

## GENERAL MOTORS U.S. CONSUMER PRIVACY STATEMENT

Last Updated: January 1, 2023

### SCOPE

Your privacy is important to General Motors Holdings LLC and its affiliates (“GM” or “we” or “our” or “us”) as is your trust in GM’s products and services. We want you to know that the personal information you share with us will be treated with care. This Privacy Statement addresses the personal information we collect and how we use and share that information.

This Privacy Statement applies to personal information we obtain from and about individuals interacting with GM and its websites, products, programs, and services, including those GM may offer under different brands, such as Cadillac, Buick, GMC, Chevrolet, OnStar, Car Bravo, and Future Roads. This Privacy Statement covers all GM controlled subsidiaries and affiliates in the U.S. except for General Motors Financial Company, Inc. and Cruise LLC, each of which has its own Privacy Statement. Certain products and services may also be subject to separate privacy statements, independently or in combination with this Privacy Statement, which we recommend you review. For example, GM’s mobile applications may have separate privacy statements, as described in the Mobile Applications section below.

Our complete Privacy Statement can be found below. Here is a summary of some key points in our Privacy Statement:

- **Collection:** We may collect information about you and your vehicle, such as name, address, email address, phone number, vehicle identification number (VIN) and vehicle performance data through your use of our products, services, websites, or call centers, or through GM affiliates, dealers, licensees, partners or others who provide information to us . **Use:** We may use your information to develop, provide, and maintain our products and services, to set up, operate and maintain your account with us, to interact with you, for safety, security, fraud detection and prevention, and product research purposes, to provide customer and vehicle support and service, and for marketing.
- **Sharing:** We may share your information as required or permitted by law, within GM and with our subsidiaries and affiliates, dealers, licensees, service providers, and other companies with whom we enter into business arrangements.
- **Rights and Choices:** You may have certain rights and choices regarding how we collect, use and share your information, which you can submit to us using the methods explained below.
- **Cookies and Tracking:** We may use cookies, pixel tags, web beacons and other similar tracking technologies to help provide our products and services, understand and customize your preferences, and display relevant advertising.
- **Mobile Applications:** GM has developed certain mobile applications that you may download to your mobile device or vehicle (“GM Applications”). When you download a GM Application, we may collect information from and about you, your vehicle, and your use of the GM Application.
- **Third Party Products and Services:** Through the use of GM products and services, you may be able to access third party services, applications and websites not controlled by GM or covered by this Privacy Statement.
- **GM Dealers:** GM and the dealers who sell or service GM vehicles are separate and independent legal entities with their own privacy practices. For questions about your dealer's privacy practices, including opting out of marketing communications from your dealer, please contact your dealer directly.

- **Access and Updates:** You may access your online accounts with us to update much of the information we collect about you or you may contact us to learn about how to do so by using the methods explained below.
- **Security Measures:** We maintain reasonable security controls and practices to protect the information we collect about you and require similar controls by our service providers.
- **Retention:** We keep your information for as long as necessary to provide our products and services, operate our business, and comply with legal obligations.
- **Children’s Privacy:** We do not target, or knowingly collect any information from children under the age of 13.
- **International Data Transfers:** We maintain appropriate protections for cross-border transfers as required by law for international data transfers.
- **Contact Us:** If you have concerns or questions regarding GM's consumer privacy practices or this Privacy Statement, please contact us at 1-866-MYPRIVACY (1-866-697-7482).
- **Changes:** We may update this Privacy Statement from time to time.

This Privacy Statement does not apply to personal information that we obtain in our capacity as an employer. If you are a current or former GM employee, you can visit our company intranet site or contact your human resources representative for a copy of our employee privacy statement. If you were considered for employment with GM, please visit [careers.gm.com/privacy](http://careers.gm.com/privacy) for more information about how GM collects, uses, and shares your personal information.

### **INFORMATION COLLECTED AND SOURCES OF INFORMATION**

As you interact with GM or our products, programs, and services, there may be opportunities for you to provide us with your information. Additionally, we may collect certain information about you or your vehicle as further described below.

