

## Operators and Drivers Privacy Notice

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This notice provides information on the Volvo Group's processing of personal information of operators and drivers of Volvo Group products ("Privacy Notice"). If you are or have been the driver or operator of a truck, bus, coach, construction machine, marine engine or any other applicable product or solution integrating such product sold or produced by any of the companies belonging to the Volvo Group (below jointly referred to as "Volvo Vehicles"), we may process data about you or that can be linked to 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 Division (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.

For the sake of clarity, please note that this Privacy Notice only covers the Volvo Group's processing of personal information in relation to operators and drivers of Volvo Vehicles. We will explain more about the categories of data we process in section "What categories of personal information may Volvo process, on which legal ground(s) and for what purposes?" below.

The processing of any other personal information that are provided by you, or on your behalf, in connection with the purchase, rental or leasing of products, solutions and services from the Volvo Group or its third party dealers/distributors are covered by the Customer Representative

Privacy Notice, please see here: [Customer Representative Privacy Notice](#).

Further, in addition to this Privacy Notice, some Volvo Group systems, applications, and processes as well as applicable Volvo Group research and development projects may have 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 the Volvo Group Privacy Officer**

The Volvo Group company that has sold and/or delivered the Volvo Vehicle that you are driving or operating (below referred to as “Volvo”) is the personal information processor or entrusted party 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 the

Function Privacy China 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?**

Volvo process various types of data either generated in or by a Volvo Vehicle, including what we refer to as vehicle related data, which includes (i) data related to the condition and performance of the Volvo Vehicle itself, (ii) data related to the actual operation of the Volvo Vehicle, (iii) data related to the surroundings of the applicable Volvo Vehicle, and (iv) data that either are related to the identification of a Volvo Vehicle or provided /generated by an individual. When this data, either alone or in combination with other data, can be linked to you as a driver or operator of a Volvo Vehicle, this becomes personal information.

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 (such as warranties and service agreements if you are both the customer and the driver or operator of a Volvo Vehicle).
- **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 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 if such processing is necessary for the purposes of a legitimate interest pursued by Volvo or a third party. It is generally considered to be in Volvo’s legitimate interest to manage its daily operations,

including to enhance and further develop its products, solutions and services offering and to secure the overall management of sold products, solutions and services.

Where it is stated herein that Volvo relies on its legitimate interests for a given processing purpose, Volvo is of the opinion that its legitimate interests are not overridden by your interests, rights or freedoms given (i) the transparency Volvo provides on the processing activity, (ii) Volvo's privacy by design approach, (iii) Volvo's regular privacy review and (iv) the rights you have in relation to the processing activity. If you wish to obtain further information on this balancing test approach, please contact the Volvo Group Privacy Officer via the contact details set out above.

- **Vital interests.** 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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Categories of Personal information	Purposes of Processing	Legal Ground for Processing
<p><b>Personal information,</b> such as name, address, gender, photo, clothing size, driver's license number, license type, driving model, ID number, copy of ID, photo, and health code information</p>	<ul style="list-style-type: none"> <li>• Vehicle pickup upon arrival</li> <li>• Participate in driver training, skills competition and other activities</li> <li>• Participate in online learning platform</li> <li>• Meet requirements such as epidemic prevention and control</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>• Consent (deemed necessary)</li> </ul>

Categories of Personal information	Purposes of Processing	Legal Ground for Processing
<p><b>Vehicle performance data</b>, such as information from vehicle components, battery usage, engine data (including exhaust emission data and fuel consumption), energy consumption, power/torque data, fault codes (with times stamps and operating hours)</p>	<ul style="list-style-type: none"> <li>• Verifying contract compliance or to be able to deliver services contracted for;</li> <li>• Confirming that required maintenance and servicing is being done throughout the lifetime of a lease;</li> <li>• Verify mileage for usage based contracts;</li> <li>• Performing proactive and preventive maintenance and diagnostics (including deliver software updates to the vehicle and contact the driver/operator with service recommendations);</li> <li>• Preventing and solving quality issues (quality related development);</li> <li>• Performing research and development to verify, validate, enhance and maintain products, solutions and services and to develop new products, solutions and services, e.g. through innovation and data analytics;</li> <li>• Developing and providing insurance related products and services, including but not limited to “connected insurance”;</li> <li>• Ensuring vehicles comply with current and future legislation and standards (including emission level and safety);</li> <li>• Reporting of emission data to competent authorities;</li> <li>• Demonstrate compliance with type approval regulations; and</li> <li>• Compliance with market surveillance obligations</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>

