

## **IDENTITY THEFT PREVENTION POLICY AND AGREEMENT**

The nature of our business is such that the Company collects confidential and proprietary information relating to customer's non-public financial information. Each employee should understand the importance of making sure this information is protected from disclosure to competitors, suppliers, vendors, and all other persons, and should also understand the importance of making sure that all customers who do business with our Company are the persons whom they represent themselves to be. That is, it is our obligation to identify, detect, prevent and/or mitigate possible identity theft.

For purposes of the Dealership's Identity Theft Prevention Program ("ITPP" or "Program") Program, and the Red Flags Rule, "identity theft" means a person commits or attempts to commit fraud using the identity (personal information) of another person without their authorization and this Program is intended to comply with the requirements of the Identity Theft Rules (16 C.F.R. part 681), issued by the Federal Trade Commission (FTC) in compliance with Sections 114 (Red Flags Rule) and 315 (Address Discrepancy Rule) of the Fair and Accurate Credit Transactions Act of 2003 (FACT Act), 15 U.S.C. 1681m(e) and 15 U.S.C.1681c(h).

Developing, communicating, maintaining and carrying out a comprehensive Program is the Dealership's policy. This Program is intended to identify potential Red Flags, detect the existence of those Red Flags, and to prevent and mitigate identity theft in connection with the opening and/or ongoing servicing (carrying the loan) a covered account.

This Program and the related policies and procedures should not be interpreted as contradicting and/or overriding any other applicable legal and regulatory requirements, either in whole or in part. This Program and its related policies and procedures set forth the Dealership's good faith efforts to comply with the law and to reduce possible identity theft. This Program does not represent guarantees, promises, representations, protections or contractual rights in favor of any person.

Every employee has a legal and ethical obligation to take all steps reasonably necessary to follow the Dealership's ITPP, including familiarizing oneself with the written ITPP Program, completing the required ITPP Program (Red Flags) training, and signing an agreement that the employee agrees to abide by the Dealership's ITPP Program and this Policy.

This obligation to protect the identity of our customers continues even after an employee leaves the Company.

Care should be taken to ensure that persons who are providing support to the Company (such as computerized data services, brokers, web hosting services, and other finance providers) abide by the requirements of the Dealership's ITPP Program.

### **EMPLOYEE AGREEMENT**

As an employee of the Company, the undersigned acknowledges that he or she has read, understands and agrees to abide by the requirements contained in the Dealership's ITPP Program, this Policy and all Red Flags related requirements. The undersigned further agrees he or she will complete the required Red Flags training

The undersigned acknowledges that violation of any part of this agreement, the Dealership's ITPP Program or the Red Flags requirements is grounds for discipline, up to and including immediate termination.

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Signature

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Date