CUSTOMER PRIVACY POLICY

Effective 17/04/2018

SCOPE AND PURPOSE
This policy is applicable to the Processing of customers' Personal Data at all companies included in the Volvo Car Group ("Volvo Cars", "our", "us" or "we"). The purpose of this policy is to provide our current, former and potential customers (jointly referred to as "customers" or "you") with a general understanding of:

- The circumstances under which we collect and process your Personal Data
- The types of Personal Data we collect
- The reasons for collecting your Personal Data
- How we handle your Personal Data
- Distribution of responsibility for the Processing of Personal Data between various legal entities at Volvo Cars, and
- Contact details for us so you can receive information about and claim your rights in relation to our processing of your Personal Data.

This policy is updated continuously to reflect the measures taken by Volvo Cars in relation to your Personal Data.

Controller
Volvo Car Corporation (a Swedish legal entity with corporate registration number 556074-3089) is the Controller in relation to Processing of your Personal Data for research and development of new and current car models, and also for certain global services offered to customers. Furthermore, Volvo Car Corporation is Controller for any Processing of Personal Data in relation to the monitoring of the quality of the cars and any potential safety recalls as well as to meet regulatory requirements.

Each national sales company within Volvo Cars is generally responsible for marketing, sales and customer relations as well as market specific services in its market. The national sales company is Controller for the Processing of Personal Data for these purposes. In markets without a national sales company, an importer usually has the same responsibility as a national sales company. Therefore, the importer is the Controller in these instances. Volvo Cars contractually requires its dealers and repairers to comply with rules.
concerning data protection. Note that Volvo Cars and its authorised dealers and repairers are separate legal entities, and that we are generally not responsible if such dealers and repairers do not follow applicable laws. If you have questions regarding your dealer's or repairer's use of your Personal Data, please contact the dealer or repairer directly.

**Principles of data Processing**
The Processing of your Personal data forms an important part of our provision of products and services to you. We appreciate the trust you place in us when providing us with your Personal data, and consider your privacy an essential part of the services we offer. In order to safeguard your Personal Data while increasing the customer value and offering enhanced and safer driving experiences, we adhere to the following five general principles.

**Freedom of choice**
Your Personal Data belongs to you. We strive not to make any assumptions regarding your privacy preferences and aim to design our services so that you can choose whether or not to share your Personal Data with us.

**Balance of interests**
Where the Processing of your Personal Data is necessary for the pursuit of a legitimate interest, and where this interest outweighs the need to protect your privacy, we may process certain Personal Data without obtaining your consent if so permitted by law. In certain other situations, we may also process your Personal Data without your consent if so is required in accordance with applicable law. For more information, see the "Consent" section below.

**Proportionality**
Volvo Cars will only process our customers' Personal Data if it is adequate, relevant and necessary in relation to the purpose for which it has been gathered. We aim to anonymize your Personal Data when a function or service can be achieved with anonymized data. If we combine anonymized or non-Personal Data with your Personal Data, it will be treated as Personal Data for as long as it remains combined.

**Transparency and security**
Volvo Cars believes in being transparent about which Personal Data we process and for which purposes. To us it is also vital to protect your Personal Data since one of Volvo Cars' core values is to protect what is important to you. On request, Volvo Cars will provide customers with further information regarding our Processing and protection of your Personal Data.

**Legal compliance**
It is Volvo Cars' policy to comply with the applicable laws, rules and regulations governing privacy and data protection in each and every country where we operate. Where necessary, we will adjust our Processing of your Personal Data as described in this policy to ensure legal compliance.

The Personal Data which Volvo Cars collects about you and the vehicle will be used:
- to provide you with products and services, including to verify your eligibility for certain purchases and services as well as to offer you enhanced offers and experiences;
- to inform you of updates to, or changes in, our products and services, including but not limited to changes to our terms and conditions and policies;
- to inform you of new products, services and events;
- to provide vehicle support and services (warranty service, recall information, etc.);
- for product development purposes, for example to improve vehicle performance, quality and safety;
- to evaluate and improve our offering to, and communication with customers;
- to comply with legal requirements or lawful authority requests;
- to inform you about our products and services and identify those that may be of interest to you;
- to carry out market research; and
- for analysis and customer profiling purposes (online and social included) done by ourselves and our chosen suppliers.
Helpful definitions
Volvo Cars makes use of the below listed definitions in this policy:

