## Dealer Sales Assistant Privacy Statement

#### Last Updated September 12, 2018

Your privacy is important to General Motors ("GM"), as is your trust in GM. We want you to know that the information you share with us will be treated with care. This Privacy Statement lets you know how we collect, use and share information when you download this software application (the "App") to your authorized phone or other Internet-connected device (your "Device") and when you use the services available through the App (the "Services"). By using this App, you agree and consent to be bound by the terms of this Privacy Statement and the Dealer SalesAssistant User Terms (the "Terms").

This Privacy Statement and Terms incorporate all applicable GM policies, dealer or service agreements, employee and/or contractor agreements, and any other applicable policies, directives, or rules.

#### Information We Collect

When you install the App or use the Services, we may collect:

- Any information you input into the App or provide us through the App, including, but not limited to, customer information, including but not limited to, the VIN of customer's vehicle, customer's name, and contact information, your contact information, including your email address, your GM Global Connect or GM Family First account information, or information about the dealer or service department you are associated/affiliated with;
- Device information, such as Device type, Device operating system, Internet Protocol (IP) address, unique identifier, type of browser, Internet service provider, and information about your use of the App; and
- Information about your use of the App, including the total number of times you download or install the App, the total number of times you use the App, when you download or attempt to download content updates to the App, the content you view while using the App, and specific actions to activate features and/or otherwise navigate the application;

If you do not want GM, or its authorized third parties, to collect or use the information in accordance with the App, stop using the App immediately and uninstall it from your Device.

# Use of Information

We use the information we collect to:

- Provide the Services;
- Communicate with you about the Services;
- Improve, troubleshoot, and evaluate the use of our products and Services (including the App); and
- Conduct research.

# **Sharing of Information**

GM may share the information collected when you use this App with third parties in the following instances:

- as required by law, such as to comply with a subpoena, or similar legal process;
- 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 trusted services providers in connection with providing the Services;
- those you ask us to share this information with; and
- · in connection with the sale, transfer or financing of a significant part of a GM business.

# **Tracking**

To help us understand how the App is being used, this App may use a third party tracking service that uses cookies, and similar technologies to obtain non-personally identifiable information about you. The non-personally identifiable information will be collected on an anonymous aggregate basis and will include information related to your use of the App.

# **Sharing of Information**

GM may share the information collected when you use this App with third parties in the following instances:

- as required by law, such as to comply with a subpoena, or similar legal process;
- 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 trusted services providers and analytics companies who work on our behalf, do not have an independent use of the information we disclose to them;
- 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.

# **Third Party Links**

This App may contain links to third-party sites not controlled by GM or covered by this Privacy Statement. We recommend that you read the Privacy Statement of other sites you visit before providing any personal information.

#### Children

We do not use the App to knowingly solicit data from or market to children under the age of 13. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact GM. We will delete such information from our files within a reasonable time.

#### **Data Retention**

GM will retain the information collected from this App for the duration of the App, and a reasonable time thereafter. If you'd like us to delete the information you have provided via the App, please contact GM, and we will respond in a reasonable time. Please note we may be required to retain certain information by law.

# Security

GM recognizes the importance of safeguarding consumer personal information in GM's possession from theft, inappropriate use, or improper distribution. GM has security policies and procedures appropriate to the level of confidentiality of that data. Our suppliers have signed agreements to protect and use your data according to our requirements. It should, however, be recognized that no company can perfectly protect personal information.

To the extent the App may utilize third party wired and/or wireless networks, GM can't promise that your communications won't be intercepted by others. You agree that GM won't be liable for any damages for any loss of privacy occurring in communication over such networks.

# Your Consent

By using this App, you are consenting to our processing of the information we collect about you from this App as set forth in this Privacy Statement now and as amended by us. "Processing," means using or touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information, all of which activities will take place in the United States. If you reside outside the United States, your information will be transferred to the United States, and processed and stored there under United States privacy standards.

By using the App and providing information to us, you consent to such transfer to, and processing in, the United States.

# Changes

This Privacy Statement may be updated from time to time for any reason. You are advised to consult this Privacy Statement regularly for any changes.

## <u>Contact</u>

If you have any questions regarding privacy while using the Application, or have questions about our practices, please contact GM.