# **Candidate Privacy Notice**

This version was published, and is valid from, 2023/02/16.

This notice provides information on the Volvo Group's processing of personal information of persons that apply for open positions within the Volvo Group ("Privacy Notice"). If you are or have applied for a position at a Volvo Group company, we may process personal information about you.

For the purpose of this notice, the "Volvo Group" means AB Volvo (publ.) and entities directly or indirectly controlled by AB Volvo including but not limited to the entities belonging to any of the Volvo Group's principal Business Areas and Truck Divisions (as may exist from time to time) such as Volvo Trucks, Volvo Buses, Volvo Construction Equipment, Renault Trucks, Arquus, Volvo Penta, Mack Trucks , Volvo Financial Services, Volvo Group Connected Solutions, Volvo Technology, Volvo Group Purchasing, Volvo Group Real Estate, Volvo Treasury, Volvo Information Technology , Volvo Group Trucks Operations , Volvo Autonomous Solutions and Volvo Energy .

This Privacy Notice applies only when Volvo Group is collecting or otherwise processing personal information for Volvo Group's purposes (i.e., when Volvo Group (either alone or in common with other entities) is a personal information processor and therefore determines the purposes for which and the manner in which any personal information is processed).

If Volvo enter into an employment agreement with you, our processing of your personal information will be governed by the Volvo Group Employee Privacy Notice.

This Privacy Notice does not apply when Volvo Group is collecting or otherwise processing personal information on behalf of another company, such as Volvo Group's independent dealers, importers, suppliers, and customers.

In addition to this Privacy Notice, some Volvo Group systems, applications, and processes may contain their own privacy notices, which provide additional details about what specific personal information is collected and how it is stored, used, and transferred.

# Identity and contact details of the personal information processor and Volvo Group China Privacy

The Volvo Group company where you have applied for a position (below referred to as "Volvo") is the personal information processor that Volvo obtains from you and the other sources described below.

"Personal information process" means that it is Volvo that decides on the purpose and means for the processing of your personal information. Volvo is responsible for the processing of your personal information under applicable data privacy laws and regulations.

If you have questions regarding the processing of your personal information, please contact Volvo Group China Privacy at <a href="mailto:privacy.china@volvo.com">privacy.china@volvo.com</a>.

# What categories of personal information may Volvo process, on which legal ground(s) and for what purposes?

For the purposes of this Privacy Notice, "personal information" refers to various information related to an identified or identifiable natural person recorded electronically or by other means, but does not include anonymized information. In other words, it is any piece of information than can be linked to you.

For the purposes of this Privacy Notice, the term "process" or "processing" means any use of personal information, including but not limited to the collection, recording, organization, storing, adaptation, alteration, transferring, making available, blocking, deletion or destruction of personal information.

#### Legal ground

Volvo will process your personal information based on either of the following legal grounds, see also further details below.

- Legal obligation. Volvo may process your personal information if such processing is necessary to comply with a legal obligation, e.g. to comply with court orders and legal reporting requirements.
- The processing is necessary for the response to public health emergencies, or for the protection of life, health, and property safety of natural persons in emergencies. Volvo may process your personal information to protect the vital interest of you and others if Volvo has valid reasons to believe that such processing of your personal information may prevent or reduce any significant potential harm to you or others.
- **Consent.** In exceptional cases or if no other legal ground can be applied, Volvo may ask for your explicit consent to process certain personal information. Such consent is your choice and is entirely voluntary.

Volvo may process the following categories of data which, in itself or in combination with other data, may constitute personal information and for the general purposes stated in <u>Table 1</u> below.

Please note that the below list is a list of examples only and not intended as an exhaustive list, and that Volvo will not necessarily process all the data listed below about you. Some of the purposes for processing will overlap and there may be several purposes which justify our use of your personal information.

Table 1 – Categories, Purpose and Legal Ground for Processing

Categories of Personal	Purposes of Processing	Legal Ground for
information		Processing

# **VOLVO**

Categories of Personal information	Purposes of Processing	Legal Ground for Processing
Individual data, such as name, date of birth, gender, nationality, preferred language and photo	<ul> <li>Enabling registration of candidates in Volvo's recruitment systems</li> <li>General administration of applications</li> </ul>	The processing is necessary for the conclusion or performance of a contract in which the individual is a party, or necessary for human resources management in accordance with the labor rules and regulations established in accordance with the law and the collective contracts signed in accordance with the law     Consent
Contact data, such as home address, email and telephone number	Enabling communication with candidates	The processing is necessary for the conclusion or performance of a contract in which the individual is a party, or necessary for human resources management in accordance with the labor rules and regulations established in accordance with the law and the collective contracts signed in accordance with the law     Consent
IT-related data, such as e-mail and password for the Volvo recruitment system including automatic messages and other communication	Enabling the use of and communication through Volvo's recruitment system	The processing is necessary for the conclusion or performance of a contract in which the individual is a party, or necessary for human resources management in accordance with the labor rules and regulations established in accordance with the law and the collective contracts signed in accordance with the law     Consent

