

VOLVO CAR PRIVACY NOTICE

Last updated: 29 March 2021

This privacy notice explains how Volvo Cars (as defined below) processes car generated data, when customers use a Volvo vehicle and associated connected services provided by Volvo Cars.

This document only explains the processing of personal data associated with the features of the newest Volvo car models, but you will not find here the explanation of the features themselves – for this, please check the [owner's manual](#) for the relevant model. Please note that if there is any discrepancy between this notice and the owner's manual in what concerns the processing of personal data, this notice takes precedence. In addition, since the manual explains all features, it will include indications of data being processed also for other features than the ones below – that is either because those features use local processing (data does not leave the car) and thus do not represent processing of personal data by Volvo Cars, or because they refer to processing of personal data by third parties as separate controllers (for example Google in the case of Android Automotive infotainment system).

Also, since the processing of data depends on the services with which the car is equipped, and on the services which you choose to activate, this document presents the widest extent of processing possible. It goes without saying that if you have an older model car, or if a new model is not equipped with a certain feature, the data processing associated with that feature will not happen.

This privacy notice does not apply to:

- Special vehicles (e.g. police cars);
- Processing of personal data that does not leave the car (local processing);
- Processing of personal data when you interact with one of our retailers (such as when you buy your car)
- Your use of software and third-party apps/services in the car (such as Google Automotive and any apps in the car's infotainment system);
- Your use of mobile apps provided by Volvo Cars, such as Volvo on Call/Volvo Cars App;
- Your use of third party value-added services based on car data (such as pay-as-you-drive insurance);
- The provision of the internet service in your car, which is supplied by a mobile network operator independently from Volvo Cars.

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1. Who is responsible for the processing of your personal data

The entity responsible for the processing of personal data referred to below is Volvo Car Corporation, having its registered office at Assar Gabrielssons Väg, SE-405 31 Gothenburg, Sweden, company registration number 556074-3089, hereinafter referred to as “Volvo Cars”, “we”, or “us”. In some situations the processing of personal data has joint controllers, which are identified in the respective sections. However, in all situations the joint controllers have agreed that the information is provided to you by Volvo Cars, and that you can exercise your rights (see section 3 below).

2. What personal data we collect and what happens with it

2.1. Processing of personal data while you drive

2.2.1. Vehicle data analytics

We process vehicle data (listed below) in order to obtain statistical information about our vehicles and how they are used. We use this information for product research and development purposes, in particular to improve and monitor the quality of vehicles and their safety features. This also serves to manage Volvo Cars' warranty commitments and to comply with our legal requirements relating to emissions monitoring.

Data categories used:

- Vehicle identification number (VIN);
- Identifiers of the vehicle's hardware and software versions;
- Diagnostic trouble codes (DTC);

Volvo cars also collects the following information on the vehicle's high-voltage battery (where applicable):

- High voltage battery ID, capacity, and health status;
- Vehicle market information;
- Charging station information (e.g. availability status, the power type, pole ID, etc.);
- Diagnostic data during charging (e.g. duration, state of charge, current fluctuation, etc.).

The legal basis for the processing of the data mentioned above is your consent (Art. 6(1)(a) GDPR).

The data Vehicle identification number (VIN), Identifiers of the vehicle's hardware and software versions, and Diagnostic trouble codes (DTC), are retained for 2 years, while the information on the vehicle's high-voltage battery is retained for the lifetime of the battery.

In the case of hybrid or electric vehicles, Volvo Cars and Polestar AB (a Swedish company headquartered in Göteborg, Assar Gabrielssons Väg 9, SE-405 31, Sweden, hereinafter referred to as "**Polestar**") share analysis data from their respective vehicles. The analysis data exchanged between Volvo Cars and Polestar, as listed above, is of a purely technical nature and does not involve actual customer data. The analysis data collected via the Volvo Cars and Polestar platforms is exchanged between the two companies for the purposes of improving and monitoring the quality of the vehicle, the performance of the electric and hybrid features, and the safety features.

