

## **ONSTAR PRIVACY STATEMENT- HIGHLIGHTS**

### **Effective June 1, 2014**

General Motors of Canada Limited, ("OnStar" or "we") wants you to know how it collects, uses, and shares Account Information, Vehicle-Related Information, and Driving Information (as described below and defined in the full Privacy Statement). Below is a short description of our practices relating to the collection, use and sharing of this information. You can read the full Privacy Statement below for more detailed information.

- **People Covered by This Privacy Statement; Related and Other Privacy Statements**

This Privacy Statement applies to you, vehicle occupants, and others who use your vehicle, the OnStar services (described in the OnStar User Terms and at [www.onstar.ca](http://www.onstar.ca)) or our website(s). Other privacy statements may also apply to additional services that you request or sign up for, or when you use or download OnStar Apps, such as our RemoteLink App. Those privacy statements should be read together with this one. Other third party services or applications, like your wireless data plan, may also have their own privacy statements. Those statements have separate terms and should be read independently of this Privacy Statement.

- **Information Collected by OnStar**

OnStar collects the following types of information about you and your vehicle:

- **Account Information**, like your contact and billing information and information about how you use certain OnStar services and our website(s);
- **Vehicle-Related Information**, like diagnostic information, odometer, oil life remaining, tire pressure, and information about collisions involving your vehicle; and
- **Driving Information**, like location, GPS speed, safety belt usage, and other similar information about how the vehicle is used.

We collect this information from a variety of sources, like you, your vehicle (when the OnStar system is active), our website(s), and third parties.

- **OnStar's Use of the Information**

OnStar uses this information to, for example:

- provide certain services to you;
- fix, maintain, enhance and/or modify the OnStar system or services;
- to analyze the software on your vehicle and to remotely update the software;
- to communicate with you; and
- to provide you with offers that might interest you.

We may use information for any purpose or share it with any third party if we anonymize it so that it no longer reasonably identifies you or your vehicle.

- **Sharing of Information – Driving Information (location, GPS speed, safety belt usage and other similar information about how the vehicle is used)**

We limit who we share your Driving Information with and the purposes for which it can be used. For example, Driving Information may be shared with:

- emergency service providers and law enforcement when you need emergency services or if your vehicle is stolen;
- GM for product safety or security purposes or to help maintain the proper operation of your vehicle;
- our service providers to help us provide or evaluate certain services; and
- any third party to comply with legal requests or to protect the rights and safety of you or others.

- **Sharing of Information – Account Information and Vehicle-Related Information**

We may share your Account Information and Vehicle-Related Information with

- third parties as part of our delivery of the Services; for joint marketing initiatives; and in order to comply with legal requests or to protect the rights and safety of you or others:
- GM to enable it to evaluate or research the safety, quality, usage, and functionality of its vehicles, to contact you, or for marketing purposes;
- your dealer for service, maintenance, or marketing purposes; and
- your fleet or rental company, if the vehicle you drive is part of a fleet or is a rental car.

- **Security; Retention of Information**

Because the security of your information is important to OnStar, we use technical, administrative, and physical safeguards designed to protect your information. We may keep information for as long as we need it for purposes like:

- providing Services to you;
- enabling us or GM to contact you; and
- allowing us or GM to engage in research, evaluation of use, and troubleshooting.


We will anonymize or dispose of the information we collect when we no longer need it.

## **THE ONSTAR PRIVACY STATEMENT**

**Effective June 1, 2014**

This Privacy Statement applies to Account Information, Vehicle-Related Information and Driving Information (defined below) that we obtain about you, your vehicle, or your use of the vehicle.

We collect this information when the OnStar system in your vehicle is active, when you use the OnStar services described in the OnStar User Terms and at [www.onstar.ca](http://www.onstar.ca) (the "Services"), when you use our website(s), when we obtain the information from other companies, or when we obtain the information from any other source that links to, presents, or refers to this Privacy Statement. We may anonymize the information we collect. That means that we alter the information so that it can't reasonably be identified with you or your vehicle. We may use anonymized information for any purpose or share it with any third party for any purpose.

