# GENERAL MOTORS FINANCIAL OF CANADA, LTD.

## PRIVACY STATEMENT

#### INTRODUCTION

General Motors Financial of Canada, Ltd. and its subsidiary GM Financial Canada Leasing Ltd. (collectively, "GM Financial", "we", "us" and "our") take steps intended to protect the privacy and confidentiality of your personal information. Personal information is information about an identifiable individual as more particularly described by applicable privacy legislation ("Personal Information"). This Privacy Statement explains how we collect, use, disclose and protect your Personal Information. This Privacy Statement does not apply to information about our employees or to information that is not Personal Information.

## PERSONAL INFORMATION WE COLLECT

GM Financial collects Personal Information as necessary to deliver financial products and services to you. The Personal Information we may collect includes:

- Contact information such as full legal name, address, email address and telephone number;
- Information about your financial and credit history including employment information, debt and income levels (including income of co-applicant, if applicable), current and past creditors, tenancy arrangements (including whether you own a house or rent, monthly mortgage or rental payment amounts, total mortgage amount, mortgage holder, market value of home), and insurance, banking or credit institutions you use or have used;
- Other information you may provide on applications, conditional sales contracts, lease agreements, and other forms including length of time at current address, marital status, gender, drivers license information, social insurance number (if provided), date of birth and information about the vehicle(s) you are leasing, financing, or purchasing;
- Banking information including the name and contact information for your bank and your account number, in order to process pre-authorized payments;
- Information about transactions we conduct for or with you and services we provide or may provide to you;
- Information about or to assist with transactions you might conduct through us that involve a third party such as the purchase of credit insurance;
- Information about your transactions with third parties such as the dealer from which you seek to buy or lease a vehicle for which you need financing;
- Information about your current and ongoing credit history;

- Information that may assist in expanding our business relationship, such as information related to your preferences, service needs and decision-making or about customer service inquiries and feedback; and
- Other information with your consent or as permitted or required by law.

We generally obtain Personal Information directly from you. However, with your consent, we may also obtain information about you from other sources such as the dealer from whom you seek to buy or lease a vehicle for which you need financing, credit reporting agencies, collection agencies, financial institutions, your past and present employers and creditors, your co-applicant, insurers, and other third parties with information relevant to the purposes described below.

You are not required to provide us with your social insurance number. However, if provided, we will use it to ensure that there is a match between your credit bureau information and to verify the accuracy and completeness of the information we obtain.

#### HOW WE USE YOUR PERSONAL INFORMATION

GM Financial uses your Personal Information to manage and administer our business including to.

- Evaluate your eligibility for and provide financial products and services to you;
- Monitor and enforce our agreements with you and to provide ongoing service;
- Manage, administer, collect and enforce accounts, collect debts owed to us and process payments;
- Obtain credit reports from consumer credit reporting and collection agencies, financial institutions or finance companies;
- Meet our legal, regulatory insurance, security and processing requirements;
- Investigate and adjudicate any dispute or claim which relates to the products or services that we offer to you, including to defend and bring legal actions;
- Maintain records for reasonable periods;
- In connection with certain business transactions involving our assets or business as further described in the "Who We Share Personal Information With and For What Purposes" section below;
- Any other purpose to which you consent or which is permitted or required by law.

Unless you ask us not to, GM Financial may contact you from time to time to provide you with information or to advise you of special offers or customer programs that we may offer and that you may qualify for. In order to do so, GM Financial may use your Personal Information to determine if you qualify for such offers or customer programs and to contact you using the contact details you have provided.

#### WHO WE SHARE PERSONAL INFORMATION WITH AND FOR WHAT PURPOSES

We may disclose your Personal Information as necessary to provide financial products and services to you, including to:

- Credit bureaus, credit reporting agencies and to your current or future creditors for the purpose of maintaining your credit history and providing credit references;
- Financial institutions for payment processing purposes;
- Third parties as reasonably necessary:
  - o to enforce your agreements with us and otherwise for the collection or payment of a debt owed to us or our affiliates;
  - o for the purposes of detecting and preventing fraud;
  - o in connection with audits; and
  - o for the purposes of meeting legal, regulatory, industry self-regulatory, risk management and security requirements;
- The dealer from whom you sought to buy or lease a vehicle for which you needed financing or a loan for the purpose of servicing your account and for our record keeping purposes;
- The Ministry of Transportation offices or other licensing services as required for licensing and registration of the vehicle(s) that you have leased, financed, purchased, or traded-in; or
- Other third parties for any other purpose to which you consent or that is permitted or required by law.

Personal Information may also be disclosed to the automotive manufacturer of the vehicle forming the subject matter of the financing or lease agreement ("Manufacturer") and Manufacturer's authorized dealers, in order that they may meet safety, security, legal and regulatory requirements, including with respect to potential recalls; maintain accurate records to respond to inquiries, provide warranty or other customer service communications and otherwise better understand and manage their relationship with you; and to satisfy other reasonable, legitimate business interests. Unless you opt-out, Manufacturers and their authorized dealers may also use your Personal Information (including financial information) to provide you with general marketing, product, service and business partner information and offers, including end of lease offers and re-marketing of these lease terms.

Personal Information may be disclosed to our affiliates (including outside of Canada) for internal audit, management, billing or administrative purposes, including defending and bringing legal actions. Unless you opt-out, Personal Information may also be disclosed to our affiliates so that they may provide you with information and special offers that may be of interest to you.

