

## GM EUROPE PRIVACY STATEMENT

Last Updated: 7. August 2023

At General Motors, your privacy is important to us, as is your trust in our products and services.

Our Privacy Statement describes how we collect, use, and share your personal data, including information obtained through this site.

Please take a moment to review our Privacy Statement and contact us if you have any questions.

- [View and print our entire GM Europe Privacy Statement \(PDF\)](#)

### SCOPE

Your privacy is important to us as is your trust in our products and services. We want you to know that the personal data you share with us will be treated with care. This Privacy Statement addresses the personal data we collect and how we use and share that personal data.

This Privacy Statement applies to personal data we collect from and about individuals interacting with GM companies and our websites, products, programs, and services across Europe, including the European Union (including the countries of the European Economic Area), Switzerland, and the United Kingdom. It includes those products and services that GM may offer under different brands, such as Cadillac. As used in this Privacy Statement, the term **GM** means the specific GM group company acting as the data controller for your personal data. You can determine which of the GM group companies is the data controller by reviewing the [“Data Controller”](#) section below.

Certain products and services may also be subject to separate privacy statements, independently or in combination with this Privacy Statement, which we recommend you review. For example, GM’s mobile applications may have separate privacy statements, as described in the Mobile Applications section below.

This Privacy Statement does not apply to personal data that we obtain in our capacity as an employer. If you are a current or former GM employee, you can visit our company intranet site or contact your human resources representative for a copy of our employee privacy statement. If you were considered for employment with GM, please visit [careers.gm.com/privacy](https://careers.gm.com/privacy) for more information about how GM collects, uses, and shares your personal data.

### Collection

As you interact with GM or our products, programs, and services, there may be opportunities for you to provide us with your personal data. Additionally, we may collect certain personal data about you or your vehicle as further described below.

You may provide us with personal data about you or your vehicle through a number of sources: GM websites, applications, services, product and related events, surveys, social media platforms, sweepstakes entries and through our customer call centers. We may also collect personal data that is publicly available. For example, we may collect publicly available information you submit to a blog, a chat room, or a social media platform, and we may use your personal data for the purposes set out in this Privacy Statement. GM engages with consumers on multiple social media platforms and if you contact us on one of our social media pages, request assistance via social media or otherwise direct us to communicate with you via social media, we may contact you via direct message or use other social media

Commented [MR1]: Hi @Costin Ionita , final wording provided by Legal Team

Commented [RS2]: Hyperlink to the PDF version.

Commented [CI3R2]: why do you need this?

Commented [RS4R2]: This is the web-copy. See [gm.com/privacy](https://gm.com/privacy) for example of how the site should look and function. The .pdf version was also attached and is the printable version.

Commented [CI5R2]: sure, but why do we need a pdf reference in the actual legal doc?

Commented [RS6R2]: Because the PDF is the actual legal doc. The web version doesn't print as a PDF without a PDF version.

Commented [RS7]: Each heading should be addressed in the clickable design. GM Privacy requirements are to have accordion format (see, e.g. [gm.com/privacy](https://gm.com/privacy) or [onstar.com/privacy](https://onstar.com/privacy) or <https://search-careers.gm.com/en/privacy/> for examples). If this cannot be accommodated for MVP, can accept page version with links to subsections.

Commented [MR8R7]: Hi @Ryan Schutte as I shared with you yesterday there is a Legal page in the Website that will contain all legal documents accessible via an index to each document and their sections, the user can access a specific section by clicking on the index item. Can you, please, confirm if I understand correctly the SCOPE wording for each form where it will be present?  
- Account Creation: Account Privacy Statement.  
- Test Drive Booking: Test Drive Booking Privacy Statement.  
- General Enquiry: General Enquiry Privacy Statement  
- B2B Lead Form: B2B Lead Privacy Statement

Commented [RS9R7]: Hi Maria -- This privacy statement would be available in each of those contexts, but we do not need to have separate documents or naming.

Commented [MR10R7]: Yes, sure! they will be links to the same URL where Privacy statement is hosted.

Commented [RS11]: Ideally, each instance of a quoted section should link the user to that section, so clicking on or pressing Data Controller would link to the Data Controller section.

tools to interact with you. In these instances, your interactions with us are governed by this Privacy Statement as well as the privacy policy of the social media platform you use.

