

GENERAL MOTORS (CHINA) GUIDELINES FOR PROTECTION OF MINORS' PERSONAL INFORMATION

Effective Date: October 1st, 2023

General Motors (China) Investment Co., Ltd. (“GM”, “We”, “Our”) places high importance on protecting the personal information of minors. Products and services under the "General Motors (China) Privacy Policy" (hereinafter the "**Privacy Policy**") are principally offered to individuals who are at least eighteen years old. Guardians, legal representatives, fully authorized agents, or any other agents validly and legally appointed under Chinese law (hereinafter referred to as "**you**") should read, understand, and agree to both the "General Motors (China) Privacy Policy" and this "General Motors (China) Guidelines for Protection of Minors' Personal Information" (hereafter the "**Guideline**") in full. Then, you may authorize and guide minors under your guardianship or legal representation to use our products or services. If you disagree with any part of the Privacy Policy and this Guideline, regarding the scenarios described and the necessary personal information of minors to be collected, minors as described in this paragraph may not be able to properly use our products, services, or some of their features.

The term "minor" is defined in the Privacy Policy as "Natural persons under the age of eighteen (18), excluding minors who are legally considered to have full civil capacity." For clarity, the term "minor" in this Guideline should be further interpreted based on the expression as "minors under your guardianship or legally represented by you." stated in the first paragraph.

Unless otherwise stipulated, terms and abbreviations used in this Guideline have the same meaning as those in the Privacy Policy.

Please be informed: If you and/or the minor enter offline scenarios (such as visiting our offline stores or other places under our actual control), video surveillance systems may be in place for purposes of ensuring safety, store operations, and public security. These systems may capture and record activities within the store's vicinity (including your image, trajectory, voice, and movements).

1 Personal Information of Minors We Collect

We primarily offer our products and services to adults on our platform and in offline scenarios. We only collect and process minors' information under specific circumstances. Before providing us with information, you must ensure that you are the guardian or legal representative of the minor or have obtained the necessary, valid, comprehensive consent and legal authorization from the concerned entities. You should also be willing to bear the actual losses caused by improperly providing someone else's personal information to us.

1.1 You provide minors' information for participation in commercial promotional activities

You can use The Durant Guild APP, The Durant Guild WeChat Mini Program, other relevant digital platforms, and participate in our offline scenarios to register minors for car shows, test rides, activities specifically for minors, parent-child activities, or other activities in which minors can participate alongside you ("**Commercial Promotional Activities**"). For this purpose, we will collect the following necessary personal information of minors through the application, user input, or offline collection: Name, Gender, Residential Address, Birthdate, **ID number**, Nationality, Educational Background, and Dietary Restrictions.

1.2 You provide minors' information for vehicle purchases on their behalf

In principle, we only offer vehicle-purchasing services to adults. In exceptional circumstances that require you to buy a vehicle in a minor's name in offline scenarios (including signing the purchase contract), we will try our best to accommodate your car purchase needs within the limits of the law. **In this situation, you must visit our offline store to verify your identity, proving that you have the right under Chinese law to recognize the actions of the minor in purchasing the vehicle.** The table below shows the scope, method, and purpose of the necessary personal information of minors we collect when providing vehicle purchasing services. Such information is essential for the execution and performance of the purchase contract.

Channel	Necessary Personal Information	Method of Collection	Purpose of Collection
Offline Scenarios	Minor's name, certificate type, ID number or passport number , mobile phone number, location, vehicle model, contact address	Offline Collection	Used to generate purchase orders and establish car purchase contracts
	The actual payer's name, bank name, bank account, transaction record information (i.e., payment time, payment amount, payment channel, the same below), invoice information, SMS verification code		For payment and refund

During the identity verification process, where applicable, we will send you a text message code through the mobile communication operator. You may be charged additional communication fees for this, which you will bear according to the mobile communication operator's tariff standards. **We may also initiate facial recognition during the verification process. Please note, the Qiyuesuo for facial recognition is**

implemented within the environment of Shanghai Genyan Network Technology Co., Ltd. They will directly collect and process facial images and other personal information during the facial recognition process. We do not have any control, decision-making power, or detailed knowledge over this. For details on how Shanghai Genyan Network Technology Co., Ltd handles personal information, you will need to view the privacy policy of their E-signature platform separately. When entering the facial recognition phase, you will be redirected to the E-signature platform of Shanghai Genyan Network Technology Co., Ltd, where the relevant privacy policy will be displayed.

