

Wallingford GMC Privacy Policy

Updated 8/18/2025

We respect your privacy. This policy explains what we collect, how we use it (including how we use AI), how we share it, and the choices and rights you have—especially under the Connecticut Data Privacy Act (CTDPA).

If you need this policy in an accessible format or another language, email contact@wallingfordgmc.com and tell us what you need. We'll accommodate reasonable requests.

1) Scope

This policy applies to personal data we process when you interact with us online (our websites/apps, forms, chat), in-store (showroom, service/parts), and via phone, email, and SMS/MMS. We primarily serve Connecticut and New England. Some activities (financing/lease applications) are covered by separate financial privacy (GLBA) notices (see §12).

We do not knowingly collect or target children under 13.

2) Key Definitions (CTDPA)

- Personal data: information linked or reasonably linkable to an identified or identifiable individual (excludes de-identified and publicly available information).
- Sale: exchange of personal data for monetary or other valuable consideration.
- Targeted advertising: ads selected based on personal data obtained from your activities across non-affiliated sites/apps to predict preferences.
- Profiling: automated processing to evaluate personal aspects (e.g., interests, economic situation), especially when used for decisions with legal or similarly significant effects.
- Sensitive data: precise geolocation, certain ID data, etc.

3) What We Collect

Identifiers & Contact

Name, postal address, email, phone number(s), IP address, cookie/ad IDs, device IDs

Customer & Vehicle Records

VIN, license plate, test-drive and appointment info, service history, warranty/recall info, trade-in details, photos related to service/condition (when provided).

Commercial Information

Vehicles viewed/saved, quotes and deal worksheets, purchase/lease and parts/service transactions, incentives redeemed.

Internet/Technical Data

Pages viewed, links clicked, time on page, referrers, approximate location from IP, browser/OS; SDKs and pixels (see §7).

Geolocation

Precise location only if you enable it in your browser/app; otherwise we collect coarse location from IP.

Communications

Email and SMS content/metadata; chat transcripts; call recordings or transcripts (where permitted by law).

Inferences for Personalization/Marketing

Vehicle interest segments (e.g., trucks vs. SUVs), timing signals (e.g., approaching service interval), engagement cohorts.

Financing/Lease Prequalification

Information you provide in credit/lease applications (processed under GLBA; see §12).

We do not intentionally collect sensitive characteristics (e.g., race, religion). If you disclose health or accommodation information (e.g., mobility needs), we use it only to honor your request.

4) Sources

- You (forms, calls, chats, emails/SMS, in-store).
- Your devices (cookies, pixels, SDKs, analytics).
- Service providers (hosting, CRM, analytics, communications, payment).
- OEMs and program partners (warranty/recall, program reporting).
- Advertising platforms (limited, pseudonymous engagement signals; see §7).

5) How We Use Your Data (Purposes)

- Provide services: quotes, orders, appointments, service/parts, warranty/recall, roadside assistance.
- Customer care & safety: respond to inquiries, fraud prevention, security, incident response.
- Marketing & measurement: emails/SMS/phone, campaign performance, frequency capping, targeted advertising (opt-out available; see §9).
- Personalization: show relevant vehicles, offers, and content on our site.
- Compliance & recordkeeping: tax, accounting, audits, legal requests.
- AI-assisted interactions & marketing: see §6.

We minimize collection and keep data only as long as needed (see §11).

6) How We Use AI (Specifics & Safeguards)

We use AI/ML tools to improve speed, quality, and relevance. Examples:

Customer Interactions

- Drafting replies in chat/email/SMS; summarizing calls to capture next steps.
- Classifying inquiries (e.g., “oil change” or “Sierra tow rating”) to route to the right person.
- Appointment triage; suggested FAQs. A human can review/correct at any time.

Marketing & Content

- Generating/optimizing ad copy, headlines, and email variants; A/B testing.
- Building audience segments using first-party site behavior (e.g., pages viewed) and platform tools for reach, frequency capping, and measurement.
- Suppression of existing customers from prospecting; fatigue controls to avoid over-messaging.

Guardrails

- AI vendors act as service providers/processors under contract; they may not use our data to train public models.
- We do not use AI to make solely automated credit, pricing, or decisions that produce legal/similarly significant effects about you.
- For profiling used in marketing, you can opt out (see §9).
- We favor de-identified/aggregated data when training internal models and apply access controls and quality checks.

If an AI-assisted interaction seems off, email contact@wallingfordgmc.com and request human review.

7) Cookies, Pixels & Consent (Banner “Behavior B”)

At first visit (and whenever preferences change), our banner presents Accept All, Reject All, and Manage Preferences with no dark patterns. Until you consent, only strictly necessary cookies load.

Categories you can control

- Functional (remembering choices, improving experience)
- Analytics (e.g., Google Analytics)
- Advertising (e.g., Google Ads, Meta Pixel) for measurement and targeted ads

You can revisit Cookie Settings anytime via the footer. Preference records typically refresh every ~12 months (or earlier where required).

