

General Motors U.S. Employee Privacy Statement

Last Updated: April 2025

This U.S. Employee Privacy Statement (**Privacy Statement**) addresses the personal information collected, used, and disclosed by General Motors Holdings LLC (**GM** or **we/our**) in the context of an individual's role or former role as an employee, director or officer of GM, or an employee of a third party company providing services to GM in the United States (**Employee** or **you/your**). When we say **Personal Information**, we mean information that identifies, relates to, or could reasonably be linked to you.

This Privacy Statement was developed in accordance with the GM Privacy Principles and pursuant to laws and regulations relating to the processing or protection of Personal Information or information generated ancillary to the employment relationship applicable to GM in the United States (**Data Privacy Laws**). Where a Data Privacy Law requires special handling for Personal Information or otherwise conflicts with this Privacy Statement, the applicable Data Privacy Law controls.

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

Personal Information collected

GM may collect the following personal information:

- **Identifiers** including name, address, email address, phone number, citizenship identification numbers issued by government bodies or agencies (e.g., depending on the country you are from, social security, citizen service or Personal Public Service number or national insurance number, passport number, tax identification number, driver's license number), GMID, GMIN, and work permit(s)
- **Demographic or protected classification information** including date and place of birth, gender, gender identity, pronoun(s), sexual orientation, marital status and marital status date, race/ethnicity, citizenship status, nationality, trade union membership, military or veteran status, and status as a person with a disability
- **Education and training related information** including academic degrees and certificates, training or apprenticeship records, and curriculum vitae
- **Employment experience information** including employment history, seniority or length of service, wages, professional certifications, references, promotions, performance and disciplinary records, recognition or achievement records, leave of absence, and time off records
- **Workplace feedback information** including responses to surveys and feedback tools
- **Photos & videos** including recordings of interviews and assessments of video interviews, recordings of events or meetings, content developed for GM training or promotional use, and site security camera footage
- **Medical reports and records** including information provided and obtained as part of pre-employment medical examinations or inquiries, pre-International Service Program

assignment physicals, medical examinations or inquiries conducted of current Employees (for example, as part of a fitness for duty examination or as part of the interactive process to assess and provide reasonable workplace accommodations), plant medical records, vaccination records (including for COVID-19), workers compensation records, workplace safety investigations, Family and Medical Leave Act records, paid family leave records, and disability claims records

- **Financial information** including compensation, tax information, bank account details, retirement account information and other details necessary to administer payroll, taxes, and benefits
- **Software application** information including information collected from computer or application use, such as usernames, passwords, encryption keys, emails, instant messages, calendar entries, system or access logs, and telemetry and other information associated with GM assets
- **Background and drug screening information** including, where applicable, the results of pre-hire background screenings of any kind such as credit and criminal background checks, educational background checks, motor vehicle record checks, drug and alcohol testing, and other screenings which may take place before or during employment
- **Workplace information** including facility access logs, badging, timeclock, or other information collected to support security and access to GM facilities and assets

We may also collect or receive Personal Information about you from third parties or public sources as needed to support the employment relationship. We will handle Personal Information the same regardless of whether we collect it or receive it from a third party.

Use

The Personal Information GM collects about you may be used and shared for the following purposes:

- Support and manage your employment relationship, or in the case of contractors, the administration of the applicable contract, including to: communicate with you; maintain employee compensation and benefit programs; manage vacation and other types of leave; monitor employee performance; administer any applicable collective bargaining agreement; promote personnel and public safety; perform data analytics, reporting, and benchmarking to improve business operations, the employee experience, to inform our outreach strategies, and for other purposes consistent with this Privacy Statement; investigate potential violations of law or GM policies and support our efforts to identify fraud, waste, or abuse in programs we offer.
- Improve our products and services.
- Comply with legal, regulatory, or contractual requirements.
- Protect our rights, such as investigating, establishing, exercising, preparing for, or defending legal claims.
- Prevent, detect, protect against, or respond to security incidents, identity theft, harassment, malicious or deceptive activities, or any illegal activity; preserve the integrity or security of systems; or investigate, report, or prosecute those responsible for any such action.

