



Volvo Group

## Candidate Privacy Notice

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This notice provides information on the Volvo Group's processing of personal data of persons that apply for open positions within the Volvo Group ("Privacy Notice"). If you are or have applied for a position at a Volvo Group company, we may process personal 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 the entities belonging to any of the Volvo Group's principal Business Areas and Truck Divisions (as may exist from time to time) such as Volvo Trucks, Volvo Buses, Volvo Construction Equipment, Renault Trucks, Arquus, Volvo Penta, Mack Trucks, Volvo Financial Services, Volvo Group Connected Solutions, Volvo Technology, Volvo Group Purchasing, Volvo Group Real Estate, Volvo Treasury, Volvo Information Technology, Volvo Group Trucks Operations, Volvo Autonomous Solutions and Volvo Energy.

This Privacy Notice applies only when Volvo Group is collecting or otherwise processing personal 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).

If Volvo enters into an employment agreement with you, our processing of your personal data will be governed by the [Volvo Group Employee Privacy Notice](#).

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

This notice applies in absence of applicability of other privacy notices available on other Volvo Group websites. 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 where you have applied for a position (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](mailto:gpo.office@volvo.com) or by post or phone at:

AB Volvo,

Att: Group Privacy Office, Dept AA14100, VGHQ

SE-405 08

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***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 candidates on the legitimate interest-basis, Volvo makes an assessment on case-by-case basis. For example, Volvo needs to process certain personal data about candidates where Volvo’s legitimate interest is to enable administration of their user profiles and/or to otherwise administrate their application for a position at the Volvo Group.

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.

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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 Volvo will not necessarily process all the data listed below about 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, Purpose and Legal Ground for Processing

Categories of Personal Data	Purposes of Processing	Legal Ground for Processing
<b>Individual data</b> , such as name, date of birth, gender, nationality, preferred language, and photo	<ul style="list-style-type: none"> <li>Enabling registration of candidates in Volvo's recruitment systems</li> <li>General administration of applications</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest (to manage applications)</li> </ul>
<b>Contact data</b> , such as home address, email and telephone number	<ul style="list-style-type: none"> <li>Enabling communication with candidates</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest (to communicate with candidates)</li> </ul>
<b>IT-related data</b> , such as e-mail and password for the Volvo recruitment system including automatic messages and other communication	<ul style="list-style-type: none"> <li>Enabling the use of and communication through Volvo's recruitment system</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest (to manage applications)</li> </ul>
<b>Competence data</b> , such as CV, including information on work related experience, education, trainings, professional memberships, diplomas, references letters as well as other data that you provide us during interviews at our premises or via digital channels	<ul style="list-style-type: none"> <li>Enabling assessment of the candidates' skills and qualifications for the position</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest (to assess candidates)</li> </ul>
<b>Performance and evaluation data</b> , such as personal and analytical tests in connection with recruitment processes	<ul style="list-style-type: none"> <li>Enabling assessment of the candidates' skills and qualifications for the position</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest (to evaluate the candidates' competences for the position)</li> <li>Consent</li> </ul>

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<b>Health data</b> , such as results from health examinations and drug tests (only for certain positions)	<ul style="list-style-type: none"><li>• Enabling assessment of the candidate's health status (if needed for specific positions or other reasons)</li></ul>	<ul style="list-style-type: none"><li>• Consent</li></ul>
<b>Security data</b> , such as information obtained through background checks (only for certain positions)	<ul style="list-style-type: none"><li>• Enabling assessment of the candidate's background (if needed for the specific position)</li></ul>	<ul style="list-style-type: none"><li>• Consent (to enable relevant third parties to release information about you)</li></ul>
<b>Current employment data</b> , such as current compensation package and expectations and notice period under current employment contract, if any	<ul style="list-style-type: none"><li>• Enabling assessment of the employment terms to be offered for the position</li></ul>	<ul style="list-style-type: none"><li>• Legitimate interest (to assess candidates and employment terms to be offered)</li></ul>

### *Specifically, about special categories of personal data*

It is specifically noted that some aspects of health and security data may be regarded as special categories of personal data under applicable data privacy laws and shall be handled with extra care and require additional protective measures. Volvo will only process special categories of personal data if Volvo has a legal obligation to process such data, and/or if Volvo has received your explicit consent to process such data. In such cases, Volvo will inform you and (if required by law to do so) seek your explicit consent to process such data. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

### *Specifically, about CCTV monitoring*

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

### *Specifically, about automated decision-making*

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

### ***From where will Volvo obtain your personal data?***

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

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

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

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

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

### ***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 is 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 Group's suppliers and service providers in connection with their provision of products and services to the Volvo Group, such as IT service providers.
- **Unions**, if required by applicable law, including information obligation towards unions in connection with appointments of managers.
- **Professional advisors**, such as lawyers and other professional advisors in connection



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with claims and the receipt of advisory services.

- **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 keep your personal data until the recruitment process has been concluded, and three (3) years (shorter or longer dependent on applicable employment legislation) thereafter to satisfy the need to use such personal data in the event of an actual, threatened or anticipated dispute or claim (e.g. on grounds of discrimination).

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



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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 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.

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



