

Privacy Statement for OnStar Vehicle Insights

Last Updated November 1, 2019

Your privacy is important to us. This Privacy Statement describes how we, General Motors Holdings LLC and its affiliates (“**GM**” or “**we**” or “**us**”), collect, use, and share information when you download and/or use the OnStar Vehicle Insights services (the, “**Services**”) via the compatible electronic device you own or control, such as your Apple or Android mobile device, your Vehicle’s infotainment system, or such other compatible computing system that you use to access the Services (each, your “**Device**”).via the Service’s application (the, “**Application**”), the Service’s website (the, “**Website**”), or through your car or truck (your “**Vehicle**”). This Privacy Statement incorporates the OnStar Privacy Statement, which is posted at www.onstar.com/privacy, which also applies to your use of other OnStar services, and the General Motors Privacy Statement, which is posted at <https://www.gm.com/privacy-statement.html>. Together these privacy statements describe our privacy practices for the Services. Capitalized terms, if not defined in this Privacy Statement, are defined in the OnStar Privacy Statement.

GM and the owner of the fleet of which the Vehicle is enrolled in, and any authorized representatives of the fleet owner such as a fleet manager (collectively, “**Fleet Owner**”), may be able to see certain information about you or the Vehicle through the Service if the Vehicle is equipped with GM connected services. It is the responsibility of the Fleet Owner, or any individual the Fleet Owner designates, to notify any drivers, passengers, or users of the Vehicle of this Privacy Statement and any connected services on the Vehicle.

Information collected by the Service may include:

- Vehicle location (if GM connected services are enabled)
- Any personal information you provide us through the Application or Website
- Your driving behavior, including emergency events, airbag deployments, routes, hard breaks, and hard accelerations (if GM connected services are enabled)
- View information describing how the Vehicles are being operated,
- vehicle diagnostics (if GM connected services are enabled) interact, on a limited basis, with other automotive vehicles that you own or control or that are part of your fleet.

Information We Collect

When you access the 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 or Website, 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; and
- If enabled with GM connected services, 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.
- If enabled with GM connected services, 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), camera image and sensor data, voice command information, stability control or anti-lock events, security/theft alerts, infotainment system usage, and WiFi data usage.
- OnStar account information associated with your Vehicle and/or fleet, 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; and

- Information you input into the Service, such as your personal account information, notification preferences, photos and images, and Vehicle check in or check out information such as Vehicle type, time, and location;
- Demographic information (such as gender, date of birth, marital status and household composition); and
- Marketing profile information

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

Use of Your Information

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

- Provide the Services;
- Communicate with you about your account or the Services;
- To develop new products and services;
- Provide product and service updates;
- Provide you with marketing offers that may interest you, including offers relevant to the location of your Device or Vehicle;
- Improve, troubleshoot, and evaluate the use of our products and Services (including the Application and the Website);
- Evaluate the quality, safety, and security of our products and services;
- Collect outstanding debts for products and services;
- Protect the safety of you or others;
- For research, evaluation of use, and troubleshooting purpose; and
- Perform analytics across your Devices

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 OnStar system or via our websites and applications.

Restricting the Collection of Location and Speed Information

You can restrict our access to and collection of the location of your Device or Vehicle by disabling location-sharing on your Device or Vehicle, if that feature is available. Your Fleet Owner may have restrictions on disabling location sharing on your Vehicle. Please consult your Fleet Owner before disabling location sharing on your Vehicle.

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 Services to make requests for third party or related services available through the Service, 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 or Vehicle with:

- The Fleet Owner
- Third party service providers working on our behalf,
- Emergency service providers,
- Individuals specified by you or by your Fleet Owner
- 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.

Fleet Owner Use and Access

You understand that by linking your account with a fleet, the Fleet owner, colleagues, administrators, and anyone designated by the Fleet Owner may view some or all of your information, including but not limited to, images or photos for expense reporting or account identification, routes, Device and/or Vehicle location, driver score, vehicle assignment, and check in/out status of a vehicle.

For a detailed description of the specific information collected by your Fleet Owner and/or employer and how that information may be used by the Fleet Owner and/or employer, please consult the Fleet Owner and/or Employer.

Your Obligations

We rely on you to inform any persons using your Device or Vehicle about this Privacy Statement and the privacy choices you have made. We also rely on you to obtain any necessary consents for the information you provide to us, including but not limited to any images or photos and any personal information of others.

Cookies and 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 (collectively, “**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, products and services, and customize your experience (for example, maintaining your account login or contact information, help you locate a nearby dealer, and autofill 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.

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.

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.

Limiting Marketing and Promotional Communications

You may choose to limit the marketing and promotional communications we send you. You can do this by visiting www.gmcontactpreferences.com and updating 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 at +1.833.266.6565.