We also receive data about you through vehicle sales records provided by your dealer and we may obtain, with your consent, data obtained from your vehicle's Event Data Recorder (**EDR**). For additional information about EDR data, please see your owner's manual. We also may obtain personal data about you and your vehicle from GM affiliates, dealers, agents or authorized repairers, GM licensees for consumer merchandise, GM partners (for example, credit card or bank partners) and other sources such as companies that provide lists of potential vehicle purchasers and current owners, if such companies are permitted to share your personal data with us pursuant to their privacy statements. We may combine personal data that we receive from the various sources described in this Privacy Statement, including third-party sources, with personal data you provide and use or share it for the purposes identified below.

The types of personal data that GM collects about you, your vehicle, or your connected devices (such as your mobile phone, computer, or tablet) may include, but are not limited to:

- identifiers (such as name, postal address, email address, screen name, account ID, login information, customer number, and telephone number; citizen identification numbers issued by government bodies or agencies (e.g., depending on the country you are in, social security, citizen service or Personal Public Service (**PPS**) number or national insurance number, passport number, ID number, tax identification number, driver's license number); copy of your passport or driver's license
- Payment information (such as your credit card number, CVV code and expiration date)
- Information about your vehicle (such as license plate number, vehicle identification number (**VIN**), make, model, model year, selling dealer, servicing dealer, date of purchase or lease, the lease/financing term, service history, mileage, oil/battery status, fuel history, battery charging and discharging history, electrical system function, gear status, and diagnostic trouble codes)
- Information about your connected devices and how you interact with our products, services, apps and websites (such as IP address, browser type, unique device identifier, cookie data, and associated identifying and usage information)
- Demographic or protected classification data (such as gender, date of birth, marital status, household composition, nationality veteran or military status and citizenship status) ,
- Commercial information (such as when you plan to purchase or lease the vehicle in which you're interested)
- Audio or video data (such as data collected by sensors or cameras in the vehicle, or photographs and videos such as those that you may submit for contests, sweepstakes, and social sharing)
- Relationships you have with GM in addition to the purchase and servicing of your vehicle
- Relationships you have with third parties in connection with your use of GM products and services (such as GM dealers, agents or authorized repairers, energy utilities, and companies offering or operating in-vehicle applications)
- Feedback, ratings, or evaluations of GM products and services attributable to you

## **USE**

The personal data GM collects about you, your vehicle, or your connected devices may be used:

- To provide products and services, programs like test drives, and maintain customer relationships
- To improve the quality, safety, and security of our products and services
- To administer your account(s) and process your payments for products and services
- To operate our websites and applications, including online registration processes
- To facilitate and support GM dealer, authorized repairer, and supplier diversity programs and GM grant programs
- To autofill data fields on our websites to improve your online experience or to store a car configuration
- To develop new products and services, including connected, autonomous and car-sharing products and services
- To provide customer and vehicle support and service (such as recall information)
- For warranty administration and validation
- To provide information and product updates
- To evaluate vehicle performance and safety
- For research, evaluation of use, and troubleshooting purposes
- To verify eligibility for vehicle purchase or incentive programs including for GM's compliance with export control laws and regulations of the United States (i.e. The Arms Export Control Act (22 U.S.C. 2778), International Traffic in Arms Regulations (22 C.F.R. Parts 120-130), Export Control Reform Act of 2018 (50 U.S.C. 4801 et seq.), and the Export Administration Regulations (15 C.F.R. Parts 730-774)) and other relevant jurisdictions which restrict sharing certain technologies with certain countries and their nationals. These laws may apply regardless of where (or by whom) such transfer takes place
- For marketing and analytics purposes, including to personalize our products to your interests by automatically processing your personal data, including your interactions with us (such as how often you look at a product or page) and products you have purchased or looked at, to create a profile and predictive assessments about you; these automated processes may affect the products, services and pricing being offered to you
- To analyze your feedback about our websites, apps, brands, products, and services
- To support the electronic signature and delivery process
- To customize and improve communication content
- To evaluate or conduct a merger, divestiture, acquisition, restructuring, reorganization, dissolution, or other sale or transfer of some or all our assets
- To comply with legal, regulatory, or contractual requirements
- To protect our rights, or to detect, investigate and prevent fraud or other illegal activity

When we maintain and use personal data that has been deidentified, we take reasonable steps to ensure that such personal data is maintained and used only in deidentified form and will not attempt to reidentify such personal data unless required or permitted by applicable law.