Categories of Personal information	Purposes of Processing	Legal Ground for Processing
Competence data, such as CV, including information on work related experience, education, trainings, professional memberships, diplomas, references letters as well as other data that you provide us during interviews at our premises or via digital channels	Enabling assessment of the candidates' skills and qualifications for the position	The processing is necessary for the conclusion or performance of a contract in which the individual is a party, or necessary for human resources management in accordance with the labor rules and regulations established in accordance with the law and the collective contracts signed in accordance with the law     Consent
Performance and evaluation data, such as personal and analytical tests in connection with recruitment processes	Enabling assessment of the candidates skills and qualifications for the position	The processing is necessary for the conclusion or performance of a contract in which the individual is a party, or necessary for human resources management in accordance with the labor rules and regulations established in accordance with the law and the collective contracts signed in accordance with the law  Consent
Health data, such as results from health examinations and drug tests (only for certain positions)	Enabling assessment of the candidate's health status (if needed for specific positions or other reasons)	• Consent
Security data, such as information obtained through background checks (only for certain positions)	Enabling assessment of the candidates background (if needed for the specific position)	Consent (to enable relevant third parties to release information about you)

## Specifically about special categories of sensitive personal information

It is specifically noted that some aspects of health and security data may be regarded as special categories of sensitive personal information under applicable data privacy laws and shall be handled with extra care and require additional protective measures. Volvo will only process special categories of sensitive personal information if Volvo has a legal obligation to process such data, and/or if Volvo has received your explicit consent to process such data. In such cases, Volvo will inform you and (if required by law to do so) seek your explicit

consent to process such data. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

# Specifically about CCTV monitoring

Volvo may use CCTV monitoring (as defined above) where permitted by law. CCTV monitoring is generally used to control and prevent unauthorized access to Volvo's premises and equipment, however in some countries it may also be used for the purpose to ensure compliance with health and safety guidelines and procedures and for overall production improvement purposes. CCTV images and recordings are securely stored and only accessible on a need-to-know basis (for example, to look into an incident).

#### Specifically about automated decision-making

The Volvo Group online recruitment system may include screening questions to identify whether candidates have certain predefined minimum competences for applied positions. Please note that if you provide a negative answer to any of the screening questions you may be automatically removed from the recruitment process through automatic decision mechanisms in the recruitment system. In such case you will receive an automated message that your application has been declined.

#### From where will Volvo obtain your personal information?

Volvo will primarily obtain your personal information from yourself, e.g. during the application process. Your personal information may also be obtained via a third party, e.g. from someone you have directed us to obtain your personal information from e.g. when we contact references that were provided to Volvo by you, or from service providers acting on Volvo's behalf (e.g. background screening and verification including education, past employment, references and health examinations).

Some personal information might also be collected from Volvo's IT-system, or equivalent, for example if you are, or have previously been, employed by a Volvo Group company or engaged as a consultant by a Volvo Group company.

#### What happens if you do not provide Volvo with any personal information?

Except for certain information that is required by law, your decision to provide any personal information to Volvo is voluntary. You will therefore not be subject to adverse consequences if you do not wish to provide Volvo with your personal information.

However, please note that it is necessary for Volvo to process certain personal information relating to you to administer your application for a position with Volvo. Accordingly, Volvo may not be able to offer you an employment if you do not provide certain necessary personal information or do not allow Volvo to process certain necessary personal information in connection with your application .

#### How will Volvo share your personal information?

Your personal information may be shared with other Volvo Group companies and with certain categories of third parties (as further detailed below), which may involve transferring your personal information to other countries.

### Sharing of personal information within the Volvo Group

The Volvo Group is a global organization with offices and operations throughout the world, and your personal information may be transferred or be accessible internationally throughout the Volvo Group's global business and between its various entities and affiliates.

Any transfers of your personal information to other Volvo Group companies (including transfers personal information for a party outside the territory of the People's Republic of China) will be subject to a standard contract established by the Cyberspace Administration, or a security assessment or certification endorsed or approved by the relevant authority from time to time.. Such agreement reflect the standard provisions, security assessments or certifications contained in the data privacy laws of the People's Republic of China (including the Personal Information Protection Law). Taking such measures in place means that all Volvo Group entities have to comply with the same personal information protection rules. It also means that your rights stay the same no matter where your data is processed by Volvo Group.

