

OPENLANE, Inc., (“OPENLANE,” “we” or “us”) respects the privacy of users of the OPENLANE website. Please read this Privacy Policy carefully so that you understand what personal information OPENLANE collects online through OPENLANE’s auction website service (the “Service”) and what it does with that information. This Privacy Policy does not apply to information you may provide to OPENLANE offline or through other means, for example, via email or via telephone. This Privacy Policy also does not apply to information you may provide to OPENLANE about your business, but only applies to personally identifiable information. If you have questions about this Privacy Policy, please contact us at [privacy@openlane.com].

### THE INFORMATION WE COLLECT

The information OPENLANE collects online through the OPENLANE website falls into two categories: (1) information voluntarily supplied by users of the Service, and (2) tracking information gathered as users navigate through the OPENLANE website. Third-party providers or websites featured on or linked to by the OPENLANE website may be gathering information, as well, through processes we don’t control.

Examples of the types of information the users of the Service may submit include, without limitation, registration information, purchase requests or feedback, and other inquiries or submissions. For example, to make use of certain features on the OPENLANE website, users need to register with OPENLANE and provide certain information as part of the registration process. OPENLANE also may ask for information from those who buy products or services or conduct other transactions through the OPENLANE website. The information you provide allows us to make the site more useful to you by providing information tailored to your individual needs or specific features that you may find useful and also allows us and our vendors to process transactions. Supplying this information is voluntary; however users to the OPENLANE website who don’t wish to supply the information necessary to register or to use particular features will not be able to take advantage of the majority of features and content available on the OPENLANE website.

In addition, OPENLANE may use a variety of methods to track users as they navigate the OPENLANE website. OPENLANE may keep track of the pages visited by its users by placing a small entry in text file, called a cookie, on a user’s hard drive. Cookies are text files we may place on your computer to understand user traffic patterns, technology used, usage data and aggregate demographics. They are also used to serve ads and authenticate you on the system. Cookies do not contain any personal information, nor can they retrieve it from your computer, but they do allow us to personalize the Service. You can remove or block cookies using the settings in your browser although doing so may interfere with your use of some of our site and Service.

In addition, OPENLANE’s web server and third party analytic companies used by OPENLANE may automatically collect limited information about your geographic information, your computer configuration when you request pages from the OPENLANE server, including your ISP, your routing information, the type of browser software you use, the operating system you’re running, the resolution of your computer monitor, the website that referred you, and your IP address. Your IP address is a number that is used by computers connected to the Internet to identify your computer so that data (such as the web pages you request) can be sent to you.

To help OPENLANE keep track of how many users are visiting particular pages within its website, and how many users are accessing particular listings that it distributes, OPENLANE may place a small file, called a web beacon, on some of its pages and on some of the listings it distribute. These web beacons allow OPENLANE to track the number of users that view its pages and its listings, but they don’t reveal any personally identifying information about individual users. Advertising networks with which we are affiliated may also use web beacons on our site to gather similar anonymous “clickstream” information, which is used to deliver targeted advertising messages to our visitors.

OPENLANE may use third party ad serving companies to collect information. Those companies are may provide services include targeting and serving some of the advertisements, promotions, or other marketing messages you see on the pages of the OPENLANE website and other websites. Anonymous tracking information called “clickstream” data is collected from the OPENLANE website and other websites so that the ad serving companies, OPENLANE and others can use such information, sometimes in conjunction with similar anonymous information gathered through other websites, to deliver advertisements targeted to the perceived interests of consumers. This clickstream data does not identify you personally and does not include your name, address, email address or telephone number, but it may include the Internet Protocol (“IP”) address of your computer. Clickstream data is used for marketing research, targeting advertising, and other similar purposes.

**For full details on the OPENLANE.com Privacy Policy please visit [www.OPENLANE.com](http://www.OPENLANE.com) or contact a sales representative at 866-969-0321.**

OPENLANE may combine your information with information we collect about you from other companies.

### USE AND DISCLOSURE OF INFORMATION

OPENLANE reserves the right to use, and to disclose to third parties, information collected from you while you are using the Service for a variety of reasons and purposes, such as providing you with information about products and services that we believe may be of interest to you. More specifically, we reserve the right to share the information that we collect from you with any of our affiliated companies.

**Statistical Information.** Much of the information we collect is in the form of aggregated statistics, such as the traffic that visits various pages within our site, and the habits and preferences of our users. We may combine your information with information we collect from other companies. Such aggregated information does not include any information that would identify you personally. We may use such aggregated information and disclose it to third parties as we see fit.

**Other Disclosures.** We may occasionally release information about our users pursuant to lawful requests or in compliance with laws. Additionally, we may use and share personal information when we believe it is necessary to protect our interests or property, to prevent potential fraud or other illegal or prohibited activity, or to prevent imminent bodily harm. This may include sharing information with other companies, lawyers, agents or government agencies. As our business grows, we may buy or sell various assets. In the unlikely event that OPENLANE, the Service, one of OPENLANE's business units, or substantially all or part of OPENLANE's assets are acquired by another company, information on our users may be among the transferred assets. We also may allow others to search some of our databases and to analyze the data they find there or aggregate it with other data, either for their business purposes, or ours.

This Privacy Policy addresses only the use and disclosure of information we collect from you. It does not cover the use of cookies or other tracking technologies by any third party.

### LINKS AND FEATURES OFFERED IN CONJUNCTION WITH OTHER PROVIDERS

To make our website more valuable to our users, we may feature some products and services that come from other providers through arrangements with companies that specialize in providing such services. We may share with these third parties such information as is necessary for them to provide the products or services.

Our site may include links or provide access to third party sites, services and products. We do not control the privacy policies and practices of third parties, and you are subject to the privacy policies of those third parties where applicable. If you can't find the privacy policy of any third party via a link either from the site's homepage or from the pages on which the products or services are offered, you should contact the third party directly for more information.

### CHANGES TO THIS PRIVACY STATEMENT

Your use of the our site and Service, and any disputes arising from it, is subject to this Privacy Policy as well as our Terms of Use and all of its dispute resolution provisions including arbitration, limitation on damages and choice of law. We reserve the right to change our Privacy Policy at any time without sending you notice. The amended Privacy Policy will be effective immediately upon posting on our site, and your continued access or use of the Service following the posting of any such amendment will constitute full acceptance of the Privacy Policy as amended. We encourage you to refer to this policy on an ongoing basis so that you understand our current privacy policy. Unless stated otherwise, our current privacy policy applies to all information that we have about you and your account.

**Effective Date: November 1, 2008**

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