

## Our Commitment to Privacy

MIC Systems & Software, Inc., a California corporation (“MIC Systems” or “we” or “our” or “us”) respects your privacy and is committed to protecting it through our compliance with this privacy policy.

This privacy policy describes the types of information we may collect from you or that you may provide when you visit the website [www.MICSystems.com](http://www.MICSystems.com) also [www.CommanderNE.com](http://www.CommanderNE.com) (our “Website”) owned and operated by MIC Systems. Your privacy and the privacy of your customers are very important to us. To better protect your privacy MIC Systems provides this policy explaining our online information practices and the choices you can make about the way your information is collected and used. It also describes how you can access and update this information. To make this notice easy to find, we make it available on our homepage and at every point where personally identifiable information may be requested.

This policy applies to information we collect: (1) on the Website; (2) in email, text, and other electronic messages between you and the Website; and (3) through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and the Website.

It does not apply to information collected by: (1) us offline or through any other means, including on any other website operated by MIC Systems or any third party; or (2) any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this privacy policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using the Website, you agree to this privacy policy. This policy may change from time to time (see Changes to This Policy). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

**BY USING OR ACCESSING THE WEBSITE, YOU ARE ACCEPTING THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY.**

## Contact Us

If you have questions or complaints regarding our privacy policy or practices, please contact us by email at [accounting@MICSystems.com](mailto:accounting@MICSystems.com), by phone at (714) 545-4444, or by written notice to:

MIC Systems, Inc.  
2964 Airway Ave.  
Costa Mesa, CA 92626  
Attn: Website Security

### Children Under the Age of 13

The Children’s Online Privacy Protection Act protects the online privacy of children under 13 years of age. We do not knowingly collect or maintain personally identifying information from anyone under the age of 13. If you are under 13, do not use or provide any information on the Website or through any of its features, register on the Website, make any purchases through the Website, use the interactive or public comment features of the Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at the contact information above.

### Information We Collect

We collect several types of information from and about users of our Website, including information: (1) by which you may be personally identified, such as name, postal address, e-mail address, telephone number or any other identifier by which you may be contacted online or offline (“personal information”); (2) that is about you but individually does not identify you; and (3) about your internet connection, the equipment you use to access the Website, and usage details. We collect this information (i) directly from you when you provide it to us; (ii) automatically as you navigate through the Website; and (iii) from third parties, for example, our business partners. Information collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies.

### Information You Provide to Us

The information we collect on or through the Website may include: (1) information that you provide by filling in forms on the Website, which includes information provided at the time of registering to use the Website, subscribing to our services, posting material, requesting further services, or any additional information provided that we may ask for if you report a problem with our Website; (2) records and copies of your correspondence (including email addresses), if you contact us; (3) details of transactions you carry out through our Website and of the fulfillment of your orders, which would include your financial information; and (4) your search queries on the Website.

You also may provide information to be published or displayed (hereinafter, “posted”) on public areas of the Website, as further described in the Public Forums section below, or transmitted to other users of the Website or third parties (collectively, “User Contributions”). Your User Contributions are posted on and transmitted to others at your own risk. Please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

#### Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including: (1) details of your visits to our Website, logs, and other communication data and the resources that you access and use in the Website; and (2) information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Please contact MIC Systems at the contact information above for information on how you can opt out of behavioral tracking and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The information we collect automatically may include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive

from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to: (1) estimate our audience size and usage patterns; (2) store information about your preferences, allowing us to customize our Website according to your individual interests; (3) speed up your searches; and (4) recognize you when you return to the Website.

The technologies we use for this automatic data collection may include: cookies, web beacons, tags and scripts and are used by MIC Systems and our marketing partners, affiliates, and analytics providers. These technologies are used in analyzing trends, administering the Website, tracking users' movements around the Website and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

### Cookies

A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

We use cookies for setting user preferences and storing user activity. The use of cookies by our tracking utility company is covered by our privacy policy. We do not have access or control over these cookies. Our partners use session ID cookies to make it easier to navigate to our Website.

### Web Beacons

Pages of the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit MIC Systems, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

### Third-Party Use of Cookies and Other Tracking Technologies

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 they may collect information, including personal 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 do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

### Log Files

As is true of most websites, we and the third party tracking services we use gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We do link this automatically collected data to other information we collect about you.

### Local Storage Objects

We use Local Storage Objects (LSOs) such as HTML5 content information and preferences. Third parties with whom we partner to provide certain features on our Website or to display advertising based upon your web browsing activity also use LSOs such as HTML 5 and Flash to collect and store information. Various browsers may offer their own management tools for removing HTML5 LSOs. To manage Flash LSOs please click here:

[http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html)

### Frames

Some of our pages utilize framing techniques to serve content from our partners while preserving the look and feel of our Website. Please be aware that you are providing your personally identifiable information to these third parties and not to MIC Systems.