You may provide us with information about you or your vehicle through a number of sources: GM websites, applications, services, product and related events, surveys, social media platforms, sweepstakes entries and through our customer call centers. We may also collect information that is publicly available. For example, we may collect publicly available information you submit to a blog, a chat room, or a social media platform, and we may use your information for the purposes set out in this Privacy Statement. GM engages with consumers on multiple social media platforms and if you contact us on one of our social media pages, request assistance via social media or otherwise direct us to communicate with you via social media, we may contact you via direct message or use other social media tools to interact with you. In these instances, your interactions with us are governed by this Privacy Statement as well as the privacy policy of the social media platform you use.

We also receive information about you through vehicle sales records provided by your dealer and we may obtain, with your consent, data obtained from your vehicle’s Event Data Recorder (“EDR”). For additional information about EDR data, please see your owner’s manual. We also may obtain information about you and your vehicle from GM affiliates, dealers, GM licensees for consumer merchandise, GM partners (for example, credit card bank partners) and other sources such as companies that provide lists of potential vehicle purchasers and current owners, if such companies are permitted to share your information with us pursuant to their privacy statements. We may combine information that we receive from the various sources described in this Privacy Statement, including third-party sources, with information you provide and use or share it for the purposes identified below.

The types of information that GM collects about you, your vehicle, or your connected devices (such as your mobile phone, computer, or tablet) may include, but are not limited to:

- identifiers (such as name, postal address, email address, screen name, account ID, customer number, and telephone number; in limited circumstances, GM may collect a Social Security Number, for example if you win a sweepstakes or receive compensation that must be reported for government tax purposes)
- payment information (such as your credit card number, CVV code and expiration date)
- information about your vehicle (such as license plate number, vehicle identification number (VIN), geolocation data, make, model, model year, selling dealer, servicing dealer, date of purchase or lease, the lease/financing term, service history, mileage, oil/battery status, fuel history, battery charging and discharging history, electrical system function, gear status, and diagnostic trouble codes)
- information about your connected devices and how you interact with our products, services, apps and websites (such as IP address, browser type, unique device identifier, cookie data, and associated identifying and usage information)
- demographic or protected classification information (such as gender, date of birth, marital status, household composition, or veteran or military status)
- commercial information (such as when you plan to purchase or lease the vehicle in which you're interested)
- audio or video information (such as information collected by sensors or cameras in the vehicle, or photographs and videos such as those that you may submit for contests, sweepstakes, and social sharing)
- physiological or biological characteristics, such as medical information collected to provide OnStar emergency services that you have requested
- voice biometric data as described in the Biometric Technology Section below
- information about your home energy usage (such as your charging and discharging of electric vehicles and stationary storage)
- relationships you have with GM in addition to the purchase and servicing of your vehicle (such as through a My GM Rewards account, a GM Rewards Card or OnStar, etc.)
- relationships you have with third parties in connection with your use of GM products and services (such as GM dealers, energy utilities, and companies offering or operating in-vehicle applications)
- information related to My GM Rewards and the My GM Rewards Card Program (“GM Card”), including rewards points, account type, tier status, enrollment, redemption
- investor and stockholder services information (such as name, address, phone number, email address, and account information)

## **USE**

The information GM collects about you, your vehicle, or your connected devices may be used:

- to provide products and services, programs, and maintain customer relationships
- to improve the quality, safety, and security of our products and services
- to administer your account(s) and process your payments for products and services
- to operate our websites and applications, including online registration processes

