

Privacy Policy

PIKE WHEATON CHEVROLET LTD. (“DEALER”) is committed to providing transparency with respect to its practices in handling personal information. To that end, this Privacy Policy is intended to establish responsible and transparent practices for the management of personal information and to satisfy the requirements of rules established by the *Personal Information Protection and Electronic Documents Act* (PIPEDA), as well as other applicable provincial privacy laws and standards which may apply.

Application and Scope

This Privacy Policy generally applies to any personal information (as defined below in the section entitled Definition of Personal Information) collected or generated by DEALER from or about its customers and other individuals with whom it deals, which may include potential customers. At any time that you do business with DEALER, participate in a contest or promotion run by DEALER or with anyone acting as an agent on our behalf, or interact with us in any manner, you are protected by the rights and safeguards contained in this Privacy Policy and you explicitly agree to its terms.

This Privacy Policy also governs personal information collected about DEALER’s website visitors and explains how we use and disclose personal information that we collect from people who visit our website and otherwise interact with us through www.pikewheaton.com (“website”). It also explains how we use cookies and similar technologies.

Definition of Personal Information

When used in this Privacy Policy, personal information means “any information about an identifiable individual”. This may include, for example, information relating to your account with us, including your identity and the services you use and subscribe to, as well as credit and banking information, billing records and any complaints documented in a file. It may also include other types of more technical information such as subscribers/users’ IP addresses, userIDs, meta-data, but only when this information can identify you as an individual. Personal information that is aggregated and cannot be associated with an identifiable individual is not considered to be personal information.

Collection and Use of Personal Information

We collect most of our information about you directly from you, with your consent when required by law. For example, when you take a test drive, online request an appointment or vehicle quote, purchase or lease a vehicle, or service your vehicle, DEALER will collect information about you. We may also conduct contests, quizzes, surveys, promotions and offer several forms of personalized services such as vehicle warranty, servicing and maintenance and OnStar services, in respect of which you may be requested to provide personal information, such as name, mailing address, telephone number, e-mail address, age and other information that may be required to provide or administer these services or promotions.

[We may also obtain personal information about you from third parties, with your consent. For example, for credit evaluation purposes, we may need to determine your creditworthiness through contact with an independent credit reporting agency.]

DEALER generally collects personal information from or about its customers and other individuals with whom it deals, and thereafter uses it, for the following purposes:

- to establish, develop and preserve its business relationship respectively with its customers and other individuals with whom it deals;
- to create, establish and administer customers' accounts and to respond to customer or supplier inquiries;
- to provide the products or services that it offers, or receive the products or services that it requests, and ensure that all related transactions are supported and implemented;
- to authenticate the identity and preserve the privacy of customers contacting DEALER by telephone, electronic means or otherwise;
- to conduct market analysis, as well as for internal training and quality assurance purposes;
- [as necessary, to establish or verify the credit of persons that use, or intend to purchase, one or more of the products or services offered by DEALER;]
- to manage its General Motors Dealer business and ensure the efficiency, reliability and security of its systems and networks;
- to meet legal and regulatory requirements and allow DEALER to meet contractual requirements relating to the products and services provided to customers;
- to ensure its records are accurate and to protect customers and DEALER from error and fraud;
- to understand and assess the interests, wants and changing needs of customers with a view to improving its products and services and developing new ones;
- to provide personalized products and services as well as product recommendations to customers; and

subject to our customers' [Right to Withdraw Consent](#), to conduct surveys on the quality of our products, services or customer service or to provide our customers with offers for additional products and services that we feel may be of interest to our customers or that we believe meet our customers' changing needs.

If you have applied for employment with DEALER, the personal information submitted with your job application will be used for recruitment and other customary human resources purposes. For example, we may send you information about new job opportunities within DEALER as well as other career development resources.

Unless required or authorized by law, DEALER will not collect or use personal information for any other or new purpose without obtaining further consent. For details on the type of information that we collect via our website and on how we use and share this information, please refer to the [Website](#) section of this Privacy Policy.

Your Consent

DEALER obtains consent from the individuals concerned for the collection, use or disclosure of personal information through various means: orally or through written documents, including agreements, forms including vehicle purchase/leasing forms and repair orders, welcome kits as well as printed or electronic communications. The form of consent sought by DEALER will vary according to the sensitivity of the personal information, the reasonable expectations of the individuals and any requirements or standards established by law.

In general, by subscribing to DEALER services and/or submitting information to us in connection with purchasing or leasing our products and services, you are providing your consent to the collection, use and disclosure of personal information as set out in this Privacy Policy [and in the DEALER [Terms and Conditions](#)]. Moreover, by visiting, interacting with and/or using our website, you agree to benefit from, be bound by, the terms and conditions of this Privacy Policy.

