

## SCHEDULE 3

### ADP Dealer Services UK Limited

#### Privacy Statement

ADP Dealer Services UK Limited and its affiliated companies (together trading under the name ADP Dealer Services International) ("We" or "Our") are committed to protecting and respecting your privacy.

We believe that privacy is important to the success and use of the Internet. This statement sets forth the Privacy Statement for ADP Dealer Services International and describes the practices that we will follow with respect to the privacy of users of this site. From time to time, we may change this Privacy Statement. For example, as we update and improve our service, new features may require modifications to the Privacy Statement. Accordingly, please check back periodically as your use of our website after the date that a change takes effect will be subject to this Privacy Statement as amended by that change. We will take your continued use as your acceptance of the changes so if a change is not acceptable to you, then you should stop using our website and our services.

This statement explains how we may collect and use personally identifiable information you provide to us [either directly or] through the use of our website, the iLearn service and HTML based emails. Your use of our website and our services (including the iLearn service) is subject to the terms of this Privacy Statement.

#### What is personally identifiable information?

"personally identifiable information" is information about you, such as name, address, e-mail address, user ID, credit card number, social security number, and so on.

#### Who we are

ADP Dealer Services International is made up of various legal entities trading in different countries. These entities are all ultimately controlled by the same ADP entity – Automatic Data Processing, Inc. When you provide information through our website, you will be providing it to ADP Dealer Services International as a whole and should be aware that it may be stored in and accessed from countries whose laws provide various levels of protection for personally identifiable information, not always equivalent to the level of protection that may be provided in your own country.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is ADP Dealer Services UK Limited, Herongate, Charnham Park, Hungerford, Berkshire, RG17 0YU, England.

If you have any questions about our privacy policies, want to exercise your right to see a copy of the information that we hold about you, or think that information we hold about you may need to be corrected, please send an email to [dsi\\_privacy@adp.com](mailto:dsi_privacy@adp.com).

#### How is information collected, used, and disclosed?

We may collect and process data from or about you provided through your use of our website, click through data on HTML based emails, our support services, the use of the iLearn service, when you make a purchase, enter into a contract with us, register with us, complete forms on our website, or correspond with us. When using our website and our services we may collect information about your computer, including where available your IP address, operating system, browser type and the data you access for system administration and to improve your experience. In common with most websites, our site uses cookies, (small data files which are downloaded to your computer) so that we can recognise that your computer has visited the site before, to improve your experience of the site, for example, by allowing the site to remember your bookmarks and language preference. You can if you wish set your Internet browser so that it will not automatically download cookies, this will not prevent you from using our site. The exact steps necessary to block cookies vary from browser to browser. They are generally explained in the "Help" section of the browser. You can find out more about the way cookies work and how to disable them at <http://www.cookiecentral.com>.

We use information held about you to help us to communicate with you in an efficient way, to enable us to comply with legal obligations under a contractual relationship with you, to notify you about changes to the services or products we offer or for other purposes where you have consented to such use.

We may disclose your personal information to any member of the ADP Group (i.e. the company's controlled directly or indirectly by Automatic Data Processing, Inc. by virtue of management control or voting rights). We may also share this data with our suppliers and trading partners in limited circumstances and to comply with a valid order of any court or regulatory body of competent jurisdiction. This includes exchanging information with other companies and organisations for the purposes of fraud

protection and credit risk reduction. In the event that we buy or sell any business or assets we may also disclose your personal information to the prospective sellers or buyers. We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ('EEA'). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, amongst other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personally identifiable information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Statement.

#### **How do we protect your information?**

We exercise great care to protect your personally identifiable information. This includes, among other things, using industry standard techniques such as firewalls, encryption, intrusion detection and site monitoring. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personally identifiable information, we cannot ensure or warrant the security of any information you transmit to us or receive from us. This is especially true for information you transmit to us via e-mail. We have no way of protecting that information until it reaches us. Once we receive your transmission, we make our best effort to ensure its security on our servers; any transmission is at your own risk.

Internally, we will restrict access to your personally identifiable information to employees who need access to the information in order to do their jobs. These employees are limited in number, and are committed to our privacy policies.

If you do not want us to use your data in any of the ways anticipated above [(including for marketing purposes)], please email us with your request at [dsi\\_privacy@adp.com](mailto:dsi_privacy@adp.com). You can also use this email address to comment on or complain about our privacy practices.

Our site may, from time to time, contain links to and from the websites of our trading partners and their affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility for or liability under these policies. Please check these policies before you submit any personal data to these websites.

#### **How can you correct, access, and update your information?**

You have the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you. If you find at any time that any of the information we hold about you is incorrect then you should notify us and we will correct the inaccuracy.

#### **Law**

This Privacy Statement is governed by and shall be construed in accordance with the laws of England and Wales.

**ADP Dealer Services UK Limited,**  
Herongate, Charnham Park, Hungerford, Berkshire, RG17 0YU  
March 30th, 2009.