General Motors does not collect facial recognition features or capture facial images during the identity verification process. The collection of facial recognition features and images is entirely done by Shanghai Genyan Network Technology Co., Ltd. General Motors does not retain any original facial image information but only retains the results of the identity verification. As per the requirements of Shanghai Genyan Network Technology Co., Ltd., we may also share your **ID number, recordings**, and name with them to support their compliance audits and checks, ensuring we use the resources of Qiyuesuo compliantly for facial recognition.

If the verification process is terminated prematurely, we will delete or anonymize the information you have provided to General Motors during the verification process and any collected personal information of the minor. Only if you successfully pass the identity verification process, the purchase contract will be finalized and completed.

- 1.3 When you actually use the vehicle mentioned in Article 1.2 that you have acknowledged to be purchased in the name of the minor (i.e., registered under the name of the minor), we may need to collect personal information, including the Vehicle Identification Number/VIN, so that you can use the services including, but not limited to, the following through that vehicle: connected car services, charging pile installation, OnStar, in-car entertainment, vehicle data security monitoring, after-sales support, home pick-up and drop-off, vehicle exchange, and used car trading. For details on the personal information, we need to collect for the aforementioned services under this clause, please refer to the relevant content of the "General Motors (China) Privacy Policy". In addition, since such vehicles are registered in the name of a minor, the corresponding personal information may be deemed as the personal information of the minor. You agree that if the situation described in this paragraph occurs, we have the right to collect such information.

2 How We Provide, Transfer, and Disclose Personal Information of Minors

- 2.1 We will provide, transfer, and disclose personal information of minors and their guardians according to the

provisions in the “Privacy Policy” and/or personal information processing rules of some specific service. When dealing with the personal information of minors, we will conduct a personal information protection impact assessment in accordance with applicable laws and regulations.

2.2 Provision

We are obliged to keep the personal information of minors confidential and will not sell or provide any of your personal information to any third party (excluding the third parties with whom you have separately agreed and for the shared purposes listed below) for such third party’s independent marketing purposes. Apart from the information sharing described in this section, without your prior authorization and consent, we will not share the personal information of minors with any other companies, organizations, or individuals. We will seek your separate authorization and consent to share the personal information of minors under the following circumstances:

To our suppliers and partners: Some functions in Commercial Promotional Activities and car purchase services may require our third-party partners or suppliers to provide to minors. Therefore, we might share some personal information of the minor with third-party partners to offer the necessary services to the minor. Below are the known related supplier details; additionally, we will disclose updated supplier information to you from time to time.

Separate Consent	Channel	Entity Name	Scenario and Purpose	Shared Necessary Personal Information	Third party personal information processing rules and contact information
○	The Durant Guild App	Shanghai Genyan Network Technology Co., Ltd	In the face recognition process, it is used to collect facial recognition features for identity verification	Name, ID Number	When you enter the E-signature platform, you can click on the applicable privacy policy link on the platform to view the full content.

Cross-border Transmission: General Motors is a global multinational company, with a considerable number of systems and tools developed at the global level or located outside of China. Consequently, the personal information of minors may be transmitted across borders (including remote access) to our affiliates in the United States so that we can achieve core functionalities on our platforms and in offline scenarios or offer products or services that involve minors. For the purpose mentioned below, we will obtain your separate consent:

○	For the scenarios involving minors purchasing vehicles as mentioned in section 1.2 above, you hereby agree that, in compliance with legal and regulatory requirements and in accordance with the “Privacy Policy”, we may transfer the personal information of minors as specified in the “Information of Our Overseas Affiliates” form to our overseas affiliates.
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The name of Overseas Recipient	Contact Information	Purpose of processing PI	Method of procession PI	Category of PI provided abroad	storage duration	Location (country/region)	the methods and procedures for PI Subject to exercise his/her right	The business function /service type relevant to PI provided abroad	Conditions for transferring PI abroad (CAC security assessment/security certification/SCC)	In case of an outbound transfer of Sensitive PI, the necessity of the outbound transfer of Sensitive PI and the impact on the rights and interests of the PI Subject
GM Holdings LLC	Email Address	vehicle damage inspection process (vehicle damage and repair tracking)	Transmitted through GOLIS and GWM system	VIN – Vehicle Identification Number	5 years	Warren, Michigan, USA Milford, Connecticut, USA	Via the following email address: gmpi.privacyprotection@gm.com	vehicle damage inspection	To be executed by SCC	No sensitive personal information provided, not involved

