GM Fleet Privacy Statement

Last Updated July 1, 2026

Your privacy is important to us. This Privacy Statement describes how we, General Motors Holdings LLC and its affiliates (**"GM" or "we" or "us"**), collect, use, and share information when you use a compatible device to access or use the GM Fleet commercial services platform (the "**Services**"), including when you access or use the Services via mobile applications (the, **"Application"**) or websites (the **"Website"**) made available for the Services or in relation to your vehicle (the **"Vehicle"**). This Privacy Statement incorporates the General Motors US Consumer Privacy Statement, which is available at https://www.gm.com/privacy-statement. Together, this Privacy Statement and our US Consumer Privacy Statement describe our privacy practices for the Services. Capitalized terms used but not defined in this Privacy Statement have the definitions provided in our US Consumer Privacy Statement.

The owner of the fleet in which your Vehicle is enrolled and any other users authorized by the fleet owner to access the Services such as a fleet manager (collectively, the **"Fleet Owner"**), may be able to access information about you and the Vehicle through the Services if the Vehicle is equipped with GM connected services. It is the responsibility of the Fleet Owner, or any individual the Fleet Owner designates, to notify all drivers, passengers, and users of fleet Vehicles of this Privacy Statement, any connected services on the Vehicles, and the Fleet Owner's collection of personal information from GM through such connected services and the Services.

You understand that by using a fleet vehicle or linking your account with a fleet, the Fleet Owner may view information collected about you and your use of the Vehicle, as further described in this Privacy Statement. This may include, for example, the Fleet Owner viewing:

- Vehicle location and routes driven (if GM connected services are enabled)
- Vehicle information, such as mileage, oil/battery status, and vehicle diagnostic information (if GM connected services are enabled)
- Your driving behavior information, such as driver score, emergency events, airbag deployments, routes, hard braking, and hard accelerations (if GM connected services are enabled)
- Any personal information you provide us through the Application or Website

For a detailed description of the specific information collected by your Fleet Owner or employer, and how they may use and disclose this information, please consult with your Fleet Owner or employer.

I. Personal Information We Collect

When you access the Services, we may collect:

- Device information, such as the location of your device, device type, device operating system, IP address, unique identifier, type of browser, Internet service provider, information about your use of the Application, and phone number.
- Information about your use of the Application or Website, including screen view time, scrolling, specific actions to activate features and/or otherwise navigate the application, reactions to alerts, searches, and your interactions with in-application marketing offers.
- If enabled with GM connected services, information about your Vehicle such as license plate number, vehicle identification number (VIN), mileage, oil/battery status, fuel or charging history, electrical system function, gear status, and diagnostic trouble codes.
- If enabled with GM connected services, Information about the use of your Vehicle, including operational and safety related information such as GPS location, routes, hard braking, hard acceleration, speed, emergency events, airbag deployments, crash avoidance alerts, impact data, safety system status, braking and swerving/cornering events, event data recorder (EDR) data, seat belt settings, vehicle direction (heading), camera image and sensor data, voice command information, stability control or anti-lock events, security/theft alerts, infotainment system usage, and WiFi data usage.
- OnStar account information associated with your Vehicle and/or fleet, vehicle-related information, and driving information, such as driver score, emergency services, the location and speed of your Vehicle based on GPS.
- Information about you from additional online and offline sources including commercially or publicly available third-party sources.
- Information you or your Fleet Owner input into the Services, such as your personal account information, notification preferences, photos and images, Vehicle assignment information, and Vehicle check-in and check-out information including time and location.
- Demographic information (such as gender, date of birth, marital status and household composition).
- Marketing profile information.

II. How We Use Personal Information

We use the personal information we collect as described in this Privacy Statement and in our US Consumer Privacy Statement. This includes, for example, to:

- Provide the Services;
- Communicate with you about your account or the Services;
- To develop new products and services;
- Provide product and service updates;
- Provide you with marketing offers that may interest you, including offers relevant to the location of your Device or Vehicle;

- Improve, troubleshoot, and evaluate the use of our products and services (including the Services, Application and Website);
- Evaluate the quality, safety, and security of our products and services;
- Collect outstanding debts for products and services;
- Protect the safety of you or others;
- For research, evaluation of use, and troubleshooting purpose; and
- Perform analytics across your devices

We may use technical measures to remove information that could reasonably identify you or your vehicle. We take reasonable steps to prevent this de-identified data from being re-associated with you and require the same safeguards from any third parties we share it with. Deidentified data is not personal information and may be used and disclosed for purposes not described in this Privacy Statement.

Communications with you in connection with these uses may be via mail, telephone, e-mail, text message and other electronic messages, through the in-vehicle OnStar system or via our websites and applications.

You can restrict our access to and collection of the location of your device or Vehicle by disabling location-sharing on your device or Vehicle, if that feature is available. Your Fleet Owner may have restrictions on disabling location sharing on your Vehicle. Please consult your Fleet Owner before disabling location sharing on your Vehicle.

III. How We Share Personal Information

We share your account information, vehicle related information, and driving information (such as the location and speed of your Vehicle) as described in this Privacy Statement and in our US Consumer Privacy Statement. For example, we share information with necessary third parties when you use the Services to make requests for third party or related services available through the Service, such as for dealer maintenance appointments or roadside assistance. We may share the location of your device in the same manner as we share location and speed of your Vehicle. For example, we may share the location of your device or Vehicle with:

- The Fleet Owner
- Third party service providers working on our behalf,
- Emergency service providers
- Individuals specified by you or by your Fleet Owner
- Others when required by law, and
- Those you ask us to share this information with.