	<b>People Covered by This Privacy Statement; Related and Other Privacy Statements</b>
	<p>This Privacy Statement applies to you and to others who use your vehicle, the Services, or our website(s). Other privacy statements may also apply to additional Services that you request or sign up for, or when you use or download OnStar Apps, such as our RemoteLink App. Those privacy statements should be read together with this one. Other third party services or applications, like your wireless data plan, may also have their own privacy statements. Those statements have separate terms and should be read independently of this Privacy Statement.</p>

When we use words like "you," "your," and "yours," we mean the owner, lessee, or user of an OnStar-equipped vehicle operating and designed for use in Canada. Please note that this Privacy Statement applies any person who uses an OnStar-equipped vehicle, our website(s) or the Services, regardless of whether the person owns, rents, leases, or borrows the vehicle. If you own or lease your vehicle and anyone else uses your vehicle or the Services, or if you sell or otherwise transfer possession of your vehicle to another person, please tell that person that there are OnStar Services active on your vehicle, and that they should read this Privacy Statement.


When we say "OnStar" or "we" or "us" or similar words, we mean General Motors of Canada Limited. We may share or disclose some information with General Motors Company ("GM"), the company that owns us, and its affiliates, including OnStar, LLC.

#### **Related Privacy Statements**

Some Services, and OnStar applications and software ("OnStar Apps"), such as the OnStar RemoteLink App, that we may offer now or in the future are governed by separate privacy statements that should be read together with this Privacy Statement. These privacy statements are available at [www.onstar.ca](http://www.onstar.ca).

#### **Other Privacy Statements**

Third parties, such as those companies that provide wireless voice, wireless data, and satellite radio services also have their own privacy statements. Those privacy statements are separate from this Privacy Statement and their terms are different. Please also refer to those privacy statements for information about how your information is collected, used, and shared. The AT&T privacy statement, which governs how AT&T treats information collected when providing wireless data services to you, is available at [www.att.com/CANTermsandconditions](http://www.att.com/CANTermsandconditions).

	<b>Information Collected by OnStar</b>
	<p>We collect information from you, from your vehicle (when the OnStar system is active), from our website(s), and from other third parties. We collect the following</p>

types of information about or relating to you or your vehicle: <b>Account Information</b> , like your contact and billing information as well as certain website usage information; <b>Vehicle-Related Information</b> , like diagnostic information, odometer, oil life remaining and, tire pressure and, <b>Driving Information</b> , like location, GPS speed, safety belt usage and other similar information about how the vehicle is used.
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### **Information Collected by OnStar**

We collect the following kinds of information from you, from GM or its affiliates, from your dealer, through our website(s), from the active OnStar system in your vehicle, and from other companies as described further below.

- **"Account Information" includes:**

- Information about you, like your name, address, telephone number, e-mail address, log-in information and PIN, license plate number, and emergency contact information;
- Your billing information, like your credit card number;
- Information about the acquisition of your vehicle, like the date of purchase or lease of your vehicle and your selling and preferred dealer;
- Information about how you use your vehicle's features and systems (including the OnStar system), like whether you have paired a mobile device with your vehicle and your use of the Services, (but does not include Driving Information as described below);
- Information about the device(s) you use to access our website(s), how you use our website(s), and your online activities over time and across different websites(s) including your IP address, device type, browser version, the pages you view, the searches you make, and your operating system (this information typically does not identify you); and

- **"Vehicle-Related Information" includes:**

- Information about your vehicle, like the vehicle's identification number ("VIN"), its make, model and year;
- Information about your vehicle's condition, like diagnostic data, odometer readings, oil life remaining, tire pressure, fuel economy;
- Information about when your vehicle is refueled or recharged;

- Information that might indicate that your vehicle has been broken into or stolen, like glass breakage or ignition switch activity, if your vehicle is equipped to detect those things;
- Information about apps that are pre-installed on the OnStar equipment, including the version of those apps;
- Information about the OnStar equipment, including the version of the OnStar software installed on that equipment;
- Information about when your vehicle's ignition is on or off; and
- Information about collisions involving your vehicle, like the direction from which impact happened and which air bags deployed.
- **"Driving Information" includes:**
  - Information like the location of your vehicle, the GPS speed of your vehicle, your safety belt usage, and other similar information about how the vehicle is used.

