

## General Privacy Notice

Effective from: 2024-06-24

Published: 2024-06-24

We take your privacy seriously and want to be transparent and provide you with information about how we use your personal data. We will only process your personal data for clearly stated purposes and in accordance with your rights.

This notice explains how we at Volvo Bil process personal data. This applies to our interactions with individuals, such as existing and potential customers, website visitors, and partners. From now on, we will collectively refer to the various individuals we interact with as "you" or "yours."

Please note that Volvo Cars has its own privacy notice that explains the specific processing that takes place as part of its products and services. You can find information about how Volvo Cars processes your personal data [here](#).

### 1. Who we are

Volvo Bil i Göteborg AB is a Swedish legal entity with company registration number 556056-6266, whose registered address is Huggåsvägen, 405 31 Gothenburg. Volvo Bil is responsible for the processing of your personal data ('we', 'Volvo', 'our', 'us').

### 2. What personal data we use and why

Personal data is information that is directly or indirectly linked to you as a physically living person. Accordingly, personal data is information about you, such as name, date of birth, contact details, IP address and information you provide to us when you order a corporate car or are in contact with our customer care. Our use of your personal data is called processing. All processing of personal data needs to be justified. This is called having a "legal basis." The legal bases we rely on when processing different categories of personal data are described below.

- **Necessary for the performance of a contract:** This basis is used when the processing of your personal data is necessary to enter into and perform our obligations under a contract with you.
- **Necessary to fulfil our, or a third party's, legitimate interest:** This basis is used when the processing of your personal data is necessary for us to pursue a business interest which is not overridden by your interest of not having the personal data processed.
- **Consent given by you:** This basis is used when you provide us with your consent to process your personal data for specific reasons.
- **Necessary to fulfil a legal obligation:** This basis is used where we are required by law to process your personal data.

### 3. Personal data processed and the purpose and legal basis for the processing

The personal data that we process is data that you have provided to us or data that we have collected from a third party.

For the following purposes, we process your personal data in order to **fulfil our contract** with you or to take steps at your request prior to entering into a contract:

- When you as a customer create an order for a corporate car from us, we process data such as your name, your contact details, your employee number, your social security number,

company, company information, as well as the vehicle's registration and VIN number for the purpose of administering, ordering and delivering the car.

- We also process this data in order to fulfil our obligations arising from the agreements you have entered into with us and to provide you with information about, for example, quality campaigns, when it is time to change your corporate car, perform service on the car or change tyres.

For the following purposes, we process your personal data based on **legitimate interest**:

- As a vehicle owner, we process data that is linked to your corporate car and security agreements such as reg number, VIN number, odometer, days/km left for service, service performed, wheel changes and repairs. We process this data to be able to ensure that the car is serviced and maintained in accordance with the regulations and that we meet the requirements of the respective vehicle manufacturer for e.g. warranty commitments.
- If you create an account on our website, we process your name, email and company in order to be able to display accurate information that applies to you.
- If you visit one of our websites or if you use our local area network (WiFi), we may automatically collect personal information such as your IP address or the name of the device you are using on our local network. We collect such personal data in order to prevent unlawful intrusion or use of our IT resources and to simplify troubleshooting. For more information on the technologies used, such as cookies, please also see our [Cookie Information Notice](#).
- To manage our interactions with you, communicate with each other, handle queries and complaints through various channels such as email, social media platforms, web forms, digital advice, customer support, customer surveys, or when you visit us in person, we process data such as your name, contact details, company and company car data. The processing is necessary to managing and administering the contact with you.
- At events where you who sign up can let us know your contact information and food preferences. We process this personal data for the purpose of providing you with a safe and pleasant arrangement.
- We process information such as your name and your contact information to be able to communicate with you as a customer, for example through customer surveys.
- If you call us, calls may be recorded for quality and training purposes to improve our products, processes and customer service.

For the following purposes, we process your personal data if you have given your **consent** to do so:

- Sending out direct marketing such as newsletters. You can always unsubscribe by clicking on the unsubscribe link in the email.
- If you have consented to this, we may use photographs of you in our marketing.
- We may need to process sensitive personal data, such as your health, because you have ordered a specially adapted vehicle, e.g. a car that is adapted for the disabled. In such cases, we will obtain your explicit consent to the processing.

For the following purposes, we process your personal data in order to comply with **legal obligations**:

- We also process your personal data to the extent that the processing is necessary to comply with applicable legislation, decisions by public authorities and any other legal obligations that rest on us. For example, we store personal data about your agreement with us to the extent necessary to comply with applicable accounting law.

### 3. Sharing of your personal data

We share data with various organizations to run our business, as well as to maintain our relationship with you and provide you with products and services. We base our sharing of personal data on different legal bases, depending on the purpose. For example, it may be your consent or our or a third party's legitimate interest. In each case, we have entered into the necessary data protection agreements to ensure that your personal data is used lawfully and in accordance with the purpose set out in this Privacy Notice.

