



Volvo Group

Operators and Drivers Privacy Notice

This notice provides information on the Volvo Group's processing of personal data 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, Arqus, Volvo Penta, Mack Trucks, UD 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 and Volvo Autonomous Solutions.

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

This Privacy Notice does not apply when Volvo Group is collecting or otherwise processing personal data 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 data 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 data may Volvo process, on which legal ground(s) and for what purposes?" below.

The processing of any other personal data 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 data is collected and how it is stored, used, and transferred.

Identity and contact details of the controller 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 controller or processor of the personal data that Volvo obtains from you and the other sources described below.



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“Controller” means that it is Volvo that decides on the purpose and means for the processing of your personal data. Volvo is responsible for the processing of your personal data under applicable data privacy laws and regulations.

If you have questions regarding the processing of your personal data, please contact the Volvo Group Privacy Officer at gpo.office@volvo.com or by post or phone at:

AB Volvo,

Att: Group Privacy Office, Dept AA14100, VGHQ

SE-405 08

Göteborg, Sweden

+46 (0)31 66 00 00

What categories of personal data 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 data.

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

Legal ground

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

- **Contractual obligation.** 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).
- **Legal obligation.** Volvo may process your personal data if such processing is necessary to comply with a legal obligation, e.g. to comply with court orders and legal reporting requirements.
- **Legitimate interests.** Volvo may process your personal data 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,

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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 data to protect the vital interest of you and others, if Volvo has valid reasons to believe that such processing of your personal data 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 data. 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 data, 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 data.

Table 1 – Categories, Purpose and Legal Ground for Processing

Categories of Personal Data	Purposes of Processing	Legal Ground for Processing
Vehicle performance data , 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)	<ul style="list-style-type: none">• Verifying contract compliance or to be able to deliver services contracted for;• Confirming that required maintenance and servicing is being done throughout the lifetime of a lease;• Verify mileage for usage based contracts;• Performing proactive and preventive maintenance and diagnostics (including deliver software updates to the vehicle and contact the driver/operator with service recommendations);	<ul style="list-style-type: none">• Legitimate interest• Legal obligation• Contractual obligation

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	<ul style="list-style-type: none"> • Preventing and solving quality issues (quality related development); • 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; • Developing and providing insurance related products and services, including but not limited to “connected insurance”; • Ensuring vehicles comply with current and future legislation and standards (including emission level and safety); • Reporting of emission data to competent authorities; • Demonstrate compliance with type approval regulations; and • Compliance with market surveillance obligations 	
<p>Vehicle usage data, 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"> • Verifying contract compliance or to be able to deliver services contracted for; • Confirming that required maintenance and servicing is being done throughout the lifetime of a lease; • Verify mileage for usage based contracts; • Verifying current market values on return or repossession of a unit; • Performing preventive and proactive maintenance and diagnostics (including deliver 	<ul style="list-style-type: none"> • Legitimate interest • Legal obligation • Contractual obligation

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	<p>software updates to the vehicle and contact the driver/operator with service recommendations);</p> <ul style="list-style-type: none">• Preventing and solving quality issues (quality related development);• 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;• Developing and providing insurance related products and services, including but not limited to “connected insurance”;• Ensuring vehicles comply with current and future legislation and standards (including emission level and safety);• Reporting of emission data to competent authorities;• Demonstrate compliance with type approval regulations; and• Compliance with market surveillance obligations	
<p>Vehicle service and repair data as well as emergency assistance data, such as geographic position, data for remote diagnostics</p>	<ul style="list-style-type: none">• Performing accident research investigations;• Performing emergency assistance on the road;• Performing preventive and proactive maintenance and diagnostics (including deliver software updates to the vehicle and contact the driver/operator with service recommendations);	<ul style="list-style-type: none">• Legitimate interest• Vital interest• Contractual obligation

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	<ul style="list-style-type: none"> • 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; • Preventing and solving quality issues (quality related development); • Enable offering safety-improvement programs and connected insurance products; • Ensuring vehicles comply with current and future legislation and standards (including emission level and safety); and • Compliance with market surveillance obligations 	
<p>Vehicle surroundings data, 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"> • 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 • Preventing and solving quality issues (quality related development) 	<ul style="list-style-type: none"> • Legitimate interest
<p>Vehicle or non-vehicle related unique identifiers, 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"> • Verifying contract compliance or to be able to deliver services contracted for; • Confirming that required maintenance and servicing is being done throughout the lifetime of a lease; • Performing preventive and proactive maintenance and 	<ul style="list-style-type: none"> • Legitimate interest • Legal obligation • Contractual obligation

