



Effective Date: June 30, 2017

Privacy Policy

Hwyl Auto Club (a business of Premier Performance Group LLC; referred to herein as “Hwyl,” “we,” “us” or “our”), provides lifestyle performance car experiences for its members.

We take the security and confidentiality of the personal information that you provide to us a top priority, and we understand the trust that you give us when you provide information to us. This Privacy Policy applies when you visit any of our websites or mobile sites, and utilize any services we provide (collectively, the “Sites and Services”). Please read our Privacy Policy carefully.

Hwyl may update this Privacy Policy in the future. We will notify our members about material changes to this Privacy Policy by sending a notice to the email address you provide to us or by placing a notice on our website at www.hwylautoclub.com.

What Information Do We Collect from You?

We receive and store any information you enter on our Sites and Services or communicate with us in any other way. This may include information that identifies you (“personal information”), including your first and last name, telephone number, postal and email addresses, user name(s) and password(s), if applicable. We also may request information about your driving preferences. You can choose not to provide information, but doing so may have an adverse impact on your use of our Sites and Services. We also may require some personal information to answer your questions or conduct other transactions through our Sites and Services. When you contact us, we may monitor or record the communication or keep a record of it to help us train employees and provide customer service.

Information Automatically Collected When Using Our Sites and Services

We collect information about our vehicles that you drive, including telemetry, vehicle dynamics, geolocation information, mileage, and other similar information. We collect and use data regarding your driving performance for a variety of purposes as described herein.

Other Information Automatically Collected

Our hosted service will collect some information about your computer when you visit or otherwise interact with our Sites and Services. For example, it may collect session data, including your IP address, web browser software, and referring website. This automatic

information is used to help us understand the interests of our members and visitors and customize your user experience, among other things.

Cookies and Other Web Technologies

Cookies are small data text files that, if your web browser permits, can be stored on your computer's hard drive. Hwyl and its Sites and Services use cookies to help us:

- Recognize your web browser as a previous visitor and save and remember any preferences set while your web browser visited our Sites and Services. For example, if you register through our Sites and Services, we may use cookies to remember your registration information so you do not need to log into our Sites and Services each time you visit. We also may save your password in a cookie if you checked the box entitled "Save this password for automatic sign-in" (or similar phrase). Please note that we encrypt for security purposes customer IDs, passwords, and any other account-related data included in cookies.
- Customize the content, website experience, and advertisements provided to you through our Sites and Services and on other websites across the Internet. For example, when you access a web page, a cookie automatically recognizes your web browser as you navigate on the Internet and presents you with information and advertising based on your apparent interests.
- Measure and research the effectiveness of the features, offerings, advertisements, and email communications (by determining which emails you open and act upon) of our Sites and Services. The "Help" menu of the toolbar on most web browsers will provide information on how to prevent your web browser from accepting new cookies, have the web browser notify you when you receive a new cookie, or how to disable most cookies. However, if you follow any such instructions to disable cookies in your web browser, you may not be able to access some tools and features offered through our Sites and Services.

Information from Other Sources

We also may periodically obtain both personal and non-personal information about you from affiliated entities, business partners and third parties and add it to other information we have about you. For example, if you visit www.hwylautoclub.com by "clicking-through" from a website operated by one of our business partners, and you have registered with that partner, then the partner may share with us information about you that you have provided to that partner, such as your contact information and demographic information. If you access third party services, such as social media services, through our Sites and Services, we also may collect information such as your user name, password, and other information made available to us through those third party services. We also may obtain from credit reporting agencies credit information about you that helps us with customer authentication and credit-related decisions, and we may obtain additional information about you from outside companies that collect information, including demographic and interest data. We also may obtain contact information and other marketing lead information from third parties, which we may add to other information about you that we maintain.

Information About Others

If you have the opportunity to provide contact information for other people or businesses through our Sites and Services, you should obtain their consent before you provide their personal information to us.

How Do We Use Your Information?

We may use the information we collect about you for a variety of purposes, including, without limitation:

- (i) the registration and management of your account, including for billing purposes, the delivery and maintenance of products or services, assistance with service-related issues or questions, and the facilitation of your access to and use of our Sites and Services;
- (ii) communication with you, including to provide information about Hwyl and invitations from Hwyl, unless you otherwise opt out of receiving any such communications from us;
- (iii) responses to your questions and comments;
- (iv) the measurement of your interest in our products, and Sites and Services, as well as the improvement, management and protection of our products and Sites and Services;
- (v) notifications about special offers and products or services available from us or our partners that may interest you, unless you otherwise opt out of receiving any such notifications from us;
- (vi) the customization of your experience with Hwyl;
- (vii) the solicitation of information from you, including through surveys, unless you otherwise opt out of receiving any such communications from us;
- (viii) the resolution of disputes and troubleshooting of other problems;
- (ix) the prevention of potentially prohibited or illegal activities;
- (x) the enforcement of our Terms of Service; and
- (xi) as otherwise described to you at the point of collection.

You shall not give, lend or otherwise disclose any passwords or other similar user identifications to any unauthorized person, or permit any unauthorized person to use your account(s) or related passwords or user identifications. Any loss of control of passwords or other similar user identifications may result in the loss of control over your information. You will be responsible for any actions taken on your behalf or any person using your passwords or other similar user identifications. You must immediately change any passwords or other similar user identifications and notify us immediately if any passwords or other similar user identifications have been compromised or if you believe they may be compromised.

How Do We Share Your Information?

