

## Employee 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 its employees ("Privacy Notice"). If you are or have been an employee of 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 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).

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 that you are or have been employed by (below referred to as "Volvo") is the personal information processor that Volvo obtains from you and the other sources described below.

"Personal information processor" 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 [privacy.China@volvo.com](mailto:privacy.China@volvo.com).

### **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 may process your personal information based on any one or more of the following legal grounds, see also further details below.

- **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.** Volvo may process your data if such processing is necessary to fulfil a contractual obligation towards you e.g. to be able to pay your contractually agreed salary, pension and other benefits.
- **The processing is necessary for the performance of statutory duties or obligations.** Volvo may process your personal information if such processing is necessary to comply with a legal obligation, e.g. to report your income to the tax authorities or 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 Table 1 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 information	Purposes of Processing	Legal Ground for Processing
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<b>Categories of Personal information</b>	<b>Purposes of Processing</b>	<b>Legal Ground for Processing</b>
<p>Individual data, such as name, date of birth, social security number (or equivalent), gender, nationality, preferred language, marital status and photo</p>	<ul style="list-style-type: none"> <li>• Enabling registration of an employee in Volvo's IT systems</li> <li>• General administration of employment</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> </ul>
<p>Organizational data, such as employee number, job description, position, place of work, business unit, department, manager and direct reports</p>	<ul style="list-style-type: none"> <li>• Enabling keeping an up-to-date organization chart and record of employees, including production of internal reports and statistics</li> <li>• Enabling internal reorganizations and merger and acquisition projects</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> </ul>
<p>Contact data, such as work address, home address, email and telephone number</p>	<ul style="list-style-type: none"> <li>• Communicate with employees</li> <li>• Maintain accountability of business records</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> </ul>

<b>Categories of Personal information</b>	<b>Purposes of Processing</b>	<b>Legal Ground for Processing</b>
<p>Compensation and benefits data, such as salary, salary reviews, tax deductions, pension information and bank account details</p>	<ul style="list-style-type: none"> <li>• Enabling payment of salary, pension and other benefits to employees, as well as reviews of salary, including production of internal reports and statistics</li> <li>• Enabling reporting to authorities, as required by law, such as tax agency</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• The processing is necessary for the performance of statutory duties or obligations</li> </ul>
<p>Employment administration data, such as employment contract and other agreements between you and Volvo, applications or other forms regarding e.g. parental leave and information about hiring date and termination date</p>	<ul style="list-style-type: none"> <li>• Maintain accountability of business records</li> <li>• General administration of employment</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• The processing is necessary for the performance of statutory duties or obligations</li> </ul>

<b>Categories of Personal information</b>	<b>Purposes of Processing</b>	<b>Legal Ground for Processing</b>
<p>Time data, such as working hours, worked time, vacation and leaves of absence (parental leave, sick leave etc.)</p>	<ul style="list-style-type: none"> <li>• Enabling keeping track of working time / leaves of absences / vacations, for remuneration as well as invoicing purposes</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• The processing is necessary for the performance of statutory duties or obligations</li> </ul>
<p>Union membership data, if applicable and relevant and subject to that it is allowed to process such personal information under applicable law</p>	<ul style="list-style-type: none"> <li>• Enabling fulfillment of Volvo's obligations as per collective bargaining agreements with unions or by labor law</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• The processing is necessary for the performance of statutory duties or obligations</li> </ul>

<b>Categories of Personal information</b>	<b>Purposes of Processing</b>	<b>Legal Ground for Processing</b>
<p>Security data, such as access cards, access rights and use of access cards and access rights</p>	<ul style="list-style-type: none"> <li>• Enabling fulfillment of Volvo’s obligations to provide a safe work environment (including control and prevention of unauthorized access to Volvo’s premises or equipment) and other work environment obligations as set out by work environment or labor laws</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• The processing is necessary for the performance of statutory duties or obligations</li> <li>• 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</li> </ul>

<b>Categories of Personal information</b>	<b>Purposes of Processing</b>	<b>Legal Ground for Processing</b>
<p>Health and safety data, such as information about work related incidents, sick-leave, rehabilitation plans, work related incidents and health examinations</p>	<ul style="list-style-type: none"> <li>• Manage health and safety at Volvo Group facilities</li> <li>• Enabling emergency services in case of emergency situations such as fire, accident, sudden illness or physical assault</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• The processing is necessary for the performance of statutory duties or obligations</li> <li>• 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</li> </ul>
<p>Performance and evaluation data, such as evaluations, assessments and disciplinary records, if any</p>	<ul style="list-style-type: none"> <li>• Enabling activities regarding competence development / improvement as well as performance evaluations and assessments</li> <li>• Enabling and suggesting learning and training activities</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• The processing is necessary for the performance of statutory duties or obligations</li> </ul>