8) Sharing & Disclosure

We do not sell personal data to data brokers. We do disclose limited data for ads/analytics which may be considered a “sale” or targeted advertising under CTDPA; you can opt out (see §9).

We share with:

- Service providers (hosting, security, IT, analytics, communications, payment, printing/mailing, AI tools) under contracts limiting use to our instructions.
- OEMs/program partners (warranty, recall, program reporting).

- Lenders/lessors/insurers you ask us to engage for financing/lease/insurance quotes (see §12).
- Authorities/third parties when required by law, safety, fraud prevention, or in corporate transactions.

Named examples (not exhaustive): Google Ads/Analytics; Meta (Facebook/Instagram) Ads/Pixel.

We do not send full driver's-license numbers, full SSNs, or complete payment-card data to ad platforms.

9) Your Choices

Targeted Advertising & Profiling for Ads (CTDPA)

- Use “Your Privacy Choices” (in the footer) or Cookie Settings to opt out of targeted advertising/profiling for ads.
- We honor Global Privacy Control (GPC) and other recognized universal opt-out signals for Connecticut residents.
- If you’re signed in to platform accounts (e.g., Google/Meta), also review those platforms’ ad settings.

Email & SMS Marketing

- Email: Click Unsubscribe or reply STOP—we honor either and process promptly as required by law.
- SMS: Reply STOP to end promotional texts from our number(s). We may send one confirmation message.

Location

- Disable precise location in your browser/device settings; we will rely only on coarse IP-based location.

Cookies

- Manage via Cookie Settings; rejecting non-essential categories will disable analytics/ads cookies.

10) Your Privacy Rights (CT Focus)

Connecticut residents may access, correct, delete, and obtain a portable copy of personal data, and may opt out of sale, targeted advertising, and profiling in furtherance of decisions with legal or similarly significant effects.

How to Exercise

Email contact@wallingfordgmc.com with the subject “Privacy Request – CT” and describe your request. We will:

- Verify your identity using information we already have (and limited additional info if needed),
- Respond within the statutory timeframe (with one permitted extension if needed), and
- Provide an appeal path if we decline a request. To appeal, reply “Appeal” to our decision email; if denied, we’ll explain how to contact the Connecticut Attorney General.

You may authorize an agent to act for you; we may require proof of authorization and identity.

Sensitive Data & Teens

Where required, we obtain opt-in consent for sensitive data uses. For individuals 13–15 in CT, we do not process personal data for sale or targeted advertising without opt-in consent.

11) Retention

We keep personal data only as long as needed for the purposes above or as required by law, then delete or de-identify it.

Typical periods (subject to legal/operational needs):

- Website analytics logs: up to 13 months (aggregate thereafter)
- Ad identifiers/segments: up to 13 months after last interaction (sooner if you opt out)
- Lead/appointment records: 24 months after last activity
- Sales/service records: generally 7 years
- Call recordings/transcripts: 18 months unless needed for safety/legal/QA
- Financing/lease records: generally 7 years (see §12)

12) Financing, Leasing, and GLBA

If you apply for or obtain financing/lease through us, your nonpublic personal information is subject to the Gramm-Leach-Bliley Act (GLBA) and the FTC Safeguards Rule. You'll receive a separate GLBA privacy notice and required credit/lease disclosures (electronically with your consent or on paper at your option). We transmit your application only to lenders/lessors you authorize and keep related records as required by law.

13) Security

We use administrative, technical, and physical safeguards appropriate to the sensitivity of the data: access controls, encryption in transit where practical, network monitoring, staff training, vendor due diligence, and incident response. No method is 100% secure; if the law requires, we will notify you of certain security incidents.

14) Non-Discrimination

We will not discriminate (e.g., deny goods/services, charge different prices, provide different quality) because you exercise privacy rights, except where differences are reasonably related to your privacy choices and permitted by law.

15) International Audience

We primarily target U.S. customers. If you access our sites from outside the U.S., you understand your data may be processed in the U.S., where laws may differ from those in your country.

16) Changes to This Policy

We may update this policy from time to time. We will post changes with a new Effective Date and, where required, seek consent for material changes.

17) How to Contact Us

Questions, requests, or accessibility needs: contact@wallingfordgmc.com

Postal mail: Wallingford GMC, 1122 Old North Colony Road, Wallingford, CT 06492

Implementation notes (keep internally)

- Footer links: Privacy Policy | Your Privacy Choices | Cookie Settings | Accessibility & Alternative Formats.

- CMP configured to Behavior B: Default “necessary only”; equal Accept All/Reject All/Manage; block non-essential tags until consent; log consent; honor GPC.
- SMS/email systems must accept STOP/Unsubscribe (any reasonable revocation) and suppress within required timeframes.
- Maintain vendor list (e.g., Google Ads/Analytics, Meta Ads/Pixel) and update this policy as the stack changes.
- Keep GLBA notice templates and Safeguards documentation current.

If you want, I can also give you the “Your Privacy Choices” modal/page copy and Cookie Settings category descriptions to drop straight into your CMP so this policy matches your on-site controls.