

BRIGHTDROP CANADA PRIVACY POLICY

SCOPE AND OVERVIEW

Your privacy is important to BrightDrop of Canada Company ("BrightDrop" or "we" or "our") as is your trust in BrightDrop's products and services. We want you to know that the information you share with us will be treated with care. This Privacy Policy describes how we collect, use and share your personal information, including information we obtain from our independent dealers in Canada as well as through your use of our Canadian websites, products and services.

This Privacy Policy does not apply to: (i) personal information we collect in our capacity as an employer; (ii) General Motors Financial's business in Canada; (iii) products and services with own privacy statements, which should be reviewed by you, for example the privacy statement for connected vehicle services. Certain mobile applications may also have separate privacy statements (that are independent of, or supplement, this or other privacy statements), as described in the Mobile Applications section below.

Key points about our information practices:

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| Collection | We may collect information about you and your vehicle, such as name, address, email address, phone number, vehicle identification number (VIN) and vehicle performance data through your use of our products or services, and through BrightDrop affiliates, dealers, BrightDrop partners and others who provide information to us. Click here to learn more. |
| Use | We may use your information to provide products and services, to maintain customer relationships, for safety and product research purposes, to provide customer and vehicle support and service, to communicate with you, and for targeted marketing and advertising purposes. Click here to learn more. |
| Sharing | We may share your information as required or permitted by law, within BrightDrop, with our subsidiaries and affiliates, with BrightDrop dealers, with our service providers, and with our business partners. Click here to learn more. |

Choices	You have choices regarding how we use and share your information for marketing and other purposes. Click here to learn more.
Cookies and Tracking	We may use cookies, pixel tags, web beacons and similar tracking technologies to help provide our products and services, understand and customize your preferences and provide you with a personalized experience that features products and services that may be of interest to you. Click here to learn more.
Interest-Based Advertising	We work with third party advertising companies to collect information about your activity on BrightDrop and non-BrightDrop websites and apps over time and across your different devices in order to deliver more relevant advertising to you. Click here to learn more.
Mobile Applications	BrightDrop may offer certain mobile applications that you may download to your mobile device or vehicle ("BrightDrop Applications"). When you download a BrightDrop Application, there may be an opportunity for you to provide us with or for us to obtain information about you or your vehicle. Click here to learn more.
Third Party Products and Services	Through the use of BrightDrop products and services, you may be able to access third party services, applications and websites not controlled by BrightDrop or covered by this Privacy Policy. Click here to learn more.
BrightDrop Dealers	BrightDrop and BrightDrop 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. Click here to learn more.
Access and Update	You may access your online accounts to update your information or you may contact us to learn about how to do so. Click here to learn more.
Security Measures	We maintain reasonable and adequate security controls to protect your information and require our service providers by contract to do the same. Click here to learn more.
Retention	We keep information for as long as necessary to provide our products and services, operate our business, and comply with legal obligations. Click here to learn more.

Children's Privacy	BrightDrop websites do not target or knowingly collect any information from children under the age of majority. Click here to learn more.
International Data Transfers	We maintain appropriate protections for cross-border transfers as required by law for international data transfers. Click here to learn more.
Contact Us	If you have concerns or questions regarding BrightDrop's privacy practices or this Privacy Policy, or the manner in which our service providers treat your personal information, please contact us at 1-800-GM-DRIVE (1 800 463-7483). Click here to learn more.
Changes	We may update this Privacy Policy from time to time. We will do so by posting additions or modifications to this page. Click here to learn more.

INFORMATION COLLECTED

As you interact with BrightDrop, there may be opportunities for you to provide us with your information. Additionally, we may collect certain information about you or your vehicle as further described below.

You may provide us with information about you or your vehicle through a number of sources: BrightDrop websites, applications, product and related events, surveys, social media platforms, contest entries and through our customer call centers. We also may collect information that is publicly available. For example, in limited situations we may collect publicly available information you submit to a blog, a chat room, or a social media platform like Facebook, Twitter or Google+ and we may use your information for the purposes set out in this privacy policy. We may also combine on-line and off-line information that we receive from the various sources described in this Privacy Policy, including third-party sources, with information you provide and use or share it for the purposes identified in this privacy policy.