In certain circumstances, personal information may be collected, used or disclosed without consent. These exceptional circumstances may include:

- where it is clearly in the interest of the individual and consent cannot be obtained in a timely way, such as in emergencies, where the life, health or safety of the individual is threatened, or where legal, medical or security reasons make it impossible or impractical to obtain consent;
- when information is being collected, used or shared for the detection, prevention of or remediation to, the breach of an agreement, fraud or other illegal activity, and the collection of consent might defeat the purpose of collecting the information;
- to collect a debt; and
- to comply with a subpoena, warrant or other court order, or as may be otherwise required or authorized by law or by any regulatory bodies having jurisdiction.

For more information on how DEALER may share your personal information, please refer to the section [Sharing your Personal Information](#) of this Privacy Policy.

Right to Withdraw Consent

Consent may be withdrawn at any time, subject to legal or contractual restrictions and reasonable notice; however, without such consent, DEALER may be limited in the services or products it is able to provide customers. You may also withdraw your consent as follows:

- **Mail marketing, Telephone marketing and Quality control communications.** You may decide that you prefer DEALER not to use your personal information to promote new and/or additional products and services which may be of interest to you and refuse

further DEALER contact by mail or telephone for marketing purposes or by email or telephone for quality control purposes. If this is the case, you may advise us by contacting customer service or contacting us using the information detailed in the [How to Contact Us](#) section below.

- **Commercial Electronic Communications.** You can always limit the communications that DEALER sends to you. To opt-out of commercial emails, simply click the link labeled “unsubscribe” or “opt-out” at the bottom of any commercial electronic communication we send you. Please note that even if you opt-out of promotional communications, we may still need to contact you with important information about your account or for other purposes as may be permitted or required under applicable laws. If you have any questions about your choices or if you need any assistance with opting-out, please contact us using the contact information detailed in the [How to Contact Us](#) section below.

For information on how you can limit the type of information that we collect, use or share about you when you visit and/or use our website, please refer to the [Website](#) section of this Privacy Policy.

Sharing of Personal Information

Your information may be made available by DEALER to third-parties or service providers to fulfill the purposes for which it has been collected or as set forth in this Privacy Policy. DEALER will NOT sell, rent or trade your personal information to any third party. However, we may share your personal information when authorized by law or as follows:

- **GM Canada.** DEALER will share your personal information with General Motors of Canada Company (“GM”) and its affiliates, for the purposes described in and subject to GM’s Privacy Policy, a copy of which can be found at www.gm.ca, (or, as the case may be, subject to the relevant affiliate’s privacy policy).
- **Third party or affiliated service providers.** We may hire service providers, which may be affiliates, to perform services on our behalf. This may include, without limitation, a person or an organization retained by DEALER to perform work on its behalf. We provide them with a limited amount of information which is necessary in order for them to provide the services required. They are prohibited from using the information for purposes other than to facilitate and carry out the services they have been engaged to provide. These service providers are not permitted to disclose this information to others.
- **As permitted or required by law.** From time to time, DEALER may be compelled to disclose personal information in response to a law, regulation, court order, subpoena, valid demand, search warrant, government investigation or other legally valid request or enquiry. We may also disclose information to our accountants, auditors, agents and lawyers in connection with the enforcement or protection of our legal rights. We also reserve the right to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful or to law enforcement and emergency services providers, in an emergency or where required or permitted by law. We may release certain personal information when we have reasonable grounds to believe that such release is

reasonably necessary to protect the rights, property and safety of others and ourselves, in accordance with or as authorized by law.

- **Business transaction.** We may disclose personal information to a third party in connection with a sale or transfer of business or assets, an amalgamation, re-organization or financing of parts of our business. However, in the event the transaction is completed, we will require that the receiving party agree that they will be similarly bound by the provisions of this Privacy Policy and that they will only use and disclose your personal information as we are similarly entitled under this Privacy Policy. In the event the transaction is not completed, we will require the other party not to use or disclose your personal information in any manner whatsoever and to completely delete such information.

Only those employees of DEALER or trusted third party contractors, who need access for business reasons, or whose duties reasonably so require, will be granted access to personal information about customers. For information on how you can limit the type of information that we collect, use or share about you when you visit and/or use our website, please refer to the [Website](#) section of this Privacy Policy.

Website Privacy

DEALER generally collects and uses personal information from or about its website visitors and users as follows:

- **Information you provide.** In many cases, we collect personal information directly from you when you visit or use our website. For instance, we may collect the following types of information:
 - **Inquiries.** We may collect your name, contact information, e-mail address and any information you provide us when you make an inquiry or contact us through our website. We will only use this information to provide you with the information requested or to contact you in order to answer your questions and/or requests or otherwise in accordance with this privacy policy.
 - **Requests for Product and/or Service.** We may collect your name, contact information, e-mail address and any other information provided to us when you sign up to receive our newsletter or when you submit a request or an order for a DEALER product and/or service. We will only use this information to process and answer your request or to manage our everyday business needs in connection with such request or otherwise in accordance with this privacy policy.
 - **Satisfaction Survey.** When you visit our Dealership, you may, from time to time, be invited to participate in a satisfaction survey. In such case and if you decide to participate in our survey, we may collect your postal code, email address and other information deemed important to complete such survey. We will only use your information for quality assurance purposes or otherwise in accordance with this privacy policy.

