information about you to governmental entities, such as regulatory agencies, law enforcement, and judicial authorities, as well as other third parties under any of the following conditions: (a) if we have your valid consent to do so; (b) to comply with a valid subpoena, legal order, court order, warrant, legal process, or other legal obligation; (c) to enforce or apply any of our terms and conditions, policies, or other agreements; (d) exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction; or (e) as necessary to pursue available legal remedies or defend legal claims. We also may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- [Third parties in connection with a potential reorganization](#): We may share your personal information to a prospective seller or buyer in the event of a potential reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Impact Auto Auctions' assets or stock, including without limitation, in connection with any bankruptcy or

similar proceeding, provided that such entity will not be permitted to process your personal information other than as described in this Privacy Policy without providing you notice and, if required by applicable laws, obtaining your consent.

CROSS-BORDER TRANSFERS OF PERSONAL INFORMATION

We store our data on servers in Canada. Your personal information may be transferred to servers in the U.S., except as otherwise required pursuant to our contractual obligations to our Clients. In order to provide protection of your personal information, we have in place contractual arrangements (where appropriate) which cover these transfers and we will use reasonable measures to safeguard your information whenever it is transferred. Nevertheless, information that is transferred to, or stored in, other countries may be accessible to courts, law enforcement and national authorities in other jurisdictions.

Any transfers of personal data from the European Union, the United Kingdom and/or Switzerland to the United States are made pursuant to the EU-U.S. Privacy Shield, the Swiss-U.S. Privacy Shield, or pursuant to European Commission-approved Standard Contractual Clauses, which are available at the following [link](#).

Our affiliate company Insurance Auto Auctions, Inc. (“IAA”) participates in and complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework (Privacy Shield) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal data transferred from the European Union, the United Kingdom and/or Switzerland to the United States in reliance on Privacy Shield. IAA has certified to the Department of Commerce that it adheres to the Privacy Shield Principles and the Swiss-U.S. Privacy Shield Principles (collectively, the “Privacy Shield Principles”). You can learn more about the Privacy Shield program, and view our certification [here](#).

IAA is subject to the oversight of the U.S. Federal Trade Commission, which has jurisdiction over IAA’s compliance with the Privacy Shield Principles. IAA will remain responsible for the processing of personal data in a manner inconsistent with the Privacy Shield Principles by third parties to which IAA has transferred personal data unless IAA proves it is not in any way responsible for the event giving rise to the damage.

You may contact IAA anytime with your privacy questions or concerns: Privacy@iaai.com.

CHILDREN AND MINORS’ PRIVACY

Our Site are not directed to individuals under the age of 18. We do not knowingly collect or use any personal information from users under 18 years of age. No information should be submitted to our Site by visitors under 18 years of age, and visitors under 18 years old are not allowed to register for our contests, newsletter, clubs or activities. You must be 18 years or older to purchase products. If we learn that we have collected personal information from someone under 18, we will take steps to delete the information as soon as possible.

RETENTION OF PERSONAL INFORMATION

The personal information that we collect from you is stored on our secure servers located in Canada and the U.S. for as long as is reasonably necessary for the purposes for which the personal information is processed and to meet IAA's legal obligations. The persons who will have access to this personal information include information technology employees, marketing, customer service, branch operations, account management, finance and legal.

PROTECTING YOUR PERSONAL INFORMATION

We take steps to protect the information entrusted to us. We have implemented technical, physical and organizational measures designed to assist in maintaining the security and confidentiality of personal information; safeguarding against anticipated threats to the confidentiality, integrity, and availability of personal information; and protecting your personal information against accidental or unlawful destruction, loss, alteration, and unauthorized access or disclosure.

For example, as noted above, if use your AFC Financing Account for purchases, we use a shopping cart feature for such purchases in order to safeguard your order information using industry standard SSL (Secure Socket Layer) encrypted connections.

However, whenever personal information is processed, there is a risk that such data could be lost, misused, modified, hacked, breached, and/or otherwise accessed by an unauthorized third party. No system or online transmission of data is completely secure. In addition to the technical, physical and organizational measures that Impact Auto Auctions has in place to protect your personal information, you should use appropriate security measures to protect your personal information. If you believe that your Impact Auto Auctions account or any information you provided to us is no longer secure, notify us immediately [by](#) contacting Ann Brooks, Senior Corporate Counsel at 708-492-7342 or ann.brooks@iaai.com and also at IAACompliance@iaai.com.

ACCESS TO AND ACCURACY OF PERSONAL INFORMATION

We endeavour to ensure that any personal information that you provide is accurate, current, and complete. However, we necessarily rely upon you to notify us of any changes to your information. We encourage you to update your information or notify us of any potential inaccuracies in the information that we hold about you. You may request access to review, update, correct, or delete your personal information that we hold. Provision of such access will be subject to satisfactory proof of identity. In limited circumstances, access to certain information may be declined where we are required or permitted to do so by applicable law. We also reserve the right not to change any personal information if we do not agree that it is inaccurate or outdated. Where a request for access is declined, we will provide you with written reasons for why your request has not been granted where required by applicable law.

Contact Us

We invite you to contact us at the coordinates below, for any of the following reasons:

- To access, update or correct your personal information held by us.

- To ask questions or express any concerns you may have about this Privacy Policy or any other matter related to the collection, use, disclosure or safeguarding of your personal information.
- To withdraw your consent to any future use or disclosure of your personal information, subject to certain limitations as permitted by applicable law.
- To obtain written information about our policies and practices with respect to service providers and affiliates outside Canada, or to ask questions about the collection, use, disclosure or storage of personal information by such service providers and affiliates on our behalf

You can contact us by **email** at ann.brooks@iaai.com and IAACompliance@iaai.com, or by **mail** sent to:

Ann Brooks, Senior Corporate Counsel, IAA, Two Westbrook Corporate Center, Suite 1000, Westchester, IL 60154