

# SCHEDULE "A"

## OnStar FMV PRIVACY PRACTICES

Effective April, 2011

Nothing is more important than the safety and security of you and your family. At **OnStar**, we apply that belief to every aspect of our service – including the protection of your information. You have a right to be confident your information is kept secure and to understand our privacy practices -- specifically, what information we gather, with whom we share that information, how we use that information to make your driving experience safer and more convenient, and what we do to protect your information. We are committed to making your safety and the security of your information a priority.

This privacy statement applies to information we obtain about our U.S. customers through the use of the **OnStar** services, our web site, and any communications between us. It is our responsibility to provide you with information about our practices and because we understand there may be others who use your car or your **OnStar** services, we want you to understand the importance of telling all occupants of your car or those who use your **OnStar** services about how their information may be collected, used, or disclosed by **OnStar**.

### 1. INFORMATION ONSTAR COLLECTS

#### What Information does OnStar collect?

The information we collect about you includes:

- your contact information, (including your name, address, telephone number and email address);
- your billing information (including your credit card number);
- information about your car, such as the vehicle identification number (VIN), make, model, and year;
- other information that you voluntarily provide to us (such as your language preference, your license plate number and/or your emergency contact information); and
- information that helps us customize our services to you, such as your use of the **OnStar** services

The information we may get from your car includes:

- information about your car's operation, including such things as diagnostic trouble codes from your **OnStar FMV Equipment** ;
- information about collisions involving your car;
- information about your use of the car and its features, such as whether you have paired a mobile device with your car);
- information about when your car's ignition is turned on or off; and
- in the limited circumstances listed below, the location and approximate GPS (global positioning satellite) speed of your car:
  - when there is a request for service made from inside your car (for example when you request driving directions);
  - when there is an automatic crash response (so we can inform emergency service providers);
  - when there is a request for Stolen Vehicle Assistance (to assist law enforcement in the recovery of your car);
  - when needed to protect the safety of you or others (for example, to locate a missing person);
  - when otherwise required for the delivery of **OnStar** services you have requested;
  - when needed by us or our suppliers for our quality, research or troubleshooting purposes;
  - when otherwise expressly consented to by you; or
  - as may be required by law.

If you use **Hands-Free Calling** minutes, we may obtain certain Customer Proprietary Network Information (CPNI) such as call detail records, the number of minutes purchased, the date minutes were purchased, the number of remaining minutes, and their expiration date. We do not share CPNI information specific to you with third parties for their marketing purposes.

### **How does OnStar get my information?**

**OnStar** collects information about you and your car in several different ways, including:

- from what you, your car dealer or the manufacturer of your car provides to us;
- from your use or purchase of **OnStar** products or services;
- from correspondence between us;
- from **OnStar** web pages you visit;

- from our wireless service providers, your satellite radio provider and third party data providers; and
- from your car itself when your **OnStar FMV Equipment** is active.

## 2. HOW WE USE THE INFORMATION WE COLLECT

**OnStar** uses information about you and your car for a variety of purposes including:

- to provide **OnStar** services to you, including checking and maintaining your **OnStar FMV Equipment**
- to communicate with you about your account;
- for troubleshooting, analysis and research purposes;
- as required by law;
- to protect the safety of you or others;
- to prevent fraud or misuse of the **OnStar** service;
- to allow us and General Motors (and its subsidiaries, affiliates and dealers) to offer you new or additional products or services; and
- for other purposes on an anonymized basis.

## 3. WHO WE SHARE YOUR INFORMATION WITH

**OnStar** is able to provide a safer, more convenient driving experience by sharing selected information with selected parties.

This would include sharing selected information with roadside assistance providers, emergency service providers, the police, our wireless service providers, credit card processors, data management companies, and others, as may be required to deliver the **OnStar** services. We may also share information we collect about you or your car as required by law, or to protect the safety of you or others.

We may also share information we collect about you or your car with the following (this does not include the sharing of the location or speed of your car, or your safety belt usage or credit card information):

- General Motors\*; its subsidiaries, affiliates, a successor or an assignee of a significant part of your car maker's or **OnStar**'s business, to enable it to evaluate or research the safety, quality, usage and functionality of its cars, to contact you with important information about your car or for marketing purposes;

- our wireless service providers, to enable them to contact you with important information about your wireless services or for marketing purposes;
- your fleet company, if you drive a car that is part of a fleet;
- your rental company, if you drive a rental car; and
- any third party on an anonymized basis

\*Please note: the maker of your car may obtain information from your car independently from **OnStar**. Please refer to your owner's manual and car maker's privacy statement for additional information.