As so-called joint controllers under GDPR, Volvo Cars and Polestar are jointly responsible for this processing of analysis data. Volvo Cars and Polestar have agreed that Volvo Cars is responsible for providing information to its customers, and that the respective rights afforded by GDPR will be exercised by Volvo customers in relation to Volvo Cars. You can read about this in section 3 below (*What rights you have in relation to the data processing we perform*).

2.2.2. Over the air software updates

In order to be able to maintain the vehicle software and provide necessary software updates directly, we process the following data:

- Vehicle identification number (VIN);
- Vehicle software version;
- Diagnostic trouble codes; and
- Vehicle manufacturing date.

We process the data mentioned above if you consent to this (Art. 6(1)(a) GDPR). If you refuse over the air software updates, this will prevent you from being able to use our updated services, or you will not be able to use them fully. Failure to update may also increase the risk of cybersecurity incidents, much like in the case of all other smart devices. Note that you can also opt to have the updates installed in one of our workshops.

We will retain records of the software updates made to the car for the entire vehicle lifetime.

2.2.3. Connected Safety

Our vehicles are equipped with the additional safety function Connected Safety, which informs you about current traffic situations on their route. This information is based on communication between your car and other vehicles in which Connected Safety is also activated (Volvo cars and trucks). This information is used to alert the driver to changing road conditions early on by displaying appropriate warnings, allowing them to adapt their driving style accordingly. Information involving personal data, in particular the driver's identity, is not exchanged between vehicles. However, if your own vehicle's hazard warning lights are activated or your vehicle detects reduced friction between your tyres and the road, information about this can be sent to vehicles approaching your own vehicle's position.

The Connected Safety service will both provide you with alerts about upcoming hazards on the road (e.g. slippery road, hazard light alerts), as well as collect data from your own car and contribute to the service:

- Vehicle identification number (VIN)
- Information about the internet connection (Wi-Fi/PSIM/Bluetooth)
- Slippery road alert activation
- Hazard light activation
- Time stamp of each alert
- Location of alert
- 3D road mapping.

We process the data mentioned above in the course of performing a service to you (Art. 6(1)(b) GDPR). You can switch the service on and off at any time.

In addition, the aforementioned data is processed anonymously and transmitted to Volvo Trucks (to create the Connected Safety service) and traffic agencies (in order to avert and reduce dangers posed by road traffic).

We will keep the data for 1 week before we delete or anonymize it.

2.2.4. Real-time Traffic Information

The Real Time Traffic Information service receives information about road traffic information from a 3rd party service provider.

The data we collect from the car are:

- Vehicle position and speed – these are shared with the 3rd party service provider to calculate congestion and to inform you and other drivers where risks for congestion exist; these data points are anonymous for the 3rd party service provider.
- Vehicle Identity Number (VIN) – this is used by Volvo Cars to verify that your vehicle has a subscription for this service.

Car models equipped with sensors that can identify traffic signs in real time as you drive do this through local processing (in the car) only.

We process the data mentioned above in the course of performing a service to you (Art. 6(1)(b) GDPR). You can switch the service on and off at any time.

The data will be stored by Volvo Cars as long as the subscription is active. Once the subscription is inactive, VIN, speed and position are stored for maximum of 90 days, unless a longer time is required under local applicable law.

2.2.5. Speech Messaging

The Speech Messaging is a feature specific to the car models that are not equipped with Android Automotive – these newer cars do not have a speech messaging service provided by Volvo Cars, but rather you have the option to activate Google Assistant. Speech Messaging is part of a larger voice command system with which you can control features of your infotainment system, and lets you create and send SMS messages by giving verbal instructions. Speech Messaging uses a 3rd party service provider, which is why this processing is not possible in the car.. To initiate a dialogue using voice commands, you first need to activate this function. Voice control will remain activated until you deliberately stop it or until you have not responded to three prompts from the system.

The following data is processing when using the voice control system:

- Recorded voice data or commands
- Vehicle identification number (VIN) - the VIN is used to verify that your car has a subscription for this service
- Phone number
- Text message) - The text message created by the 3rd party service provider is stored in the cloud and sent back and saved in your vehicle. The text message can be sent as SMS.