- Other Group companies within Volvo Cars and their sub-processors. Personal and vehicle data is transferred to other Group companies for car orders, warranty matters, customer care, provision of IT systems for business support and data storage.
- Other vehicle manufacturers and general agents for each vehicle brand. Vehicle and customer information is disclosed to handle recalls and warranty matters as well as to conduct customer surveys, car orders and orders for delivery communication.
- Authorised Volvo dealers and their sub-processors. Personal data is transferred to authorised Volvo dealers when this is necessary to fulfil your request, such as in connection with delivery, service and return of a corporate car.
- Our legal advisors and other professional consultants. Personal data needs to be disclosed to these parties for advisory purposes and to be able to represent us in any disputes and/or in court proceedings.
- Law enforcement authorities (e.g. police, courts). Personal data needs to be shared or may be shared with law enforcement authorities (e.g. police, courts) to comply with a legal obligation or our legitimate interest in providing data in the event of suspicion of a serious crime or when it is necessary to establish, exercise or defend against legal claims.
- IT suppliers and their sub-processors. Personal data is transferred to IT providers who provide general business support systems to us, such as suppliers of software and data storage.
- We share your information with financial service providers or our financial services partners in order to conduct our business.
- Insurance Partners. We may share your personal information with our insurance partners. Each insurance partner acts as the data controller for its processing of personal data after such a transfer and you can read about how each insurance partner processes personal data by visiting their website or contacting them directly.
- We share your information with the company you are employed by in order to be able to offer the right corporate car type and ensure that you get the right salary deduction.
- For those of you who have chosen a Volvo test car, we share your data with Volvo Cars R & D (see special information about this when you choose and order a test car).

### 4. How we collect your personal data

We collect personal data directly from you, the company you work for and, in some cases, from third parties with whom we work.

Some of the personal data you provide to us is necessary for us to fulfil our legal and contractual obligations to provide the products and services to you or the company you represent. If you do not provide us with certain necessary personal data, we will not be able to fulfil our legal and/or contractual obligations to you or the company you represent.

## 5. International Transfers

If we carry out international transfers of personal data, we always use tools and safeguards to ensure that such transfers comply with applicable laws and that your personal data is afforded the same level of protection as within the EU/EEA. Typically, we use tools and safeguards to:

- ensure that the relevant country is subject to an adequacy decision by the European Commission, or
- ensure the implementation of so-called standard contractual clauses issued by the European Commission (available on the European Commission's website); and
- ensure the implementation of technical safeguards such as encryption and pseudonymisation. Om du vill ha mer information om våra internationella överföringar kan du kontakta oss med hjälp av kontaktuppgifterna nedan.

## 6. How long do we keep your personal data

Volvo Bil will only retain your personal data for as long as is necessary for one or more of the purposes set out above, or if we have a legal obligation to retain the data (including but not limited to: contract periods, warranty and product liability requirements, statutory reporting obligations, necessary retention requirements for anticipated disputes and/or to prevent fraud). When we no longer have a legitimate business need for the data, we either anonymise the data so that it can no longer be linked to you, or your vehicle, or we delete the data.

The following standard retention periods apply to the types of personal data referred to in this Privacy Notice. These retention periods are subject to certain rights that you may exercise (such as your right to erasure), the choices and permissions you have chosen, periodic changes to other legal obligations that we are required to comply with, or where we have otherwise notified you of a different retention period.

- Customer contact details: for the period in which you are a customer and thereafter for an additional period of up to 5 years.
- Non-customer contact information: up to 12 months after our last interaction with you or an enquiry about a product or service. This period will start to apply again after each new interaction with us.
- Contract details: for the duration of the contract and thereafter for a further period of up to five 5 years.
- Online identifiers: up to 36 months from the date of your last interaction with us. Please see our [cookie policy and cookie banner](#) for specific durations.
- Customer Service Interactions: 1 year from the date the case was closed.

## 7. Profiling and automated decision making

### Profiling

We use automated processing to get a better understanding of you and your personal preferences. We use this, for example, when we profile you to:

- Personalise and tailor the marketing shown to you by analysing or predicting your personal preferences based on information we have about you.

- Personalise and tailor your experience when interacting with our various channels such as our website.

The use of automated processing in this way has no significant effect on you as an individual. Please note that you always have the right to object to our use of profiling as described above. To do so or if you have any questions about our profiling processes, please contact us.

## 8. Your rights and controls

You have specific legal rights in relation to the personal data that we process about you. In general, your rights relate to the ability to:

- withdraw your consent (the most common is the opt-out from marketing)
- object to our processing of your data
- ask for a copy of the data we hold about you (so-called subject access right)
- ask for the data to be transferred to another entity (so-called data portability)
- ask for the data to be corrected or restricted
- ask for the data to be deleted (so-called right to be forgotten)

As mentioned, these rights are not absolute and in some cases data protection legislation restricts their application. Should this be the case for a request you make to us, we will always explain why we are unable to comply with your request.

If you would like to submit a request regarding any of your rights as a data subject, you can contact us by filling out this [form](#). We kindly ask you to use the form as it provides us with the information we need to verify your identity and efficiently process your request. If you prefer not to use the form, you are always welcome to contact us and submit your request using the contact details in the next section.

When you need to provide detailed information at the bottom of the form, enter "Volvo Bil" (to get data from Volvo Bil only) or "Volvo Bil and Volvo Cars" (to get data from both Volvo Bil and Volvo Cars).

You also have the right to lodge a complaint with your local data protection authority if you have questions about how we use your personal data. However, we would appreciate it if you got in touch and raised your concerns directly with us first so that we can try to resolve them together.

## 9. Contact information

If you have any questions about how we use your personal data, you can contact us via [dataprotection@volvocars.com](mailto:dataprotection@volvocars.com) or contact Volvo Car Corporation's Data Protection Officer:

Postal address: Volvo Car Corporation, Attention: Data Protection Officer, dept. 50092, VAK, 405 31 Gothenburg, Sweden.

E-mail: [globdpo@volvocars.com](mailto:globdpo@volvocars.com)

10. Uppdatering av detta meddelande  
We are continuously developing our products and services and will therefore also review and update this Privacy Notice. Therefore, we encourage you to review this Privacy Notice periodically. The date at the top of the Privacy Notice tells you when it was last updated. We will handle your personal information in a manner consistent with the Privacy Notice in effect when it was collected, unless we have your consent to process it otherwise.