## **SHARING**

GM may share the personal data it collects about you, your vehicle, or your connected devices (including the categories of personal data listed above) in the following instances and with the following categories of third parties:

- Within GM, with our GM controlled subsidiaries and affiliates, with GM dealers, agents or authorized repairers, with service providers we or our dealers, agents or authorized repairers use to deliver products and services to you, and with GM licensees
- With our service providers who work on our behalf and who do not have an independent right to use the personal data to which they have access or that we disclose to them
- With companies we enter business or marketing arrangements with, such as arrangements supporting products and services, we offer to you
- With public safety entities, if the 112-based eCall in-vehicle system is activated automatically by means of in-vehicle sensors in the event of a severe accident, or manually by button press within the vehicle
- With third parties you have authorized to request from or exchange data with GM (for example, financial organizations who offer financing for the purchase or lease of GM vehicles)
- With third parties for research and development purposes (such as university research institutes for improving highway safety)
- In connection with the sale, transfer, or financing of a significant part of a GM business or its assets, including any such activities associated with a bankruptcy proceeding
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, detect, investigate, and prevent fraud or other illegal activity, or respond to a law enforcement request
- As required or permitted by law, such as in conjunction with a subpoena, government inquiry, litigation, dispute resolution or similar legal process

Apart from the purposes listed above, GM will not share personal data about you or your vehicle with other third parties for their independent use without your prior consent.

## **LEGAL BASIS**

We rely on the following legal basis for using and sharing your personal data as described in “**Use**” and “**Sharing**” above:

- When you have given your consent to the processing of your data for one or more specific purposes. Where our processing relies on your consent, you may withdraw your consent at any time by contacting us (see also “**Choices**” below).
- When the processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract, including:

- to provide you with a product, service, or program that you've requested from us
  - to administer and validate warranties
  - to administer your account(s) and process your payments for products and services
- When the processing is necessary for compliance with a legal obligation applicable to the GM data controller, including:
  - to report environmental or emissions performance to regulatory bodies
  - to support the electronic signature and delivery process
  - to comply with lawful order from a criminal investigation body
  - to support the 112-based eCall in-vehicle system in accordance with Directives 95/46/EC ( 1 ) and 2002/58/EC ( 2 ) of the European Parliament and of the Council
- When the processing is necessary in order to protect your vital interests of you or of another natural person, including:
  - to provide customer and vehicle support and service (such as recall information)
- When the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, if you are a child, such processing including:
  - to operate our websites and applications, including online account creation and administration processes
  - to contact you with information, product updates, and for marketing and analytics purposes, including profiling and predictive assessments
  - to analyze feedback about our websites, apps, brands, products, and services
  - to provide customer and vehicle support and service (such as recall information)
  - to provide products and services, programs like test drives, and maintain customer relationships
  - to improve the quality, safety, and security of our products and services
  - to evaluate vehicle performance and safety
  - to facilitate and support GM dealer, agent, authorized repairer and supplier diversity programs and GM grant programs
  - to autofill data fields on our websites to improve your online experience or to store a car configuration
  - to develop new products and services, including connected, autonomous and car-sharing products and services
  - to perform research, evaluate product and services use, and troubleshooting

- to protect our business, websites, products and services from network and personal data security risks
  - to verify eligibility for vehicle purchase or incentive programs including for GM's compliance with export control laws and regulations of the United States (i.e. The Arms Export Control Act (22 U.S.C. 2778), International Traffic in Arms Regulations (22 C.F.R. Parts 120-130), Export Control Reform Act of 2018 (50 U.S.C. 4801 et seq.), and the Export Administration Regulations (15 C.F.R. Parts 730-774)) and other relevant jurisdictions which restrict sharing certain technologies with certain countries and their nationals. These laws may apply regardless of where (or by whom) such transfer takes place
  - to customize and improve communication content
  - to protect our rights, or to detect, investigate and prevent fraud or other illegal activity
  - to share service history data with dealers, agents or authorized repairers and their respective service providers
  - to share relevant data with our services providers who work on our behalf and who do not have an independent right to use the data to which they have access or that we disclose to them
- Where there is another applicable legal basis for data processing, especially provisions set out by applicable law.