Hwyl may share your information with others as follows:

- We may offer products or services of our business partners. You can tell when a third party is involved in a product or service you have requested because their name will

appear either with ours or separately. If you choose to use these products or services, we may share information about you, including your personal information, with those business partners. We do not control the privacy practices of these third-party business partners, and our Privacy Policy does not cover the actions of these third parties or their information practices. Rather, the separate privacy policies of any such third parties will describe how they use your information.

- You can choose to access certain third party social media websites and services through our Sites and Services. When you do so, you share information with those third party websites, and their privacy policies will govern the information you share with them. Our Privacy Policy does not cover either these third parties or their information practices.
- We may use third party vendors to provide various services or functions on our behalf, including, without limitation, business analytics, customer service, marketing, distribution of surveys, and fraud prevention. We may also authorize third party vendors to collect information on our behalf to operate features of our Sites and Services or facilitate the delivery of online advertising tailored to your interests, among other reasons. Third party vendors have access to and may collect information only as needed to perform their functions and are not permitted to share or use the information for any other purpose.
- We use a third party to provide and manage credit card and payment processing. This third party payment processor is not permitted to store, retain, or use billing information, including your billing name, address and credit card number, except for the sole purpose of payment processing on our behalf. When your credit card payment is processed by our third party payment processor through our Sites and Services, you will be redirected to the payment processor's website, at which time the payment processor's privacy policy will apply, and this Privacy Policy will no longer apply. This Privacy Policy will only apply again if and when you are redirected back to our Sites and Services.

We Also May Share Your Information:

- Within our company (and its business units) and with our corporate affiliates, for operational purposes.
- In response to subpoenas, court orders, or other legal process; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. We reserve the right to raise or waive any legal objection or right available to us in any such cases.
- When we believe it is necessary to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of Hwyl, our members, or others; and in connection with our Terms of Service and other agreements, subject to applicable law.
- To obtain a credit report.
- To obtain a criminal background check.

- In connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the event of bankruptcy.

Except as described above, we will notify you when your personal information will be shared with third parties, and you will have an opportunity to choose not to have us share such information. We also may share aggregate or anonymous information with third parties, including advertisers and investors. For example, we may tell our advertisers the number of visitors our Sites and Services receive. This information does not contain any personal information and is used to develop content and services we hope you will find of interest.

How Can You Update and Revise Your Information?

We take reasonable steps to ensure that your information is relevant, accurate, and complete. Your use of our Sites and Services may permit you to update or revise your personal information through our Sites and Services or otherwise from time to time. If you remove certain information from your account(s), we only will retain those copies of such information as necessary for us to comply with governmental orders, resolve disputes, troubleshoot problems, enforce any agreement that you have entered into with us, and as we otherwise deem reasonably necessary.

What Choices Do You Have Regarding the Collection and Use of Your Information?

In addition to the other choices you may have as described elsewhere in this Privacy Policy, you may also

- Choose not to provide us with certain information that we do not automatically collect, although it may be needed to take advantage of certain services or features offered through our Sites and Services;
- Revise or update information as described above; and
- Unsubscribe from promotional messages through any email we send.

How Do We Protect Your Information?

We want you to feel confident about being a member of Hwyl, and we commit to protecting the information we collect, as described in this Privacy Policy. While no company or website can guarantee security, we have implemented administrative, technical, and physical security procedures intended to help protect the personal information you provide to us.

For example, we permit only authorized personnel to access personal information, and they only may do so for permitted business functions. However, we make no guarantee, representation or warranty that use of our Sites and Services is protected from all security threats, viruses, or other vulnerabilities or that your information always will be secure.

Do Not Track Requests

Unless your web browser settings are configured to make your online activities and publicly available information about your online activities (such as traffic data described in this Privacy Policy) invisible to usage analytics tools, we do not presently have the capability to omit you

from usage analytics to the extent your browser only sends us a “do not track” message and does not otherwise screen you from tracking without any action on our part.

Third parties other than our vendors, consultants and other service providers do not have authorization from us to track which websites you visited prior to and after visiting our Sites and Services. That said, we cannot control all third party tracking and there may be some third party tracking over time and across third party websites that occurs without our knowledge or consent.

California Privacy Rights

Pursuant to Section 1798.83–.84 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, what types of personal information, if any, the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information in the immediately preceding calendar year. To access this information, please contact us by emailing info@hwylautoclub.com with “CA Privacy Requests” in the subject line. Please note that, under the law, we are not required to respond to your request more than once in a calendar year, nor are we required to respond to any requests that are not sent to the above-designated email.

How Do We Protect Children’s Privacy?

The Sites and Services are intended for general audiences and are not intended for children. Should an individual whom we know to be a child under age 13 provide their personal information to us, we will delete or destroy such information as soon as reasonably possible.

Does Our Privacy Policy Apply to External Links?

If any part of our Sites and Services links you to other websites, those external websites do not operate under this Privacy Policy. We recommend that you examine the privacy statements posted on those other websites to understand their procedures for collecting, using, and disclosing personal information.

How Does Our Privacy Policy Apply If You Visit Our Sites and Services from Outside the United States?

If you visit our Sites and Services from outside the United States, your information may be transferred to, stored, and processed in the United States where our servers are located and where we operate our databases. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. However, Hwyl takes steps pursuant to laws in the United States to protect your privacy. By using our Sites and Services, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this Privacy Policy.

How Can You Contact Us With Questions?

If you have questions about this Privacy Policy or how we collect and use your information, please contact us at info@hwylautoclub.com.