We also receive information about you through vehicle sales and service records provided by your dealer and we may obtain, with your consent, data obtained from your vehicle's Event Data Recorder ("EDR") as described in your owner's manual (i.e., how various systems in your vehicle operate, the speed and distance of your vehicle). For additional information about EDR data, please see your owner's manual.

We also may obtain information about you and your vehicle from BrightDrop affiliates (such as General Motors), BrightDrop partners (for example, bank partners, financing partners, etc.) and other sources such as companies that provide lists of potential vehicle purchasers and current owners, if such companies are permitted to share your information with us pursuant to their privacy statements and applicable law.

BrightDrop 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 tools to interact with you. In addition, when you engage with BrightDrop content on or through third-party social networking websites, plug-ins or applications (such as Twitter or Facebook feeds), we may have access to certain information associated with your social media account (e.g., name, username, email address, profile picture, gender) to deliver the content or as part of the operation of the website, plug-in or application. In these instances, your interactions with us are governed by this privacy policy as well as the privacy policy of the social media platform you use.

The types of information that BrightDrop collects about you may include, but are not limited to:

- contact information (such as name, address, city, province, postal code, email address and telephone number)
- 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 and other loan-related information, service history, mileage, oil/battery status, fuel or charging history, electrical system function, gear status, and diagnostic trouble codes)
- information about your connected devices (such as mobile phone, computer, or tablet) 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 information (such as gender, date of birth, marital status and household composition)
- marketing profile information including purchasing patterns and preferences (such as when you plan to purchase or lease; the vehicle in which you're interested)
- photographs and videos such as those that you may submit for contests, sweepstakes or social sharing
- relationships you have with BrightDrop in addition to the purchase and servicing of your vehicle (such as through BrightDrop Dealers)
- incentive eligibility verification information (such as school name, branch of service or company name for vehicle purchase programs)

USE

The information BrightDrop collects about you and your vehicle may be used:

- to provide products and services 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 administer your participation in contests or promotions
- to autofill data fields on our websites to improve your online experience
- 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 as described in the vehicle owner manual
- for research, evaluation of use, and troubleshooting purposes
- to verify eligibility for vehicle purchase or incentive programs
- for marketing and analytics purposes, including to display targeted advertising
- to support the electronic signature process between you and your dealer

- to customize and improve our interactions with you and personalize your experience with BrightDrop
- to comply with legal, regulatory or contractual requirements

Communications with you in connection with these uses may be via mail, telephone, e-mail, text message, social media and other electronic messages, through the in-vehicle OnStar system or via our websites and applications. Communications may contain information regarding products or services, events, special offers, promotions and contests offered by BrightDrop, its affiliates, partners and/or the originating dealer and may be tailored based on information we have about you. BrightDrop may send you text messages using an automated telephone dialing system to the mobile phone number you have provided if you have opted in to receive text/SMS messages standard data and message rates may apply. See "Choices" below to learn how to manage your communication preferences.

SHARING

BrightDrop may share the information it collects about you or your vehicle in the following instances:

- within BrightDrop and with our subsidiaries and affiliates, and with BrightDrop dealers
- with our service providers who work on our behalf (such as hosting our websites, sending emails and other communications, conducting customer research, managing and analyzing data, providing advertising services) and who do not have an independent right to use the information to which they have access or that we provide to them
- with our business partners for BrightDrop marketing activities, business partner marketing activities or both
- with third parties for research and development purposes (such as university research institutes for improving highway safety)
- in connection with the prospective or completed sale, transfer or financing of a significant part of a BrightDrop 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, investigate fraud or respond to a law enforcement request
- as required or permitted by applicable law, such as in conjunction with a subpoena, government inquiry, litigation, dispute resolution or similar legal process (which may include lawful access by US or other foreign courts, law enforcement or governmental agencies).