- to facilitate and support GM dealer and supplier diversity programs and GM grant programs
- to autofill data fields on our websites to improve your online experience
- to develop new products and services, including connected, autonomous and car-sharing products and services
- to provide customer and vehicle support and service (such as recall information)
- for warranty administration and validation
- to provide information and product updates
- to evaluate vehicle performance and safety
- for research, evaluation of use, and troubleshooting purposes
- to verify eligibility for vehicle purchase or incentive programs
- to verify eligibility for GM card and to provide GM card account management services
- for marketing and analytics purposes
- to support the electronic signature and delivery process between you and your dealer
- to customize and improve communication content
- to evaluate or conduct a merger, divestiture, acquisition, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets
- to comply with legal, regulatory or contractual requirements
- to protect our rights, or to detect, investigate and prevent fraud or other illegal activity

Communications with you in connection with these uses may be via mail, telephone, e-mail, text message, social media, and other electronic messages, through the in-vehicle infotainment or OnStar system or via our websites and applications. Texting with GM is subject to the GM Consolidated Texting Policy (“Texting Policy,” available at [gm.com/texting-policy](http://gm.com/texting-policy)). See “Choices” below to learn how to manage your communication preferences.

You may choose to forward information from one of our websites or emails to another person through our Forward to a Friend or similar program. Email addresses submitted to our E-card or other Forward to a Friend programs are not used by us for other marketing purposes unless the recipient interacts with us separately.

When we maintain and use information that has been deidentified, we take reasonable steps to ensure that such information is maintained and used only in deidentified form, and will not attempt to reidentify such information unless required or permitted by applicable law.

### **SHARING**

GM may share the information it collects about you, your vehicle, or your connected devices (including the categories of information listed above) in the following instances and with the following categories of third parties:

- within GM, with our GM controlled subsidiaries and affiliates, with GM dealers, with service providers we or our dealers use to deliver products and services to you, and with GM licensees. However, transaction information regarding your GM Card will not be shared with GM dealers
- with our services providers who work on our behalf and who do not have an independent right to use the information to which they have access or that we disclose to them

- with companies we enter into business or marketing arrangements with, such as arrangements supporting services we offer to you and our GM card program
- with third parties for research and development purposes (such as university research institutes for improving highway safety)
- in connection with the sale, transfer or financing of a significant part of a GM business or its assets, including any such activities associated with a bankruptcy proceeding
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, detect, investigate and prevent fraud or other illegal activity, or respond to a law enforcement request
- as required or permitted by law, such as in conjunction with a subpoena, government inquiry, litigation, dispute resolution or similar legal process

Apart from the purposes listed above, GM will not share information about you or your vehicle with other third parties for their independent use without your prior consent.

### **CHOICES**

If you do not want to receive marketing communications from GM, please visit our Consumer Preference System website at [www.gmcontactpreferences.com](http://www.gmcontactpreferences.com). This will allow you to opt out of unsolicited marketing telephone and email communications and/or to change previously submitted opt-out preferences. You can also call 1-866-MYPRIVACY (1-866-697-7482) to opt out of direct mail communications, as well as telephone and email communications, and/or to change previously submitted opt-out preferences.

If you opt out of receiving marketing communications from GM, your personal information will not be used to send marketing communications, but may still be used for the other purposes described in this Privacy Statement (such as vehicle support and service).

To unsubscribe from a particular email newsletter or other communication (such as My GMLINK Service Reminders), you should follow the instructions in the email or on a related website.

To opt-out of receiving text messages from GM, you should follow the opt-out instructions in that specific text message program or visit our Texting Policy, at [gm.com/texting-policy](http://gm.com/texting-policy), for more information. If you have opted into any of our text message programs and you later decide to change your phone number or cancel your phone plan you should immediately opt-out of any text message programs and re-opt in with your new phone number if you wish to continue to receive text messages from GM. This will help us ensure we continue to honor your preferences and text the correct phone number.

### **COOKIES/TRACKING TECHNOLOGIES**

GM may use cookies, pixel tags, web beacons and other tracking technologies on our websites, applications, email messages and advertisements, sometimes across devices, to gather information about your visit (such as demographic data, browser type, IP address, pages visited, activities conducted on the page, and the day and time of your visit). Using cookies provides benefits to you, such as allowing you to maintain your account login information or contact information on Request a Quote forms between visits or locating a nearby dealer. In addition, we use information gathered from cookies to autofill fields on forms such as the city, state or zip code associated with your IP address. This information can be corrected by you before submitting any form or inquiry or you can disable the cookie as discussed below and the information will not be collected.