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	<p>diagnostics (including deliver software updates to the vehicle and contact the driver/operator with service recommendations);</p> <ul style="list-style-type: none">• Verify mileage for usage based contracts;• To verify location for compliance with contract terms and/or trade sanction restrictions);• 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;• Preventing and solving quality issues (quality related development);• Ensuring vehicles comply with current and future legislation and standards (including emission level and safety);• Reporting of emission data to competent authorities;• Demonstrate compliance with type approval regulations; and• Compliance with market surveillance obligations	
<p>Driver / operator behavior and location data, 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">• Verifying contract compliance or to be able to deliver services contracted for;• Confirming that required maintenance and servicing is being done throughout the lifetime of a lease;• Verify mileage for usage based contracts;	<ul style="list-style-type: none">• Legitimate interest• Legal obligation• Contractual obligation

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	<ul style="list-style-type: none">• Credit underwriting purposes;• 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;• Conduct floorplan audits and repossessions where deemed necessary;• Perform recoveries on default;• Preventing and solving quality issues (quality related development);• 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;• Ensuring vehicles comply with current and future legislation and standards (including emission level and safety);• Demonstrate compliance with type approval regulations; and• Compliance with market surveillance obligations	
<p>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</p>	<ul style="list-style-type: none">• Verifying contract compliance or to be able to deliver services contracted for;• Confirming that required maintenance and servicing is being done throughout the lifetime of a lease;	<ul style="list-style-type: none">• Legitimate interest• Contractual obligation

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	<ul style="list-style-type: none">• Performing proactive maintenance and diagnostics (including deliver software updates to the vehicle and contact the driver/operator with service recommendations);• Verify mileage for usage based contracts;• To verify location for compliance with contract terms and/or trade sanction restrictions);• 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• Preventing and solving quality issues (quality related development);	
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From where will Volvo obtain your personal data?

Volvo generally obtain your personal data;

- 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 data 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 data?

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 data?

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Your personal data 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 data to other countries.

Sharing of personal data within the Volvo Group

The Volvo Group is a global organization with offices and operations throughout the world, and your personal data 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 data to other Volvo Group companies (including transfers from within the EU/EEA to outside the EU/EEA) will be governed by an intercompany agreement based on EU approved Standard Contractual Clauses or such other mechanisms as have been recognized or approved by the relevant authorities from time to time. Such agreement reflect the standards contained in European data privacy laws (including the EU General Data Protection Regulation). Having this agreement in place means that all Volvo Group entities have to comply with the same internal rules. It also means that your rights stay the same no matter where your data are processed by Volvo Group.

Sharing of personal data with third parties outside of the Volvo Group

In addition to the sharing of personal data between Volvo Group companies as set out above, Volvo may also share your personal data 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.

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- **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 data are disclosed, are expected and required to protect the confidentiality and security of your personal data and may only use your personal data in compliance with applicable data privacy laws and regulations.

Further, in the event that any Volvo Group company that is located within the EU/EEA transfers personal data to external third parties that are located outside of the EU/EEA the relevant Volvo Group company will satisfy itself that there are appropriate safeguards in place which provide adequate levels of protection of your personal data as required by applicable data privacy laws (including the EU General Data Protection Regulation). For example, this may include the use of EU approved Standard Contractual Clauses or such other mechanism as have been recognized or approved by the relevant authorities from time to time.

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

How does Volvo safeguard personal data?

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

These measures are appropriate to the risks posed by the processing of personal data and to the sensitivity of the personal data 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 data when using Volvo systems.

For how long will Volvo process your personal data?

Volvo will not process your personal data 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 data 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 data Volvo process about you: this right entitles you to know whether we hold personal data about you and, if we do, to obtain information on and a copy of the specific pieces and categories of personal data.

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- Request a rectification of your personal data: this right entitles you to have your personal data corrected if it is inaccurate or incomplete.
- Object to the processing of your personal data: this right entitles you to request that Volvo no longer processes your personal data.
- Request the erasure or deletion of your personal data: this right entitles you to request the erasure or deletion of your personal data, including where such personal data would no longer be necessary to achieve the purposes.
- Request the restriction of the processing of your personal data: this right entitles you to request that Volvo processes your personal data only in limited circumstances, including with your consent.
- Request portability of your personal data: this right entitles you to receive a copy (in a portable and, if technically feasible, readily usable format) of your personal data, or request Volvo to transmit such personal data to another data controller.
- In the event that our processing of your personal data 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 data 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 data 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.