**How OnStar Collects the Information**

We collect the information described above from you (such as when you use a website, or talk to an OnStar advisor), from your vehicle (usually by remote communication using the OnStar equipment in your vehicle), and from other sources, such as the manufacturer, your dealer and others.

	<p><b>OnStar's Use of the Information</b></p> <p>OnStar uses the Account Information, Vehicle-Related Information, and Driving Information to provide Services to you, to remotely deliver and install updates to the software on your vehicle, to fix, maintain, or improve the OnStar system or Services, to communicate with you, and to provide you with offers that may interest you.</p>
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- **OnStar's Use of the Information**

OnStar may use your Account Information, Vehicle-Related Information, and Driving Information for the following purposes.

  - To provide Services to you, including checking, maintaining, and updating the OnStar system;
  - To collect information about vehicle system status, identify if system or software updates are available and to remotely deliver and install the updates;
  - To communicate with you about your account or the Services;

- To provide you with offers for products or services that may interest you, including online offers based on your previous online activities and, with your prior additional consent, offers based on the location of your vehicle;
- For troubleshooting, evaluation of use, and research;
- To improve our products and Services;
- To protect the safety of you or others;
- To prevent and detect fraud or misuse of the OnStar service; and
- As required by law.

	<p><b>Sharing of Information – Driving Information (location, GPS speed, safety belt usage and other similar information about how the vehicle is used)</b></p> <p>We limit who we share your Driving Information with and the purposes for which it can be used. For example, Driving Information may be shared with: emergency service providers and law enforcement when you need emergency services or if your vehicle is stolen; with GM for product safety or security purposes, to protect the safety of you or others, or to help maintain the proper operation of your vehicle; with appropriate third parties to comply with legal requests or to protect the rights and safety of you and others; and with our service providers to help us provide or evaluate the Services.</p>
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**Sharing of Information – Driving Information (location, GPS speed, safety belt usage and other similar information about how the vehicle is used)**


We may share your Driving Information with the third parties listed below, for the following purposes:

- Emergency Service Providers, like the police, roadside assistance providers, ambulance providers, or other similar emergency service providers, to give you the emergency services you need;
- Law Enforcement, to provide the OnStar Stolen Vehicle Assistance Services that have been requested by you, like Remote Ignition Block and Stolen Vehicle Slowdown, if your vehicle is equipped with these features;
- GM or its affiliates, for product safety or security purposes, to protect the safety of you or others, or to help maintain the proper operation of your vehicle. For example, we may share this information with GM or its affiliates in determining whether to perform a

remote software update or change to the software in your vehicle and to deliver and install the update;

- Other parties with your prior permission, to provide you with the services you have specifically requested or subscribed to, like your insurance provider if you choose to participate in a discount based program based on your Driving Information (e.g., a safe driver program);
- Our service providers, like companies that store or process information on our behalf, that help us provide the Services or operate our business;
- A company that buys or takes over our business, to enable it to provide the Services, or to operate the business; and
- Appropriate third parties, in order to comply with legal obligations, to protect the safety or rights of you or others, or in response to a subpoena, warrant, court order, or other legal request.

We will not otherwise share your Driving Information with unaffiliated third parties unless you provide your prior additional consent.

	<p><b>Sharing of Information – Account Information and Vehicle-Related Information</b></p> <p>We may share your Account Information and Vehicle-Related Information with third parties as part of our delivery of the Services; for joint marketing initiatives; and in order to comply with legal requests or to protect the rights and safety of you and others. We may also share this information with GM or its affiliates to enable it or them to evaluate or research the safety, quality, usage, and functionality of its vehicles, to contact you, or for marketing purposes. We may share information about how you use our website(s) with third parties. We may share information with your dealer for service, maintenance, or marketing purposes. We may also share information with your fleet or rental company.</p>
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**Sharing of Information – Account Information and Vehicle-Related Information**


We may share your Account Information and Vehicle-Related Information with third parties for the purposes outlined below. Your Driving Information is not shared with these third parties unless otherwise stated above.