- "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data;
- "Processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- "Personal Data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- "Processing" means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- "Sensitive Personal Data" means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Data collection
You may provide us with information about you or your vehicle when utilising Volvo Cars' services in or outside a vehicle or in other contacts with Volvo Cars, for example through our websites or customer centres (in this context, please note that phone calls may be recorded, with your consent, for quality assurance purposes). We may also obtain such data from our authorised dealers and repairers and other third parties. Such data may include:

- your contact information (name, address, telephone number, email address, etc.);
- demographic information (age, marital status, household composition, etc.);
- vehicle information (vehicle identification number (VIN), model, date of purchase, service history, etc.);
- location data generated by your activities (navigation assistance, search queries, location sharing, etc.); and
- data pertaining to your purchase and use of our products and services (customer preferences and settings, purchase history, Volvo ID, etc.).

Your vehicle will also automatically collect data relating to the vehicle and its surroundings, primarily of technical nature and not directly related to you as a person. Such data ("Vehicle-recorded data") is typically connected to the vehicle identification number (VIN) of the vehicle and may therefore be traceable to you. Vehicle-recorded data may include:

- safety information (whether airbags or belt tensioners have been triggered, whether the doors and windows are locked or open, etc.);
- system functionality status (of the engine, throttle, steering, and brakes, etc.);
- driving data (vehicle speed, brake and accelerator pedal use, steering wheel movement, etc.);
- location data (the position of the vehicle in case of an accident, etc.); and
- surroundings data (temperature outside the vehicle, images, etc.).

Information about certain Vehicle-recorded data is also included in the Owner's Manual.
We are particularly careful and apply additional measures if and when collecting and Processing Sensitive Personal Data, as required by applicable law. For avoidance of doubt, it is noted that applicable law may require other kind of data to also be treated as Sensitive Personal Data.

**Notice**
Where reasonably practical or as required by applicable law, we will, in connection to collecting or registering your Personal data, provide you with (i) specific information as to the purposes of the Processing of your Personal Data, (ii) the identity of the Controller, (iii) the identities of any third parties to whom the data may be disclosed and (iv) other information which may be necessary to ensure that you are able to safeguard your rights. The above information may, for example, be provided when you purchase a vehicle, in the vehicle’s infotainment system, in mobile applications developed by Volvo Cars, at www.volvocars.com or otherwise in an agreement which you enter into with Volvo Cars.

**Consent**
Where reasonably practical or as required by applicable law, we will obtain your consent prior to collecting or using your Personal Data. The request for your consent will be clear and specific and provide you with a reasonable basis with which to make your decision. We will never take your consent for granted. Instead, we will make sure that you can consent in a clear and transparent manner. Your consent is voluntary and may always be revoked, for example by terminating a particular service or contacting Volvo Cars at the address indicated in the "Information and access" section below. If you do not give your consent, it may not be possible to use services or parts of services.

**Collection and Processing of Personal Data without consent**
The collection and use of Vehicle-recorded data may be necessary in order for (i) technicians to diagnose and rectify faults in vehicles during the service and maintenance of vehicles, (ii) Volvo Cars product development, for example enhancements of the vehicles' quality and safety features, (iii) managing Volvo Cars' warranty undertakings and (iv) fulfilment of legal requirements. When collecting or using Vehicle-recorded data for these purposes, and for similar legitimate interests pursued by Volvo Cars, we will generally not seek your consent unless this is deemed necessary in the individual case or required by applicable law.

**Third party applications**
You may access applications and other services linked with the vehicle but provided by a third party, which may, for example, require transmission of location data and other Vehicle-recorded data to this third party. Volvo Cars is not responsible for the collection or use of Personal Data in applications or services provided by a third party, and recommends that you carefully review applicable terms for (and any integrity policy related to) such applications or services before you use them. If you have questions concerning a certain third party’s use of your Personal Data, please contact the third party directly.

**International transfers**
Volvo Cars may transfer your Personal Data to recipients in countries outside of the European Economic Area which may have differing data protection laws. This includes countries which the EU Commission does not consider to have an adequate level of protection for Personal Data. If this occurs Volvo Cars will ensure there is a legal ground for the transfer in accordance with applicable data protection legislation. You will also be informed about the legal ground, what safeguards were implemented, and where you can obtain a copy of information on these safeguards.