Personal Information may be used by GM Financial and disclosed to parties connected with the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of GM Financial or our business or assets (including your lease or loan agreement), for the purposes of evaluating and/or performing the proposed transaction. Assignees or successors of GM Financial or our business or assets may use and disclose your Personal Information for similar purposes as those described in this Privacy Statement.

GM Financial may also disclose your Personal Information as necessary to meet legal, regulatory, insurance, audit, and security requirements, and as otherwise with your consent or as permitted or required by law.

#### SERVICE PROVIDERS

Personal Information may be transferred to or collected by outside agents or service providers (including our affiliates acting in this capacity) that perform services on our behalf, including telemarketing, direct sales, electronic and digital marketing, market research, data processing, website administration, insurance tracking, debt collection, inspections, and similar services. Some of these service providers may be located outside of Canada, including in the United States and Mexico. As a result, your Personal Information may be collected, processed and stored in another jurisdiction. Reasonable contractual or other measures we may take to protect your Personal Information while processed or handled by these service providers are subject to legal requirements applicable to our service providers, for example lawful requirements to disclose Personal Information to government authorities in certain circumstances.

#### **OUR WEBSITE**

We may collect information automatically from visitors to our website, for example through the use of "cookies", "web beacons" and other tracking technology. The information that we may collect includes the date and time of your visit, your computer's IP address and the pages of our website that you visited. If you do not want to receive cookies, you may set your browser to reject them. However, if you turn cookies off, you may not have access to some of our website's features. We also may use web beacons from third parties to help us compile aggregate statistics regarding the operation of our website.

Our website may provide links to other websites which are not governed by our Privacy Statement. We encourage you to read the privacy statement of every website you visit.

## YOUR CONSENT

GM Financial generally collects, uses and discloses your Personal Information with your consent, except as permitted or required by law. Depending on the sensitivity of the Personal Information, your consent may be implied or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. You may provide your consent in some circumstances where notice has been provided to you about our intentions with respect to your Personal Information and you have not withdrawn your consent for an identified purpose, such as by using an opt-out mechanism provided, if any. Generally, by providing us with Personal Information, we will assume that you

consent to our collection, use and disclosure of such information for the purposes described in this statement or otherwise at the time of collection.

You can refuse to consent to our collection, use or disclosure of your Personal Information, however, we may then not be able to provide you with the products or services you request. Subject to legal and contractual restrictions, you may withdraw your consent to our further collection, use or disclosure of information at any time by giving us reasonable notice. However, you may not be permitted to withdraw your consent to certain necessary collections, uses and disclosures of your Personal Information (for example but not limited to maintaining reasonable business and transaction records and the ongoing disclosure of your Personal Information to consumer credit reporting agencies) and if you withdraw your consent to certain collections, uses and disclosures of your Personal Information we may not longer be able to provide you with financial products or services.

#### THE ACCURACY OF YOUR PERSONAL INFORMATION

GM Financial strives to ensure that the information we hold about you is as accurate, complete and up-to-date, as is necessary for the purposes for which it is to be used. To be able to do so, GM Financial requires notification of any changes to your Personal Information such as your name, address or other relevant information. GM Financial regularly updates your credit bureau to provide accurate and up to date reporting relative to the financial services provided to you.

## PROTECTING YOUR PERSONAL INFORMATION

Protecting your Personal Information is important to us. Therefore, access to your information is limited to our employees, mandataries, agents and service providers who need access in order to perform their job or provide services to us. We take reasonable steps to protect your Personal Information, using physical, procedural, and electronic security measures that are appropriate to the sensitivity of the information, which may include safeguards to protect against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

## ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

The GM Financial entity with whom you are dealing may establish and maintain a file of your Personal Information for the purposes described in this Privacy Statement, which will be accessible at the applicable GM Financial office as set out below. If you wish to request access to or correction of your Personal Information in our custody or control, you may write to the applicable GM Financial office below, attention Privacy Officer. Your right to access or correct your Personal Information is subject to applicable legal restrictions. We may take reasonable steps to verify your identity before granting access or making corrections.

#### **CONTACT US**

If you have any questions or concerns regarding our privacy practices, or would like to opt-out of the use and disclosure of your Personal Information for marketing purposes (as described above), you may contact the applicable GM Financial Office by the following means:

## For General Motors Financial of Canada, Ltd.

By Mail: 2001 Sheppard Avenue East, Suite 600, Toronto, ON, M2J 4Z8

By Telephone: Toll Free: 1-877-346-5469
By Email: privacy.ca@gmfinancial.com

Attention: Privacy Officer

# For GM Financial Canada Leasing Ltd.

By Mail: 2001 Sheppard Avenue East, Suite 600, Toronto, ON, M2J 4Z8

By Telephone: Toll Free: 1-877-346-5469
By Email: privacy.ca@gmfinancial.com

Attention: Privacy Officer

## CHANGES TO THIS STATEMENT

This Privacy Statement may be revised from time to time. If we intend to use or disclose Personal Information for purposes materially different than those described in this statement, we will make reasonable efforts to notify affected individuals, if necessary, including by revising this Privacy Statement. If you are concerned about how your Personal Information is used, you should contact us as described above to obtain a current copy of this statement. Your continued provision of Personal Information or use of our services following any changes to this Privacy Statement constitutes your acceptance of any such changes. You may determine when this Privacy Statement was last updated by referring to the date found on the first page.