

# OnStar Europe

## Privacy Statement

Version date: 2016

Your privacy is important to OnStar. This Privacy Statement explains what personal information OnStar collects and how we handle it.

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### **1. Who is OnStar?**

The full name of OnStar and the company responsible for data protection (the “**data controller**”) is OnStar Europe Limited. It is a UK company located at Griffin House, UK1-101-135, Osborne Road, Luton, United Kingdom, LU1 3YT and with Companies House number 8582207 and VAT number GB170 0812 43.

OnStar Europe Ltd. is a subsidiary of General Motors Holdings LLC (“GM”), 300 Renaissance Drive, Detroit, Michigan 48243 USA. We share information with GM and its subsidiaries and affiliates, including but not limited to General Motors UK Limited (t/a “Vauxhall”), Adam Opel AG (“Opel”), and OnStar LLC (collectively, the “GM group of companies”). When General Motors Holdings LLC., and its controlled subsidiaries and affiliates in the United States, including OnStar LLC, (“GM U.S.”) receive personal information from OnStar, it is shared in compliance with applicable legal requirements providing adequate protection for the transfer of personal information to countries outside of the European Economic Area or Switzerland. Please visit the GM U.S. privacy statement available at <http://www.gm.com/toolbar/privacyStatement.html> for further information.

### **2. What data does OnStar collect and how is it used?**

OnStar is transparent about what we do with your data:

Name and contact details	We collect your name, contact details (address, phone number, e-mail) and ID data* to provide you with OnStar Services.  We also use this data to send you marketing information, but only if you have opted in to receiving marketing information.
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	<p>You can opt out of marketing information at any time by adjusting your settings.</p> <p>*In certain countries, local law may require us to collect additional identification data such as date of birth or identity card number.</p>
OnStar account information	We collect, store and process your account settings (account number, preferences, marketing opt-ins, preferred dealer) and access codes (password, PIN, security questions) to provide you with OnStar Services and to communicate with you in the manner you have authorized. If you request a remote service such as Lock/Unlock or Stolen Vehicle Assistance, we will request that you provide your PIN, if applicable, also over the phone, as an identifier.
OnStar Services record	We collect, store and process a record of the Services provided to you by OnStar.
Payment details	Our payment processor, Adyen BV (see below) collects, stores and processes the payment details you provide (bank and account number or credit/debit card number, issuing bank, expiry date and security code) to process payments.
Automatic Crash Response data	If your vehicle's sensors detect an impact or crash event, we collect and store the event information (impact speed and direction details, rollover status, seatbelt status and passenger seat occupancy), vehicle location, and information from your call with an OnStar Advisor, including a recording of that call.
Emergency contact details	We collect and store the contact details of a person you would like us to contact in the case of emergency, and contact that person at your request.
Vehicle data	We collect, store and process the basic identifiers of your vehicle (vehicle identification number/VIN, registration number, type, model year and specification), its diagnostic characteristics (currently mileage, tyre pressure and oil life, and may include diagnostic data on additional vehicle systems, such as airbag, stability control, engine and transmission, emissions, and antilock brakes), service delivery history and sensor activations (in particular air bag deployment, impact and theft alert triggers). We use this data to provide OnStar Services, in particular emergency service and diagnostic assistance to you. We also use this data internally for purposes of safety, product improvement, troubleshooting and quality control.
Vehicle location	<p>We collect, store and process a vehicle's location at a specific time only if you</p> <ol style="list-style-type: none"> <li>1. order a Service that requires us to do so, or</li> <li>2. press the SOS button and either request emergency assistance or do not respond, or</li> </ol>

	<p>3. if the vehicle’s sensors detect an Automatic Crash Response event.</p> <p>In the case of service requests, we use your location to provide the requested service. In the case of an SOS button press, crash event and confirmed emergency, we provide the vehicle location to the local public emergency service answering point (112 or 999) in order that they can find the vehicle.</p>
Privacy Button	You can mask and unmask vehicle location data collection by pressing the Privacy Button in your vehicle (certain vehicles also may be equipped to permit masking by clicking through the settings on your radio screen). Please note that pressing the Privacy Button to mask the collection of vehicle location data will have no effect in an emergency situation (e.g. SOS Button push or emergency service request, Automatic Crash Response, Theft Alert Notification, or Stolen Vehicle Assistance).
Wi-Fi data plan information	We collect, store and process your Wi-Fi data plan information in order to provide first level support and answer questions about your Wi-Fi service.
Login session token	When you view our website we collect and store your login session token if you elected the “remember me” option in the login screen.
Anonymized data	We collect, store and process anonymized data (data that cannot be traced back to you) for statistical purposes and for analysing and improving our services.