The processing of your data is necessary to provide the voice control system and associated services, and therefore to perform the contract concluded with you (Art. 6(1)(b) GDPR). If you do not provide your data, it will not be possible to use the voice control system.

The recorded voice data will be shared with the 3rd party service provider, in order to provide the service to you. The resulting text message is shared by the 3rd party service provider with us, and then passed to your vehicle. The 3rd party service provider is a separate controller for this data.

2.2. Processing in the event of an incident

In the event of an incident or (near) accident, personal data will be processed for the following purposes for a certain period of time:

2.2.1. Active Safety Data Recorder (ASDR)

The “Active Safety Data Recorder” (ASDR) primary purpose is to record data related to traffic accidents or collision-like situations. This information will be processed by our research and development department to help us better understand the circumstances in which traffic accidents, injuries, and damage occur.

If you enable this service, Volvo Cars collects and processes the following data for future development purposes and active safety-related complaints:

- Vehicle Identity Number (VIN);
- Type of safety event triggered and its occurrences;
- Front-facing camera images are captured during 4 seconds before and after collision-like situations;
- Vehicle location at time of incident.

This function only records data when a non-trivial collision situation occurs. It does not record any data during normal driving conditions.

We collect the data mentioned above based on your consent (Art. 6(1)(a) GDPR), and we keep it for 10 years before we delete or anonymise it.

2.2.2. Event Data Recorder (EDR)

The vehicle stores safety-related information relating to crash or near-crash situations in an Event Data Recorder (EDR) – also known as the car’s “black box”. The safety-related information includes data such as:

- How various systems in your vehicle were operating;
- Whether or not the driver and passenger safety belts were buckled/fastened;
- How far (if at all) the driver was depressing the accelerator and/or brake pedal; and,
- How fast the vehicle was traveling.

The period recorded is usually up to 30 seconds. Recording only takes place if a non-trivial collision situation occurs. No data is recorded under normal driving conditions. Furthermore, the recording does not include who is driving the vehicle or the geographical location of the (near) crash.

The data recorded is also needed to allow Volvo Cars to comply with its legal requirements specified in laws and by government authorities (Art. 6(1)(c) GDPR). The provision of personal data is thus required by law.

2.2.3. Emergency Call (eCall)

The Emergency Call (eCall) is a mandatory service all modern cars sold in the European Economic Area are equipped with. eCall means that an emergency call is made automatically in the event of a severe accident, detected by activation of one or more sensors within the vehicle; that means an eCall will be made by the car automatically even if all occupants in the car are unconscious, and the data mentioned below is automatically transmitted to the call centre. This function can also be triggered manually by pushing and holding the SOS button for at least 2 seconds; please be mindful that this is not recommended unless you are experiencing an emergency, and abuse is sanctioned under applicable laws.

When an emergency call is made, the following data is processed:

- Vehicle Identification Number (VIN);
- Vehicle propulsion or engine specification;
- Vehicle model specification;
- Time of the incident;
- Location of the incident;
- Direction of the vehicle travel.

By default, the “eCall” service in Volvo vehicles is routed to a third party services provider (this is called a third party service eCall or TPS eCall); this supplier varies by region, and you can get more information by contacting us. You can at any time choose to have the call routed to the public emergency service 112, by modifying your car settings accordingly.

The data is only collected when the eCall is made, and the only entities having access to it are Volvo Cars and the third party providing the service (or the emergency service itself, if selected). However, they may forward this data to specialised emergency services (for example ambulance) if necessary.

We process this data for the purpose of protecting the vital interests of the driver and of other occupants in the car (Art. 6(1)(d) GDPR), as well as under a legal obligation (Art. 6(1)(c) GDPR).

The personal data will be retained for a period of 90 days, and the processing is limited to the emergency situations referred to above.

2.2.4. Roadside Assistance

Our roadside assistance service helps you in the event of a flat tyre, breakdown or accident. By activating the black On Call button in the car or using the contact feature in the Volvo Cars app (previously Volvo on Call app), the car makes a call to the roadside assistance service. This service is subscription-based. Roadside assistance support will be able to send suitable help to the driver of the vehicle whenever the driver may need assistance, such as sending out a tow truck.