We may also share the location of your device when necessary to provide the Application Services to you; to comply with legal obligations; to protect the safety and rights of you and others; for product safety and security purposes; and for the purposes described in this Privacy Statement and in our US Consumer Privacy Statement.

IV. Cookies and Tracking Technologies

GM products and services use cookies, web beacons, pixels and other device tracking technologies that allow us to identify you on your devices in a unique manner, such as through IP address or VIN (collectively, **"Cookies"**), to gather information about your activity such as demographic data, browser type, pages visited, activities conducted on the page, and the day and time of your visit. We use Cookies, sometimes across devices, to measure your activity, remember your preferences, maximize and improve the performance of our website, products and services, and customize your experience (for example, maintaining your account login or contact information, help you locate a nearby dealer, and autofill fields on forms).

We may also combine this information with other information collected online or offline about you, including information provided by third party sources, and it may be used or shared for the purposes described in this Privacy Statement. We may also allow third party advertising and personalization partners to use Cookies on our website in order to develop personalized content and appropriate advertising based on your visits over time on GM websites and applications and non-GM websites and applications. This information may also be used to evaluate our online advertising campaigns or to tailor promotions and other marketing messages to you.

Similarly, we may also place Cookies in our emails to measure the effectiveness of our email campaigns by identifying the individuals who open or act upon an email message, when an email message is opened, how many times an email message is forwarded, the type of software, device, operating system and browser used to deliver the email and any URL accessed through our email message.

At this time, we do not honor "do not track" signals if enabled in a web browser.

V. Your Rights

Depending on where you live, you may have certain rights related to personal information about you. To exercise the rights described below, or to see what rights may be available in your state, please submit a verifiable consumer request to us by either:

- Completing GM's U.S. Consumer Privacy Request Form
- Calling us at 1-866-MYPRIVACY (1-866-697-7482)

We do not accept consumer privacy requests made by email.

Rights

GM offers the following privacy rights to all consumers covered by this Privacy Statement:

- Access and obtain a copy of my Personal Information
- Correct my Personal Information
- Delete my Personal Information

Depending on where you reside, you may also be able to request additional privacy rights that may include:

- Opt-out of processing my Personal Information for targeted advertising (in California, this is called "Do Not Share My Personal Information")
- Opt-out of selling my Personal Information
- Opt-out of certain types of automated processing of personal information
- Obtain a list of categories of Third Parties Receiving Personal Information
- Obtain a list of Third Parties Receiving Personal Information

Processing Expectations

We do not discriminate against consumers who exercise these rights. We take reasonable steps to respond to all requests and will work to process your request in accordance with the laws that apply where you reside. Our processing time may vary, and in some cases, we may require up to 45 days to process your request. We may retain the personal information you submit with your request for as long as required or permitted by applicable law.

For consumers who submit a request to "Access my Personal Information," we will also notify you of vehicles that we associate with you as the vehicle owner or the account holder for vehicle services, and the categories of data that we collected about these vehicles. These categories of vehicle data may include information about how you use your Vehicle, including Vehicle location data. If we notify you that GM has collected categories of vehicle data for a vehicle that you own and operate, you may submit a request for additional access to the vehicle data that relates to your vehicle use by following the instructions provided with that notice.

Authorizing an Agent

You may be permitted by law to authorize someone else to act as your agent to exercise some of your privacy rights on your behalf. In such cases, your authorized agent must provide documentation supporting his or her authority to make this request on your behalf. In some cases, we may also require you to verify your identity directly with us and confirm the request before we will process it.

Further information about how to submit this request and the documentation we require to support it is available within our U.S. Consumer Privacy Request Form at https://consumerprivacy.gm.com. Your authorized agent can also contact us at gm.datacompliance@gm.com to request a copy of our Authorized Agent Form and to submit this request on your behalf. Documentation supporting your authorized agent's

right to submit this request on your behalf, such as a copy of our Authorized Agent Form signed by you or a Power of Attorney, must be submitted with this request. If this request is submitted over the phone, your authorized agent will be asked to email supporting documentation to gm.datacompliance@gm.com.

Verifying Your Request

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 if we cannot verify you or your authority to make the request.

If we decline to take action regarding your request, we will notify you. You may have the right to appeal. To submit an appeal request, please contact us at gm.datacompliance@gm.com.

Global Privacy Control

Our websites respond to the Global Privacy Control (GPC) signal when we detect that it is enabled on the web browser used to access our websites. We respond to your web browser's GPC setting each time you visit our websites. When we detect the GPC signal, we honor this as your request to opt out of "sales" and certain types of targeted advertising at the web browser-level by turning off data collection by some website cookies and tracking technologies. We will not honor a prior web browser setting if you disable GPC in the web browser used to access our websites between visits to our websites, or if you later visit our websites from different devices or browsers that does not send the GPC signal. More information on how to use the GPC signal, including supported browsers, is available at https://globalprivacycontrol.org/. At this time, we do not honor "Do Not Track" signals if enabled in a web browser.

VI. Security

We maintain reasonable technical, administrative, and physical security and confidentiality measures designed to help protect Personal Information from unauthorized access and use. We also require (other than in certain emergency situations) third party service providers acting on our behalf or with whom we disclose personal information to provide similar security and confidentiality measures.

VII. 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 in the Services, including the applicable Application or Website, or by notifying you via email or postal mail.