Categories of Personal information	Purposes of Processing	Legal Ground for Processing
<p><b>Vehicle usage data</b>, such as brake usage, gear shifting, acceleration/deceleration, dashboard settings, power/torque utilization, technical data generated from the engine (exhaust emission data, fuel consumption); (with time stamps and operating hours)</p>	<ul style="list-style-type: none"> <li>• Verifying contract compliance or to be able to deliver services contracted for;</li> <li>• Confirming that required maintenance and servicing is being done throughout the lifetime of a lease;</li> <li>• Verify mileage for usage based contracts;</li> <li>• Verifying current market values on return or repossession of a unit;</li> <li>• Performing preventive and proactive maintenance and diagnostics (including deliver software updates to the vehicle and contact the driver/operator with service recommendations);</li> <li>• Preventing and solving quality issues (quality related development);</li> <li>• Performing research and development to verify, validate, enhance and maintain products, solutions and services and to develop new products, solutions and services, e.g. through innovation and data analytics;</li> <li>• Developing and providing insurance related products and services, including but not limited to “connected insurance”;</li> <li>• Ensuring vehicles comply with current and future legislation and standards (including emission level and safety);</li> <li>• Reporting of emission data to competent authorities;</li> <li>• Demonstrate compliance with type approval regulations; and</li> <li>• Compliance with market surveillance obligations</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>

Categories of Personal information	Purposes of Processing	Legal Ground for Processing
<p><b>Vehicle service and repair data as well as emergency assistance data</b>, such as geographic position, data for remote diagnostics</p>	<ul style="list-style-type: none"> <li>• Performing accident research investigations;</li> <li>• Performing emergency assistance on the road;</li> <li>• Performing preventive and proactive maintenance and diagnostics (including deliver software updates to the vehicle and contact the driver/operator with service recommendations);</li> <li>• Performing research and development to verify, validate, enhance and maintain products, solutions and services and to develop new products, solutions and services, e.g. through innovation and data analytics;</li> <li>• Preventing and solving quality issues (quality related development);</li> <li>• Enable offering safety-improvement programs and connected insurance products;</li> <li>• Ensuring vehicles comply with current and future legislation and standards (including emission level and safety); and</li> <li>• Compliance with market surveillance obligations</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>

Categories of Personal information	Purposes of Processing	Legal Ground for Processing
<p><b>Vehicle surroundings data</b>, such as road and ambient conditions data, video recordings and/or recordings generated by optical-electronic instruments or comparable equipment of the outside of the truck and/or the truck's surroundings (with time stamps and operating hours)</p>	<ul style="list-style-type: none"> <li>• Performing research and development to verify, validate, enhance and maintain products, solutions and services and to develop new products, solutions and services, e.g. through innovation and data analytics; and</li> <li>• Preventing and solving quality issues (quality related 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> <li>• The processing is necessary for the performance of statutory duties or obligations</li> <li>• Consent (deemed necessary)</li> </ul>



Categories of Personal information	Purposes of Processing	Legal Ground for Processing
<p><b>Vehicle or non-vehicle related unique identifiers,</b> such as the vehicle-ID (including VIN and chassis ID), IP number, MAC address, SIM card number, IMEI</p>	<ul style="list-style-type: none"> <li>• Verifying contract compliance or to be able to deliver services contracted for;</li> <li>• Confirming that required maintenance and servicing is being done throughout the lifetime of a lease;</li> <li>• Performing preventive and proactive maintenance and diagnostics (including deliver software updates to the vehicle and contact the driver/operator with service recommendations);</li> <li>• Verify mileage for usage based contracts;</li> <li>• To verify location for compliance with contract terms and/or trade sanction restrictions);</li> <li>• Performing research and development to verify, validate, enhance and maintain products, solutions and services and to develop new products, solutions and services, e.g. through innovation and data analytics;</li> <li>• Preventing and solving quality issues (quality related development);</li> <li>• Ensuring vehicles comply with current and future legislation and standards (including emission level and safety);</li> <li>• Reporting of emission data to competent authorities;</li> <li>• Demonstrate compliance with type approval regulations; and</li> <li>• Compliance with market surveillance obligations</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>