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

CHOICES

You have certain choices regarding how we use and share your information (e.g. marketing and related purposes):

- To make choices about how we use and share your information as described in this Privacy Policy contact us (see "How to Contact Us" below for contact information). For example, you can contact us to make choices about marketing telephone, email and other electronic communications or by following the unsubscribe instructions in the message/communication;
- To make choices about whether you would like to receive BrightDrop marketing communications (including telephone, direct mail, email, text message or other electronic communications), contact us (see "How to Contact Us" below for contact information). For email and text message communications, you may also follow the unsubscribe instructions in the message/communication you receive;
- To make choices relating to interest-based advertising or cookies and digital tracking technologies, please see the "Cookies/Tracking Technologies" and "Interest-Based Advertising" sections of this Privacy Policy or contact us (see "How to Contact Us" below for contact information);
- To change previously submitted opt-out preferences, please contact us (see "How to Contact Us" below for contact information).

Please note that if you opt out of receiving marketing communications from BrightDrop, your personal information will not be used to send marketing

communications, but may still be used for the other purposes described in this Privacy Policy (such as vehicle support and service). In addition, we may still contact you with transactional or account-related information or where we are permitted to do so by law.

COOKIES/TRACKING TECHNOLOGIES

BrightDrop may use cookies, pixel tags, web beacons and other tracking technologies on our websites, applications, email messages and advertisements to gather information about your visit (such as demographic data, browser type, device ID, IP address, pages visited, activities conducted on the page, and the day and time of your visit). Using cookies provides benefits to you, such as allowing you to maintain your account login information or contact information on Request a Quote forms between visits, or locating a nearby dealer. In addition, we use information gathered from cookies to autofill fields on forms such as the city, province or postal code associated with your IP address. This information can be corrected by you before submitting any form or inquiry or you can disable the cookie as discussed below and the information will not be collected.

We place pixel tags and web beacons 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.

To measure site activity, provide a better user experience, and tailor our marketing communications, we or our service providers or business partners may compile information from the cookies, pixel tags, web beacons or other tracking technologies on our websites. This information may be combined with other information collected online or offline about you, including data provided by third party sources, and may be used or shared for the purposes described in this Privacy Policy.

To the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we treat these identifiers and associated information as personal information. Similarly, to the extent that non-personal information is

combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

At this time, we do not honor "do no track" signals from a web site browser. However, you may refuse or delete cookies. Please refer to your browser Help instructions to learn more about cookies and other technologies and how to manage their use. If you elect to refuse or delete cookies, you will need to repeat this process if you use another computer, or change browsers. If you choose to decline cookies, some of the functionality of a website may be impaired.

INTEREST-BASED ADVERTISING

We may work with third party advertising networks and other advertising and personalization partners that use their own tracking technologies (including cookies and pixel tags) on BrightDrop and non-BrightDrop websites and apps in order to provide you with tailored advertisements on our behalf across the Internet (including on social networking websites and apps). These companies may collect information about your activity over time and across your different devices on BrightDrop and non-BrightDrop websites and apps (such as web pages you visit and your interaction with our advertising and other communications) and use this information to make predictions about your preferences, develop personalized content and deliver ads that are more relevant to you on third party websites and apps. This information may also be used to evaluate our online advertising campaigns or to tailor promotions or other marketing messages to you across your devices.

To the extent that BrightDrop engages in interest based advertising, BrightDrop adheres to the Digital Advertising Alliance of Canada's Self-Regulatory Principles for Online Behavioral Advertising (www.youradchoices.ca). If you do not wish to receive personalized advertising or content from participating third-party advertising companies while visiting BrightDrop web sites, you may click on the AdChoices icon or link located on the web site or visit the [Digital Advertising Alliance of Canada's Opt-Out page](#). If you do not wish to receive personalized advertising or content from participating third-party advertising companies on non-BrightDrop websites, please visit the [Digital Advertising Alliance of Canada's Opt-Out page](#) or click on the AdChoices icon on a BrightDrop advertisement and follow the instructions on how to opt out. To learn more about interest-based advertising in mobile apps and to opt out

of this type of advertising by third-party advertising companies that participate in the Digital Advertising Alliance of Canada's AppChoices tool, please download the version of AppChoices for your device at <https://youradchoices.ca/appchoices/>.

Opting out of relevant advertising will not opt you out of all advertising, but rather only those advertisements that are personalized to your interests by BrightDrop or its service providers.

To successfully opt-out, you must have cookies enabled in your web browser. Please see your browser's instructions for information on cookies and how to enable them. Your opt-out only applies to the web browser you use so you must opt-out of each web browser on each device that you use. Once you opt out, if you delete your browser's saved cookies, you may need to opt-out again.

