

Four Star Driving School, LLC. - PRIVACY POLICY

Last Revised: 11/4/2020

Four Star Driving School, LLC. cares about your privacy. For this reason, we collect and use personal information only as needed to deliver our products, services, websites and mobile applications, and to communicate with you about the same, or as you have requested (collectively, our “Services”). Your personal information includes information such as:

- Name
- Address
- Telephone number
- Date of birth
- Email address
- Driver ID
- Billing and payment information
- Candidate information (for job applicants)
- Other data collected that could directly or indirectly identify you.

Our Privacy Policy explains how and why we use your personal information that we collect.

What information we collect, how we collect it, and why

Much of what you likely consider personal information is collected directly from you when you:

- i. create an account or purchase any of our Services (ex: billing information, including name, address, credit card number, driver identification);
- ii. request assistance from our team (ex: phone number);
- iii. complete contact forms or request newsletters or other information from us (ex: email); or
- iv. participate in contests and surveys, apply for a job, or otherwise participate in activities we promote that might require information about you.

However, we also collect additional information when delivering our Services to you to ensure necessary and optimal performance. These methods of collection may not be as obvious to you, so we thought we’d highlight and explain a bit more about what these might be (as they vary from time to time):

Cookies and similar technologies on our websites and our mobile applications allow us to track your browsing behavior, links clicked, items purchased, your device type, and to collect various data, including analytics, about how you use and interact with our Services. These technologies automatically collect data when you use and interact with our Services, including metadata, log files, cookie/device IDs, page load time, server

response time, and approximate location information to measure website performance and improve our systems, including optimizing DNS resolution, network routing and server configurations. Specifically, interactions with the features, content and links (including those of third-parties, such as social media plugins) contained within the Services, Internet Protocol (IP) address, browser type and settings, the date and time the Services were used, information about browser configuration and plugins, language preferences and cookie data, information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and error data is collected. All this allows us to provide you with more relevant product offerings, a better experience on our sites and mobile applications, and to collect, analyze and improve the performance of our Services. We may also collect your location (IP address) so that we can personalize our Services.

Supplemented Data may be received about you from other sources, including publicly available databases or third parties from whom we have purchased data, in which case we may combine this data with information we already have about you so that we can update, expand and analyze the accuracy of our records, assess the qualifications of a candidate for employment, identify new customers, and provide products and services that may be of interest to you. If you provide us personal information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us.

How we utilize information.

We strongly believe in both minimizing the data we collect and limiting its use and purpose to only that (1) for which we have been given permission, (2) as necessary to deliver the Services you purchase or interact with, or (3) as we might be required or permitted for legal compliance or other lawful purposes:

Delivering, improving, updating and enhancing our Services. We collect various information relating to your purchase, use and/or interactions with our Services. We utilize this information to:

- Improve and optimize the operation and performance of our Services (again, including our websites and mobile applications)
- Diagnose problems with and identify any security risks, errors, or needed enhancements to the Services
- Detect and prevent fraud and abuse of our Services and systems
- Collecting aggregate statistics about use of the Services
- Understand and analyze how you use our Services and what products and services are most relevant to you.

Much of the data collected is aggregated or statistical data about how individuals use our Services, and is not linked to any personal information.

Sharing with trusted third parties. We may share your personal information with third parties with which we have partnered to allow you to integrate their services into our

own Services, and with trusted third party service providers as necessary for them to perform services on our behalf, such as:

- Processing credit card payments
- Serving advertisements
- Conducting contests or surveys
- Performing analysis of our Services and customers demographics
- Communicating with you, such as by way email or survey delivery
- Customer relationship management
- Recruiting support and related services. These third parties (and any subcontractors they may be permitted to use) have agreed not to share, use or retain your personal information for any purpose other than as necessary for the provision of Services.