### **Does OnStar share or sell anonymized information?**

Anonymized information is data that can no longer be identified as belonging to you or your car. We may share or sell any anonymized data with third parties for any purpose, which may prove useful for such things as research relating to public safety or traffic services.

*Of course, we will comply with all laws regarding notifying you and obtaining your consent before we collect, use or share information about you or your car in any other way than has been described in this privacy statement.*

### **4. YOUR CHOICES REGARDING THE INFORMATION WE COLLECT**

If you would like to limit the permitted uses or disclosures of your personal information (other than those required or permitted by law) or would like further information, you may contact us by pressing the blue button in your car, or by calling 1-888-4ONSTAR (1-888-466-7827).

When possible, we will provide choice as to how your information is used. We may not have the opportunity to provide you with a choice as to whether or not we use your information to contact emergency service providers or to provide you with **OnStar** Service.

### **Can I choose my communication preferences?**

We use a number of methods to contact you to tell you about products or services that may be of interest to you. This includes postal mail, telephone calls and, if you have provided us with an email address, electronically. Because we recognize that you may not want to receive marketing messages by all of these methods all of the time, we offer you a choice as to how you would like us to communicate with you.

You can manage your communication preferences in a number of ways, by following specific opt-out instructions provided in the communication, or by contacting us. [Click here](#) to see a copy of our Do Not Call Policy.

Please note: changing your communication preferences will only stop delivery of marketing-related communications. We may continue to send you important service or account related information via these channels. We may also send you important messages using the **OnStar FMV Equipment** in your car to provide you with information regarding important service or account issues or to notify you about the cancellation of your **OnStar** service. You may choose not to receive these types of messages by contacting us as outlined above.

Supplemental Information for California Residents:

Your California Privacy Rights: California privacy law requires us to provide California residents with specific disclosures about our privacy practices, including telling you about the information we share with other third parties for their marketing purposes. You may request a copy of this information on an annual basis by contacting us.

## **5. UPDATING YOUR INFORMATION**

### **Do I have access to my information?**

We provide quick, convenient access to your personal information. If you would like to access or ensure accuracy of your information, you can contact an **OnStar** Advisor from your car, call 1-888-4ONSTAR, or visit our website at [www.OnStar.com](http://www.OnStar.com).

### **Can I obtain a copy of information about me or my service events?**

You can request a copy of information relating to your account or service event by calling 1-888-4ONSTAR. It's important for you to note that we are not required to release any records (including audio records) that are created as part of the **OnStar** service without a subpoena (unless otherwise required by law).

## **6. SAFEGUARDING YOUR INFORMATION**

### **What does OnStar do to safeguard my information?**

We recognize the importance of safeguarding personal information in our possession. To protect your information from loss, misuse and unauthorized access, disclosure, alteration, destruction and theft, we have implemented and maintain a number of technical, administrative, and physical safeguards. For example, sensitive information, such as financial/credit card information, is

encrypted when transmitted between your computer and our website servers via the Internet.

If a third party service provider is used to provide services that require access to your personal information, we require that each party has appropriate security measures to maintain the safety of your information. We also require that your information is only accessible to authorized individuals and only for the purpose of providing the service.

For certain services, we may ask you for your Personal Identification Number (PIN) to help identify you (or other people you have authorized). We also require you to have a username and password in order to access your account through our website. It is important that you maintain the confidentiality of your PIN, username, and password at all times as we cannot be responsible for any unauthorized use of the service when the appropriate authentication has been provided. You may periodically wish to update or change your PIN, username, and/or password and can do so at any time.

You are responsible for keeping your PIN, username, and password secure and you should not disclose them to anyone (unless you wish to authorize them to access your account or services and possibly incur charges on your account).

We provide services to you through wireless networks. Although it is illegal for unauthorized people to intercept your calls, such interceptions of wireless carriers can occur.

## **7. OUR ONLINE PRACTICES**

### **Does OnStar use "Cookies" or other online tracking technologies?**

We may use cookies and other tracking devices on our Websites. Using cookies on our sites provides benefits to you, such as allowing you to maintain your account login information between visits, or locating a nearby dealer. The use of cookies also allows us to measure site activity to provide a better user experience. Cookies and other tracking devices may be used to tell us the time and length of your visit, the pages you look at on our site, the site you visited just before coming to ours, and the name of your Internet service provider.

