

GENERAL MOTORS COMPANY U.S. CONNECTED SERVICES PRIVACY STATEMENT

Last Updated: May 2022

The General Motors Family of Companies (including General Motors Company, OnStar, LLC ("OnStar"), and affiliates) (collectively, "GM" or "we") provides this U.S. Connected Services Privacy Statement ("Privacy Statement") to address the personal information we collect and how we use and share that information when you use connected services made available by GM in connection with GM vehicles, products, services, programs, websites, infotainment systems, social media sites, and mobile applications (products and services). This Privacy Statement applies to the products and services offered by GM, but excludes products and services with separate privacy statements that do not incorporate this Privacy Statement. For example, General Motors Financial Company, Inc. maintains its own privacy statement.

Key points about our information practices:

Collection	We may collect information about you and your accounts with us, such as your name and address. And when you use our connected vehicle products and services, we may collect information about your vehicle, including diagnostics, use, and vehicle location. We may also collect various types of information about you from dealers and others who provide information to us. See below to learn more.
Use	We may use your information to improve the quality, safety, and security of our products and services, to develop new products and services, and for marketing. See below to learn more.
Sharing	We may share your information to provide you with products and services, to improve the quality, safety, and security of products and services, to comply with applicable law, to respond to your requests, to allow recipients to use it for marketing, and other purposes subject to your consent where required. See below to learn more.
Choices	You have choices regarding how we use and share your information for marketing and other purposes. See below to learn more.
Your Obligations	Given the nature of our products and services, there may be times when someone other than you is using one of the products and services we provide to you (<i>for example, you let someone else drive your vehicle</i>). We rely on you to inform such person about this Privacy Statement and the privacy choices you have made.
Cookies and Tracking	We may use cookies and similar technologies to help provide our products and services, understand and customize your preferences, and display relevant advertising to you. See below to learn more.
Third Party Products and Services	In connection with our products and services, you may be offered the opportunity to use third party products and services that are not owned or controlled by GM and are governed by separate user terms and privacy statements. See below to learn more.
Access and Update	You may access your online accounts to update your information or you may contact us to learn about how to do so. See below to learn more.

Security measures	We maintain reasonable and adequate security controls to protect your information and require our service providers by contract to do the same. See below to learn more.
Retention	We keep information for as long as necessary to provide our products and services, operate our business, and comply with legal obligations. See below to learn more.
Children's privacy	We do not target or knowingly collect any information from children under the age of 13. See below to learn more.
International Data Transfers	We maintain appropriate protections for cross-border transfers as required by law. See below to learn more.
Changes	We will notify you of any material changes by posting the updated version of this Privacy Statement and taking other steps as needed. See below to learn more.
Contact Us	Please contact us by mail, email, or phone with any questions. See below to learn more.

INFORMATION WE MAY COLLECT

We may collect the following information when you use our connected products or services, and otherwise with your consent. We may also collect your information from GM dealers, licensees, partners, service providers, and independent third party sources. The types of information that we may collect include:

- **Information about you and your accounts with us:** such as your name, postal address, telephone number, date of birth, e-mail address, screen name, account ID, customer number, login information, demographic data or protected classification information, gender, password, PIN, emergency contact information, information about the acquisition and financing of your vehicle, like whether or not you have financed or leased your vehicle, the lease/financing term, and billing information, like your credit card number, CVV code and expiration date. We may also collect information related to My Rewards and the My GM Rewards Card Program ("GM Card") including rewards points, account type, tier status, enrollment, and redemption. In limited circumstances, we may collect a Social Security Number, for example if you win a sweepstakes or receive compensation that must be reported for government tax purposes
- **Information about your vehicle:** such as license plate number, vehicle identification number (VIN), mileage, oil/battery status, fuel or charging history, electrical system function, gear status, and diagnostic trouble codes.
- **Information about the use of your vehicle, including operational and safety related information:** such as GPS location, speed, air bag deployments, crash avoidance alerts, impact data, safety system status, braking and swerving/cornering events, event data recorder (EDR) data, seat belt settings, vehicle direction (heading), audio or video information such as information collected from camera images and sensor data, voice command information, stability control or anti-lock events, security/theft alerts, and infotainment (including radio and rear-seat infotainment) system and WiFi data usage.

- **Information about your devices and how you interact with our products and services, including apps and websites:** such as IP address, browser type, unique device identifier, cookie data, associated identifying and usage information from your mobile phone, laptop, or other device.