**Data use**
For most Processing acts, you are able to terminate our use of your Personal Data by updating your preferences, terminating a particular service, revoking your consent to the Processing by contacting Volvo Cars at the address indicated in the "Information and access" section below or as otherwise instructed by us. However, and unless otherwise follows from applicable law, you may generally not opt out of the Processing of your Personal Data:
- in relation to certain acts of collection and further Processing of your Vehicle-recorded
data relating to safety, quality and product improvement;
• which we perform in order to send you important notices, such as changes to our terms and conditions and policies or in case of product recalls; and
• which we perform in order to comply with our legal obligations.

Retention
We will only retain your Personal data for as long as it is necessary to fulfil the purposes outlined in this policy or the purposes of which you have otherwise been informed. This means that when you have consented to our Processing of your Personal data, we will retain the data for as long as the customer relationship lasts (and, where applicable, until the expiry of the warranty period) or until you withdraw your consent. If you decide to terminate your customer relationship, we may still retain your personal data for five (5) years, after which the data will be deleted. If we have not received your consent for Processing, the data will only be retained to the extent we are permitted to do so by law.

Data quality
When we process your Personal Data, we strive to ensure that it is correct and up to date. We attempt to delete or correct Personal Data that is incorrect or incomplete. For more information regarding your right to ensure the accuracy of your Personal Data held by us, please see the "Information and access" section below.

Information and access
As stated in the "Notice" section above, we may provide you with specific information concerning our Processing of your Personal Data when collecting or registering such data. You have the right to request (i) a copy of the Personal Data that we store about you, (ii) that we correct or remove Personal Data that you think is inaccurate, and (iii) to have your Personal Data deleted and to have our processing of your Personal Data restricted in certain circumstances. In addition you have the right to object to our processing of your Personal Data as well as to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and to have these transmitted to another Controller.

Requests should be sent to the legal entity stipulated in the end of this document. Your requests will be dealt with in a prompt and proper manner. Where the applicable law provides for an administrative fee for complying with your request(s), such a fee may be charged by Volvo Cars. In addition, you may be able to access an overview of certain Personal Data that you have provided directly and that is held by Volvo Cars, and correct or update your information, by logging in to the Volvo Cars consumer portal account, or a similar service offered in your local market. For more information on your rights please contact our Data Protection Officer. Please see contact details for our Data Protection Officer in the end of this document.

Your obligations
Volvo Cars recognises that there may be situations in which you may allow someone else to use a product or service that we provide. For example, you may permit someone else to drive your car. It is important that if you do allow someone else to use your vehicle that you inform them of this privacy policy and the privacy choices that you have made. If you sell or otherwise transfer your car, it is your responsibility to delete all information from the car’s system and contact us to transfer or cancel your account. If you do not delete this information, it may remain in the car’s system. For instructions on how to delete information from the car’s system, see the Owner's Manual for your car.

Security
Volvo Cars has taken technical and organisational measures in order to protect your Personal Data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of Processing.

Disclosures to third parties
Volvo Cars may share your Personal Data:
• among Volvo Cars units;
• with Volvo Cars authorised dealers and repairers, for the purpose of distributing product and service offers and other communications to you; with other business partners for the purpose of distributing product and service offers and other communications to you or for research and development purposes;
• in connection with the sale or transfer of a Volvo Cars entity or its assets;
• as required by law, for example in connection with a government inquiry, dispute or other legal process or request;
• when we, in good faith, believe that disclosure is necessary in order to protect our rights, for example in order to investigate potential violations of our terms and conditions or to detect, prevent or disclose fraud or other security issues;
• with other business partners or third parties where you have elected to receive a service from them and authorised them to request data from Volvo Cars, (for example, for Volvo In-car Delivery);
• with our product and service providers who work on our behalf in connection with the above uses, such as wireless service providers, companies that host or operate our website, send communications, perform data analytics, credit card processors, or system providers necessary to process, store, or manage credit card or financial information; and
• with emergency services providers, such as law enforcement, roadside assistance providers, and ambulance providers, in order to deliver related services (for example, for Volvo On Call Emergency Support).

A Volvo Cars entity being the Controller of your Personal Data will, as a general rule, only disclose your Personal Data to a third party if it has received your consent to do so. However, if permitted by law we may share your Personal Data without your consent, unless we consider your consent necessary in the individual case or your consent is required by law, in the following situations:
• when disclosure is required by law; and
• when disclosure is necessary for the purpose of a legitimate interest pursued by Volvo Cars (for example in order to protect our legal rights, as described above).

