# **Privacy Statement for Application Services**

Last Updated: May 1, 2018

Your privacy is important to us. This Privacy Statement describes how we, General Motors of Canada Company ("GM" or "we" or "us"), collect, use, disclose 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 location and diagnostic information of your Vehicle and 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 obtain the consent of and ensure that all users of your Vehicle know that anyone with access to Application Services through your Device may be able to access information about your account and your Vehicle. You must also inform any other users of your Vehicle about this privacy statement.

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, <u>including the location of your Vehicle</u>. These terms are defined in the Privacy Statement for Connected Vehicle Services. The Privacy Statement for Connected Vehicle Services, which is posted at <u>www.onstar.com/ca/en/footer-links/privacy-policy.html</u>, as supplemented by this Privacy Statement for Application Services, describes our privacy practices for the Application Services and also for other connected vehicle 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, and phone number;
- Information about your use of the Application, including screen view time, scrolling, specific actions and taps to
  activate features and/or otherwise navigate the application, reactions to alerts, and the progress, completion
  and/or abandonment of in-application purchases.
- Account Information, Vehicle-Related Information, and Driving Information, such as the location and speed of your Vehicle based on GPS; and
- Information about you from additional online and offline sources including commercially or publicly available third party sources.

We collect and treat that 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;
- Provide you with marketing offers;
- 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 Privacy Statement for Connected Vehicle Services. 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 or any other connected vehicle service which requires this information.

#### 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 Privacy Statement for Connected Vehicle Services. For example, we share information with necessary third parties, including GM Dealers, when you use the Application to request third -party 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; with OnStar LLC, General Motors LLC, General Motors Company and other of our affiliates for product safety and security purposes; and for the purposes described in the Privacy Statement for Connected Vehicle Services.

# 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 1.888.40NSTAR (1.888.466-7827) 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.ca or within the Application on your Device, or by notifying you via email or postal mail.

# Your Consent to the Processing and Transfer of Your Information

You consent to the storage and processing of your information in the United States and in other countries where we have operations.

#### 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.ca 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 455 Station A, Windsor, ON N9A 6L7, or by calling us at 1.877.299.1372.