



Volvo Group

Employee Privacy Notice

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This notice provides information on the Volvo Group's processing of personal data of its employees ("Privacy Notice"). If you are or have been an employee 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'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).

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 employed by (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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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 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 e.g., to be able to pay your contractually agreed salary, pension, and other benefits.
- **Legal obligation.** Volvo may process your personal data if such processing is necessary to comply with a legal obligation, e.g., to report your income to the tax authorities or to comply with court orders and legal reporting requirements.
- **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 employees on the legitimate interest-basis, Volvo makes an assessment on case-by-case basis. For example, Volvo needs to process certain personal data to enable administration of your business-related travels where Volvo’s legitimate interest is to manage its daily operations; or Volvo needs to process certain personal data to review the status and location of its IT-equipment where Volvo’s legitimate interest is to secure its equipment.

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.



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- **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. Your consent is free and informed, you have the possibility or not to give it as well as to withdraw it at any time.

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
Individual data , such as name, date of birth, social security number (or equivalent), gender, nationality, preferred language, marital status and photo	<ul style="list-style-type: none">• Enabling registration of an employee in Volvo's IT systems• General administration of employment	<ul style="list-style-type: none">• Performance of a contract• Legitimate interest (to manage the workforce)
Organizational data , such as employee number, job description, position, place of work, business unit, department, manager and direct reports	<ul style="list-style-type: none">• Enabling keeping an up-to-date organization chart and record of employees, including production of internal reports and statistics• Enabling internal reorganizations and merger and acquisition projects	<ul style="list-style-type: none">• Performance of a contract• Legitimate interest (to manage the workforce)
Contact data , such as work address, home address, email and telephone number	<ul style="list-style-type: none">• Communicate with employees• Maintain accountability of business records	<ul style="list-style-type: none">• Performance of a contract• Legitimate interest (to manage and communicate with the workforce)
Compensation and benefits data , such as salary, salary reviews, tax deductions, pension information and bank account details	<ul style="list-style-type: none">• Enabling payment of salary, pension and other benefits to employees, as well as reviews of salary, including production of internal reports and statistics• Enabling reporting to authorities, as required by law, such as tax agency	<ul style="list-style-type: none">• Performance of a contract• Comply with legal obligation• Legitimate interest (to manage the workforce)



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Employment administration data , such as employment contract and other agreements between you and Volvo, applications or other forms regarding e.g. parental leave and information about hiring date and termination date	<ul style="list-style-type: none">• Maintain accountability of business records• General administration of employment	<ul style="list-style-type: none">• Performance of a contract• Comply with legal obligation• Legitimate interest (to manage the workforce)
Time data , such as working hours, worked time, vacation and leaves of absence (parental leave, sick leave etc.)	<ul style="list-style-type: none">• Enabling keeping track of working time / leaves of absences / vacations, for remuneration as well as invoicing purposes	<ul style="list-style-type: none">• Comply with legal obligation• Legitimate interest (to manage the workforce)
Union membership data , if applicable and relevant and subject to that it is allowed to process such personal data under applicable law	<ul style="list-style-type: none">• Enabling fulfillment of Volvo's obligations as per collective bargaining agreements with unions or by labor law	<ul style="list-style-type: none">• Performance of a contract• Comply with legal obligation
Security data , such as access cards, access rights and use of access cards and access rights, personal addresses, professional experience, place of birth, family members data, phone numbers, travels for the 5 past years, social media accounts, education level, passport and ID data	<ul style="list-style-type: none">• Enabling fulfillment of Volvo's obligations to provide a safe work environment (including control and prevention of unauthorized access to Volvo's premises or equipment) and other work environment obligations as set out by work environment or labor laws• Enabling access to restricted premises• Enabling granting of defense accreditation	<ul style="list-style-type: none">• Comply with legal obligation• Protect vital interests• Legitimate interest (to maintain safety)



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Health and safety data , such as information about work related incidents, sick-leave, rehabilitation plans, work related incidents and health examinations	<ul style="list-style-type: none">• Manage health and safety at Volvo Group facilities• Enabling emergency services in case of emergency situations such as fire, accident, sudden illness or physical assault	<ul style="list-style-type: none">• Comply with legal obligation• Protect vital interests• Legitimate interest (to maintain safety and manage workforce)
Performance and evaluation data , such as evaluations, assessments and disciplinary records, if any, as well as personal preferences e.g. on mobility and career paths	<ul style="list-style-type: none">• Enabling activities regarding competence development / improvement as well as performance evaluations and assessments• Succession planning Enabling and suggesting learning and training activities	<ul style="list-style-type: none">• Performance of a contract• Comply with legal obligation• Legitimate interest (to manage the workforce)
Competence data , such as learning records and training activities and relevant work authorizations	<ul style="list-style-type: none">• Managing education, training, and development	<ul style="list-style-type: none">• Legitimate interest (to manage the workforce)
Travel administration data , such as information on business trips, booking details, passport number, company credit card number, travel invoices and allowances	<ul style="list-style-type: none">• Enabling business travels	<ul style="list-style-type: none">• Performance of a contract• Legitimate interest (to manage the workforce)