#### Sharing of personal information with third parties outside of the Volvo Group

In addition to the sharing of personal information between Volvo Group companies as set out above, Volvo may also share your personal information with certain categories of third parties, including:

- <u>Business partners</u>, such as Volvo Group's suppliers and service providers in connection with their provision of products and services to the Volvo Group, such as IT service providers.
- <u>Unions</u>, if required by applicable law, including information obligation towards unions in connection with appointments of managers.
- <u>Professional advisors</u>, such as lawyers and other professional advisors in connection with claims and the receipt of advisory services.
- <u>Law enforcement</u>, regulatory authorities and other public and judicial bodies in connection with legal obligations such as court orders or legal reporting requirements or if considered necessary in exceptional cases to protect the vital interest of you or others.

Any third party service providers and professional advisors to whom your personal information are disclosed, are expected and required to protect the confidentiality and security of your personal information and may only use your personal information in compliance with applicable data privacy laws and regulations.

Further, in the event that any Volvo Group company that is located within the People's Republic of China transfers personal information to external third parties that are located outside of the People's Republic of China the relevant Volvo Group company will satisfy itself that there are appropriate safeguards in place which provide adequate levels of protection of your personal information as required by applicable data privacy laws (including the Personal Information Protection Law). For example, this may include the use of standard contracts developed by Cyberspace Administration or pass the security assessments or certifications recognized or approved by the relevant authorities from time to time.

If you have questions about how Volvo will share your personal information, please contact the VOLVO Group Privacy Officer via the contact details set out above.

#### How does Volvo safeguard personal information?

Volvo utilizes appropriate and reasonable legal, technical and organizational security measures, including information technology security and physical security measures, to adequately protect personal information.

These measures are appropriate to the risks posed by the processing of personal information and to the sensitivity of the personal information and take into account the requirements of applicable local law. In addition, the measures are continuously improved in line with the development of available security products and services.

Volvo requires all persons to abide by applicable security policies related to personal information when using Volvo systems.

#### For how long will Volvo process your personal information?

Volvo will normally keep your personal information until the recruitment process has been concluded, and two (2) years thereafter (or longer dependent on applicable employment legislation) to satisfy the need to use such personal information in the event of an actual, threatened or anticipated dispute or claim (e.g. on grounds of discrimination).

If consent has been given to store personal information for future recruitment needs, it will be stored until a future recruitment of the applicant is no longer relevant and/or until such consent has been withdrawn .

#### Your data protection rights

You may be entitled, where provided for under applicable data privacy laws and regulations, to:

- Request access to the personal information Volvo process about you: this right entitles you to know whether we hold personal information about you and, if we do, to obtain information on and a copy of the specific pieces and categories of personal information.
- Request a rectification of your personal information: this right entitles you to have your personal information corrected if it is inaccurate or incomplete.
- Object to the processing of your personal information: this right entitles you to request that Volvo no longer processes your personal information.
- Request the erasure or deletion of your personal information: this right entitles you to request the erasure or deletion of your personal information, including where such personal information would no longer be necessary to achieve the purposes.
- Request the restriction of the processing of your personal information: this right entitles you to request that Volvo processes your personal information only in limited circumstances, including with your consent.
- Request portability of your personal information: this right entitles you to receive a copy (in a portable and, if technically feasible, readily usable format) of your personal information,

or request Volvo to transmit such personal information to another personal information processor.

• In the event that our processing of your personal information or part thereof is based on your consent, to withdraw at any time your consent, in which case Volvo will cease any further processing activities of your personal information or the relevant part thereof (however such withdrawal will not affect the legality of the data processing activities prior to the withdrawal).

Please note that Volvo may not always be obliged to comply with a request of deletion, restriction, objection or data portability. Assessment may be made on a case by case basis of Volvo's legal obligations and the exception to such rights.

You also have the right to lodge any complaints you may have regarding Volvo's processing of your personal information to a supervisory authority. For more information about these rights and how to exercise them, please contact the Volvo Group Privacy Officer via the contact details set out above.

### What happens if this Privacy Notice changes?

Volvo encourages the periodic review of this Privacy Notice to stay aware of any changes to it.

We reserve the right to amend this Privacy Notice as needed. When we do, we will note near the top of this Privacy Notice the date that any such changes are made and/or when they become effective.