Privacy Statement for Application Services

Last Updated May 1, 2018

Your privacy is important to us. This Privacy Statement describes how we, General Motors Holdings LLC and its affiliates ("GM" or "we" or "us"), will collect, use, and share information (including the location of your OnStar-equipped eligible vehicle (your "Vehicle") and how your Vehicle is used) when you download this software application ("Application") to your phone or other Internet-connected device (your "Device") and when you use the services available through the Application, which may include services that allow you to view the location and diagnostic information of your Vehicle, to issue commands to your Vehicle, such as door lock/unlock and remote engine start commands, and to schedule services you request with third party service providers, such as dealer maintenance appointments and roadside assistance (the "Application Services").

It is your responsibility to ensure that all users of your Vehicle know that anyone with access to the Application Services through your Device may be able to access information about your account and your Vehicle, including the location of your Vehicle.

Other individuals with access to the Application Services associated with your Vehicle may be able to view your Account Information, Vehicle-Related Information and Driving Information, including location of your Vehicle.

This Privacy Statement incorporates the OnStar Privacy Statement, which is posted at www.onstar.com/privacy, and which also applies to your use of other OnStar services. Together these privacy statements 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:

• Device information, such as the location of your Device, Device type, Device operating system, Internet Protocol (IP) address, unique identifier, type of browser, Internet service provider, information about your use of the Application, and phone number; and
• 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 marketing offers;
• Account Information, Vehicle-Related Information, and Driving Information, such as the location and speed of your Vehicle based on GPS.
• Information about you from additional online and offline sources including commercially or publicly available third party sources.

We collect and treat this information as described in the OnStar Privacy Statement.

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; and
• Provide you with marketing offers that may interest you, including offers relevant to the location of your Device;
• Improve, troubleshoot, and evaluate the use of our products and Services (including the Application); and
• Conduct research.

Restricting the Collection of Location and Speed Information

You can restrict our access to and collection of the location of your Device by disabling location-sharing on your Device, if that feature is available on your Device.

Some of the Application Services require access to and collection of the location and speed of your Vehicle. We collect location and speed of your Vehicle when you access or use the Application Services, or as otherwise disclosed in the OnStar Privacy Statement. You can restrict our access to and collection of location and speed of your Vehicle, or the location of your Device, by not using the Application Services.

Sharing of Information

We share your Account Information, Vehicle-Related Information, and Driving Information (such as the location and speed of your Vehicle) 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 for dealer maintenance appointments or roadside assistance. We may share the location of your Device in the same manner as we share location and speed of your Vehicle. For example, we may share the location of your Device with:

• third party service providers working on our behalf,
• emergency service providers,
• others when required by law, and
• those you ask us to share this information with.

We may also 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.
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 or VIN, 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.

Limiting Marketing and Promotional Communications
You may choose to limit the marketing and promotional communications we send you. You can do this by contacting us at 1.888.4ONSTAR and selecting your contact preferences. We will also provide opt-out instructions in all of our promotional communication channels; for example, an Unsubscribe option will appear at the bottom of all marketing-related emails.

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 www.onstar.com/privacy 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.

How to Contact OnStar
For general questions about the Application Services, visit www.onstar.com or call us 1.888.4.ONSTAR (1.888.466.7827). If you have questions about our privacy practices, contact the Privacy Manager by email at privacymanager@OnStar.com, by mail to OnStar Privacy Manager, P.O. Box 1027, Warren, Michigan, 48090-1027, or by calling us at 1.877.299.1372