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IT-related data , such as user-ID, passwords, log-in details as well as data and logs about your use of Volvo's IT equipment, application or services, as per Volvo's IT policies, as applicable from time to time	<ul style="list-style-type: none">• Enabling the performance of work tasks, such as writing emails, establishing documents, reports, presentations, drawings etc.• Enabling proper license usage• Enabling follow-up of Volvo's policies, including Volvo Group Code of Conduct and Volvo's IT policies, as applicable from time to time, to ensure that such policies are adhered to and to investigate suspected prohibited• Maintaining system logs for the purpose of ensuring security, troubleshooting and performing audits	<ul style="list-style-type: none">• Performance of a contract• Comply with legal obligation• Legitimate interest (to manage business processes and systems, access, data protection and cyber security in general)
Help desk and support data , such as questions from you/your manager/HR relating to your employment or IT-equipment or support provided to you in relation to the same	<ul style="list-style-type: none">• Enabling answering questions from you / your manager / HR regarding your employment or IT-equipment / services or provision of support necessary for the performance of your work tasks	<ul style="list-style-type: none">• Performance of a contract• Legitimate interest (to manage business processes and systems)
Maintenance / repair / service data , such as tracking, and logging of activities undertaken by you in connection with maintenance, repair or service on a company car or department car	<ul style="list-style-type: none">• Enabling providing employment benefits to you such as a company car or car allowance, involving the use of vehicle related data or vehicle generated data when you have used a company car or department car	<ul style="list-style-type: none">• Legitimate interest



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Vehicle data , such as vehicle related data or vehicle generated data which is automatically generated if you use a Volvo-owned vehicle, such as a truck	<ul style="list-style-type: none">• Enabling research and development activities related to Volvo products (e.g. trucks), involving the use of vehicle related data and or data generated when you have used a Volvo-owned product	<ul style="list-style-type: none">• Legitimate interest
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 and where applicable monitor automated production 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• Quality and efficiency improvement• Developing and/or refining the production process	<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)
Next of kin data , such as the name and contact details of persons indicated by you to be contacted in case of an emergency	<ul style="list-style-type: none">• Communicate with emergency contacts of employees	<ul style="list-style-type: none">• Legitimate interest (to manage and communicate with the workforce)
External involvement data such as board memberships and other employments or engagements outside of the Volvo Group	<ul style="list-style-type: none">• Manage conflict of interest matters.	<ul style="list-style-type: none">• Legitimate interest (to ensure anti-corruption and compliance with code of conduct)

Specifically, about special categories of personal data

It is specifically noted that union membership and some aspects of health and safety 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 is authorized by collective bargaining agreement to process such data, has a legal obligation or a legitimate business need to process such data (including but not limited to prudent practices to help manage widespread health emergencies). In such cases, Volvo will inform you and (if required by law to do so) seek your explicit consent to process such data. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Specifically, about CCTV monitoring

Volvo may use CCTV monitoring (as defined above) where permitted by law. CCTV monitoring is generally used to control and prevent unauthorized access to Volvo’s premises and equipment, however in some countries it may also be used for the purpose to ensure compliance with health and safety guidelines and procedures and for overall production



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improvement purposes. CCTV images and recordings are securely stored and only accessible on a need-to-know basis (for example, to look into an incident).

Specifically, about automated decision-making

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

Specifically, about surveys

Survey responses are anonymized and aggregated so that replies cannot directly identify you. The collected survey responses, along with the data that Volvo provides about you (name, company email address and other demographic data) are for the purpose of administrating a survey, creating reports and providing related analytics on employee engagement, experience, perception, performance, leadership effectiveness and how you act according to Volvo values. Though Volvo has asked the service provider for a specific aggregated threshold (or conducted further de-identification process) an individual identity might still be possible to determine based on the information provided by you in the comments/free text fields, however before potential analysis of comments/free text fields the material will be even further anonymized. Though, it's still of importance that you try to avoid to identify yourself or another person directly or indirectly in those fields.

From where will Volvo obtain your personal data?

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

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

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

What happens if you do not provide Volvo with any personal 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 employment with Volvo, such as the employment contract, the provision of IT tools and services, access rights to Volvo's premises and the payment of salary and benefits.

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.



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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 reflects 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



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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, travel agencies, payroll agencies and benefit administrators, pension and insurance companies, occupational healthcare providers, company car service providers and company card providers.
- **Unions**, if applicable, in connection with lay-offs, termination of employment matters, PPI (Plan for Personal Improvement) matters, internal reorganization projects and merger and acquisition projects.
 - **Professional advisors**, such as insurers, lawyers, and other professional advisors in connection with insurance claims, audits and the receipt of advisory services.
 - **Counterparties and their advisors**, such as in connection with merger and acquisition projects.
 - **Emergency service providers**, such as the police, fire brigade, ambulance, and roadside assistance in connection with emergency assistance.
 - **Law enforcement**, regulatory authorities, and other public and judicial bodies in connection with legal obligations such as court orders or legal reporting requirements or if considered necessary in exceptional cases to protect the vital interest of you or others.

Any third-party service providers and professional advisors to whom your personal 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.



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For how long will Volvo process your personal data?

Volvo will normally keep your personal data during the employment and as documented in our data retention schedule and applicable supplements. After your employment has ended, Volvo will only process the personal data deemed necessary for the fulfillment of the purposes for which it was collected and only up and until such purpose has been fulfilled or, if later, for such time as may be required to comply with local legal, tax or benefits obligations or to satisfy any legal requirements in the event of an actual, threatened or anticipated dispute or claim.



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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.

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.