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Competence data, such as learning records and training activities and relevant work authorizations	<ul style="list-style-type: none"> <li>• Managing education, training and development</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> </ul>
Travel administration data, such as information on business trips, booking details, passport number, company credit card number, travel invoices and allowances	<ul style="list-style-type: none"> <li>• Enabling business travels</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> </ul>
IT-related data, such as user-ID, passwords, log-in details as well as data and logs about your use of Volvo's IT equipment, application or services, as per Volvo's IT policies, as applicable from time to time	<ul style="list-style-type: none"> <li>• Enabling the performance of work tasks, such as writing emails, establishing documents, reports, presentations, drawings etc.</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> </ul>
	<ul style="list-style-type: none"> <li>• Enabling proper license usage</li> </ul>	<ul style="list-style-type: none"> <li>• The processing is necessary for the performance of statutory duties or obligations</li> </ul>



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	<ul style="list-style-type: none"> <li>• Enabling follow-up of Volvo’s policies, including Volvo Group Code of Conduct and Volvo’s IT policies, as applicable from time to time, to ensure that such policies are adhered to and to investigate suspected prohibited</li> </ul>	
<p>Help desk and support data, such as questions from you/your manager/HR relating to your employment or IT-equipment or support provided to you in relation to the same</p>	<ul style="list-style-type: none"> <li>• Enabling answering questions from you / your manager / HR regarding your employment or IT-equipment / services or provision of support necessary for the performance of your work tasks</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> </ul>
<p>Maintenance / repair / service data, such as tracking and logging of activities undertaken by you in connection with maintenance, repair or service on a company car or department car</p>	<ul style="list-style-type: none"> <li>• Enabling providing employment benefits to you such as a company car or car allowance, involving the use of vehicle related data or vehicle generated data when you have used a company car or department car</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> </ul>

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<p>Vehicle data, such as vehicle related data or vehicle generated data which is automatically generated if you use a Volvo-owned vehicle, such as a truck</p>	<ul style="list-style-type: none"> <li>• Enabling research and development activities related to Volvo products (e.g. trucks), involving the use of vehicle related data and or data generated when you have used a Volvo-owned product</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> </ul>
<p>Image material, such as video footage that is being recorded on a Volvo Group company closed-circuit television system (“CCTV”) installed on the applicable Volvo Group company premises or other video and related security / monitoring systems whether on Volvo Group premises or not but to which we have a legitimate purpose in viewing / accessing</p>	<ul style="list-style-type: none"> <li>• Manage safety and security at Volvo Group facilities</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> </ul>
<p>Next of kin data, such as the name and contact details of persons indicated by you to be contacted in case of an emergency</p>	<ul style="list-style-type: none"> <li>• Communicate with emergency contacts of employees</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> </ul>

***Specifically about special categories of sensitive personal information***

It is specifically noted that union membership and some aspects of health and safety 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 is authorized by collective bargaining agreement to process such data, has a legal obligation or a legitimate business need to process such data (including but not limited to prudent practices to help manage widespread health emergencies). 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***

Volvo does not regularly and systematically perform automated decision making producing a legal effect concerning individuals or that would have a similarly significant effect. In the event that you are interacting with a Volvo company that is performing such automated decision making you should receive a specific notice that outlines the details of the automated decision making.

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

Volvo will primarily obtain your personal information from yourself, e.g. during the application and on-boarding process, throughout the duration of employment, and, in some cases where permitted, upon separation.

Your personal information may also be obtained via your manager or Human Resources, or other third party to whom you have directed us to obtain your personal information, e.g. when we contact references that were provided to Volvo by you.

Some personal information might also be automatically generated from Volvo's IT-system, or equivalent, for example when creating your user-id to Volvo systems.

**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 employment with Volvo, such as the employment contract, the provision of IT tools and services, access rights to Volvo's premises and the payment of salary and benefits. Accordingly, Volvo may not be able to offer you an employment if you do not provide your personal information or do not allow Volvo to process certain personal information in connection with your employment.

## 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 national cyberspace authority or a security assessment or certification endorsed or approved by the relevant authority from time to time. Such agreement reflects 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:

- **Business partners**, 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, travel agencies, payroll agencies and benefit administrators, pension and insurance companies, occupational healthcare providers, company car service providers and company card providers.
- **Unions**, if applicable, in connection with lay-offs, termination of employment matters, PPI (Plan for Personal Improvement) matters, internal reorganization projects and merger and acquisition projects.
- **Professional advisors**, such as insurers, lawyers and other professional advisors in connection with insurance claims, audits and the receipt of advisory services.
- **Counterparties and their advisors**, such as in connection with merger and acquisition projects.
- **Emergency service providers**, such as the police, fire brigade, ambulance and roadside assistance in connection with emergency assistance.
- **Law enforcement**, 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 during the employment and as documented in our data retention schedule and applicable supplements. After your employment has ended, Volvo will only process the personal information deemed necessary for the fulfillment of the purposes for which it was collected and only up and until such purpose has been fulfilled or, if later, for such time as may be required to comply with local legal, tax or benefits obligations or to satisfy any legal requirements in the event of an actual, threatened or anticipated dispute or claim.

#### **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.

- Refusal 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 data 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.