Categories of Personal information	Purposes of Processing	Legal Ground for Processing
<p><b>Driver / operator behavior and location data</b>, such as speed data, driving pattern; seatbelt usage, driver alerts, instantaneous geo-positioning data and location data (with time stamps and operating hours)</p>	<ul style="list-style-type: none"> <li>• Verifying contract compliance or to be able to deliver services contracted for;</li> <li>• Confirming that required maintenance and servicing is being done throughout the lifetime of a lease;</li> <li>• Verify mileage for usage based contracts;</li> <li>• Credit underwriting purposes;</li> <li>• To verify location for compliance with contractual terms (such as contractual restrictions on permitted geographical use) and/or trade sanction restrictions, other regulatory requirements or agreed permitted use restrictions;</li> <li>• Conduct floorplan audits and repossessions where deemed necessary;</li> <li>• Perform recoveries on default;</li> <li>• Preventing and solving quality issues (quality related development);</li> <li>• Performing research and development to verify, validate, enhance and maintain products, solutions and services and to develop new products, solutions and services, e.g. through innovation and data analytics;</li> <li>• Ensuring vehicles comply with current and future legislation and standards (including emission level and safety);</li> <li>• Demonstrate compliance with type approval regulations; and</li> <li>• Compliance with market surveillance obligations</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>

Categories of Personal information	Purposes of Processing	Legal Ground for Processing
<p><b>Driver / operator related data that may be manually provided by the driver/operator in connection with the use of certain Volvo Vehicles, such as driver ID, dashboard settings</b></p>	<ul style="list-style-type: none"> <li>• Verifying contract compliance or to be able to deliver services contracted for;</li> <li>• Confirming that required maintenance and servicing is being done throughout the lifetime of a lease;</li> <li>• Performing proactive maintenance and diagnostics (including deliver software updates to the vehicle and contact the driver/operator with service recommendations);</li> <li>• Verify mileage for usage based contracts;</li> <li>• To verify location for compliance with contract terms and/or trade sanction restrictions);</li> <li>• Performing research and development to verify, validate, enhance and maintain products, solutions and services and to develop new products, solutions and services, e.g. through innovation and data analytics; and</li> <li>• Preventing and solving quality issues (quality related 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>

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

Volvo generally obtain your personal information;

- interactively over the wireless network in connection with the use of Volvo Vehicles (e.g. via the telematics gateway); or
- using diagnostic tools (e.g. in connection with proactive maintenance and repair services).

In addition to the above, Volvo may obtain certain additional data from your employer, or from you if you have manually entered personal information in connection with your use of a Volvo Vehicle (e.g. dashboard settings such as language preferences, radio preferences, seat inclination settings).

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

If and when you use a Volvo Vehicle, Volvo will automatically obtain vehicle generated and other vehicle related data relating to your use of the Volvo Vehicle. The processing of certain vehicle generated and other vehicle related data is necessary if you want to use all features and functionalities of Volvo Vehicles, such as real time notices and remote diagnostic services.

### **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 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's authorized dealers and service centers for the purpose of ensuring service and repair of Volvo Vehicles and for purposes connected with our finance and insurance offerings;
  - Volvo's suppliers and service providers who support Volvo in the delivery of products, solutions and services, including IT suppliers and service providers;
  - Volvo's business and co-operation partners for purposes such as business intelligence and analytics purposes (however, in most cases the data is only shared on an anonymized and aggregated basis); and
  - Third parties with whom we transact or collaborate to provide products, solutions or services and other third parties with whom we seek to innovate, develop and deliver new or improved products, solutions and services to our customers or new or

improved internal processes and operations, all of which ultimately enhance how we can support our customers.

- **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**, in connection with merger and acquisition projects.
- **Emergency service providers**, such as the police, fire brigade, ambulance and roadside assistance to protect the vital interest of you and others such as 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 not process your personal information longer than necessary given the purpose of the processing, unless otherwise required or permitted by law.

Please note that, unless shorter retention times apply due to legal or contractual obligations, vehicle generated and other vehicle related personal information connected to a certain vehicle may be processed for the entire expected life of the vehicle type, which could be up to 25 years (e.g. for research and development projects or to ensure that Volvo can manage product liability claims).

### **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 controller.
- 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.

Please further note that restrictions or objections on processing certain data may have negative consequences for your use of Volvo Vehicles. If certain data is disabled you may not be able to use all the features and functionality of the Volvo Vehicle and Volvo may not be able to notify you about issues with the vehicle in real time. This may cause reduced functionality of the vehicle and could result in the damage or inoperability of the vehicle.

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.