- Emergency service providers, law enforcement, roadside assistance providers, and other similar third parties, that help us deliver the Services;

- Our service providers, like companies that store or process information on our behalf, that help us deliver advertising to you, that help us provide or evaluate the Services, or that help us operate our business;
- Your dealer, to assist it in servicing your vehicle, for marketing purposes or to provide Dealer Maintenance notifications;
- Satellite radio providers and wireless telecommunications and data service providers, to contact you with information about your satellite, wireless telecommunications or data services, or for marketing purposes;
- Third parties with whom we contract to provide you with joint marketing offers. We will not share your Driving Information or your credit card information with unaffiliated third parties without your prior additional consent;
- Third party advertising companies that may automatically collect or receive information about your online activities over time and across different websites (see the Cookies and Other Tracking Technologies section for more information);
- Your fleet company if the vehicle is a part of a fleet;
- Your rental company if the vehicle is a rental car;
- GM or its affiliates to enable it to evaluate or research the safety, quality, usage and functionality of its vehicles, to contact you, or for its marketing purposes;
- A company that buys or takes over our business, to provide the Services, any other services you have requested, or to operate the business;
- Other parties you ask us to share the information with, like third parties who need the information to provide you with a program or service that you have requested; and
- Appropriate third parties, in order to comply with legal obligations, protect the safety or rights of you or others, or when we receive a subpoena, warrant, court order, or other legal request.

We will only share your credit card information with wireless service providers (e.g. AT&T), credit card processors, or systems providers necessary to process, store or manage credit card information, with a company that buys or takes over our business or with appropriate third parties to comply with legal obligations.



	<p><b>Your Choices; How OnStar Communicates with You; Access to Your Information</b></p> <p>We may offer you certain choices about the information we collect and how we use or share the information. You can access and correct your contact and account information.</p>
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- **Your Choices About the Collection, Use and Sharing of Information**

You have certain choices about the information we collect and how we use or share that information. For example, you may choose not to receive marketing information from us. Some collection and sharing practices are tied to the Services we offer. To stop the collection or sharing of some information, you may have to decline those Services or be willing to accept limited functionality.

To learn about the choices available to you, please contact us at [privacymanager@onstar.com](mailto:privacymanager@onstar.com). See the Cookies and Other Tracking Technologies for your choices regarding the collection of information via cookies.

- **How OnStar Communicates with You**

We may contact you about products or services that may be of interest to you, about your account, your vehicle or the Services (including cancellation of the Services) using postal mail, telephone calls, e-mail, text messages (sometimes called SMS messages), or other electronic messages using any electronic address you have provided to us.

We may communicate using pre-recorded spoken messages through the OnStar system to give you information about the Services, your vehicle, your account, or cancellation of the Services.


You can manage your communication preferences by following the instructions that may be provided in the communication, or by contacting us. See "How to Contact OnStar."

Please Note: We offer you the ability to opt out of receiving certain kinds of communications from us, such as marketing-related messages. Please be aware that opting out of one kind of communication does not affect communications that you have not opted out of receiving, or that we are required or permitted by law to send to you.

- **Access to Your Information**

If you'd like to access or ensure the accuracy of the contact or Account Information that you have provided, please contact us. See "How to Contact OnStar."

To the extent required by applicable law, we provide access to records of service events, like when you request service, when an OnStar advisor calls in to your vehicle, or when we provide crash-related, theft-related, or emergency services.

	<p><b>Security; Retention of Information</b></p> <p>We use technical, administrative, and physical safeguards designed to help protect your information. We and our service providers may process and store information about you or your vehicle in Canada, the United States, or other jurisdictions from which the Services will be provided and where the privacy laws may be different from those in Canada. We may keep information for as long as we need it for purposes like: providing Services to you; to enable us or</p>
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	GM or its affiliates to contact you; for our or GM's, or its affiliates' research, evaluation of use, and troubleshooting purposes.
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- **How OnStar Safeguards Your Information**

We use technical, administrative, and physical safeguards designed to help protect your information from loss, misuse and unauthorized access, disclosure, alteration, destruction or theft.

If we transfer, or otherwise make information that identifies you or your vehicle available to a third-party service provider (other than in an emergency situation), we will contractually require any such service providers maintain similar technical, physical and administrative safeguards designed to protect your information from loss, misuse and unauthorized access, disclosure, alteration, destruction or theft.