We place pixel tags and web beacons 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.

To measure site activity, provide a better user experience, and tailor our marketing communications, we or our service providers or companies we do business with may compile information from the cookies, pixel tags, web beacons or other technologies on our websites. This information may be combined with other information collected online or offline about you, including data provided by third party sources, and may be used or shared for the purposes described in this Privacy Statement. We may also allow third party advertising and personalization companies to use this information to develop personalized content and appropriate advertising based on your visits over time on GM web sites and non-GM web sites. This information may also be used to evaluate our online advertising campaigns or to tailor promotions and other marketing messages to you across your devices.

At this time, we do not honor “do not track” signals if enabled in a web browser.

You may choose to decline or delete some or all of the cookies that we use on our websites; however, doing so may impair the functionality of our websites. Please refer your web browser’s settings or help features to learn more about cookies and other technologies and how to manage their use. If you elect to refuse or delete cookies, you will need to repeat this process if you use another computer or device or change web browsers.

GM adheres to the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising ([www.AboutAds.info](http://www.AboutAds.info)). If you do not wish to receive personalized advertising or content from us while visiting GM web sites, you may click on the AdChoices icon and/or link located at the bottom of the web site page or the [Digital Advertising Alliance’s Opt-Out page](#), where applicable. If you do not wish to receive personalized advertising or content from us on non-GM websites, please visit the [Digital Advertising Alliance’s Opt-Out page](#) or click on the AboutAds icon on a GM advertisement and follow the instructions on how to opt out. Opting out of relevant advertising will not opt you out of all advertising, but rather only those advertisements that are personalized to your interests by GM or its agents or representatives.

### **MOBILE APPLICATIONS**

GM may offer certain mobile applications that you have the option to download to or use with your connected device or vehicle (“GM Applications”). When you choose to download or use a GM Application, there may be an opportunity for you to provide us with, or for us to obtain, information about you, your connected device, or your vehicle. Each GM Application may display a separate privacy statement that will inform you about how any information is collected, used and shared via the application and how to decline such use or uninstall the application.

### **CONNECTED SERVICES**

Our U.S. Connected Services Privacy Statement applies to your use of our connected services, such as services offered through GM vehicles and mobile applications, and describes the information we collect use and share in connection with those services. A copy of our U.S. Connected Services Privacy Statement is available at [OnStar.com](http://OnStar.com).

### **BIOMETRIC TECHNOLOGY**

Instead of being asked security questions, we may offer voice verification services when you contact our call centers. If you consent to use this service, we will use a mathematical model when you speak to a call center Advisor to compare your voice in real-time against a voice print provided during enrollment. If we detect a match, you may be automatically authenticated and may not have to provide a PIN or answer account security questions.

For your security:

- Voice biometric data is only used to confirm your identity when you contact a participating call center.
- Voice biometric data will not be sold or shared without your consent.
- When we use your voice to create a voiceprint, we will encrypt your biometric data so that it cannot be used by third parties.
- If you opt-out or close your account, we will delete your biometric data.

### **THIRD PARTY SERVICES, APPLICATIONS AND WEBSITES**

Through the use of GM products and services, you may be able to access third party services, applications, and websites not offered or controlled by GM (“Third Party Services”). We recommend that you carefully review the privacy disclosures of these Third-Party Services, before interacting with them or providing your personal information to them. Unless otherwise expressly indicated by GM, this Privacy Statement does not apply to your use of such Third Party Services or how such Third Party Services may collect, use, or share your information.

### **GM DEALERS**

GM and dealers that sell GM vehicles are separate legal entities with their own privacy practices. This Privacy Statement does not apply to a dealer’s collection, use, or sharing of your information. For questions about your dealer's privacy practices including opting out of marketing communications from your dealer, please contact your dealer directly.