2.3 Transfer

<input type="radio"/>	<p>In principle, we will not transfer the personal information of minors to any legal entity, organization, or individual. However, with this separate authorization and consent, you agree that we can transfer the personal information of minors under the following circumstances: in cases involving our mergers, acquisitions, business reorganizations, or other similar transactions. If such transactions necessitate the transfer of personal information, we will require the new legal entity or organization holding your personal information to continue being bound by this Privacy Policy. If the new legal entity or organization processes your personal information beyond the purposes and methods originally set out in this Privacy Policy, they will seek your prior authorization and consent. We will notify you about the identity and contact details of the new legal entity or organization, reasons for the transfer, types of personal information involved, potential impacts, and obligations that the recipient must continue to fulfill, using proper methods like pop up notifications.</p>
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2.4 Disclosure

Publicly disclosing your personal information requires conducting a personal information protection impact assessment in accordance with applicable laws and regulations. We will only publicly disclose your personal information after implementing industry-standard safety measures and only in the following scenarios. For the purposes listed below, we will seek your separate consent:

<input type="radio"/>	<p>You agree to let us use the personal information we have collected and processed from platforms or offline scenarios, which might include your photos, images, audio recordings, video materials, etc., for the purpose of creating publicly available promotional materials.</p> <p>The impact of such public disclosure is that people familiar with you might recognize your relevant information. De-identification safety measures we will undertake include data anonymization, desensitization, encryption, suppression, pseudonymization, generalization, randomization, sampling, aggregation and statistics, synthesis, and differential privacy. The personal information processing rules related to this disclosure</p>
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	purpose can be found in the "Privacy Policy."
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3 How We Protect and Store Minors' Personal Information

We protect and store both your and minors' personal information as outlined in the "Privacy Policy" and/or specific personal information handling rules of a particular service.

All personal information of minors will be stored in Beijing and/or Shanghai, China. We strictly limit access to minors' personal information, adopt the principle of minimum necessary access for staff who might come into contact with it, and implement necessary security measures to record and control how our personnel handle such information, preventing unauthorized duplication or downloading of minors' data.

Should we cease platform services entirely due to reasons such as expiry of information holding duration, business adjustments, or bankruptcy liquidation, any collected personal information of minors will be deleted or anonymized.

4 Rights and Choices of Minors

Minors are entitled to all the rights as specified in Section 6 of the "Privacy Policy," including accessing, correcting, deleting personal data, and changing or revoking authorization or consent. As minors use our products and services, you can contact us through the methods provided in Section 6 of this Guideline and Section 9 of the "Privacy Policy" to exercise management rights over the minor's personal information.

5 Updates and Scope of this Guideline

5.1 Scope

The products and services provided by platform and offline scenarios are primarily designed for adults in China. This Guideline applies exclusively to situations where General Motors collects minors' information under specific circumstances.

5.2 Updates

As the platform and offline service offerings evolve or expand, there may be changes in the type, purpose, and manner in which we handle minors' personal information. We reserve the right to periodically update or revise this Guideline in accordance with relevant laws and regulations. If such updates or revisions result in substantial changes to your rights under this Guideline, we will notify you individually or publicly when you or the minor uses our products or services and seek your consent. If you disagree with the updated or revised Guideline, the minor should cease using the platform and offline services immediately. Continuing use implies acceptance of our updates and revisions to this Guideline.

5.3 Significant Changes

For significant changes to this Guideline, we'll provide a more prominent notification (including email, SMS, site messages, pop-up notifications, etc., detailing the specific updates to this Privacy Policy). Significant changes include but aren't limited to: (1) Major shifts in our service model, such as purposes for handling minors' personal information, types of information handled, and the manner of use. (2) Major changes in our ownership structure or organizational structure, such as business adjustments or bankruptcy mergers resulting in a change of ownership. (3) Primary entities receiving, transferring, or publicly disclosing minors' information undergo changes. (4) Significant changes in the rights of you or the minor concerning personal information processing and how you can exercise these rights. (5) Changes in the department responsible for personal information security, contact methods, and complaint channels. (6) When personal information security impact assessment reports indicate high risks. Old versions of this Guideline will be archived for reference.

6 How to Contact Us

Should you or a minor have questions about this Guideline or encounter any privacy-related concerns during the use of our services, you can reach us via:

- Email: gmpi.privacyprotection@gm.com.
- Address: 56 Jinwan Road, Pudong New District, Shanghai, China, 201206.
- Phone: 4001001818.

Typically, we will respond within ten (10) working days. Account deletion services will be processed within fifteen (15) working days, and personal sensitive information deletion within ten (10) working days.

If you find certain personal information handling rules unclear, contact us, and we'll further clarify using notifications, site messages, or pop-ups. If unsatisfied with our response, you can report to the Central Cyber Affairs Office's Illegal and Harmful Information Reporting Center (Official website: <https://www.12377.cn/>).

[THE END]