- Manage, market and promote GM and GM affiliate businesses and products.
- Support GM and GM business partners' joint marketing programs.
- Solicit on behalf of non-profit organizations.
- Secure our network and information security assets.
- Proceed with processing initiated by an Employee or otherwise for purposes where the Employee has consented (e.g., for verification of employment for credit approval purposes or employment reference checks).

Disclosures

We may disclose Personal Information within GM, including to GM affiliates. We also may disclose Personal Information to the following categories of third parties:

- to our service providers who work on our behalf and who do not have an independent right to use the Personal Information for the purposes described in "Use" above, such as companies that administer our contests and promotions, host or operate our websites, send communications, perform data analytics, or with background screening suppliers for information verification
- if you are represented by a trade union, certain of your Personal Information may be made available to authorized trade union representatives to the extent necessary to administer collective bargaining or other union activities as permitted by applicable law
- with third parties for research and development purposes
- in connection with the sale, transfer or financing of a GM business or its assets, including any such activities associated with a bankruptcy proceeding
- as required or permitted by law, such as to comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, local, or other government authorities
- as permitted by law, such as (a) when we believe in good faith that disclosure is necessary to protect our rights, your safety, or the safety of others, (b) to prevent, detect, protect against, or respond to security incidents, identity theft, fraud, harassment, malicious or deceptive activities, or other illegal activity, or preserve the integrity or security of systems, (c) to investigate, establish, exercise, prepare for, or defend legal claims, or (d) to conduct screening to ensure you are not on any government list of restricted parties

Apart from the purposes listed above, GM will not disclose information about you with other third parties for their independent use without your permission, or where required by Data Privacy Laws, your consent.

International data transfer

GM is a global company and therefore you may need to transfer your data to a country outside of where it was collected. Typically, data is transferred to the United States for processing, although Personal Information may be transferred to any location where GM, our subsidiaries or our service providers operate worldwide.

When GM and its affiliates in the United States, including OnStar, (GM U.S.), receive Personal Information from GM and affiliates outside the United States, (Non-U.S. Companies), we comply with applicable legal requirements providing adequate protection for the transfer of Personal Information to third countries.

We may store Personal Information in the United States, the European Economic Area (EEA), and other locations where we or our service providers maintain servers. With respect to such transfers from the EEA to the United States and other non-EEA jurisdictions, we implement standard contractual clauses and other mechanisms to protect such data. See “How to contact us” below or, where applicable, to request a copy of these standard contractual clauses or to inquire for any requests to access Personal Information or exercise other privacy rights.

How we safeguard your information

GM maintains reasonable technical, administrative, and physical security and confidentiality measures designed to help protect Personal Information from unauthorized access or 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. Learn more about cybersecurity at GM by visiting <https://www.gm.com/cybersecurity>.

How long we keep your Personal Information

We may keep the Personal Information we collect for as long as necessary for the purposes described in this Privacy Statement. Where required, we will de-identify or dispose of the Personal Information we collect when we no longer need it for the uses described in this Privacy Statement. We are required to maintain certain information to comply with laws or if necessary to establish, exercise or defend a legal claim. To the extent possible, we will restrict the processing of your Personal Information for the limited purposes that require its retention.

Accuracy

Keeping Personal Information accurate and up to date is important. It is the responsibility of Employees to keep their Personal Information up to date where GM has made systems or processes available for Employees to do so. For example, to update or correct personal contact information (i.e., name, home address, telephone number), Employees should go to Workday. Employees without computer access should contact their local Employee Relations activity or Human Resources for assistance. If you are unable to update your Personal Information using Workday, contact the GBS Shared Service Center 1-800-584-2000 or gmnapeopleservices.us@gm.com or contact your local Employee Relations activity for assistance.