#### **CHOICES**

Communications with you in connection with the "Use" above may be via mail, telephone, e-mail, social media, and other electronic messages, through the in-vehicle infotainment or via our websites and applications. To unsubscribe from a particular email newsletter or other communication, you should follow the instructions in the email or on a related website, such as in the data and privacy section of your GM account. To opt-out of receiving text messages from GM, you should follow the opt-out instructions in that specific text message program. If you have opted into any of our text message programs and you later decide to change your phone number or cancel your phone plan you should immediately opt-out of any text message programs and re-opt in with your new phone number if you wish to continue to receive text messages from GM. This will help us ensure we continue to honor your preferences and text the correct phone number.

If you opt out of receiving marketing communications from GM, your personal data will not be used to send marketing communications but may still be used for the other purposes described in this Privacy Statement (such as vehicle support and service). Some collection and sharing practices are necessary to provide products and services we offer or to support mandated features such as eCall. To stop processing of some data, with the exception of eCall, you may have to decline those products and services or be willing to accept limited functionality.

Where we rely on your consent as the legal basis for processing your personal data, you may withdraw your consent at any time. See "How To Contact Us" below.

#### **COOKIES AND TRACKING TECHNOLOGIES**

GM may use cookies, pixel tags, web beacons and other tracking technologies on our websites, applications, email messages and advertisements, sometimes across devices, to gather data about your visit (such as demographic data, browser type, IP address, pages visited, activities conducted on the page, and the day and time of your visit). Details for how we use cookies and tracking technologies as well as any choices you may have to consent to loading cookies are described in our [Cookie Policy](#).

Commented [RS12]: Confirm/add updated Hyperlink

### **MOBILE APPLICATIONS**

GM may offer certain mobile applications that you have the option to download to or use with your connected device or vehicle (**GM Applications**). When you choose to download or use a GM Application, there may be an opportunity for you to provide us with, or for us to obtain, data about you, your connected device, or your vehicle. Each GM Application may display a separate privacy statement that will inform you about how any personal data is collected, used and shared via the application and how to decline such use or uninstall the application.

### **THIRD PARTY SERVICES, APPLICATIONS AND WEBSITES**

Through the use of GM products and services, you may be able to access third party services, applications, and websites not offered or controlled by GM (**Third Party Services**). We recommend that you carefully review the privacy disclosures of these Third-Party Services, before interacting with them or providing your personal data to them. Unless otherwise expressly indicated by GM, this Privacy Statement does not apply to your use of such Third-Party Services or how such Third-Party Services may collect, use, or share your personal data.

### **GM DEALERS, AGENTS, AUTHORIZED REPAIRERS**

When you take delivery of a vehicle from a dealer or agent or have your vehicle serviced by an authorized repairer, they will share certain data with GM. Please be aware that these entities are separate from GM and you should read their privacy statement to ensure that you understand their privacy practices and procedures. For questions about dealer, agent or authorized repairer privacy practices including opting out of marketing communications from them, please contact them directly.

While GM encourages dealers, agents and authorized repairers to ensure full compliance with all applicable privacy legislation and has provided personal data to them relating to privacy obligations, GM is not responsible for their compliance with applicable law. When completing a purchase or lease agreement or signing a service repair order, you should be provided with information describing the dealer, agent, or authorized repairer's privacy practices and related policies that explain that certain personal data that you provide to the dealer may be shared with GM.

Dealers, agents or authorized repairers who provide vehicle diagnostic, maintenance, and repair services typically collect and share vehicle data with GM. This data may include the vehicle identification number associated with your vehicle, vehicle diagnostic and maintenance data, and vehicle systems status data. GM uses this data to assist them in diagnosing and repairing your vehicle, to maintain a service history of your vehicle, for warranty and recall purposes, for GM's research and development purposes, for analytics purposes, and to help GM comply with our legal or regulatory obligations. This data is transferred out of Europe to General Motors Holdings, LLC in the United States or other jurisdictions where we operate as described in the "**International Data Transfers**" section of this Privacy Statement.

