



FIAT CHRYSLER AUTOMOBILES

Privacy Statement

***Personal Information Protection –
Code of Conduct***

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Introduction

FCA Canada Inc. (FCA Canada) is a subsidiary of FCA US LLC, a member of the Fiat Chrysler Automobiles N.V. (FCA) family of companies. When the term FCA Canada is used in this policy, it means FCA Canada Inc.

Your privacy is extremely important to us. We are committed to meeting or exceeding the privacy standards established by applicable legislation.

To protect your privacy and safeguard your Personal Information, we have adopted this Privacy Statement. This Privacy Statement applies to Personal Information about customers and other individuals dealing with us directly or indirectly, but not to Personal Information about our own employees.

Our FCA Canada Privacy Officer ensures that we fulfill our obligations under this Privacy Statement, the federal Personal Information Protection and Electronic Documents Act (also known as “PIPEDA”), the Civil Code of Québec and Québec’s Act respecting the protection of Personal Information in the private sector, the Personal Information Protection Act (British Columbia) and the Personal Information Protection Act (Alberta), and any other applicable federal or provincial privacy legislation.

FCA Canada takes privacy very seriously. Simply stated, we will not distribute information about you, such as your name, mailing address, phone number and other Personal Information, to anyone other than related third parties. These are companies that are part of the FCA family of companies, FCA Canada dealers, and businesses which perform services for FCA Canada or its dealers.

FCA Canada reserves the right to alter this Privacy Statement from time to time.

Definitions

The following definitions apply in this Privacy Statement:

Personal Information – information about an identifiable individual (or, in Québec, information which relates to a natural person and allows that person to be identified). This generally excludes business contact information.

Collection – FCA Canada’s gathering, acquiring or obtaining your Personal Information in any form, by any means and from any source, including from third parties.

Use – what FCA Canada and its service providers and agents (and, in Québec, mandataries; we will call all of these “service providers”) do to or with your Personal Information for FCA Canada’s own purposes.

Disclosure – communicating Personal Information to an organization outside FCA Canada for that other organization’s purposes; this does not include communication to service providers.

Consent – agreement to our collection, use or disclosure of your Personal Information. This can be express, when you affirm your agreement in some way; “opt-out”, when you are given an opportunity to withhold consent and do not do so; or implied, when it is obvious from the nature of the transaction that your agreement “goes without saying.”

Principle One

Accountability

We have appointed a Privacy Officer who is accountable for our compliance with this Privacy Statement and applicable privacy laws, and in particular is responsible for:

- ◆ Implementing procedures to protect your Personal Information
- ◆ Establishing procedures to receive and respond to complaints and inquiries
- ◆ Training staff and communicating to staff information about our Privacy Statement and privacy practices
- ◆ Developing information to explain our procedures
- ◆ Monitoring developments in privacy and security on a continuing basis

We are responsible for all of your Personal Information under our control. Our employees have access to your Personal Information only on a need-to-know basis.

If we share your Personal Information with a service provider, we ensure that a comparable level of protection is in place. We require the service provider to comply with a number of provisions, such as not using your Personal Information for any purpose other than the purpose for which FCA Canada has provided it, not disclosing it to anyone else without our instructions, returning or destroying it on completion of the services, and advising FCA Canada immediately of any concerns or objections expressed by individuals.

In that connection, because a number of the service providers we use are located in the United States or elsewhere, your Personal Information may be processed and stored in that country, and United States governments, courts or law enforcement or regulatory agencies may be able to obtain disclosure of your Personal Information under the laws of the United States (including the USA PATRIOT Act).

Principle Two

Identifying Purposes For Collecting Your Personal Information

At or before the time we collect your Personal Information, we identify the purposes for which we are doing so. These include:

- ◆ Assisting customers with their purchase and maintenance of motor vehicles and accessories, including customizing, warranty programs and obtaining financing
- ◆ Identifying and communicating with individuals interested in receiving information about FCA Canada products and services and other marketing purposes
- ◆ Complying with governmental regulations, including requirements regarding recall notices and/or leasing contracts
- ◆ Participating in customer loyalty programs
- ◆ Training our staff
- ◆ Operating our website(s)
- ◆ Developing principles and solutions for the design of our products

If we want to use or disclose your Personal Information for a new purpose, we will obtain any necessary consent to do so.

Principle Three

Consent

We obtain consent before collecting, using or disclosing your Personal Information, except where the applicable privacy laws provide that consent is not required.

We will not require you, as a condition of buying or owning a vehicle or receiving any other products or services from FCA Canada, to consent to the collection or use of Personal Information beyond what is required for that purpose. We may, however, from time to time ask for additional information; you are in no way obligated to provide it.

The form of consent required depends on the sensitivity of the information that is being collected and on what is reasonable in the circumstances.

You can withdraw your consent at any time subject to certain legal restrictions. We will inform you of the implications of such withdrawal.

Principle Four

Limiting Collection

We will collect your Personal Information only by fair and lawful means, and we will collect only the information necessary to fulfill the identified purpose or purposes.

Principle Five

Limiting use, Disclosure And Retention of your Personal Information

We will not use or disclose your Personal Information for purposes other than those for which it was collected, except with your consent or as required or authorized by law.

When we no longer need your Personal Information, we will destroy, erase, or anonymize it.

We give access to your Personal Information only to those employees and service providers who have a “need to know” it.

If we are selling all or part of our business to a new owner, all or part of your Personal Information associated with our business (or that part) may be disclosed to the buyer, but only under a confidentiality agreement and in accordance with applicable laws.

Principle Six

Accuracy

We ensure that your Personal Information is as accurate, complete and up-to-date as necessary for the purposes for which it is to be used. You can assist us in ensuring the accuracy of your Personal Information by promptly advising us of any changes.

Principle Seven

Safeguards

The security of your Personal Information is important to us. We take reasonable steps to protect your Personal Information against loss or theft, unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction, and similar risks.

We take care when we dispose of or destroy your Personal Information, to prevent unauthorized parties from gaining access.

Principle Eight

Openness

We are open about our policies and practices with respect to our management of your Personal Information.

You may ask about our privacy practices by contacting the FCA Canada Privacy Officer at privacyofficer.ca@fcagroup.com or 1-877-639-8629.

Principle Nine

Individual Access

Upon your written request and subject to applicable laws, we will tell you if we have Personal Information about you, and what use and disclosure we make of it, and will give you access to it. Your request should be made to our Privacy Officer.

Before complying with your request, we will verify your identity. We will respond within 30 days at no cost to you.

Applicable privacy laws may contain limitations which require or permit us to deny or limit the access we give you to your Personal Information.

If you demonstrate that the Personal Information we have about you is inaccurate or incomplete, we will correct, delete or add to it as required. If appropriate, we will transmit the amended information to third parties that have access to the information.

Principle Ten

Challenging Compliance

You can address a challenge concerning our management of your Personal Information to our Privacy Officer.

If you make such an inquiry or complaint, we will tell you about those procedures.

We investigate all complaints, and if a complaint is justified we take appropriate measures, which may include amending our policies and practices.

For More Information

Contact the FCA Canada Inc. Privacy Officer at:

privacyofficer.ca@fcagroup.com

or call:

1-877-639-8629

or visit our website at:

www.fcacanada.ca/privacy