HOW WE MAY USE YOUR INFORMATION

We may use your information in order to:

- provide our products, programs, and services
- improve the quality, safety, and security of our products and services
- develop new products and services, including autonomous vehicle and car-sharing products and services
- maintain customer relationships and communicate with you
- administer your account(s) and process your payments for products and services
- operate our websites and applications, including online registration processes
- provide customer and vehicle support and service (*for example, recall information, servicing and maintenance or warranty service*)
- for warranty administration and validation
- provide product and service updates
- evaluate the quality, safety, and security of our products and services
- collect outstanding debts for products and services
- for research, evaluation of use, and troubleshooting purposes
- protect the safety of you or others
- verify eligibility for vehicle purchase and incentive programs
- verify eligibility for GM Card and provide GM Card account management services
- perform marketing, including interest based marketing and advertising across your devices (with necessary consents)
- administer your participation in contests, quizzes, surveys, promotions and offers
- customize and improve communication content and your experience with GM and
- comply with legal, regulatory or contractual requirements

Where required, we will anonymize your information in a way that it can't reasonably be associated with you or your vehicle. We may use anonymized information or share it with third parties for any legitimate business purpose.

Communications with you in connection with these uses may be via mail, telephone, e-mail, text message and other electronic messages, through the in-vehicle infotainment or OnStar system or via our websites and applications. Subject to the GM Consolidated SMS Policy ("Texting Policy"), which can be found at gm.com/texting-policy.html, GM and those acting on behalf of GM may send you text messages using an automated telephone dialing system to the mobile number you have provided. Message and data rates may apply. See "Choices" below to learn more about how you can manage your communication preferences.

HOW WE MAY SHARE YOUR INFORMATION

We may share your information as follows for the uses described below (and where required we will obtain additional consent or anonymize the information):

GM Family of Companies: Within the GM family of companies (*for example, including OnStar*) for the above uses.

Emergency Service Providers: With emergency service providers, such as law enforcement, roadside assistance providers, and ambulance providers, in order to deliver related services (*for example, Stolen Vehicle Assistance Services*).

Business Partners and Independent Third Parties: With business partners, such as SiriusXM, in connection with their products and services; research institutes, for research and development purposes (*for example, improving highway safety*); or dealers, fleet, or rental companies, for service maintenance of your vehicle. We may also share data with third parties for marketing activities (with necessary consents) or where you have elected to receive a service from them and/or authorized them to request data from GM (*for example, financial organizations who offer financing for the purchase or lease of GM vehicles or usage based insurance providers*).

Service Providers: With our product and service providers who work on our behalf in connection with the uses described in the preceding section, such as dealer managed service providers, wireless service providers (e.g. AT&T), companies that administer our contests and promotions, host and/or operate our websites, send communications, perform data analytics, process, store, or manage credit card, information (we will not otherwise share your credit card information).

Where Required or Permitted by Law: As required or permitted by law, such as in conjunction with a subpoena, government inquiry, litigation, dispute resolution, or similar legal process, when we believe in good faith that disclosure is necessary to protect our rights, your safety, or the safety of others, to detect, investigate and prevent fraud, or to conduct screening to ensure you are not on any government list of restricted parties.

Business Transfers: With a prospective or completed sale, transfer, or financing of a part of a GM business or its assets.

YOUR CHOICES

You have certain choices regarding how we use and share your information, such as for marketing and related purposes. Please visit our Consumer Preference System website at www.gmcontactpreferences.com or contact us to make choices about telephone, email, text message and other communications. See "How To Contact Us" below. To manage text message programs, see our texting policy at gm.com/texting-policy.html.

If you choose to exercise your choices regarding certain marketing communications, your information may still be used for the other purposes described in this Privacy Statement (*for example, vehicle support and service*), including marketing communications where you have not exercised your choices, or communications we are required or permitted by law to send to you (*for example, certain types of transactional or account-related messages*).

In addition, some collection and sharing practices are tied to the products and services we offer. To stop the collection or sharing of some information, you may choose to decline those products and services or you may choose to accept limited functionality.

YOUR OBLIGATIONS

The nature of our products and services means that there may be circumstances where you might let someone else use a product or service that we provide to you (*for example, you enrolled your vehicle in OnStar services and then let someone else drive the vehicle*). It is important that if you do let someone else use one of our products or services that you inform them of this Privacy Statement and of the privacy choices that you have made.

If you sell or otherwise transfer your vehicle, it is your responsibility to delete all information (such as contacts, address look-ups, saved map addresses, or preferences) from the vehicle and contact us to transfer or cancel your account. If you do not delete this information, it may remain in the vehicle and may be accessible to future users of the vehicle. For instructions on how to delete information from your vehicle, please refer to your vehicle owner's manual.