### **ACCURACY AND UPDATES**

You may view or update many of the pieces of personal data we process about you in your online account. To learn about how to update your mail, email or telephone information please review your account or [contact us at: cadillac.europe@gm.com](mailto:cadillac.europe@gm.com).

## RIGHTS AND CHOICES

If you are a resident of the European Union (including the countries of the European Economic Area), Switzerland, or the United Kingdom, you may have the following rights in respect of your personal data, as described in the data protection laws applicable to your jurisdiction:

- Request from us access to your personal data
- Request from us rectification or completion of your incorrect or incomplete personal data
- Request from us erasure of your personal data
- Request from us temporary restriction of processing
- Right to data portability
- Right to object: You have the right to object the processing of personal data concerning you under the conditions specified in applicable data protection laws. Note that if you do this, it may impact our ability to provide certain products and services to you.
- Right to withdraw consent: If processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. If you withdraw your consent at any time, this does not affect the lawfulness of the processing of your personal data prior to the withdrawal of your consent. Note that if you do this, it may impact our ability to provide certain products and services to you.
- Right to lodge a complaint: You can lodge a complaint under applicable data protection laws with the competent data protection supervisory authority.
- Right to object to automated decision-making, including profiling: You can request to not be subject to individual automated decision-making, including profiling; to obtain human intervention, to express your point of view; and to contest the decision where our processing produces a legal effect or similarly significantly affects you, except where the processing is necessary for entering into, or the performance of, a contract between you and us, is based on explicit consent, or is based on another exception under applicable law. You have the right to withdraw your consent to individual automated decision-making, including profiling, at any time.

If you have any questions or if you want to exercise your rights, see **“How To Contact Us”** below. For your protection, we take reasonable steps to verify all requests before they are processed. This may include, for example, a request from us for you to confirm your identity, to validate documents you submit to us, to verify your authority to make the request, or for other purposes. In all cases, we reserve the right to deny your request in accordance with applicable law if we cannot verify you or your authority to make the request. We may need to retain certain data for recordkeeping purposes, to complete any transactions that you began prior to your request, or for other purposes as required or permitted by applicable law.

## HOW WE SAFEGUARD YOUR PERSONAL DATA

Commented [RS13]: OPEN for CAC info.

Include link contact form and email inbox.

Commented [MR14R13]: @Sherif Mady and @Alexandra Smedley we need the email address and the link to request a call back



We maintain reasonable and appropriate technical, administrative, organizational, and physical security and confidentiality measures designed to help protect your data from unauthorized access or acquisition and to ensure a level of security appropriate to the risk of varying likelihood and severity for your rights and freedoms related to personal data. We also require by contract (other than in an emergency situations) that third party service providers acting on our behalf or with whom we share your data also undertake to provide such security and confidentiality measures in accordance with industry standards.

#### **HOW LONG WE KEEP YOUR PERSONAL DATA**

We may keep the data we collect for as long as necessary to provide products or services to you, to operate our business, to enable us to communicate with you, for our safety, research, evaluation of use, or troubleshooting purposes, or to satisfy our legal or contractual obligations. We regularly delete or anonymize personal data subject to our information lifecycle management policy and record retention schedule. We are required to maintain data to comply with taxation or other applicable laws or if we need your personal data to establish, exercise or defend a legal claim. To the extent possible, we will restrict the processing of your personal data for the limited purposes that require its retention.

#### **CHILDREN'S PRIVACY**

GM websites and other online services do not target or knowingly collect any personal data from children.

#### **INTERNATIONAL DATA TRANSFERS**

GM stores your data in the United States, the European Union (including the countries of the European Economic Area (EEA)), Switzerland, and other locations where GM, our brands or our service providers operate worldwide. With respect to such transfers from the EEA, Switzerland or the United Kingdom to the United States and other non-EEA jurisdictions which are not deemed to have adequacy under applicable data protection laws, we implement standard contractual clauses and other mechanisms, such as supplementary measures, to provide adequate protection for the transfer of this personal data. GM Holdings, LLC (GMH) acts as a data processor for its GM controlled subsidiaries, including the data controllers listed below, by providing data hosting, maintenance, support, and troubleshooting of services, as well as other redundant back office support.