The Roadside Assistance service is offered in partnership with insurance companies that vary by country - you can get more information by contacting us. These insurance companies operate the call center that takes your call.

In order to provide you with the service, we will process the following data:

- Vehicle identification number (VIN);
- Vehicle propulsion or engine specification;

- Vehicle model specification;
- Time of the call;
- Location at time of the call;
- Direction of the vehicle travel.

The data is collected automatically, but only when the request for roadside assistance is made. The only entities having access to it are Volvo Cars and the third party providing the service, but the latter will forward some of this data to the specialised services you request (for example tow services).

We process this data in the course of providing the roadside assistance service to you (Art. 6(1)(b) GDPR).

We will process the data for a period of 8 years, except for geolocation data that is deleted after 90 days.

2.3. Processing of data related to maintenance and repairs

2.2.1. Service planning

The service planning feature is an optional service that helps you keep your car in good condition and observe the vehicle's warranty conditions by prompting you to schedule your visits to a workshop. For example, with service planning you may be prompted to change certain filters earlier or later than at the recommended fixed period of time, if their actual wear and tear requires this. Service planning works by continuously collecting and analysing certain vehicle diagnostic-related information to predict early signs of vehicle issues and then helping you to set up a maintenance programme before you visit a workshop. The service planning feature also helps us schedule production and delivery of spare parts, which is an important component in our sustainability goals and also in our endeavour to provide you with a premium service and repair experience by optimizing content, logistics and workshop utilization.

In order to provide you with the service planning feature, the following data will be collected:

- Data about the car - vehicle identification number (VIN), hardware revisions and software versions;
- Status and statistics from components (of the engine, throttle, steering, high voltage batteries and brakes, etc.);
- Driving data (Milage, Engine hours, Driving conditions e.g. city- high way driving, etc.)

We process the data mentioned above in the course of performing a service to you (Art. 6(1)(b) GDPR). You can switch the service on and off at any time.

The data will be shared with our national sales company in your country, in order to administer deliveries and bookings, as well as to tailor special offers for you (note that you will only receive special offers where you have agreed to this separately). Service planning will not directly perform bookings, thus the data is not shared with workshops.

We will store data connected to the car high voltage battery and VIN for 10 years, in order follow up on the battery state of health. The other data will be kept for 3 years. Data connected to the car high voltage battery will be kept in relation to the VIN for 10 years in order follow up on the battery state of health.

2.2.2. Connected Service Booking

You can send a booking request directly from the vehicle to your workshop to make an appointment to have your vehicle serviced or repaired. To use this service, you will need to create a Volvo ID and register it for your vehicle, and also connect your vehicle to the internet. You can read more about how your data is processed when you create a Volvo ID [here](#).

The Connected Service Booking service is similar to the Digital Service Booking service available in the Volvo Cars App. Volvo Cars, the Volvo national sales company or importer in your country, as well as the retailer performing the service are organising this service together, thus we are joint controllers for the processing of this data. We have agreed that the information is provided to you by Volvo Cars, and that you can exercise your rights in relation to Volvo Cars (please see section 3 - What rights you have in relation to the data processing we perform below).

The following data is processed when sending a booking request:

- Your identifiers (Volvo ID, email address, first and last name)
- Data related to the desired service (type of service, date and time, your message to the workshop entered in the message field)
- Data related to the selected workshop (such as name, address)
- Depending on the service requested, vehicle identity, software version, diagnostic trouble codes, service requirement, time since last service, fluid levels, odometer value, as well as your own description of the purpose of the booking (if any)

which will be shared with our national sales company in your country and the retailer selected (which might be service/repair workshop, body paint workshop, car reconditioning specialists and car logistics services).

The data will be used to book the service, organise performance, contact you in matters regarding the service booked or as direct consequences of using the service such as sending confirmations and notifications. This data is processed in order to perform the booking you request (in other words, our legal basis for this processing is your contract with us (Art. 6.1. b) GDPR).