- **Where Information is Processed or Stored**

We and our service providers may process and store the information described in this Privacy Statement in Canada, the United States, or other jurisdictions from which the Services will be provided and where the privacy laws may be different from those in Canada. Information may be available to the government or its agencies in the country where the data is processed or stored under a lawful order in that country. You may contact us, as set out below, in order to find out about our practices in this regard.

- **How Long OnStar Keeps Your Information**

We may keep the information we collect until we no longer need the information to provide Services to you, to operate our business, to enable us or GM or its affiliates to communicate with you, for our or GM's or its affiliates' safety, research, evaluation of use, or troubleshooting purposes, or to satisfy our or GM's or its affiliates' legal or contractual obligations.

We will anonymize or dispose of the information we collect when we no longer need it.

	<p><b>Cookies and Other Tracking Technologies</b></p> <p>We use "cookies" and similar tracking technologies to improve your user experience and to operate our website(s), and for marketing. You can refuse cookies by choosing the appropriate settings in your web browser.</p>
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- **Cookies and Other Tracking Technologies**

We use cookies and other methods on our website(s) and in the OnStar system in your vehicle to operate our website(s), to provide you with offers that may interest you (including on third-party websites), and to personalize the content we present you on our website(s) or in your vehicle. Some cookies exist only during a particular session and some are persistent over multiple sessions over time.

These methods can allow you to maintain your account log-in information and other information between visits and they allow us to measure site activity to provide a better user experience. For example, cookies and other tracking devices may be used to tell us the time and length of your visit, the pages you look at on our site, the site you visited just


before coming to ours, the name of your Internet service provider, and similar information.

We may use advertising service providers to serve OnStar advertisements on other websites that you visit. In serving OnStar advertisements, these companies may use cookies and other tracking devices to collect information about your visits to other websites, like browser type, IP address, which page was visited, and time of day. We use this information to evaluate our online advertising campaigns or to tailor promotions and other marketing messages to you.

Third parties whose websites or other resources you use might also use cookies or other tracking methods. The privacy practices of those third parties are covered by their own privacy statements. We encourage you to read them.

If you do not want our website(s) to collect information through the use of cookies, you can set your web browser to reject cookies. Each browser is different, so you should check your browser's "Help" menu to learn how to change your cookie preferences. If you reject or block cookies, however, our website(s) may not function as intended. In addition to our advertising service providers, other online network advertising companies may use cookies or other technologies on our website(s) or Services to collect information about your online activities over time and across different websites and services. You may also be able to exercise choices regarding such companies via certain third party tools. Read more information about such choices <http://www.networkadvertising.org/choices/> and <http://www.aboutads.info/choices/>.

Most web browsers include a "do not track" setting. However, there is a lack of certainty or consistency with respect to what impact that setting should have on the information collected or on a user's browsing experience. Accordingly, and consistently with respect to the operation of many websites, if you enable that setting, it will not change what information is exchanged with your computer, or how that information is used, when you visit our website(s).


	<p><b>Changes to This Privacy Statement</b> We'll post any revised Privacy Statement to the OnStar website (<a href="http://www.onstar.com">www.onstar.com</a>). If we make a material change, we'll notify you, otherwise bring the change to your attention, or where required by law, get your consent.</p>
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- **Changes to This Privacy Statement**

We may need to update this Privacy Statement from time to time as our business and Services expand or change, or if we are required to by law. If we do, we will post the most up-to-date version on the OnStar website ([www.onstar.ca](http://www.onstar.ca)) so you should periodically check for any updates.

If we materially change the practices stated in this Privacy Statement and you're an OnStar customer, we will notify you by sending an e-mail to the email address that you have

provided or, if you do not have an e-mail address on file with us, we will send the notice by postal mail or otherwise take reasonable steps to bring the change to your attention. We'll get your consent to the changes if legally required.