When you buy or lease a vehicle from, or sign a service repair order with, a GM dealer, the dealer may share your information with GM for use by GM in accordance with this Privacy Statement. We recommend that you read your dealer’s privacy disclosures to ensure that you understand its privacy practices, including how your dealer shares your information with GM. Additionally, because your dealer often is the first contact with you, your dealer can answer any questions you may have about your dealer’s privacy practices. Although GM encourages dealers to ensure full compliance with all applicable privacy law and may provide dealers with information relating to their respective privacy obligations, GM is not responsible for dealers’ compliance with applicable law.

### **ACCURACY AND UPDATES**

You may contact us, as provided below, to learn about how to update your mail, email or telephone information. Please call one of the following Customer Assistance Centers that is specific to your vehicle:

- Buick: 1-800-521-7300
- Cadillac: 1-800-458-8006
- Chevrolet: 1-800-222-1020
- GMC: 1-800-462-8782
- Saturn: 1-800-553-6000
- HUMMER (2010 and prior model years): 1-866-486-6376
- Pontiac: 1-800-762-2737

For inquiries about how the information you submit to the Investor Information portion of GM’s website or to GM Stockholder Services is handled, please call 1-313-667-1432.

You may update GM Rewards Cards contact information, such as name, address, phone number and email address, by logging onto the Account portion of the website listed on the back of your card. You can refer to the back of your credit card for customer assistance phone numbers for your account needs.

If you have a question or concern about the privacy practices of the GM Rewards Cards or the GM Card websites, please contact us by sending an email from the Contact Us page.

For GM Family First participants, you may update your information by contacting your Human Resources representative or updating your information via WorkDay. For Vehicle Purchase Plan (“VPP”) participants, you may update your personal information by visiting the VPP site that applies to you.

## **YOUR RIGHTS**

Residents of certain states, such as California and Virginia, may have the right to submit a privacy request in accordance with their local laws. Depending on where you live, you may have the right under your local laws to request that we:

- provide access to the personal information that we collect about you – to do so, submit a request to Access My Personal Information,
- delete the personal information that we collect about you – to do so, submit a request to Delete My Personal Information, or
- correct inaccuracies in personal information that we collect about you – to do so, submit a request to Correct My Personal Information.

You may also have the rights under your local laws to opt-out of certain ways that we use and share your personal information, such as to opt-out of:

- the sale of your personal information to third parties, which may include, for example, where we share your personal information with third parties for their own independent uses – to do so, submit a request to Do Not Sell My Personal Information,
- certain types of targeted advertising based on your activity across other sites – to do so, submit a request to Opt-out of Targeted Advertising (for California residents, Do Not Share My Personal Information); please note, after opting out of targeted advertising, you may still see advertising from us on other sites based on your current visits to those sites, or
- certain types of automated processing of your personal information – to do so, submit a request to Opt-out of Profiling.

### *Exercising Your Rights*

To exercise the rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 1-866-MYPRIVACY (1-866-697-7482)
- Visiting GM’s [U.S. Consumer Privacy Request Form](#)

Other than as required by law, we do not respond to signals or mechanisms enabled in web browsers indicating a preference to exercise the rights listed above.

We do not discriminate against consumers who exercise these rights. We take reasonable steps to respond to all requests and will work to process your request in accordance with the laws that apply where you reside. Our processing time may vary, and in some cases we may require up to 45 days to process your request. We may retain the information you submit with your request for as long as required or permitted by applicable law.



### *Authorizing an Agent*

You may be permitted by law to authorize someone else to act as your agent to exercise some of your privacy rights on your behalf. In such cases, your authorized agent must provide documentation supporting his or her authority to make this request on your behalf. In some cases, we may also require you to verify your identity directly with us and confirm the request before we will process it.

