#### **Dealer Sales Assistant Application Privacy Statement**

Last Updated: 2016-12-01

Your privacy is important us. This Privacy Statement describes how we, General Motors of Canada Company ("GM"), collect, use, disclose and share information when you download and use the Dealer Sales Assistant software application ("**Application**") to your Internet-connected device (your "**Device**") and when you access or use the services available through the Application. This Privacy Statement is provided as clarification to and applies in addition to the GM Privacy Policy, a copy of which can be found at gm.ca.

It is your responsibility to inform any other users of your Device and/or the Application about this Privacy Statement.

#### **Information We Collect**

# Dealer, Dealer Employee and GM Field Employee Users

When you use the Application as a Dealer or Dealer Employee, you will be asked to provide your GM GlobalConnect ID and password for authentication purposes. You must be a current GlobalConnect Sales Workbench application registered user in order to use the Application. If you use the email functionality in the Application, the email address you provide will be used to permit you to send the consumer the email that the consumer has requested of you, and will not be retained by GM within this Application.

#### GM Family First Employee/Retiree Users

When you use the Application as a GM Family First Employee/Retiree you will be asked to provide your GM Family First username and password for authentication purposes. You must be a current GM Family First registered user in order to use the Application. If you use the email functionality in the Application, the email address you provide will be used to permit you to send the consumer the email that the consumer has requested of you, and will not be retained by GM within the Application.

# All Users (Dealers, Dealer Employees, GM Family First Users, Retirees, GM Field Employees)

When you install or use the Application, we collect device information, such as its operating system, Device type, Internet Protocol (IP) address, type of browser, Internet service provider, phone number and other unique identifiers pertaining to your Device.

When you use this Application, you may be asked to provide information about an individual or their vehicle including, an email address, and GM Card Bonus code. You are responsible for informing that individual about the terms of this Privacy Statement, and by providing such information to us YOU REPRESENT AND WARRANT THAT YOU HAVE OBTAINED ALL NECESSARY PERMISSION/CONSENTS FROM AN INDIVIDUAL PRIOR TO COLLECTING ANY INFORMATION ABOUT THE INDIVIDUAL OR THEIR VEHICLE, including notifying the

individual regarding what information you are collecting, how it will be used within this Application and with whom it will be shared. You also agree that any information so collected will be used <u>only</u> for the purposes of supporting the use of this Application as a tool for you, as a dealership sales representative or GM employee or retiree, as the case may be, to work with the individual to review product features and options, and to help the individual define and find the vehicle they are interested in.

To help us understand how the Application is being used, the Application uses a third party service that uses cookies, and similar technologies to obtain information about the Application and your use of the Application, such as information related to the Application's crashes, the functionality you use within the Application, and how frequently and how long you use the Application.

# **Sharing of Information**

GM may share the information collected with third parties for the following purposes:

- · when required or permitted by law;
- with our affiliates, who may also use it for any of the purposes for which we use it;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- with our services providers and analytics companies who work on our behalf;
- With our GM dealers to enhance your product and service experience and to provide you with general marketing, product, and service information;
- with our business partners to conduct joint marketing programs with GM; and
- in connection with the sale, transfer or financing of a significant part of a GM business.

# **Opt Out Rights**

The Application may provide options to limit the collection of certain information, either within the Application itself, or through the privacy settings of your Device. To stop the Application from collecting any information, you can may uninstall the Application by using the standard uninstall process available on your Device or via the application marketplace or network you used to download the Application.

#### **Data Retention and Use**

GM may keep and use the information we collect until we no longer need the information to provide the Application to you, to operate GM related business, for research or

evaluation of use, for troubleshooting purposes or to satisfy GM's or its affiliate's legal or contractual obligations; AND for

- · Meeting safety, security, legal and regulatory requirements;
- Providing you or the individual whose information you have collected, with general marketing and business partner information, offers and advertisements;
- Conducting market analysis and analyzing business results;
- Maintaining the accuracy of our records to respond to your consumer inquiries and provide you and consumers with warranty or other customer service communications, and otherwise better understand and manage our relationship with you; and
- Satisfying other reasonable, legitimate business interests (such as maintaining our relationship with you; improving and analyzing our products, services, and customer satisfaction; and collecting outstanding debts).

GM may process the information described in this Privacy Statement in Canada, the United States or other jurisdictions, where the privacy laws may be different from those in Canada. The term "processing" includes collecting, storing, deleting, using, combining, processing and disclosing information. Your information may be available to law enforcement agencies under the laws of Canada or the United States and/or those other jurisdictions.

If you'd like us to delete the information you have provided via the Application, please telephone the Dealer Systems Support Help Desk at 1-800-265-0573 or send an email to dealersupport@cc.gm.ca. Please note we may be required to retain certain information by law.

## **Security**

GM uses technical, administrative, and physical safeguards designed to help protect your information, that are appropriate to the sensitivity of the information we collect We require our third party service providers and business partners to maintain similar safeguards against loss, misuse, and unauthorized access, disclosure, alteration, destruction, or theft of your information. However, no company can perfectly protect personal information, so we cannot guarantee the safety or security of your personal 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.gm.ca or your Device, or by notifying you via email or postal mail.

#### **How to Contact GM**

If you have any questions regarding privacy while using the Application, or have questions about our practices, please telephone the Dealer Systems Support Help Desk at 1-800-265-0573 or send an email to dealersupport@cc.gm.ca.