- **Technical information.** When you visit our website, we may use electronic means such as cookies to collect technical information. This information may include information about your visit to our website, including the IP address of your computer and which browser you used to view our website, your operating system, resolution of screen, location, language settings in browsers, the site you came from, keywords searched (if arriving from a search engine), the number of page views, information you entered, advertisements you have seen, etc. This data is used to measure and improve the effectiveness of our website or enhance the experience for our customers. For instance, it may be used to ensure that the products advertised on our website are available in your area or that we are not showing you the same ads repeatedly. We treat this information as personal information when it is associated with your account or contact information. We also collect and use the following information when you visit and/or interact with us on our website:
 - **Google Analytics:** We use Google Analytics which allows us to see information on user website activities including, but not limited to, page views, source and time spent on our website. This information is depersonalized and is displayed as numbers, meaning that it cannot be tracked back to individuals. You may opt-out of our use of Google Analytics by visiting the [Google Analytics opt-out page](#).
 - **[Google AdWords:** We use Google AdWords Remarketing to advertise DEALER across the Internet and to advertise on third party websites (including Google) to previous visitors to our website. AdWords remarketing will display ads to you based on what parts of the DEALER website you have viewed by placing a cookie on your web browser. It could mean that we advertise to previous visitors who haven't completed a task on our site or this could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. This cookie does not in any way identify you or give access to your computer or mobile device. The cookie is only used to indicate to other websites that you have visited a particular page on our website, so that they may show you ads relating to that page. If you do not wish to participate in our Google AdWords Remarketing, you can opt out by visiting [Google's Ads Preferences Manager](#)].
 - **[Behavioral Advertising.** DEALER does not allow third party cookies on its website for purposes of delivering third parties advertising based on preferences or interests known or inferred from the data collected for advertising purposes (often referred to as Online Behavioral Advertising or OBA).]
- **Your Choice with Cookies.** You can block the use of cookies by activating the settings in your browser. The Help feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you choose to withhold consent, or subsequently block cookies, you may not be able to access all or part of the content of our website. Additionally, you can disable or delete similar data used by browser add-ons, by changing the add-on's settings or visiting the website of its manufacturer. You can also generally opt-out of receiving personalized ads from third

party advertisers and ad networks who are members of the Digital Advertising Alliance of Canada. Please visit the [DAAC opt-out page](#) for more information.

- **Privacy Policies of Third Parties.** This Privacy Policy only addresses the use and disclosure of information by DEALER. Other websites that may be accessible through this website have their own privacy policies and data collection, use and disclosure practices. We encourage you to familiarize yourself with the privacy statements provided by all third parties prior to providing them with information or taking advantage of an offer or promotion.

Personal Information Outside of Canada

In some cases, personal information that we manage may be transferred, processed and stored outside Canada, and therefore may be available to government authorities under lawful orders and laws applicable outside of Canada. DEALER will strive to protect personal information disclosed to third parties by contractual agreements requiring that those third parties adhere to confidentiality and security procedures and protections that are, at a minimum, equivalent to those employed by DEALER itself.

Security of Personal Information

We will use reasonable security measures to protect your personal information against unauthorized access. DEALER has implemented security measures that contain administrative, technical and physical controls that are designed to safeguard your personal information.

Retention

Personal information will be retained only as long as necessary for the fulfilment of the purposes for which it was collected and for which consent was received, unless otherwise required or permitted by law. Personal information that is no longer required to fulfil the identified purposes or for a purpose required or permitted by law, will be destroyed, erased or made anonymous. DEALER has developed and implemented retention procedures, and will ensure destruction of personal information in a method that prevents improper access.

Access and Correction

DEALER respects your right to access and correct your personal information. If you need assistance updating your personal information, please contact us using the contact information detailed in the [How to Contact Us](#) section below.

How to Contact Us

If you have questions or concerns regarding this Privacy Policy or the personal information that DEALER has about you, or if you wish to address a challenge concerning compliance with the above principles, you may do so by contacting DEALER's designated individual or individuals accountable for compliance with this Privacy Policy at: www.pikewheaton.com/ContactUsForm

Change of Privacy Policy

DEALER will review and update its policies and procedures as required to keep current with rules and regulations, new technologies, standards and customer concerns. Our Privacy Policy may therefore, change from time to time. We will post any privacy policy changes on our website and, if the changes are significant, we will provide a more prominent notice.

This Privacy Policy was last updated on June 07, 2017.

[Please note that both the English and French versions of our Privacy Policy have equal legal value.]