COOKIES AND OTHER ONLINE TRACKING TECHNOLOGIES

GM products and services use cookies, web beacons, pixels and other device tracking technologies that allow us to identify you on your devices in a unique manner, such as through IP address or VIN ("cookies"), to gather information about your activity, such as demographic data, browser type, pages visited, activities conducted on the page, and the day and time of your visit. We use cookies, sometimes across devices, to measure your activity, remember your preferences, maximize and improve the performance of our website and products and services, and customize your experience (*for example, maintaining your account login or contact information, helping you locate a nearby dealer, autofilling fields on forms*).

We may also combine this information with other information collected online or offline about you, including information provided by third party sources, and it may be used or shared for the purposes described in this Privacy Statement. We may also allow third party advertising and personalization partners to use cookies on our website in order to develop personalized content and appropriate advertising based on your visits over time on GM websites and applications and non-GM websites and applications. This information may also be used to evaluate our online advertising campaigns or to tailor promotions and other marketing messages to you.

GM adheres to the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising. To learn more about behavioral advertising please visit www.AboutAds.info. If you do not wish to receive personalized advertising or content from us, please visit the [Digital Advertising Alliance's Opt-Out page](#) or click on the AdChoices icon located at the bottom of the website page (for GM websites) or on GM advertisement (for non-GM websites). Even if you opt-out of behavioral advertising from us, you will still receive advertising, but the advertisements will not be personalized to your interests.

Similarly, we may also place cookies in our emails to measure the effectiveness of our email campaigns by identifying the individuals who open or act upon an email message, when an email message is opened, how many times an email message is forwarded, the type of software, device, operating system and browser used to deliver the email and any URL accessed through our email message.

Please also refer to your browser Help instructions to learn more about cookies and other technologies and how to manage their use. If you elect to refuse or delete cookies, you will need to repeat this process if you use another computer, or change browsers. If you choose to decline cookies, some of the functionality of a website may be impaired. Please contact us with further questions about how to opt-out of cookies and other technologies.

California Do-Not-Track. At this time, we do not honor website browsers' "do not track" signals. However, you may refuse or delete cookies, and otherwise express your choices on marketing issues as described above.

THIRD PARTY SERVICES, APPLICATIONS AND WEBSITES

Certain third party services or applications (*for example, your carrier data plan, navigation services*) you download, that are pre-installed, or which you may sign up for may have separate user terms and privacy statements, which are independent of our Privacy Statement. GM is not responsible for the personal information practices of these third party services or applications and your use is subject to the user terms and privacy statement for those third party services or applications. We recommend that you carefully review the user terms and privacy statement of each third party service or application before using that service or application. Similarly, our websites may contain links to independent sites outside of and not controlled by GM, such as those belonging to GM dealers, GM licensees, or independent product review sites. GM is not responsible for these sites or the omissions, policies, or content of these sites, and GM is not responsible for the personal information practices of such third parties. We recommend that you read the privacy policies of these third parties before providing them any personal information and before using their sites.

ACCESS AND UPDATES TO YOUR INFORMATION

You can access your online account to view or update your information in that account. You may also contact us, as provided below, to learn about how to access, review, correct, update, or delete the information about you in our records. We may need to retain certain information for recordkeeping purposes, to complete any transactions that you began prior to your request, or for other purposes as required or permitted by applicable law.

Please Note: We do not provide access to records of service events (*for example, when you request service, an OnStar advisor calls in to your vehicle, or when we provide crash, theft, or emergency services*). We generally do not release those records (including audio records) unless we receive an appropriate court order or are otherwise required by applicable law.

HOW WE SAFEGUARD YOUR INFORMATION

We maintain reasonable and adequate technical, administrative, and physical security and confidentiality measures designed to help protect your information from unauthorized access or use. We also require by contract (other than in certain emergency situations) that third party service providers acting on our behalf or with whom we share your information also undertake to provide such security and confidentiality measures in accordance with industry standards.

HOW LONG WE KEEP YOUR INFORMATION

We may keep the information we collect for as long as necessary to provide products or services to you, to operate our business, to enable us to communicate with you, for our safety, research, evaluation of use, or troubleshooting purposes, or to satisfy our legal or contractual obligations. Where required, we will anonymize or dispose of the information we collect when we no longer need it for the uses described above.

CHILDREN'S PRIVACY

GM websites, in-vehicle applications, and other online services do not target or knowingly collect any information from children under the age of 13.

