**PRIVACY POLICY**

Data Driven Retention Systems, LLC dba Retentrics (the “**Company**” or “**we**”) has developed this privacy policy out of respect for the privacy of visitors to our website (the “Website”). This policy describes the personal information we collect, use, and disclose about individuals who visit and/or interact with this Website.

Whenever you visit our Website, we will collect some information from you automatically when you visit and navigate through the site, and some voluntarily when you submit information using a form on the Website, enroll in or subscribe to our newsletter or marketing communications, request information, or use any of the other interactive portions of our Website. Through this Website, we will collect information that can identify you and/or your activity.

Additionally, whenever you communicate, interact, or do business with us online, apply for a position of employment or fill out any form on the Website (including an assessment form or survey), we will be collecting personal information from you or about you in the course of our interactions or dealings with you. We do not, however, collect from or about any Website visitor any sensitive personal information (also known as personally identifiable information) such as social security numbers, driver’s license numbers, financial account numbers, or medical information.

**Collection of Personal Information**

The Company collects the following categories of personal information about visitors to our Website:

* **Personal Identifiers & Contact Information**, including first name, last name, email address, phone number, and any personal information you provide to us through the “Contact Us” form on our Website.
* **Commercial Transactional Data**, including information regarding products or services provided, purchasing history, payment information and information collected for payment processing.
* **Employment Information**, when you provide your educational or employment information, including company/business/employer name, employer address, your manager’s name, your job title and information about time or tenure in past positions if submitting a resume or inquiries through forms on the Website.
* **Internet Network Activity**, including account usernames, passwords, the date and time of your visit to the Website; webpages visited; links clicked on the Website; browser ID; browser type; device ID; operating system; form information downloaded; domain name from which our site was accessed; search history; and cookies.
* **Mobile Device Data**, information collected when you navigate, access, or use any of our websites or applications via mobile device, including device type, software type.
* **Visual, Audio or Video Recordings**, your image when recorded or captured in surveillance camera footage or pictures of you taken on our premises or at our events or that you share with us; audio recordings of calls and virtual meetings as disclosed to you at the time of the call.
* **Geolocation Data**, including your IP Address.
* **Protected Classifications,** such asrace, ethnicity, national origin and gender.

**Retention of Personal Information**

In deciding how long to retain each category of Personal Information that we collect, we consider many criteria, including, but not limited to: the business purposes for which the Personal Information was collected; relevant federal, state and local recordkeeping laws; contractual requirements to retain customer data, applicable statute of limitations for claims to which the information may be relevant; legal preservation of evidence obligations and continuing need to use the data for other business purposes identified in the policy.

**Sources of Personal Information**

The Company collects Personal Information from individuals who visit or navigate through our Website, clients, inquiry forms, client assessments, payment processing through the shopping cart feature, the Company’s employees that consumers interact with, the Company’s contractors that consumers interact with, Company-issued computers electronic devices and or vehicles, Company systems, networks, software applications, and databases that individuals log into or use, including from vendors the Company engages to manage or host such systems, networks, applications, or databases.

**Business Purposes for Which We May Use Your Personal Information**

* To fulfill or meet the purpose for which you provided the information.
* To reduce employee turnover by generating anonymous comparative retention results for clients.
* To collate collected data from client assessments and anonymously compare those results with other dealerships within our database.
* To process and submit financing applications, including to apply for credit, or credit pre-qualification.
* To process, complete, and maintain records on transactions, including purchases and payments.
* To retain your selection for Text opt in/opt out to ensure clients who opted out are not sent any text messages.
* To schedule, manage and keep track of client appointments.
* To maintain records of when client decline a service or sale.
* To respond to consumer inquiries, including requests for information, client support online, or phone calls.
* To improve user experience on our Website.
* To understand the demographics of our Website visitors.
* To debug, identify, and repair errors that impair existing intended functionality of the Website.
* To contact you by email, telephone calls, mail, SMS, or other equivalent forms of communication regarding updates or informative communications related to the functionalities, services, or other information you requested or asked the Company to provide to you.
* To detect security incidents.
* To protect against malicious or illegal activity and prosecute those responsible.

**Disclosure of Your Personal Information**

The Company does not share your personal information with any third party, unless required to do so by law or government agency, for the purpose of defending or prosecuting legal claims, or with service providers/vendors (such as financial institutions, marketing support vendors, transaction processing vendors, and software database support vendors) that process, collect or store this information for the benefit of the Company and that are restricted from using or disclosing the information outside the scope of the services they provide to the Company.

**Sale of Personal Information**

We do NOT and will NOT sell your personal information in exchange for monetary or other valuable consideration, including the data of any minors.

**Protection of Your Personal Information**

We use reasonable and appropriate measures to safeguard the information you submitted to us through the Website or that we received about you through the Website, including:

* We keep automatically collected data and voluntarily collected data separate at all times.
* We use internal encryption on all data stores that house voluntarily captured data.
* We use commercially reasonable tools and techniques to protect against unauthorized access to our systems.
* We restrict access to private information to those who need such access in the course of their duties for us.