We may use third parties to serve **OnStar** advertisements on other Websites. In serving **OnStar** advertisements, these companies may use cookies and other tracking devices to collect certain information about your visits to other Websites (such as browser type, IP address, which page was visited, and time of day). This information may be used to evaluate our online advertising campaigns or to tailor promotions and other marketing messages to you.

You may elect to refuse cookies. Please refer to your browser Help instructions to learn more about cookies and how to manage their use.

## 8. HOW TO CONTACT US

For answers to frequently asked questions about our privacy practices, please visit our website at [www.OnStar.com](http://www.OnStar.com). If you have a specific concern -about the privacy of your account information, you can contact the Privacy Manager via email at [privacymanager@OnStar.com](mailto:privacymanager@OnStar.com). You can also write **OnStar's** Privacy Manager at OnStar Privacy Manager, P.O. Box 1027, Warren, Michigan, 48090-1027 or call us at 1.877.299.1372. Please include your contact information and a detailed description of your request or concern. If you are an existing subscriber, please also include your **OnStar** Account Number.

## 9. CHANGES TO THE PRIVACY STATEMENT

We may need to update this policy from time to time as our business and services expand, or if we are required to by law. If we do, we will post the most up-to-date version on the [OnStar.com](http://OnStar.com) website so you should periodically check **OnStar.com** for any updates.

If we make any change which materially affects our privacy practices regarding the collection, use, or sharing of your information, we will notify you by sending an email to the email address you have provided, or, if you do not have an email address on file with us, by postal mail. We will also post a notice of the change on [www.OnStar.com](http://www.OnStar.com).

# FREQUENTLY ASKED QUESTIONS

## Does OnStar track the location or speed of my car?

The simple answer is no. **OnStar** does not continuously track the location or speed of your car. **OnStar** only knows this information when:

- there is a request for service initiated from within the car (when you press an **OnStar** button to speak with an advisor);
- there is a request for Stolen Vehicle Assistance or to locate a missing person;
- there is an Automatic Crash Response;
- required by law;
- required to protect our rights or property or the safety of you or others;
- required by us for research or troubleshooting purposes;

- when otherwise required for the delivery of **OnStar** services that you have requested; or
- when otherwise expressly consented to by you.

### **Can OnStar listen to or monitor my personal conversations in my car without me knowing?**

No. It is not possible for **OnStar** to listen to or monitor conversations in your car without you knowing it. When an advisor calls into your car, the following will occur:

- a light flashes;
- there is a ring;

**OnStar** intentionally developed this functionality so that our advisors cannot override it. In addition, calls through the **OnStar FMV Equipment** are normally audible through the stereo speakers, and cars programmed with text display capabilities will show an indicator of a connection to **OnStar** on the driver's instrument panel. Moreover, **OnStar's** policy requires advisors to announce their presence immediately upon establishing a call into your car.

### **Does OnStar keep recordings of my interactions with the advisors?**

Yes. We may record and monitor all interactions between us, including interactions between us when you are in your car, in order to maintain or improve the quality of our service, for training purposes or to promote and provide **OnStar** service. **OnStar** advisors may also remain on the line if, during a request for service, we conference in a third party such as emergency service providers or the police. It is important for you to know that these parties may also separately record and/or monitor the interaction. We may also review your interactions with **OnStar's** automated services for training and/or quality improvement purposes.

### **What do I do if I forget my PIN or need to change my PIN?**

You can change your PIN or add other authorized users of your car onto your account with their own PIN at any time by contacting an **OnStar** advisor from your car, calling 1-888-4.ONSTAR (1-888-466-7827) or TTY 1-877-248-2080. To inquire about a forgotten PIN, contact us at the numbers above or email us at [ContactUs@OnStar.com](mailto:ContactUs@OnStar.com) or [TTY@OnStar.com](mailto:TTY@OnStar.com) to obtain your PIN by mail.



Remember not to share your OnStar PIN, username or password with anyone. OnStar cannot be responsible for unauthorized use of the service when the appropriate authentication has been provided.

**What can I do to help ensure the security of my OnStar account?**

For your protection, do not share your onstar.com username, password and PIN with anyone. OnStar cannot be responsible for unauthorized use of the service when the appropriate authentication has been provided.