

Information Notice – Care by Volvo subscription through Volvocars.com

Controllers

Care by Volvo Car UK Limited (company number 11734379) and **Volvo Car UK Limited** (company number 02281044), both companies registered in England and Wales and with address Scandinavia House, Norreys Drive, Maidenhead, SL6 4FL, United Kingdom, along with **Care by Volvo Car AB** (company registration no 556746-9407) and **Volvo Car Corporation** (company registration no 556074-3089), both companies registered in Sweden and with address SE-405 31 Gothenburg, Sweden, are all legal entities within the Volvo Car Group and are hereinafter referred to as “Care by Volvo”, “we”, “our” and “us”, and will as joint controllers process your personal data as described below.

Purpose and legal basis for processing

Data that you provide

During the subscription period we process the personal data that you provide in connection with signing up for or otherwise in relation to your Care by Volvo subscription through our digital channels. The purpose of our processing is to administer your subscription and all services included therein, including (i) any necessary contacts with authorities for official reporting of your car(s), (ii) identity and credit check, including development of our risk evaluation model, (iii) invoicing, (iv) delivery of car(s) and services throughout the subscription, (v) follow-ups on your satisfaction through surveys, (vi) repossess our car(s) at the end of your subscription and enforce other rights under the subscription contract and (vii) communication on upcoming services and/or updates related to the services, potential car recalls and other relevant matters concerning the subscription. We will also process the personal data that you provide through the use of your car(s) and utilisation of services for the purposes of statistics, research and development. We will furthermore process your personal data in order to be able to recognise you as a recurrent customer and thus enhance your user experience.

The legal basis for our processing of your personal data in order to administer your subscription and the services included therein is that this is necessary for the performance of our contract with you. However, the legal basis for our processing of your personal data in order to follow up on your satisfaction, communicate updates related to your subscription, develop our risk evaluation model, statistics, research and development and to communicate with you in relation to matters concerning your car(s), as well as to recognise you as a recurrent customer, is our legitimate interest. The legal basis for processing of your personal data in relation to identity checks and car recalls, which are performed due to a legal requirement, is for compliance with a legal obligation.

Data collected from the car

We will also collect and analyse data from the car(s) in order to assess the status of the car(s) and, if and when needed, initiate maintenance procedures. We will use such data to pre-organise maintenance visits in order to keep such visits efficient and to a minimum. We will also save the maintenance history of the car(s) to be able to better plan the car(s)' future maintenance schedule. The legal basis for the aforementioned processing is that this processing is part of the services offered in the contract and therefore needed to fulfil the contract with you.

Further, we will collect information about mileage directly from the car(s) in order to be able to contact you to adapt your current mileage allowance to avoid any unexpected extra mileage fee at the end of the subscription period. The legal basis for the aforementioned processing is our legitimate interest.

Marketing and profiling

In addition to the above, we will – provided that you consented hereto – process your personal data for marketing purposes, including your potential response and interactions with the digital marketing communication in order to deliver relevant and high-quality marketing communication and for statistical purposes. If you have accepted our use of cookies, we combine your personal data with your online behavior on our websites when possible in order to reach a more accurate target audience.

The legal basis for our processing of your personal data for marketing purposes, including our processing in relation to be able to deliver relevant and high-quality marketing communication, is your consent. You have the right to withdraw your consent to our processing of your personal data related to marketing purposes at any time. Please direct a request for withdrawal of consent to Care by Volvo using the contact information on <https://support.volvocars.com/privacy>.

Disclosure and recipients of your personal data

Your personal data may be disclosed to companies within the same group of companies as Care by Volvo and selected business partners for the purposes of delivering the subscription services, including your car(s). Such personal data may also be disclosed to Vehicle Registration Authorities. If you have registered for the 30 day comprehensive car insurance at no extra cost, we will – in order for you to activate the insurance on the date you collect your car – notify our insurance partner with the license plate number of your subscription car.

To comply with our legal obligations as a responsible lender and appointed representative of Volvo Car UK Limited, who are authorised and regulated by the Financial Conduct Authority, we will further share your data with Experian Ltd. and Schufa Holding AG. Their processing activity includes (i) assessing your creditworthiness, affordability and product suitability, (ii) verifying your identity, (iii) managing your account, (iv) tracing and recovering debt, and (v) preventing fraud, money laundering and other criminal activity.

We will exchange the performance of your subscription with Experian Ltd. on an ongoing basis, including any debts not repaid on time. Experian Ltd. will share this information with other organisations. If you have a

financial associate your data will be linked together in your credit report and evaluated when you apply. You should discuss this with your financial associate and share this information before applying. Experian Ltd. will link your files until such time as you or your financial associate successfully files for dissociation. Experian Ltd. is a so-called credit reference agency and if you would like further information about the role of such agencies, how they work with personal data and your data protection rights, please see <https://www.experian.co.uk/legal/crain/>. For similar information about Schufa Holding AG, please see https://www.schufa.de/en/schufa-information/schufa-information_en.jsp.

In case that tickets, fines or charges relating to your Care by Volvo subscription are addressed to us, we may also disclose your personal data as required to the issuer thereof. The legal basis for such a disclosure is our legitimate interest.

We may also share your personal data with selected business partners for the purposes of enforcing our rights under the subscription contract, for example if you fall into arrears or break any other term of the contract. This includes sharing your personal data (i) with a debt collection agency for the purpose of collecting outstanding debt, (ii) with a repossession agency for the purpose of recovering a car (which according to the contract needs to be returned) and (iii) with a solicitor for the purpose of representing us in court proceedings.

Finally, we may disclose your personal data as required by law, for example in connection with a government inquiry, dispute or other legal process or request.

In relation to our business partners located outside of EEA, we will transfer your personal data with the basis of the Standard Contractual Clauses adopted by the European Commission.

Retention times

We will retain your personal data in connection with your Care by Volvo subscription up to twelve (12) months after the end of your Care by Volvo subscription, unless we are legally obliged to keep the data for a longer period of time. If you have been in contact with us due to a complaint, we will retain your personal data related to such complaint during three (3) years from when you first contacted us with your complaint. If you consented to our marketing communication, we will retain your personal data provided in that respect up to twelve (12) months after you have opted-out from receiving further marketing communication material from us in order to make sure that no further marketing material is sent to you. We will process your personal data in relation to statistics, research and development purposes for a period of twelve (12) months from the date of collection. After that time the personal data will be pseudonymized and stored for a period up to ten (10) years.

Your rights and our contact information

For information on your rights in relation to our processing of your personal data and contact details for further information and complaints as well as contact details to our Data Protection Officer, please visit www.volvocars.com/uk/support/topics/legal-documents/privacy, where you e.g. will find the Volvo Car Group's Customer Privacy Policy.