We will store your data for a period of 15 months, however please note that the Volvo service partner retailer providing the service is subject to various retention and documentation obligations and may also be required by law to disclose personal data to authorities ((Art. 6.1 c) GDPR). This information can be found in the privacy policy of the service partner.

2.2.3. Diagnostic read-out in workshops

If servicing or repairs are carried out on your vehicle by one of our authorised service centres or partners, your vehicle is connected to the Vehicle Information Diagnostic for Aftersales system ("VIDA") for this purpose, and we will receive the following information about the problem:

- Diagnoses;
- Fault codes;
- Data about the vehicle (VIN, software version) and condition of the vehicle.

This data is of purely technical nature and we process it in order to follow up on the quality of our cars and manage our product manufacturer obligations, for product development as well as safety follow-up purposes (if necessary). This data is kept for the lifetime of the vehicle.

We process this data in our legitimate interests mentioned previously (Art. 6(1)(f) GDPR), and where applicable also to fulfil legal and other official requirements, such as safety-related recalls (Art. 6(1)(c) GDPR).

2.2.4. Emissions reporting

When you visit an authorised Volvo workshop or service partner, they will collect emissions data from your car, which will be sent to us in order to be reported pursuant to Regulation (EU) 2021/392. This collection of data occurs every time your car is serviced, unless you inform the service retailer that you object.

The data collected is:

- Emission data: mainly total fuel consumed (lifetime), total distance travelled (lifetime), total grid energy into the battery (lifetime) – with several breakdowns provided under Annex XXII of Regulation (EU) 2017/1151;
- Data about the vehicle (VIN).

We store the emissions data until that data has been reported upon.

2.2.5. Bug Reporting

This function helps Volvo Cars to collect the report of the software bugs. This data collection occurs when you visit an authorised Volvo workshop or service partner. With this report, we can generate a fix for these bugs and to maintain our software in good health. The report will then be processed internally by Volvo Cars, to understand the impact of the bugs.

By enabling this function, Volvo Cars will collect and process the data below:

- Vehicle identification number (VIN)
- Start-up diagnostics
- Vehicle configuration
- Head unit local configuration
- Android Automotive diagnostics
- Vehicle network diagnostics
- Software versions
- Reports and logfiles targeted to developers

We process the data mentioned above if you consent to this (Art. 6(1)(a) GDPR). After we have processed the data above, we will delete or anonymize your data in our server after 90 days.

2.4. Third Party Apps

The infotainment system of new car models runs on the Google Android Automotive operating system. In this regard, Google is an independent controller when it comes to processing your personal data.

Third party apps you download in the car from the PlayStore are also offered by independent controllers, similarly with how they operate on a smartphone. For further information, please refer to the individual service providers' own terms and conditions as well as their privacy notices.

2.5. Law enforcement requests

Every once in a while we receive requests from law enforcement agencies (police, customs authorities, etc) to provide various types of data related to our cars. As a general approach, we only provide personal data when legally required (Art. 6(1)(c) GDPR). We do provide data that is technical in nature and which does not in itself reveal a link with an individual (e.g., serial number of a car part connected to a VIN number, service history for a VIN number, etc.).

When we are presented with a request from a law enforcement authority that includes personal data, but we are not under a legal obligation to provide the data, we make an assessment of necessity and proportionality of the requested information and we may decide to provide all or part of the requested information (Art. 6(1)(f) GDPR).

We keep records of the requests received and responses provided, without the actual data provided (where applicable), however this is not an additional processing of personal data.

3. Your rights in relation to the processing of personal data

As a data subject you have specific legal rights granted by the General Data Protection Regulation relating to the personal data we process about you. These are briefly explained below, and you can exercise them by filling out the dedicated form indicated below.