We will also disclose your information to third parties:

- in the event that we sell or buy any business or assets (whether a result of liquidation, bankruptcy or otherwise), in which case we will disclose your data to the prospective seller or buyer of such business or assets; or
- if we sell, buy, merge, are acquired by, or partner with other companies or businesses, or sell some or all of our assets. In such transactions, your information may be among the transferred assets.

Communicating with you. We may contact you directly or through a third party service provider regarding products or services you have signed up or purchased from us, such as necessary to deliver transactional or service related communications. We may also contact you with offers for additional services we think you'll find valuable if you give us consent, or where allowed based upon legitimate interests. You don't need to provide consent as a condition to purchase our goods or services. These contacts may include:

- Email
- Text (SMS) messages
- Telephone calls
- Messenger applications (e.g. WhatsApp, etc.)
- Phone calls or text messages.

If we collect information from you in connection with a co-branded offer, it will be clear at the point of collection who is collecting the information and whose privacy policy applies. In addition, it will describe any choice options you have in regard to the use and/or sharing of your personal information with a co-branded partner, as well as how to exercise those options. We are not responsible for the privacy practices or the content of third-party sites. Please read the privacy policy of any website you visit.

If you make use of a service that allows you to import contacts (ex. using email marketing services to send emails on your behalf), we will only use the contacts and any other personal information for the requested service. If you believe that anyone has

provided us with your personal information and you would like to request that it be removed from our database, please contact us at privacy@4stardrivingschool.com.

Transfer of personal information abroad. If you utilize our Services from a country other than the country where our servers are located, your personal information may be transferred across international borders, which will only be done when necessary for the performance of our contract with you, when we have your consent to do so, or when the appropriate standard contractual clauses are in place. Also, when you call us or initiate a chat, we may provide you with support from one of our global locations outside your country of origin.

Compliance with legal, regulatory and law enforcement requests. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (such as subpoena requests), to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical.

To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of legal process. We will also share your information to the extent necessary to comply with any ICANN, registry or ccTLD rules, regulations and policies when you register a domain name with us. For reasons critical to maintaining the security, stability and resiliency of the Internet, this includes the transfer of domain name registration information to the underlying domain registry operator and escrow provider, and publication of that information as required by ICANN in the public WHOIS database or with other third parties that demonstrate a legitimate legal interest to such information.

How you can delete your data.

If you make a request to delete your personal information and that data is necessary for the products or services you have purchased, the request will be honored only to the extent it is no longer necessary for any Services purchased or required for our legitimate business purposes or legal or contractual record keeping requirements.

***'Do Not Track'* notifications.**

Some browsers allow you to automatically notify websites you visit not to track you using a "Do Not Track" signal. There is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, we currently do not alter our practices when we receive a "Do Not Track" signal from a visitor's browser.

Age restrictions.

Our Services are available for purchase only for those over the age of 16. Our Services are not targeted to, intended to be consumed by or designed to entice individuals under the age of 16. If you know of or have reason to believe anyone under the age of 16 has provided us with any personal information, please contact us.

Non-Discrimination.

We will not discriminate against you for exercising any of your privacy rights. Unless permitted under applicable laws, 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 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.

Changes to this policy.

We reserve the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and any other places we deem appropriate, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If we make material changes to this Privacy Policy, we will notify you here, by email, or by means of a notice on our home page, at least thirty (30) days prior to the implementation of the changes.

Data Protection Authority.

If you are a resident of the European Economic Area (EEA) and believe we maintain your personal information subject to the General Data Protection Regulation (GDPR), you may direct questions or complaints to your local supervisory authority or our lead supervisory authority, the UK's Information Commissioner's Office, as noted below:

www.ico.org.uk

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom
Phone: 0303 123 1113

Contact us.

If you have any privacy-related questions, concerns or complaints about our Privacy Policy, our practices or our Services, you may contact us by email at privacy@4stardrivingschool.com.

We will respond to all requests, inquiries or concerns within thirty (30) days.