INTERNATIONAL DATA TRANSFERS

We store your information in the United States, the European Economic Area (EEA), and other locations where we or our service providers maintain servers. We provide appropriate protections for cross-border transfers as required by law for international data transfers. With respect to such transfers from the EEA to the United States and other non-EEA jurisdictions, we implement standard contractual clauses and other mechanisms to protect such data.

CHANGES TO THIS PRIVACY STATEMENT

We may need to update this Privacy Statement from time to time as our business and products or services expand or change, or as required to by law. If we do, we will post the updated version of the Privacy Statement on our website, and ask for your consent to the changes if legally required.

HOW TO CONTACT US

If you have concerns or questions regarding GM's consumer privacy practices or this Privacy Statement, please press the blue button in your vehicle, visit our website(s), or call us at 1-866-MYPRIVACY (1-866-697-7482) or 1-888-4ONSTAR (1-888-466-7827) for OnStar questions. You may also contact the Privacy Manager by mail at OnStar Subscriber Services, P.O. Box 1027, Warren, Michigan USA 48090-1027 or by email at privacy@gm.com.

CALIFORNIA PRIVACY STATEMENT

This PRIVACY STATEMENT FOR CALIFORNIA RESIDENTS ("California Privacy Statement") supplements the information contained in the U.S. Connected Services Privacy Statement provided by THE GENERAL MOTORS FAMILY OF COMPANIES (including General Motors Company, OnStar, LLC ("OnStar"), and affiliates) (collectively, "GM" or "We") and applies solely to visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"). Any terms defined in the CCPA have the same meaning when used in this California Privacy Statement.

Collection of Personal Information

We may collect certain information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer or household ("Personal Information"). Personal Information does not include de-identified or aggregated information.

Please see the following disclosure regarding the information that we may collect, use, and share based on your use of the products and services and the consent(s) you have provided to us:

Personal Information Categories & Examples

We may collect the following categories of Personal Information

- Identifiers, such as name, postal address, unique personal identifier, internet protocol address, signature, email address, account name, or other similar identifiers;
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as bank account number, credit card number, debit card number, or any other financial information, medical information, health insurance information, social security number, physical characteristics or description, passport number, driver's license or state identification card number, insurance policy number, education, employment, or employment history;
- Protected classification characteristics under California or federal law, such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, or veteran or military status;
- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data;
- Internet or other electronic network activity information, including, browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement;
- Geolocation data;
- Audio, electronic, visual, thermal, olfactory, or similar information; and
- Inferences drawn from other personal information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.

Personal Information Source Categories

We may collect Personal Information from consumers providing this information directly to us or automatically through their interaction with our products or services; GM dealers; licensors; service providers; marketing partners; and/or independent third-party sources.

Business or Commercial Purpose(s) for which Personal Information is Collected

We may use Personal Information to provide and improve our products and services; improve the quality, safety, and security of our products and services; to administer your account(s) and process your payments for products and services; to operate our websites and applications, including online registration processes; to facilitate and support GM dealer and supplier programs and transactions; to

provide customer and vehicle support and service (such as recall information); for warranty administration and validation; to provide product and service updates; develop new products and services; for research, evaluation of use, and troubleshooting purposes; to verify eligibility for vehicle purchase or incentive programs; for marketing and/or analytics purposes; to customize and improve communication content; to comply with legal, regulatory or contractual requirements; to evaluate or conduct a merger, divestiture, acquisition, restructuring, reorganization, dissolution, or other sale or transfer of all of our assets; to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity; and to debug to identify and repair errors that impair existing intended functionality.

Categories of Third-Party Sharing of Personal Information

With respect to each category of Personal Information collected, we may share Personal Information with our service providers; emergency service providers, such as law enforcement, roadside assistance providers and ambulance providers; business partners for marketing activities; and independent third parties, such as research institutions, in-vehicle app providers or usage-based insurance providers.

Your Rights and Choices

The CCPA provides certain consumers (i.e., California residents) with specific rights regarding their Personal Information. This section describes the CCPA rights that you may have and explains how to exercise those rights. You have a right not to receive discriminatory treatment for exercising these privacy rights.

Right to Opt-Out of the Sale of Personal Information

We have disclosed or sold Personal Information to third parties for a business or commercial purpose in the preceding 12 months in the following categories: Identifiers and internet or similar network activity. You have a right to opt-out of the sale of your Personal Information. We do not sell the Personal Information of minors under 16 years of age without affirmative authorization.