You agree by using this Website that you understand that no transmission of information over the internet can be guaranteed to be totally secure. If you do not want to transmit information to us—because we cannot and do not guarantee it will be 100% secure during its transmission—then you agree that you should not/will not submit personally identifiable information through the Website.

**Third Party Vendors**

We may use other companies and individuals to perform certain functions on our behalf. Examples include vendors administering e-mail services, running special promotions, processing payments, performing IT or cybersecurity services, and texting platforms, privacy vendors, and other consultants. We utilize [PainterPro](https://pointerpro.com/privacy/)’s assessment services and [NextFluent](https://www.nextfluent.com/privacy-policy/)’s backend tool services (privacy polices are linked). To help ensure the protection of your privacy, we recommend that you review the linked privacy policies.

Such parties only have access to the personal information needed to perform these functions and may not use or store the information for any other purpose. Subscribers or site visitors will never receive unsolicited e-mail messages from vendors working on our behalf. All third-party vendors will be required to sign nondisclosure agreements.

**Business Transfers**

In the event we sell or transfer a particular portion of our business assets, consumer information may be one of the business assets transferred as part of the transaction. If substantially all of our assets are acquired, consumer information may be transferred as part of the acquisition.

**Compliance with Law and Safety**

We may disclose specific personal information based on a good faith belief that such disclosure is necessary to comply with or conform to the law or that such disclosure is necessary to protect our employees or the public.

**Use of Cookies**

Cookies are small files that a Website may transfer to a user’s computer that reside there for either the duration of the browsing session (session cookies) or on a permanent, until deleted, basis (persistent cookies) that may be used to identify a user, a user’s machine, or a user’s behavior. We make use of cookies under the following circumstances and for the following reasons:

* Provide you with services available through the Website and to enable you to use some of its features
* Authenticate users and prevent fraudulent use of user accounts
* Identify if users have accepted the use of cookies on the Website
* Compile data about Website traffic and how users use the Website to offer a better Website experience
* Understand and save visitor preferences for future visits, such as remembering your login details or language preference, to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the Website

You may delete cookies from your web browser at any time or block cookies on your equipment, but this may affect the functioning of or even block the Website. You can prevent the saving of cookies (disable and delete them) by changing your browser settings accordingly at any time. It is possible that some functions will not be available on our Website when use of cookies is deactivated. Check the settings of your browser. Below you can find some guidance:

* [Safari](https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac)
* [Opera](https://help.opera.com/en/latest/web-preferences/#cookies)
* [Internet Explorer](https://support.microsoft.com/en-us/topic/how-to-delete-cookie-files-in-internet-explorer-bca9446f-d873-78de-77ba-d42645fa52fc)
* [Google Chrome](https://support.google.com/chrome/answer/95647?hl=en)
* [Mozilla](https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer#w_cookie-settings)

Do Not Track (DNT) is a privacy preference that users can set if they do not want web services to collect information about their online activity. We do not respond to DNT signals.

**Aggregated or Pseudonymized Data**

In an ongoing effort to better understand and serve the users of our Website, we conduct research on our Website visitors’ demographics, interests, and behavior based on the personal information provided to us. Such research may be compiled and analyzed on an aggregated or pseudonymized basis. This aggregated or pseudonymized information does not identify you. We may share aggregated or pseudonymized data with affiliates and partners for business or research purposes. We may also disclose aggregated or pseudonymized user statistics in order to describe our services to current and prospective business partners, and to third parties for other lawful purposes.

**External links**

Our Website contains links to other sites that may not or are not owned by, supervised by or maintained by our Company. We are not responsible for the privacy practices or the content of such websites. To help ensure the protection of your privacy, we strongly recommend that you review the privacy policy of any site you visit via a link from our Website.

**Passwords**

The personal data record created through your registration with our Website can only be accessed with the unique password associated with that record. To protect the integrity of the information contained in this record, you should not disclose or otherwise reveal your password to third parties.

**Children Under the Age of 18**

Our Website is not intended for children under 18 years of age. No one under age 18 may provide any personal information on the Website. We do not knowingly collect personal information from children under 18. **If you are under 18, do not use or provide any information on our Website**. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at privacy@retentrics.com.

**International Visitors**

We do not target, market to, or offer our products or services to consumers outside of the United States. You agree not to submit your personally identifiable information through the Website if you reside outside the United States.

**Consent to Terms and Conditions**

By using this Website, you consent to all terms and conditions expressed in this Privacy Policy.

**Changes to Our Privacy Policy**

As our services evolve and we perceive the need or desirability of using information collected in other ways, we may from time to time amend this Privacy Policy. We encourage you to check our Website frequently to see the current Privacy Policy in effect and any changes that may have been made to them. If we make material changes to this Privacy Policy, we will post the revised Privacy Policy and the revised effective date on this Website. Please check back here periodically or contact us at the address listed at the end of this Privacy Policy.

**Questions About the Policy**

The Website is owned and operated by Retentrics. If you have any questions about this Privacy Policy, please contact us at privacy@retentrics.com or call 833-378-7839.

***\*\*This policy was last updated June 12, 2023.***