



Volvo Group

Visitor Privacy Notice

This notice provides information on the Volvo Group's processing of personal data of occasional and professional visitors to the Volvo Group premises ("Privacy Notice"). If you are visiting or have visited the premises of a Volvo Group company, we may process personal data 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 principal Business Areas (as may exist from time to time) such as Volvo Trucks, Volvo Buses, Volvo Construction Equipment, Renault Trucks, Arquus, 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.

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 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 you are or have been visiting (below referred to as "Volvo") is the controller of the personal data that Volvo obtains from you and the other sources described below.

"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



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+46 (0)31 66 00 00

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

For the purposes of this Privacy Notice, “personal data” is any information about a specific individual or that identifies or may identify a specific individual. 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 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 will process your personal data based on either of the following legal grounds, see also further details below.

- **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, secure its facilities and equipment and keep internal control. In order to base its processing of personal data of its visitors on the legitimate interest-basis, Volvo makes an assessment on case-by-case basis. Example, Volvo may need to process certain personal data to enable the administration of your visit to the Volvo Group where Volvo’s legitimate interest is to manage its daily operations in a secure manner.

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.

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

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you, and 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 of Personal Data, Purpose and Legal Ground for Processing

Categories of Personal Data	Purposes of Processing	Legal Ground for Processing
Contact data , such as name, title, place of work and e-mail address	<ul style="list-style-type: none"> • Enabling registration of visitors in Volvo's visitor registration systems • General administration of visits 	<ul style="list-style-type: none"> • Legitimate interest (to manage visits to Volvo premises)
Time data , such as date and time of when the visit occurred	<ul style="list-style-type: none"> • Enabling registration of time of visits 	<ul style="list-style-type: none"> • Legitimate interest (to manage visits to Volvo premises)
Vehicle detail data , such as registration number of the vehicle that you state upon registration	<ul style="list-style-type: none"> • Enabling visitor access to parking lots 	<ul style="list-style-type: none"> • Legitimate interest (to manage visits to Volvo premises)
Security data , such as access cards, access rights and use of access cards and access rights given to you	<ul style="list-style-type: none"> • Enabling visitor to access Volvo facilities in a secure manner • Enabling identification and verification of visitors 	<ul style="list-style-type: none"> • Legitimate interest (to enable secure access to Volvo facilities)
IT-related data , such as user-ID, passwords and log-in details for your use of Volvo public networks (if applicable)	<ul style="list-style-type: none"> • Enabling access to Volvo public internet networks 	<ul style="list-style-type: none"> • Legitimate interest (to manage public internet access control, data protection and cyber security in general)
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	<ul style="list-style-type: none"> • Manage safety and security at Volvo Group facilities 	<ul style="list-style-type: none"> • Legitimate interest (to maintain security and safety, prevent fraud or theft; and (where applicable) to assist with regulatory compliance)



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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).

From where will Volvo obtain your personal data?

Volvo will obtain the personal data from yourself or the person you are visiting us together with, as it is possible for visitors to enter the names of their group of visitors. Further, if you are visiting a Volvo employee, that person may provide personal data about you to the reception for registration purposes.

Some personal data might also be automatically generated from Volvo's IT-system and CCTV systems, such as log information and/or image materials.

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

Your decision to provide any personal data to Volvo is voluntary, however for security purposes, all visitors must register themselves in connection with visits to Volvo Group premises. If you do not wish to provide your personal data in connection with a visit, we may not be able to grant you access to the Volvo Group premises.

How will Volvo share your personal data?

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:

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- **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.
- **Professional advisors**, such as insurers, lawyers and other professional advisors in connection with insurance claims, audits and the receipt of advisory services.
- **Emergency service providers**, such as the police, fire brigade, ambulance and roadside assistance to protect the vital interest of you and other 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 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 normally process your personal data for a maximum period of two (2) years after your visit. After this period, Volvo will only process the personal data as may be required to comply with local legal obligations or to satisfy any legal requirements in the event of an actual, threatened or anticipated dispute or claim.



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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.
- 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.

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.



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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.