1. **Right to withdraw consent:** Where you have given consent for the processing of your personal data, you may withdraw your consent at any moment with effect for the future.
2. **Right to access your personal data:** You may ask from us information regarding personal data that we hold about you. We will provide you with a copy of your personal data upon request. If you request further copies of your personal data, then we can charge you with a reasonable fee that we base on the administrative costs. You have the right to the information about our safeguards for the transfer of your personal data to a country that is outside the EU and the EEA if you request that we confirm whether or not we process your personal data, and we transfer your personal data to a country that is outside the EU and the EEA.
3. **Right to rectification:** You may obtain from us rectification of incorrect or incomplete personal data concerning you. We make reasonable efforts to keep personal data in our possession or control which are used on an ongoing basis, accurate, complete, current and relevant, based on the most recent information available to us.
4. **Right to restriction:** You may obtain from us restriction of processing of your personal data, if:
 - a) you contest the accuracy of your personal data, for the period we need to verify the accuracy,

- b) the processing is unlawful and you request the restriction of processing rather than erasure of your personal data,
 - c) we do no longer need your personal data for the processing purpose but you require them for the establishment, exercise or defense of legal claims, or
 - d) you object to the processing while we verify whether our legitimate grounds override yours.
5. **Right to portability:** You have the right to receive your personal data that you have provided to us, and, where technically feasible, request that we transmit your personal data (that you have provided to us) to another organization, if:
- a) we process your personal data by automated means;
 - b) we base the processing of your personal data on your consent, or our processing of your personal data are necessary for the execution or performance of a contract to which you are a party;
 - c) your personal data are provided to us by you; and
 - d) your right to portability does not adversely affect the rights and the freedoms of other persons.

You have the right to receive your personal data in a structured, commonly used and machine-readable format. Your right to receive your personal data must not adversely affect the rights and the freedoms of other persons. Your right to have your personal data transmitted from us to another organization is a right you have if such transmission is technically feasible.

6. **Right to erasure:** You have the right to request that we delete the personal data we process about you. We must comply with this request if we process your personal data, unless processing is necessary:
- a) for exercising the right of freedom of expression and information;
 - b) for compliance with a legal obligation which requires processing by Union or Member State law to which we are subject;
 - c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or
 - d) for the establishment, exercise or defense of legal claims.
7. **Right to object:** You may object – at any time – to the processing of your personal data due to your particular situation, provided that the processing is not based on your consent but on our legitimate interests or those of a third party. In this event we shall no longer process your personal data, unless we can demonstrate compelling legitimate grounds and an overriding interest for the processing or for the establishment, exercise or defense of legal claims. If you object to the processing, please specify whether you also wish the erasure of your personal data, otherwise we will only restrict it.

You also have the right to object at any time, regardless of any reason, to the processing of your personal data for direct marketing (which includes profiling to the extent that it is related to such direct marketing), if such processing was based on our legitimate interest. If the marketing was based on your consent, you can withdraw consent (see above).

8. **Right to lodge a complaint:** You can lodge a complaint to your local data protection supervisory authority or with any other data protection authority in the EU. However, we will appreciate if you first contact us to try and solve your problem – you can find our contact details below.

You can exercise your rights in relation to us by filling out [this form](#) (first, choose your country or region, then open and fill out the online form), which will help us to deal with your request properly. The online form contains the information that we need to verify your identity and review your request. For requests submitted by telephone or email, you will need to provide us with sufficient information that allows us to reasonably verify that you are the person whose personal data we collected and describe your request in sufficient detail to allow us to properly evaluate and respond to it. If we are not able to verify your identity for access and deletion requests with the information provided, we may ask you for additional pieces of information.

You can exercise these rights in relation to all of the joint controllers mentioned in this notice.

4. Contact information

In order to exercise your rights, please see section 3 above. If you have any other questions regarding the subject matter of personal data protection, you can contact us at the following contact details:

Company: Volvo Car Corporation

Postal Address: Volvo Car Corporation, Assar Gabrielssons Väg, SE-405 31 Gothenburg, Sweden

E-Mail: globdpo@volvocars.com

Website: <https://www.volvocars.com/intl/support/contact>

5. Changes to this notice

We reserve the right, at our discretion, to modify our privacy practices and update this privacy notice as needed. Whenever we make substantial changes to this notice, and in particular when this notice underlies your consent, we will inform you of the changes. This privacy notice is current as of the date which appears at the top of the document.