Data Processing on our behalf
We restrict access to your Personal Data to Volvo Cars' employees and suppliers who need to use the information in order to process it on our behalf, and who are contractually required to keep your Personal Data secure and confidential. We aim to choose the option for Processing services that best safeguards the integrity of your Personal Data towards any third party. Some of these processing activities might be performed outside of the EEA under a specific legal basis as required by national law.

Marketing
We will not sell or trade your Personal Data with third parties unless we have your consent to do so. We will not share your Personal Data with third parties for their marketing purposes, unless we have received your consent for such disclosures. If you have provided such consent, but wish to stop receiving marketing materials from a third party, please contact that third party directly. We may provide you with information regarding new products, services, events or similar marketing activities. If you wish to unsubscribe to a particular e-mail newsletter or similar communication, please follow the instructions in the relevant communication. You may also use your Volvo Cars consumer portal account, or a similar service offered in your local market, to opt out of specific types of communication from Volvo Cars and to change previously submitted preferences.

California privacy rights
If you are a California resident you have the right to request information from Volvo Cars regarding the manner in which we share certain categories of your personal information with third parties for the third parties' direct marketing purposes. California law provides that you have the right to submit a request to Volvo Cars at the address listed below and receive information about the categories of personal information Volvo Cars disclosed
to third parties for third parties’ direct marketing purposes during the preceding calendar year; and the names and addresses that received such information, or examples of the product or services marketed if the nature of their business cannot be determined by the business name. If you are a California resident, you are entitled to receive a copy of this information in a standardized format and the information will not be specific to you individually. See the below Contact details to make a request.

**Websites and cookies**

In general, you can visit Volvo Cars websites without telling us who you are or revealing any information about yourself. However, to be able to provide you with certain services or offerings, we often need to record certain items of Personal Data such as your name and email address. We may also collect (by means of cookies) anonymous information on how you have used our websites prior to such recording. This information will be helpful to us in order to improve our websites or marketing. All Volvo Cars websites open to our customers include information concerning our use of cookies. For certain countries there is also an online procedure for accepting or declining cookies. For more information regarding our use of cookies, please consult the local information concerning cookies published for your country under www.volvocars.com.

Volvo Cars does not track its customers over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. Third parties that have content on our Sites such as a social feature may set cookies on your browser or obtain information about the fact that a web browser visited a specific Site from a certain IP address. Third parties cannot obtain any other personally identifiable information from our Sites unless you provide it to them directly.

**Apps**

When you download or register to use one of our apps, you may submit Personal Data to us such as your name, email address, phone number and other registration information. Further, when you use our apps, we may collect certain information automatically, including technical information related to your mobile device, and information about the way you use the app. Depending on the particular app you use and only after you have consented to such collection, we may also collect information stored on your device, including contact information, location information or other digital content. Further details about the kind of information we collect is set out in the information notice and/or the special notice for each individual app.

**Third-party services and apps**

Some third-party apps which you download, are preinstalled or you can sign up for may have separate terms and privacy policies that apply regardless of our privacy policy. Volvo Cars is not responsible for the use of Personal Data in apps or services from a third party. We recommend that you carefully review the user terms and privacy policy of each third party service or application prior to signing up, downloading, or using them. We also recommend looking for privacy choices and controls in third-party apps after downloading.

**Children**

Our services are not intended for use by children. We do not knowingly solicit or collect any Personal Data about children under the age of 13 or market our products or services to them. If a child has provided us with Personal Data, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age 13, please contact us. If we learn that we have inadvertently collected the personal information of a child under 13, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.

**Monitoring**

As a result of legal requirements, we have to monitor how our system works, including the vehicles we have produced. This means that we collect sample data from these vehicles.
Lodging of complaint to supervisory authority

Lodging of complaint to supervisory authority If you are of the opinion that we are processing your personal data in violation of data protection laws and regulations you have the right to lodge a complaint with your supervisory authority.

Data protection representative

You can contact the Volvo Car’s Data Protection Officer via the following contact details:

E-mail address: globdpo@volvocars.com

Postal address: Volvo Car Corporation, Attention: The Data Protection Officer, HB3S, 405 31 Göteborg, Sweden.

Contact details

To exercise your rights, e.g. to obtain information or access to Personal Data which we Process, you must contact the Volvo Cars unit responsible for Processing (see under "Controller" above).