

# Certified Service Mobile Toolbox Privacy Statement (the "Privacy Statement")

Last Updated June 16, 2020

Your privacy is important to General Motors of Canada Company and its affiliates ("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 describes how we collect, use and share information when you download this software application (the "App") via the Apple or Android device that you own or are authorized to use (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, the Certified Service Mobile Toolbox User Terms (the "Terms"), and the Software Application Consent.

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 collect:

- Any information you provide us through the App, including, but not limited to, photos or videos, customer information, including the customer's VIN, information you put into your profile, your contact information, including your email address, your GM Global Connect account information, or information about the dealer or service department you are associated with;
- Device information, such as Device type, Device operating system, Internet Protocol (IP) address, Device 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 App.

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 the App by using the standard uninstall process available as part of 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](#);
- [with dealers indicating which dealer employee's login and when they login to the App](#);
- in connection with the sale, transfer or financing of a significant part of a GM business.

## **Your Obligations**

[We also rely on you to obtain any necessary consents for the information you provide to us, including but not limited to any images or photos and any personal information of others.](#)

## **Tracking**

[To help us understand how the App is being used, this App uses 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.](#)

## **Third Party Links**

This [App](#) may contain links to third-party sites not controlled by GM or covered by this Privacy Statement. GM is not responsible for the privacy practices or the content of any

third-party sites. 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 target or knowingly collect 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 [at the number provided below](#). We will delete such information from our files within a reasonable time.

## **Data Retention**

GM [will](#) retain the information collected from this [App](#) for as long as necessary to provide you with the Services, to carry out the purposes identified in this Privacy Statement, to operate our business, for our safety, research, evaluation of use, or troubleshooting purposes, or to satisfy our legal or contractual obligation. 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.

[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.](#) 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 [Canada and](#) 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.

## **International Data Transfers**

We store and process your information in the United States and other locations where we or our service providers maintain servers. We provide appropriate protections for cross-border transfers as required by law for international data transfers. Your information may be accessible by law enforcement, governmental agencies or courts in the country where the data is processed or stored pursuant to a lawful access request in accordance with the laws of that jurisdiction. You may contact us, as set out below, in order to receive information about our policies and practices with respect to service providers outside of Canada.

## **Changes**

We reserve the right to update this Privacy Statement from time to time for any reason. You are advised to consult this Privacy Statement regularly for any changes. Your continued access to and/or use of the Services, including the App, after any such changes constitutes your acceptance of and agreement to this Privacy Statement, as revised.

## **Contact**

If you have any questions regarding privacy while using the App, or have questions about our practices, please contact us at 1-888-337-1010 or send an email to [CSMT@gm.com](mailto:CSMT@gm.com).