

Privacy Policy for No Contact Test Drive

Last Updated February 1, 2021

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 No Contact Test Drive services (the, “**Services**”) via the compatible electronic device you own or control, such as your Apple or Android mobile device, 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 one or more GM connected-services capable vehicles that are enrolled in the No Contact Test Drive program (“**Vehicle**”) that are made available to you by a participating dealer (the “**Dealer**”).

This Privacy Statement incorporates the OnStar Privacy Statement, which is posted at www.onstar.com/privacy. 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 Dealer, and any authorized representatives of the Dealer, may be able to see certain information about you or the Vehicle through the Services if the Vehicle is equipped with GM connected services. It is your responsibility to notify any passengers of this Privacy Statement and the information that may be accessible via GM connected services.

Information We Collect

When you access the Services, we may collect:

- Information you input into the Service through the Application or Website, such as name, email, phone number, address;
- Information you provide in connection with the Services, including your valid state-

issued Driver's License and proof of current automotive insurance, and the information contained within each of these items;

- 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;
- Information about your use of the Application or Website, including pending and past No Contact Test Driver reservations and requests, 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 use of the Vehicle, including operational and safety related information such as GPS location, speed, air bag deployments, crash avoidance alerts, impact data, safety system status, braking events, accelerating events,

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.

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

Use of Your Information

We use the information we collect 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;
- 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, services, and Vehicles;
- 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 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 the Vehicle, if that feature is available. The Dealer

may have restrictions on disabling location sharing on the Vehicle. Please consult with the Dealer before disabling location sharing on the Vehicle.

Sharing of Information

We share the information we collect as described in this Privacy Statement and the OnStar Privacy Statement. We may share your information with:

- The Dealer, for the purposes set forth above in “Use of Your Information”;
- Third party service providers working on our behalf;
- Emergency service providers;
- Others when required by law or to comply with legal obligations;
- To protect the safety and rights of you and others;
- For product safety and security purposes;
- For the purposes described in the OnStar Privacy Statement; and
- Those with whom you ask us to share this information.

Your Obligations

We rely on you to inform any persons using your Device or the 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 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 the 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 <https://stone-azure-static-gm-cdn-com.cdn-prv.gm.com/test-drive/legal-docs/privacy-mobile.pdf> 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.