### **3. Does OnStar share my data with affiliated GM entities?**

OnStar shares data with the GM group of companies, some of which might be outside your country of residence. GM acts as a Data Processor for OnStar by providing maintenance, support, and troubleshooting of OnStar Services, as well as other redundant back office support. In addition, aggregated and anonymised data is shared within the GM group of companies to evaluate or research the safety, quality, usage, and functionality of their vehicles and services, including the OnStar Services; to provide you with vehicle support and services; and to ensure accurate customer records and maintain customer relationships. Your information also is shared within the GM group of companies in order for them to contact you about your vehicle or the Services, or for marketing purposes, but only if you have opted in to receive marketing information.

When General Motors Holdings LLC., and its controlled subsidiaries and affiliates in the United States, including OnStar LLC, ("GM U.S.") receive personal information from OnStar, it is shared in compliance with applicable legal requirements providing adequate protection for the transfer of personal information to countries outside of the European Economic Area or Switzerland. Please visit the GM U.S. privacy statement available at <http://www.gm.com/toolbar/privacyStatement.html> for further information.

You should not subscribe to the OnStar Services if you do not want your information shared within the GM group of companies.

#### **4. Does OnStar pass my data on to third parties or service providers?**

We will never sell your personal data to any third party. To the extent we use the assistance of third parties or service providers to provide our service to you, this is explained below:

Name and contact details	<p>Other than sharing your name and contact details within the GM group of companies as stated above and with certain third party service providers as set forth below, we do not share this information with other third parties or service providers.</p> <p>The laws of your country may require us to provide your identification data to the mobile network operator that provides the connectivity for the OnStar Services.</p> <p>We may use your personal information to carry out necessary due diligence to verify that applicable laws and regulations do not prohibit us from providing goods or services to you.</p>
OnStar account information	<p>OnStar uses the services of Covisint Corporation, Detroit, Michigan, for identity management. Your name, e-mail address, password, PIN and identity questions will be stored and processed on Covisint servers in Frankfurt, Germany, with back-up servers in Chicago. Covisint's parent company Compuware Corp., Detroit, Michigan will comply with applicable legal requirements providing adequate protection for the transfer of personal information to countries outside of the European Economic Area or Switzerland.</p>
OnStar Services record	<p>OnStar may route your SMS connection data through the servers of Jasper Technologies, Inc., 189 North Bernardo Avenue, Suite 150, Mountain View, CA 94043, USA as a backup, or to provide services such as door unlock requests, horn/light activate requests and vehicle location requests. Jasper Technologies will comply with applicable legal requirements providing adequate protection for the transfer of personal information to countries outside of the European Economic Area or Switzerland.</p>
Billing and payment details	<p>We use a third party billing partner, Zuora Inc., 1051 E Hillside Blvd., Suite 600, Foster City, CA 94404 USA for billing processing, and provide your contact and account billing data to Zuora for that purpose. Zuora will comply with applicable legal requirements providing adequate protection for the transfer of personal information to countries outside of the European Economic Area or Switzerland.</p> <p>We use a third party payment processor, Adyen BV, Simon Carmiggeltstraat 6-50, 1011 DJ Amsterdam, The Netherlands for payment processing. The payment details you provide are input directly into the Adyen payment page, where Adyen collects, stores and processes them in order to process your payment of OnStar services. Adyen will comply with applicable legal requirements providing adequate protection for the transfer of</p>