### How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information: (1) to present our Website and its contents to you; (2) to provide you with information, products, or services regarding your dealership management solutions; (3) to fulfill any other purpose for which you provide it; (4) to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for

billing and collection; (5) to notify you about changes to our Website or any products or services we offer or provide through it; (6) allow you to participate with interactive features on our Website; (7) in any other way we may describe when you provide the information; and (8) for any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please contact us at the contact information above. 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.

Finally, we never use, share, sell or rent the personally identifiable information provided to us online in ways unrelated to the ones described in this privacy policy without also providing you an opportunity to opt-out or otherwise prohibit such unrelated uses.

#### Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. We may disclose personal information that we collect or you provide as described in this privacy policy: (1) to our subsidiaries and affiliates; (2) to contractors, service providers, and other third parties we use to support our business; (3) to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of MIC Systems' assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by MIC Systems about our Website users is among the assets transferred; (4) to third parties to market their products or services to you if you have not opted out of these disclosures; (5) to fulfill the purpose for which you provide it; (6) for any other purpose disclosed by us when you provide the information; or (7) with your consent.

We may also disclose your personal information: (1) to comply with any court order, law, or legal process, including to respond to any government or regulatory request; (2) to enforce or apply our terms of use or terms of sale and other agreements, including for billing and collection purposes; or (3) if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of MIC Systems, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We never use, share, sell or rent the personally identifiable information provided to us online in ways unrelated to the ones described in this privacy policy without also providing you an opportunity to opt-out or otherwise prohibit such unrelated uses.

#### Newsletters

If you wish to subscribe to our newsletter(s), we will use your name and email address to send the newsletter to you. If you wish to opt-out of receiving these newsletters you may do so at any time by following the unsubscribe instructions within the emails you receive.

#### Service Related Announcements

We will send you strictly service-related announcements on rare occasions when it is necessary to do so. For instance, if our service is temporarily suspended for maintenance, we might send you an email. Generally, you may not opt-out of these communications, which are not promotional in nature.

#### Referrals

When you register for a demo you have the opportunity to let us know if you heard about us from somebody you know. If you do, we will give you the opportunity to provide us with your referral's name and email address so we can credit them with a referral bonus. MIC Systems stores this information for the sole purpose of providing the referral bonus and tracking the success of our referral program. If your name has been provided as a referral you may contact us at [accounting@MICSystems.com](mailto:accounting@MICSystems.com) to request we no longer store your name.

#### Links to Other Sites

This Website contains links to other sites that are not owned or controlled by MIC Systems. Please be aware that MIC Systems is not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our Website and to read the privacy policies of each and every website that collects personally identifiable information.

#### Public Forums

Our Website offers publicly accessible blogs or community forums. Our blog is managed by a third party application that may require you to register to post a comment. We do not have access or control of the information posted to the blog. You will need to contact or login into the third party application if you want the personally identifiable information that was posted to the comments section removed. To learn how the third party application uses your information, please review their privacy policy.

## Service Providers

We use other third parties such as an email service provider to send out emails on our behalf. When you sign up for our services, we will share your personally identifiable information only as necessary for the third party to provide that service.

## Social Media Feature and Widgets

Our Website will soon include social media features, such as the Facebook and Twitter buttons. These features may collect your IP address, which page you are visiting on our Website, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy policy of the company providing it.

## Business Transitions

In the event MIC Systems goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, your personally identifiable information will likely be among the assets transferred. You will be notified via email or prominent notice on our Web site for 30 days of any such change in ownership or control of your personally identifiable information, as well as any choices you may have regarding your personally identifiable information.

## Our Commitment to Data Security

The security of your personally identifiable information is important to us. We follow generally accepted industry standards to protect the personally identifiable information submitted to us, both during transmission and once we receive it. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## Changes to This Policy



We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Website prior to the change becoming effective. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

#### How You Can Access, Correct, Delete and Deactivate Your Information

You can access, delete and correct all your personally identifiable information that we collect online and maintain by contacting us at the contact information above.

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at [accounting@MIC Systems.com](mailto:accounting@MIC Systems.com). We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We use this procedure to better safeguard your information. You can correct factual errors in your personally identifiable information by sending us a request that credibly shows errors. To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access or making corrections.

#### California Privacy Rights

California Civil Code Section 1798.83 and the California Consumer Privacy Act of 2018 entitle California users to request information concerning the disclosure of certain personal information to third parties for the third parties' direct marketing purposes. California users who wish to request further information in compliance with these laws may contact MIC Systems by email at [accounting@MICSystems.com](mailto:accounting@MICSystems.com).