

California Consumer Privacy Act Disclosure

The following disclosure is for California residents on behalf of Tricolor Holdings and subsidiaries (Tricolor Auto Group, Tricolor Auto Acceptance, Ganas, Ganas Ya, Ride Now). The terms “we,” “our,” “us” in this disclosure refers to Tricolor Holdings and its subsidiaries.

CCPA Overview

This Disclosure is provided to comply with the California Consumer Privacy Act (CCPA). The CCPA law provides additional data privacy rights to California residents regarding the collection, use, and deletion of their personal information. “Personal Information” is information that identifies, relates to, describes, references, is capable of being associated with you, or could reasonably be linked, directly or indirectly, with a particular consumer or device.

This Disclosure supplements the information contained in our online and consumer privacy notices and provides California residents with more information about Personal Information we collect and disclose for a business or commercial purpose. The Policy covers Personal Information, which is collected, used, or disclosed outside of or separate from already exempted activities covered under federal law, such as when we collect Personal Information to offer you a financial product or service for personal, family, or household purposes.

Collection and Use of Personal Information

Information may be collected through this website, in email, text, and other electronic messages between you and this website. Other methods of collecting information may include interaction with our advertisements and applications on third-party websites and services (if those applications and advertisements include links to this disclosure).

Information collected may include information that identifies, relates to, describes, references, is capable of being associated with, or could be linked, directly or indirectly, with a particular consumer or device (“Personal Information”).

We may have collected the following categories of personal information from consumers within the last twelve (12) months:

- Identifiers such as full name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, telephone number, account name, Social Security number, driver license number, passport number, or other similar identifiers.
- Personal information categories listed in the California Customer Records Statute such as a name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.
- Protected classification characteristics under California or federal law such as age, race, color, ancestry, national origin, citizenship, creed, marital status, sex (including gender, gender identity, gender expression) veteran or military status.
- Internet or other similar network activity such as browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
- Geolocation data such as physical location or movements.

- Professional or employment related information such as current or past job history or performance evaluations.
- Inferences drawn from other personal information which may include a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We collect this information from the following sources:

- Directly from you, your authorized agents, or parties (e.g., from documents that you provide to us related to the services for which you engage us or through information we collect from you including your employer, while providing services to you).
- Indirectly from your activity on our digital properties (e.g., from submissions through our website portal or website details we collect automatically).
- From third parties that interact with us in connection with the services we perform (e.g., credit bureaus).
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP (Internet Protocol) addresses, and information collected through cookies [web beacons,] [and other tracking technologies].

The Personal Information we collect or have collected in the past 12 months may be used or disclosed for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information to purchase a vehicle or have service performed on your vehicle.
- To provide you with information, products, or services that you request from us.
- To create, maintain, customize, and secure your account with us.
- To test, research, analyze, and product development, including to develop and improve our websites, products, and services.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collections.
- To provide, support, and develop our websites, goods, and services.
- To respond to Law enforcement requests, in connection with court orders or litigation matters or as required by applicable law, court order, and governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of Personal Information or use Personal Information we collect for purposes not disclosed within this Disclosure.

Shared Personal Information

We may disclose your Personal Information to:

- Our subsidiaries and affiliates,
- Contractors
- Service providers

- Other third parties we use to support our business purpose [and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose to them]. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.
- Government or regulatory authorities, as required by law.

Some content or applications, including advertisements, on the Website are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies [alone or in conjunction with web beacons or other tracking technologies] to collect information about you when you use our website. The information they collect may be associated with your personal information or information about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Sale of Personal Information

We do not rent or sell your name, address, email address(s), phone number(s), credit card information or other personal information to any third party. We may use and disclose some or all your information to third parties as set forth herein. We require these third parties to keep your personally identifiable information secure in accordance with federal and state legal requirements, such as the Gramm Leach Bliley Act, where applicable.

Information for Parents and Guardians

We do not knowingly collect or maintain information about children under the age of 16, unless that information is provided by a parent, legal guardian, or authorized adult. We do not sell information about children under the age of 16.

Your Rights Under CCPA

California Civil Code Section 1798.83 permits California residents to request information about our collection and use of your personal information over the past twelve months including:

- The categories and specific pieces of Personal Information we have collected about you.
- The categories of sources from which such information is collected.
- The business or commercial purpose for collecting such information.
- The categories of third parties with whom we share such information.
- You have the right to request information about our sale or disclosure for business purposes of your personal information to third parties.

Right to Request Deletion of Personal Information

You have the right to request the deletion of certain Personal Information. Please note that notwithstanding your request, California law permits us to retain certain categories of Personal Information for numerous purposes, including to complete a transaction, to perform a contract

between you and our dealership, and to comply with a legal obligation, such as a record retention requirement.

Non-Discrimination Rights

You have the right to not receive discriminatory treatment for the exercise of privacy rights conferred by the CCPA. We will not discriminate against you if you exercise your CCPA rights. For that reason, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you with a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services, or a different level or quality of goods or services.

Exercising Your Rights

If you are a California resident, you can submit a request to us by:

Emailing us: CAT@ganasauto.com

Calling us: (888)448-7426 (Tricolor Auto); (844)844-2627 (Ganas Auto); (844)426-2792 (Ganas Ya);

Only you or your authorized agent (i.e., a person registered with the California Secretary of State that you authorize to act on your behalf) may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. In California, a minor is defined as anyone under 18.

The verifiable consumer request must:

- Provide sufficient information that allows us to verify whether you are the person about whom we collected personal information or an authorized representative.
 - Confirmation of California Residency
 - Full name
 - Address
 - Email address, and
 - Other information that authenticates you (if a customer) or verifies you (if non-customer or authorized party).
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Time and Method

Upon our receipt of a consumer request, you will receive confirmation of our receipt of the request. We endeavor to respond to a verifiable consumer request within 45 days of its receipt.

If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt.

The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests (right to know), we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance. We do not charge a fee to process or respond to your verifiable request.

Questions or Comments

If you have any questions or comments regarding this CCPA Disclosure or our privacy practices, please contact us by submitting your question using the FAQ tab found on our website.