

We self-certify compliance with



ATX GROUP, INC.

SAFE HARBOR POLICY

EFFECTIVE MARCH 1, 2010

At ATX Group, Inc. and our subsidiaries (“ATX”), we respect individuals’ concerns about privacy and consider the protection of Personal Information to be an essential part of relationships we maintain with employees, consumers and business customers (automobile manufacturers and affiliated dealerships). ATX has certified that it abides by the Safe Harbor privacy principles, as set forth by the United States Department of Commerce, regarding the collection, storage, transfer, use and other processing of Personal Information transferred from the European Economic Area (“EEA”) and Switzerland to the United States:

For purposes of this Policy, “Personal Information” means information that (i) is transferred from the EEA or Switzerland to ATX in the United States, (ii) is recorded in any form, (iii) is about, or relates to, an identified or identifiable consumer, customer or employee, and (iv) can be linked to that individual. This Policy outlines our general policy and practices for implementing the Safe Harbor privacy principles for online and offline Personal Information.

Safe Harbor Privacy Principles

ATX’s practices regarding the collection, storage, transfer, use and other processing of Personal Information comply with the Safe Harbor principles of notice, choice, onward transfer, access, security, data integrity, and enforcement and oversight.

Notice

We notify our consumers, customers and employees located in the EEA or Switzerland about the purposes for which we collect and use Personal Information, the types of third parties to which we disclose the information, the choices individuals have for limiting the use and disclosure of the information, and how to contact us about our practices concerning Personal Information. Consumers and customers may view our Privacy Policy at www.atxg.com/privacy. Employees can find additional information in either their employment contract or on ATX’s internal intranet, ATXinside.

Purpose of Collection and Use of Personal Information

ATX collects certain Personal Information about consumers and customers located in the EEA or Switzerland, such as name, email address, postal address, telephone number, credit card number and vehicle location at time of contact. We process Personal Information about consumers and customers (i) to facilitate the provision and customization of our services (ii) to respond to consumer and customer requests, (iii) to evaluate the quality of our products and services, (iv) to communicate with consumers and customers about our products, services and related issues, (v) for internal administrative and account management analytics purposes, and (vi) to comply with our legal obligations, policies and procedures.

ATX collects certain Personal Information about employees, such as name, national identification number, mailing address, telephone numbers, gender, birth date, marital status, names and birth dates of dependents. In addition, ATX may maintain information about employees relating to employment with the company, such as employee identification number, business unit, division and department where the individual is employed, physical work location, job description, compensation, hire and termination dates, performance reviews, training records, educational background, language proficiency and certifications and licenses. We process Personal Information about employees (i) for various administrative and record keeping purposes and (ii) to comply with legal and contractual obligations, policies and procedures, including payment of taxes and financing of employee wages and benefits. We process sensitive information about our employees to the extent necessary or appropriate for compliance with relevant legal or contractual obligations, including managing attendance and employee records.

Except as specified below, consumers, customers and employees located in the EEA or Switzerland may direct us not to disclose their Personal Information to third parties (other than our service providers). We do not use Personal Information for purposes incompatible with the purposes for which we originally collected the information without notifying the relevant individuals of such uses and offering an opportunity to opt out.

Onward Transfer of Personal Information

We may share Personal Information with service providers we have retained to perform services on our behalf. We require service providers to whom we disclose Personal Information and who are not subject to laws based on the European Union Data Protection Directive to either (i) subscribe to the Safe Harbor principles or (ii) contractually agree to provide at least the same level of protection for personal information as is required by the relevant Safe Harbor principles.

In addition, we may disclose Personal Information without offering individuals an opportunity to opt out (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government officials based on an enforceable government request or as may be required under applicable law, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity.

Access to Personal Information

ATX provides consumers, customers and employees located in the EEA or Switzerland with reasonable access to the Personal Information maintained about them. We also provide a reasonable

opportunity to correct, amend or delete that information where it is inaccurate. We may limit or deny access to Personal Information where providing such access is unreasonably burdensome or expensive under the circumstances, or as otherwise permitted by the Safe Harbor principles. To obtain access to Personal Information, individuals may contact ATX as specified in the “How to Contact Us” section of this Policy.

Security

ATX maintains reasonable administrative, technical and physical safeguards to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

Data Integrity

ATX takes reasonable steps to ensure that the Personal Data the company processes are (i) relevant for the purposes for which they are to be used, (ii) reliable for their intended use, and (iii) accurate, complete and current. ATX depends on consumer, customers and employees to update and correct Personal Data to the extent necessary for the purposes for which the information has been collected or subsequently authorized by the individuals. Individuals may contact ATX as indicated in the “How to Contact Us” section below to request that ATX update or correct their Personal Data.

Enforcement and Oversight

ATX has established procedures for periodically verifying implementation of and compliance with the Safe Harbor principles. We conduct an annual self-assessment of our practices with respect to Personal Information to verify that representations we make about our Personal Information privacy practices are true and that related privacy policies have been implemented as represented.

Consumers, customers and employees may file a complaint with ATX in connection with the company’s processing of their Personal Information under the Safe Harbor principles. Consumers, customers and employees may direct their complaints regarding Safe Harbor compliance to our Privacy Office, as specified below.

If the complaint cannot be resolved through our internal process, we will cooperate with local European Data Protection Authorities. We will take steps to remedy any problems arising out of a failure to comply with the Safe Harbor principles.

How to Contact Us

Consumers and customers may address any questions or concerns regarding our Safe Harbor Privacy Policy or our practices concerning Personal Information by contacting us through our Web site at www.atxg.com, or by e-mail via privacyofficer@atxg.com or by writing to:

ATX Group, Inc.
Attention: Privacy Officer
8550 Freeport Parkway
Irving, TX 75063
USA

Employees should direct their inquiries to privacyofficer@atxg.com

ATX EUROPEAN EMPLOYEE SAFE HARBOR PRIVACY NOTICE

You may request a copy of the company's Safe Harbor notice pertaining to the personal information of ATX workforce members by sending an e-mail to ATX Human Resources at hr@atxg.com or to the ATX Privacy Officer at privacyofficer@atxg.com.