Access

GM provides Employees with reasonable access to their Personal Information to examine it for accuracy and completeness in accordance with Data Privacy Laws and GM policies. Note that there are exceptions to access such as: confidential or proprietary information, business re-organization or advancement plans, situations in which granting access might involve the disclosure of other people's Personal Information, information relating to an ongoing investigation of the individual, or litigation or potential litigation involving GM. Employees should contact their local Human Resources or Employee Relations activity to determine the appropriate procedure for access.

California

California residents have the right to submit privacy requests to access, review, correct, or delete the Personal Information GM collects and uses or to request to opt out of Personal Information sale, sharing, and profiling. For more information and instructions for making a request, please review the [Additional Information for California Consumers](#).

Beneficiaries

Each Employee who supplies information about another person for the purpose of that person's enrollment in or coverage under an insurance policy, pension plan, benefit plan, or any similar policy, plan, or contract represents that they have obtained any required consent from such person to allow GM to collect, use, and disclose such information in connection with administering the applicable policies, plans, or contracts. GM will collect, use, and disclose a beneficiary's information in accordance with this Privacy Statement.

Monitoring GM assets and resources

GM monitors the use of GM assets and resources, including through the use of automated tools, to ensure their appropriate use and integrity, to maintain privacy and security of data entrusted to us, including employee Personal Information, to ensure compliance with applicable laws and GM policies and procedures, and for other purposes permitted by Data Privacy Laws. Employees should have no expectation of privacy concerning their use of GM-owned assets including technology, connected vehicles, or other GM information systems, except where Data Privacy Laws provide otherwise. Employees should expect that any and all telephone conversations or transmission, email or transmission, or internet access or usage by an employee by any GM-owned electronic device or system, including but not limited to the use of a computer, telephone, wire, radio or electromagnetic, photoelectronic or photo-optical systems, may be subject to monitoring at any and all times and by any lawful means. GM deploys automated and other tools to capture proof of business transactions, to protect GM confidential information and property, to investigate potential violations of company policy, or for any other legitimate business purpose permitted by law. Learn more at protect.gm.com.

We monitor our facilities using video monitoring devices including security cameras and badge access management security tools. These devices may be deployed anywhere not prohibited by law but are not used in private spaces. Employees should expect that parking facilities, facility entrances, elevators, and rooms with sensitive or valuable equipment will be monitored.

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 by posting a new effective date at the top of this Privacy Statement and your continued employment will mean you accept the changes. When there is a material change to this Privacy Statement, then we will notify you as required by law, such as by email, posting at your worksite, or through a notice on the company intranet site.

No contract & employees of third parties

This Privacy Statement does not constitute a contract between General Motors and any Employee.

This Privacy Statement also describes Personal Information we process about individuals who are employees of third party service providers to enable access to GM's systems, facilities, and otherwise fulfill the obligations outlined in the applicable service provider agreement. Nothing in this Privacy Statement changes the nature of the relationship between employees of a third party and GM or establishes an employment relationship with GM.

Interaction with other GM privacy statements

This Privacy Statement covers all GM controlled subsidiaries and affiliates in the U.S. except where such entity has its' own established Employee Privacy Statement. General Motors Health Care Programs have a separate Notice of Privacy Practices for medical information covered under the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Employees may also be consumers of GM products and Personal Information may also be collected in that context. This consumer Personal Information will be handled as explained in the [General Motors U.S. Consumer Privacy Statement](#).

In certain cases, GM products and services are made available to Employees for testing, evaluation, development, or product demonstration purposes. Use of these products and services is subject to the Privacy Statement applicable to the product or service and any supporting GM policies. For example, Personal Information collected in the course of delivering GM's connected services from company vehicles or in association with GM company vehicles or in association with GM company vehicle programs is described in the [General Motors U.S. Consumer Privacy Statement](#) and the [Company Vehicle Operations \(CVO\) policy](#) but is also used as described in this Privacy Statement.

How to contact us

If you have any questions or comments about this Privacy Statement, the ways in which we collect, use, and disclose your Personal Information please do not hesitate to contact us at privacy@gm.com.