

Privacy Statement for OnStar Guardian

Last Updated: September 25, 2024

Your privacy is important to us. This Privacy Statement for OnStar Guardian describes how we, General Motors Holdings LLC (when used in the United States) and General Motors of Canada Company (when used in Canada) and their respective affiliates (“GM” or “we” or “us”), collect, use, and share information, when you download this software application (“Application”) to the authorized Apple or Android smartphone (“Device”) that you own or are authorized to use, and when you use the services available through the Application, which may include detecting a crash event in a vehicle in which you are traveling and the ability to initiate a call to OnStar advisors, receive roadside assistance services, and view location and other information of the Devices owned by or authorized to be used by the members of your “My Family” group (the “Application Services”).

This Privacy Statement supplements the applicable General Motors U.S. Consumer Privacy Statement, which is posted at https://www.gm.com/us/en/privacy_statement/ (when used in the United States) or the GM Canada Connected Vehicle Services Privacy Statement, which is posted at https://www.onstar.com/ca/en/privacy_statement/ (when used in Canada), and which also applies to your use of other OnStar services (each of these may be referred to as “OnStar Privacy Statement”). Together this Privacy Statement and the U.S. Consumer Privacy Statement or GM Canada Connected Vehicle Services Privacy Statement describe our privacy practices for the Application Services. Capitalized terms, if not defined in this Privacy Statement, are defined in the OnStar Privacy Statement.

Information We Collect

When you install the Application or use the Application Services, we collect:

- Information about you and your account with us, such as your name, address, telephone number, e-mail address, photo, login information, password, and emergency contact information;
- Device information, such as device sensor information, including but not limited to accelerometer and gyroscope data, Device type, Device operating system, Internet Protocol (IP) address, unique Device identifier, Internet service provider, Wi-Fi information, battery level, and phone number;
- Device location information and information derived from your location information, such as speed, heading and driving status;
- Information about your use of the Application, including screen view time, scrolling, specific actions to activate features and/or otherwise navigate the application, reactions to alerts, searches, and your interactions with in-application features;

- Information about you from additional online and offline sources including commercially or publicly available third-party sources; and
- Information you input into the Application, such as phone numbers and emails of individuals from which you have obtained the requisite consent.

We collect and treat this information as described in the OnStar Privacy Statement. If you provide an emergency contact, please ensure that you notify that person that his or her personal information that you will provide to us will be used to contact him or her on your behalf. It is your responsibility to ensure that all members of your “My Family” group know that anyone with access to the Application Services through your Device (or through the Device of another member of “My Family” group) may be able to access information about their Device, including the location of their Device.

Once you log into the Application, it will continue to run in your Device’s foreground or background and collect the information described above until you log out, even if you close the Application.

Use of Your Information

We use the information we collect as described in the OnStar Privacy Statement. For example, we use the information to:

- Provide the Application Services;
- Communicate with you about your account or the Application Services;
- To develop new products and services;
- Perform marketing, including interest based marketing and advertising (with necessary consents);
- Improve, troubleshoot, and evaluate the use of our products and Services (including the Application); and
- Conduct research.

Restricting the Collection of Location Information

You can restrict our access to and collection of the location of your Device by disabling Location Services on your Device, if that feature is available on your Device. Some of the Application Services require access to and collection of the location of your Device to function and if you disable sharing of your Device location in your Device settings, some of the Application Services will not function properly. You can also restrict our access to and collection of location of your Device by logging out of the Application.

Sharing of Information

We share your information as described in the OnStar Privacy Statement. For example, we share information with necessary third parties when you use the Application to make requests for third party or related services available through the Application, such as roadside assistance. We may share your information with:

- third party service providers working on our behalf;
- members and invitees of your “My Family”;
- emergency service providers;
- individuals specified by you when using the Application, such as emergency contacts;
- others when required or permitted by law, and
- those you ask us to share this information with.

We may share the location of your Device when necessary to provide the Application Services to you; to comply with legal obligations; to protect the safety and rights of you and others; for product safety and security purposes; and for the purposes described in the OnStar Privacy Statement.

Sharing of Information with “My Family” members

By using the Application, other members of your “My Family”, now or in the future, may have access to your account information, phone number, device information, driving status, and the location of your Device, even when your Device is outside of the United States or Canada. You can restrict the sharing of your information with you “My Family” members by turning off Location Sharing in the Application Settings menu.

Tracking Technologies

GM may use device tracking technologies that allow us to identify you on your Device in a unique manner, such as use of IP address, to gather information about your activity within the Application Services, such as demographic data, browser type, pages visited, activities conducted on the page, and the day and time of your visit. GM uses this information, sometimes across devices, to measure your activity, remember your preferences, maximize and improve the performance of our products and services, and customize your experience. For more information about GM’s use of tracking technologies, please see the OnStar Privacy Statement.

Your Choices

You have certain choices regarding how we use and share your information, such as for marketing, and related purposes. Please see “How To Contact Us” below to make choices about telephone, email, text message and other communications. You can also opt-out

from promotional email and text message communications at any time by following the unsubscribe instructions in the email or text message itself.

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

Security

We use technical, administrative, and physical safeguards designed to protect your information and we require third party service providers to maintain similar safeguards against loss, misuse, and unauthorized access, disclosure, alteration, destruction, or theft of your information.

Changes to This Privacy Statement

We reserve the right to update this Privacy Statement from time to time for any reason. We will notify you of a material change to this Privacy Statement by placing a notice on https://www.onstar.com/us/en/privacy_statement/ (when used in the United States) and https://www.onstar.com/ca/en/privacy_statement/ (when used in Canada) or within the Application on your Device, or by notifying you via email or postal mail.

Access

If you would like to access or ensure the accuracy of your Account Information, please contact us as described below. 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.

How to Contact Us

For general questions about the Application Services, visit https://www.onstar.com/us/en/privacy_statement/ (when used in the United States) and <https://www.onstar.com/ca/en/home/> (when used in Canada) or call us at 1.888.4.ONSTAR (1.888.466.7827), or for TTY users (hearing/speech impaired): 1.877.248.2080. If you have questions about our privacy practices or this Privacy Statement, you may contact the Privacy Manager by mail at P.O. Box 1027, Warren, Michigan, 48090-1027 (when used in the United States) or 1908 Colonel Sam Drive,

Oshawa, Ontario L1H 8P7, Attention: Privacy Coordinators, Mail Code: CA1-163-005 (when used in Canada) or by email at privacy@gm.com.

You may also contact us by clicking “CONTACT US” on the GM or GM Canada websites.