Right to Know About Personal Information Collected, Used, Disclosed, or Sold

You have the right to request up to twice in a 12-month period that we disclose certain information to you about our collection, use and disclosure of your Personal Information over the past 12 months. Once we receive your request and verify your identity, we will disclose to you the information you request in the following areas: (1) the categories of Personal Information we collected about you; (2) the categories of sources for the Personal Information; (3) our business or commercial purpose for collecting or selling that Personal Information; (4) the categories of third parties with whom we shared that Personal Information; and (5) the specific pieces of Personal Information we collected about you in the preceding 12 months.

Right to Delete Personal Information Collected or Maintained

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your request and verify your identity, we will delete your Personal Information from our records, unless an exception under the CCPA applies. In our response to your request to delete, we will specify the manner in which we have deleted your Personal Information or, if we must deny your deletion request, the basis for this refusal.

Exercising Your Rights

To exercise the rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 866-MYPRIVACY (697-7482)
- Visiting consumerprivacy.gm.com

Authorizing an Agent

You may designate an authorized agent to submit your consumer request on your behalf, so long as the authorized agent has provided us with a valid Power of Attorney under the California Probate Code or has provided proof that it has your written permission to submit the request and have submitted an authorized agent designation form. If we do not receive a valid Power of Attorney, we may also require you to verify your identity directly with us and directly confirm that you provided the authorized agent permission to submit the request. Our authorized agent permission form can be obtained at GM's California Privacy Data Subject Request page or by contacting gm.data.compliance@gm.com. You can submit a completed form to us on our website or by email to gm.datacompliance@gm.com. If you submit your request over the phone, please email all documents to gm.datacompliance@gm.com. We will not be able to process your request until you provide all required documentation.

Verifying Your Request

We cannot respond to your request to know or request to delete if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify your identity or authority to make the request. To verify your identity, we ask that you to provide us with the following information when you submit your request: (1) first name, (2) last name, and (3) phone number or email.

We will use the above information to verify your identity. We will require additional information to verify your identity and fulfill your request depending on the type of request or the information requested by you.

Notice of financial incentive

We may offer financial incentives, as defined by the California Consumer Privacy Act, when you enroll in our My Rewards program. My Rewards is a loyalty program in which participants earn and redeem points by engaging in eligible transactions, including, but not limited to, purchasing or leasing eligible GM vehicles at participating GM dealerships in the United States, purchasing certain goods or services from a participating dealer or online through participating GM websites, purchasing certain services from OnStar, or transacting with the My GM Rewards Credit Card. For a complete description of the most current eligible transactions, as well as details on earning and redeeming points, go to <https://experience.gm.com/rewards>.

We offer the My Rewards program to enhance our relationship with you so that you can enjoy more of our products and services at a lower price. To become a My Rewards member and earn and receive program benefits, users must enroll by providing name, address, and email. Users also have the option to complete a profile with additional information about hobbies and interests to allow for better tailored offers, but this information is not required for program membership. In addition, new members of the My GM Rewards Credit Card are enrolled in My Rewards based on the data provided in the card application. To provide the program benefits, we must receive and track the personal information provided when you

enroll in the My Rewards program or when you engage in activities to earn points, such as contact information and purchase history.

In order to complete membership into My Rewards, you also must acknowledge both the [My GM Rewards Program Terms and Conditions](#) and the [GM Privacy Statement](#). Consumers may withdraw from participation in the My Rewards program at any time by contacting a My Rewards Member Support Specialist at 844-764-2665.

Solely for purposes of complying with the California Consumer Privacy Act, we estimate that the value of a consumer's data related to the My Rewards program to be, on average, \$0.19 per program member. We have calculated the value of a consumer's data by estimating the expenses related to the provision of the My Rewards marketing program per member.

Direct Marketing

California residents have the right to request information from GM regarding the manner in which GM shares certain categories of your personal information with third parties for the third parties direct marketing purposes. California law provides that you have the right to submit a request to GM at its designated address and receive the following information:

- The categories of information GM disclosed to third parties for the third parties' direct marketing purposes during the preceding calendar year; and
- The names and addresses of third parties that received such information, or if the nature of their business cannot be determined from the name, then examples of the products or services marketed.

You are entitled to receive a copy of this information in a standardized format and the information will not be specific to you individually. You may make such a request by calling 1-866-MYPRIVACY (1-866 697-7482).

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make material changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect, use, and share your Personal Information, your choices and rights regarding such use, or wish to exercise your rights under the CCPA, please do not hesitate to contact us at:

Phone: 866-MYPRIVACY (697-7482)

Website: consumerprivacy.gm.com

Email: privacy@gm.com