Further information about how to submit this request and the documentation we require to support it is available within our U.S. Consumer Privacy Request Form at [consumerprivacy.gm.com](http://consumerprivacy.gm.com). Your authorized agent can also contact us at [gm.datacompliance@gm.com](mailto:gm.datacompliance@gm.com) to request a copy of our Authorized Agent Form and to submit this request on your behalf. Documentation supporting your authorized agent's right to submit this request on your behalf, such as a copy of our Authorized Agent Form signed by you or a Power of Attorney, must be submitted with this request. If this request is submitted over the phone, your authorized agent will be asked to email supporting documentation to [gm.datacompliance@gm.com](mailto:gm.datacompliance@gm.com).

### *Verifying Your Request*

For your protection, we take reasonable steps to verify all requests before they are processed. This may include, for example, a request from us for you to confirm your identity, to validate documents you submit to us, to verify your authority to make the request, or for other purposes. In all cases, we reserve the right to deny your request in accordance with applicable law if we cannot verify you or your authority to make the request.

If we decline to take action regarding your request, you may the right to appeal. Please contact us at [gm.datacompliance@gm.com](mailto:gm.datacompliance@gm.com) if you would like to submit such an appeal.

## **HOW WE SAFEGUARD YOUR INFORMATION**

We maintain reasonable technical, administrative, and physical security and confidentiality measures designed to help protect your information from unauthorized access or use. We also require (other than in certain emergency situations) third party service providers acting on our behalf or with whom we share your information to provide similar security and confidentiality measures.

## **HOW LONG WE KEEP YOUR INFORMATION**

We may keep the information we collect for as long as necessary to provide products or services to you, to operate our business, to enable us to communicate with you, for our safety, research, evaluation of use, or troubleshooting purposes, or to satisfy our legal or contractual obligations. Where required, we will anonymize or dispose of the information we collect when we no longer need it for the uses described in this Privacy Statement.

## **CHILDREN'S PRIVACY**

GM websites and other online services do not target or knowingly collect any information from children under the age of 13.

## **INTERNATIONAL DATA TRANSFERS**

When GM and its controlled subsidiaries and affiliates in the United States, including OnStar LLC, ("GM U.S.") receive information from GM controlled subsidiaries and affiliates in Europe, (collectively "Europe Companies"), we comply with applicable legal requirements providing adequate protection for the transfer of personal information to countries outside of the EEA, UK, or Switzerland. GM U.S. acts as

a data processor for its Europe Companies by providing data hosting, maintenance, support, and troubleshooting of services, as well as other back office support.

We store your information in the United States, the European Economic Area (EEA), and other locations where we or our service providers maintain servers. With respect to such transfers from the EEA to the United States and other non-EEA jurisdictions, we implement standard contractual clauses and other mechanisms to protect such data.

Individuals that use products or services offered by Europe Companies may wish to raise any privacy questions with such company directly, including filing any requests to access European customer data or exercise other privacy rights. Each Europe Company has a separate privacy statement that you can find by visiting its website. Individuals may also raise questions with GM U.S. using the contact details below.

In addition, anonymized and aggregated data from Europe Companies are shared with GM U.S. to evaluate or research the safety, quality, usage, and functionality of vehicles and services; to provide Europe Company customers with vehicle support and services; and to ensure accurate customer records and maintain customer relationships. Information also is shared with GM U.S. in order to contact Europe Company customers about their vehicle or the services, or for marketing purposes, but only if the individual has opted in to receive marketing information.

### **HOW TO CONTACT US**

If you have concerns or questions regarding GM's consumer privacy practices or this Privacy Statement you may contact us at 1-866-MYPRIVACY (1-866-697-7482).

### **CHANGES TO THIS PRIVACY STATEMENT**

We may amend this Privacy Statement from time to time. In some cases, we will notify you of this change only by posting a new effective date at the top of this Privacy Statement and your continued use of our products and services covered by this Privacy Statement will mean you accept the changes. In other cases, if we intend to collect, use, or share personal information in a way that is materially different from the way that we disclosed at the time of collecting your personal information, then we will notify you as required by law, such as by email or through a notice on the applicable website.