In addition, anonymized and aggregated data is shared with GMH to evaluate or research the safety, quality, usage, and functionality of vehicles and services, including providing customers with vehicle support and services, and to ensure accurate customer records and maintain customer relationships.

#### **DATA CONTROLLER**

The data controller for your personal data is the General Motors entity that you hold a relationship with or who offers products or services to you based on your country. The table below describes the data controllers covered under this Privacy Statement in association with the countries or regions that each processes personal data in. When you are dealing with one of these GM companies for the country covered, that GM company is the Data Controller for your personal data. If you are in a country that is not listed below, the data controller is Cadillac Europe GmbH.

<b>Countries of Controllership</b>	<b>Data Controller</b>	<b>Address</b>
Sweden	General Motors Sweden AB	P.O. Box 16285 103 25 Stockholm, Sweden

Switzerland	Cadillac Europe GmbH	Boulevard Lilienthal 6, 8152 Glattpark, Switzerland
United Kingdom	GM Specialty Vehicles UK Limited	100 New Bridge Street, London, EC4V 6JA

In some instances, your vehicle may be equipped with features for which you are the Data Controller, such as performance data monitors or other technologies. For those features, you are responsible to ensure compliance with applicable laws and regulations, including, but not limited to: data protection laws, laws related to camera surveillance and recordings, road traffic and security laws, and laws on the protection of publicity and personality rights. You should comply with any notice and consent requirements before capturing and/or recording the voices or images of other persons or before collecting other personal data and notify other drivers of your vehicle about these features and their obligations under applicable laws and require them to comply.

#### HOW TO CONTACT US

GM has appointed a Data Protection Officer (DPO) for Europe pursuant to applicable data protection laws. With respect to any questions regarding the protection of your personal data or your rights under applicable data protection laws, our DPO can be contacted at [privacy.europe@gm.com](mailto:privacy.europe@gm.com). Our DPO can also be reached at the following address: FAO General Motors Europe DPO, 100 New Bridge Street, London, EC4V 6JA, United Kingdom.

#### CHANGES TO THIS PRIVACY STATEMENT

We may amend this Privacy Statement from time to time. In some cases, we will notify you of this change only by posting a new effective date at the top of this Privacy Statement and your continued use of our products and services covered by this Privacy Statement will mean you accept the changes. In other cases, if we intend to collect, use, or share personal data in a way that is materially different from the way that we disclosed at the time of collecting your personal data, then we will notify you as required by law, such as by email or through a notice on the applicable website.

**Commented [MR15]:** Hi @Ryan Schutte what about the rest of the countries to be launched in 2024? We need to update this list as soon as we launch in each country, right?

**Commented [RS16R15]:** Hi @Maria Requeman Only concern from me are describing companies not in operation before they're in operation. I don't want to the legal documents to get ahead of the business plans, however, completely agree that we'll need to include all of the relevant GM entities who will interact with customers here.

**Commented [RS17R15]:** Provisionally the structure here with one privacy statement referencing multiple controllers is approved. I should have final feedback on the first paragraph in the next day or 2.

**Commented [RS18R15]:** @Maria Requeman @Costin Ionita -- This paragraph of the Controller Table is approved. Please let me know if we need any additional entities in the immediate term noting my comment above re: sharing any confidential launch plans inadvertently.

**Commented [MR19R15]:** Hi @Felix Amyot, please, make sure we add the relevant details to this table once we launch in each new country. @Ryan Schutte and @Pawel Czech (C) can you, please confirm that details to add to this table are those included in the tab "country-legal entity\_address" on this file: [Insurance country, legal entity for Test Drive Terms and Conditions.xlsx](#)

**Commented [RS20R15]:** @Pawel Czech (C) Confirmed that these are as listed in the insurance table, however, are these the "full" addresses for mailing purposes? I ask because in the US we have an additional field for "Zip Code" that follows the address needed for the mailing system to make sense of the address.

**Commented [MR21R15]:** Hi @Ryan Schutte the zip code is already part of the address column, it is not shown in a separated column.