We may also use services provided by third-party platforms (such as social networking and other websites) to serve targeted advertisements on such platforms to you or others, and we may provide a hashed version of your email address or other information to the platform provider for such purposes. To opt-out of the use of your information for such purposes, please contact our customer care center at 1-800-GM-DRIVE ([1 800 463-7483](tel:18004637483)).

MOBILE APPLICATIONS

BrightDrop may offer certain mobile applications that you may download to your mobile device or vehicle ("BrightDrop Applications"). When you download a BrightDrop Application, there may be an opportunity for you to provide us with or for us to obtain information about you or your vehicle. Each BrightDrop Application will display a separate Privacy Policy that will inform you about how any information is collected, used and shared via the application and how to decline such use or uninstall the application.

Through the Infotainment system, BrightDrop may also offer applications developed by third parties ("3rd Party Application"). When you download a 3rd Party Application to your mobile device or vehicle, the 3rd Party Application may collect information about you in connection with your download or use of that application. BrightDrop is not responsible for the collection or use of information by 3rd Party Applications. We

recommend that you carefully review the privacy statement of each 3rd Party Application prior to downloading or using them.

THIRD PARTY SERVICES, APPLICATIONS AND WEBSITES

Through the use of BrightDrop products and services, you may be able to access third party services, applications and websites not controlled by BrightDrop or covered by this Privacy Policy, such as those belonging to BrightDrop dealers, co-branded websites offered in conjunction with a business partner, or independent product review sites. We recommend that you carefully review the Privacy Policy of other third party services, applications and websites before providing any personal information.

BRIGHTDROP DEALERS

BrightDrop and BrightDrop 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.

When you buy or lease a vehicle from a BrightDrop dealer, the dealer will share your information with BrightDrop. Please be aware that each dealer operates as a separate legal entity and you should read the dealer's privacy statement to ensure that you understand its privacy practices and procedures. Additionally, because the BrightDrop dealer often is the first contact with you, the dealer can answer any questions you may have about its privacy practices. While BrightDrop encourages its dealers to ensure full compliance with all applicable privacy legislation and has provided information to our dealers relating to privacy obligations, BrightDrop is not responsible for dealers' compliance with applicable law.

When completing a purchase or lease agreement or signing a service repair order with the BrightDrop dealer, you should be provided with information describing the dealership's privacy practices and related policies that explain that certain personal information that you provide to the dealer may be shared with BrightDrop for some or all of the purposes described in this Privacy Policy.

ACCESS AND UPDATE

You may contact us, as provided under "How to Contact Us" below, to request to access, review, correct, update, or delete the information about you in our records subject to limited exceptions set out under applicable law. We may need to retain certain information 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 INFORMATION

We maintain reasonable and adequate technical, administrative, and physical security and confidentiality measures designed to help protect your information from unauthorized access or acquisition. We also require by contract that third party services providers acting on our behalf or with whom we share your information also undertake to provide such security and confidentiality measures in accordance with industry standards.

HOW LONG WE KEEP YOUR INFORMATION

We may keep the information 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. Where required, we will anonymize or dispose of the information we collect when we no longer need it for the uses described above.

CHILDREN'S PRIVACY

BrightDrop websites do not target or knowingly collect any information from children under the age of majority.

INTERNATIONAL DATA TRANSFERS

We store your information in Canada, the United States, the European Economic Area (EEA), and other locations where we or our service providers maintain servers. With respect to such transfers between Canada, the EEA, the United States and other non-EEA jurisdictions, we implement standard contractual clauses and other mechanisms to protect such data. 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.

HOW TO CONTACT US

If you have concerns or questions regarding BrightDrop's privacy practices (including the use of service providers located outside of Canada) or this Privacy Policy you may contact us at:

- 1-800-GM-DRIVE ([1 800 463-7483](tel:18004637483));
- By mail at 500 Wentworth Street WEST, Oshawa, ON, L1J 0C5, Attention: Privacy Coordinator, Mail Code: CA1-163-005; or
- By email at contactus@gm.com with the term "Privacy" in the subject line

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. We will do so by posting additions or modifications to this page.