	personal information to countries outside of the European Economic Area or Switzerland.
Automatic Crash Response data	In the event of an emergency we may share Automatic Crash Response data, vehicle location and information from the OnStar Advisor voice call with you with the local emergency assistance provider (112 or 999) so the emergency assistance provider can better respond and find your vehicle.
Emergency contact details	This data is not given to any third party.
Vehicle data	We may share your vehicle data with your selected dealer, so the dealer can access diagnostic data like oil life and odometer remotely. We send this data to your preferred dealer in the form of a monthly report unless you have opted out of Dealer Maintenance Notification.
Vehicle location	This data is not given to any third party except as follows: <ol style="list-style-type: none"> <li>1. if you have asked us to do so, so that you can obtain a service from that third party (for example Roadside Assistance);</li> <li>2. in an emergency, to the local emergency services;</li> <li>3. in order to comply with legal obligations, to ensure the safety or rights of you or others, or when we receive a valid order from a legal enforcement authority.</li> </ol>
Vehicle location history	This data is not given to any third party except in order to comply with legal obligations, to ensure the safety or rights of you or others, or when we receive a valid order from a legal enforcement authority.
Wi-Fi data plan information	We share this data with the mobile network operator from which you have ordered a data plan and from which you receive Wi-Fi Hotspot services.
Login session token	This data is not given to any third party.
Anonymized data	We may give anonymized data (data that cannot be traced back to you) to third party service providers for statistical purposes and for analysing and improving our services.

## **5. How secure is my information?**

OnStar maintains administrative, technical and physical security safeguards to protect its systems and your information. While OnStar does not control the security of information sent via the internet or other public networks, once we have received your information, our security measures are designed to prevent unauthorised access.

You are responsible for taking all reasonable steps to protect your account access codes (password, PIN, security question answers). Store these in a safe location and do not share them with any third party.

## **6. What about advertisement by OnStar or third parties?**

When you sign up for OnStar, you will be asked if you want us to process your personal information for marketing purposes. If you elect not to do so, we will not process your data for marketing purposes. If you have opted in to receiving marketing information and no longer wish to do so, you can instruct us to stop such processing at any time by adjusting your settings or talking to an OnStar advisor. We will never sell your personal information to any third party advertisers.

## **7. What about links to other websites?**

Some links provided in this site may lead to sites furnished by independent site owners. If you use these links, you leave this site. The information presented therein is the sole responsibility of those site owners. OnStar has no control or responsibility for the content of independent sites and provides these links to its visitors for their convenience. If you decide to access any of the third party sites from this site, you do so entirely at your own risk.

Our site may, from time to time, contain links to and from the websites of dealers or other retailers, partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

OnStar and Vauxhall/Opel dealers are separate legal entities with their own privacy practices. For questions about your dealer's privacy practices including opting out of marketing communications from your dealer, please contact your dealer directly.

## **8. What information can I see?**

If you push the Privacy Button you will be able to see and adjust your privacy settings. See your Owner Manual for details.

## **9. What choices do I have?**

- You can sign up for and terminate the OnStar Services at any time.
- You can change your marketing, diagnostics services and preferred dealer choices by adjusting your settings online or by talking to an OnStar advisor.
- You mask and unmask location data collection by pressing the Privacy Button in your vehicle (certain vehicles also may be equipped to permit masking by clicking through the settings on your radio screen).
- You can correct and update your account information, such as name, address, phone number and email address online or by talking to an OnStar advisor.
- You can access information held about you. Your right to access or have certain data deleted can be exercised in accordance with applicable data protection laws by contacting us at the address set out below enclosing a copy of your driving license or other recognized form of identity. Any access request will be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## **10. Updates to the Privacy Statement**

We may need to update this Privacy Statement from time to time as our business and services expand or change, or if we are required to by law. If we do, we will post the most up-to-date version on the OnStar website so you should periodically check for any updates. If we materially change the practices stated in this Privacy Statement and you're an OnStar customer, we will notify you by sending an e-mail to the email address that you have provided or, if you do not have an e-mail address on file with us, we will send the notice by postal mail or otherwise take reasonable steps to bring the change to your attention. We'll get your consent to the changes if legally required.

## **11. Contact**

You can contact us as follows:

### **OnStar Europe Limited**

**Griffin House, UK1-101-135, Osborne Road**

**Luton, United Kingdom, LU1 3YT**

**E-mail: [europe@onstar.com](mailto:europe@onstar.com)**

Our customer service department is available to address any concerns you may have regarding the OnStar Services. Click [here](#) for local numbers.

Local freephone	1800800001
Charged at local rate	014073388
International freephone	80080022334

Unless you tell us otherwise, we will send notices to you at the contact details you provide. You may change your e-mail address for notification purposes at any time by contacting us at the phone number or email address provided under the "Contact" section of the User Terms.