	<p><b>How to Contact OnStar</b> You can contact us by pressing the blue OnStar button in your vehicle, by calling us at 1 888-4ONSTAR, or by regular mail. For privacy related questions, email the OnStar Privacy Manager at <a href="mailto:privacymanager@onstar.com">privacymanager@onstar.com</a>.</p>
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- **How to Contact OnStar**

If you have a general question, you can visit our website at [www.onstar.ca](http://www.onstar.ca), press the blue OnStar button in your vehicle, or call us at 1-888-4ONSTAR (1-888-466-7827). You may write to us at OnStar Subscriber Services, PO Box 1027, Warren, Michigan USA 48090-1027.

If you have a specific question about our privacy practices, contact the OnStar Privacy Manager by e-mail at [privacymanager@onstar.com](mailto:privacymanager@onstar.com), or write to OnStar's Privacy Manager at OnStar Privacy Manager, P.O. Box 1027, Warren, Michigan, 48090-1027, or call us at 1-877-299-1372.

### Frequently Asked Questions

- **Will OnStar collect information from my vehicle if I cancel all OnStar Services?**

No. Once the cancellation request has been processed, we'll no longer collect information from your vehicle using the OnStar equipment or services unless you press the blue OnStar button or ask us to collect information again, like by reactivating Services.

You must cancel all Onstar Services before you sell or transfer your vehicle. You can do this by contacting us at 1-888-4ONSTAR or by pressing the blue button in your vehicle.

- **What information does OnStar share with GM?**

When we talk about "GM," we mean General Motors Company and its affiliates, including General Motors of Canada Limited.

We share your Account Information and Vehicle-Related Information with GM to enable GM to evaluate or research the safety, quality, usage, and functionality of its vehicles, to contact you with information about your vehicle, or for marketing purposes.

We may also share your Driving Information with GM for product safety and security purposes, to protect the safety of you or others, or to help maintain the proper operation your vehicle. For example, we may share this information when determining whether to perform a software or systems update or upgrade for your vehicle.

If a company buys or takes over the business of GM, we would share the same information with that company.

- **What Information Does OnStar Share with AT&T?**

We share your name, billing address, home address, phone number, e-mail address, and details about your acceptance of the terms and privacy statements that apply to your request for, or use of, data services. If we receive any updates for that information, we share those updates with AT&T.

If a credit card is stored on file with OnStar for purchase of a data plan with AT&T, or a one-time payment method is provided, we send the credit card number, expiration date, first and last name, and billing address, and details about the voice or data package that you purchased.

The information that we share with AT&T, as well as any other information that AT&T collects from or about you, will be subject to AT&T's privacy policy. You should read AT&T's privacy policy at [www.att.com/CANTermsandconditions](http://www.att.com/CANTermsandconditions) to find out how AT&T collects, uses, and shares your information.

- **What should I do to help safeguard my information?**

Keep your username, service set ID (or "SSID," which is the unique number associated with the OnStar equipment in your vehicle) and password secret. Don't give your PIN to anyone you don't want to use the Services or incur charges that you must pay.

You are responsible for any use of the Services by persons who give us your PIN or password. We cannot be responsible for any unauthorized use of the Services by persons who give us your PIN or password. Contact us to change your PIN.

It's illegal for people to intercept wireless telephone calls, but some people do it. Be cautious of what information you disclose on any wireless telephone call.

- **Can OnStar hear what's going on in my vehicle?**

Our advisors cannot listen to anything going on in your vehicle without you knowing it. An advisor can only hear sounds from your vehicle if you call an OnStar advisor or an OnStar advisor calls in to your vehicle. If an OnStar advisor calls in to your vehicle, you'll know because:

- A light will flash;
- You'll hear a ring; and;
- The radio will mute.

In addition, calls through the OnStar system are normally audible through the stereo speakers and vehicles that have text display capabilities will indicate that a call is occurring. On top of that, OnStar requires its advisors to announce their presence immediately upon establishing a call into your vehicle.

We designed these measures so that our advisors cannot override them.

- **Does OnStar keep recordings of my interactions with OnStar advisors?**

We may record and monitor all interactions between us (including interactions when you are in your vehicle) in order to maintain or improve the quality of our Services or for training purposes.

OnStar advisors may also remain on the line if, during a request for services, we conference in a third party like an emergency service provider or the police. These parties may also separately record and/or monitor the interaction. We may also review your interactions with OnStar's automated Services for training and/or quality improvement purposes.