

# PRIVACY NOTICE – TELL US REPORTING LINE

Updated: 01 December 2021

Volvo Cars is committed to maintaining an ethical work environment and encourages the timely reporting of suspected, or known, wrongdoing through our dedicated whistleblowing channel (the “Tell Us Reporting Line”).

You can make a report through the Tell Us Reporting Line (a “Tell Us Report”) anonymously, however we may not be able to investigate your concern as effectively. If you do provide us with information about your identity, we will treat your information in a confidential and secure manner and use it in such a way that your anonymity is protected from disclosure to the concerned person/s, to the extent legally possible.

Any individual may use this channel to raise concerns (the “Tell Us Report”) related to the following types of unethical or unlawful behaviours:

- Illegal and/or criminal activity;
- Financial fraud;
- Bribery or corruption;
- Violation of competition laws (for example price fixing, exchange of price sensitive information, collusion with competitors);
- Any other activities, which by law amount to improper or unethical conduct, including but not limited to: discriminatory practices, sexual harassment, use of child labour, or human rights violations; and/or
- Violations of the Volvo Cars Code of Conduct, a Corporate Policy or Corporate Directive.

The Tell Us Reporting Line is an addition to the other standard forms of reporting and should only be used to make a report when other reporting channels cannot be used or are considered unsuitable for the particular situation.

Volvo Cars does not tolerate any retaliation, discrimination or disciplinary action against anyone for raising concerns in good faith, regardless of whether those allegations result in a substantiated investigation.

To ensure a high level of protection for the personal data you provide to us through the Tell Us Reporting Line, we have based this notice on, and will comply with our obligations under, the EU General Data Protection Regulation (GDPR).

This Privacy Notice applies to you and the personal data you provide to us when filing a Tell Us Report.

You can find below:

1. Who is responsible for the processing of your personal data
2. What personal data we process and why
3. How long we keep your personal data
4. Who will have access to your personal data
5. How we secure your personal data
6. What rights you have in relation to the data processing we perform
7. How to contact us

## 1. Who we are

The entity responsible for the processing of personal data in relation to the Tell Us Reporting Line 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**".

## 2. What personal data we collect and why

When you make a report through the Tell Us Reporting Line, we will collect the following types of personal data about you:

- (i) Your name, address, contact number and/or email address if provided by you (unless you choose to report anonymously)
- (ii) Any additional information you provide about yourself voluntarily either by freetext or that is included in any documentation you provide to us.

In the event we need further information from you, or have questions in relation to your Tell Us Report, to protect the confidentiality of the information you give to us, we will communicate with you directly through the Tell Us Report Line, or through any other form of communication you have consented to us using. Any other personal data collected during these communications will be handled in accordance with this privacy notice.

The Tell Us Reporting Line is not intended to collect or process your sensitive personal data, although you may disclose this to us voluntarily, for example, if you provide us information about your race or ethnic origin, your religious or ideological beliefs, trade union membership, or sexual orientation, with the Tell Us Report.

Your personal data will be used by us in order to review your Tell Us Report and to investigate suspected legal violations or potential misconduct. We will process your personal data based on:

- I. The fulfilment of our legal obligations, including, but not limited to, our legal obligation to implement the EU Whistleblowing Directive (2019/1937) and associated local law/s, as well as obligations imposed by law or regulation specific to the concern raised in the Tell Us Report (e.g. criminal law, competition law, or labour law) (GDPR Article 6(1)(c)).
- II. Our legitimate interests in ensuring compliance with applicable laws and our Corporate Code of Conduct, Policies and Directives, throughout all of our operations and facilitating the provision of information by individuals regarding a suspected breach of such compliance, provided that our interests are not overridden by the interests, fundamental rights and freedoms of the individuals involved (GDPR Article 6(1)(f)).
- III. If you provide us with sensitive personal data about you, we will process it on the basis of GDPR Article 9(2), specifically where i) we obtain your consent, ii) where necessary for the purposes of carrying out the obligations and exercising specific rights belonging to you or us in the field of employment and social security and social protection law; or iii) where necessary for reasons of significant public interest or IV) as otherwise required by law.

We will only process your personal data for the purposes stated above, unless otherwise required by law. If we need to process your personal data for purposes not identified above, we will do so only after providing you with notice and, if required by law, obtaining your consent.

### **3. How long we keep your personal data**

We will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

When a compliance investigation has found an allegation or suspicion of misconduct substantiated (in whole or in part), your personal data will be deleted, or anonymized, within two years from the date on which the investigation is concluded.

If the allegation or suspicion of misconduct is found to be unsubstantiated or groundless, we will delete or anonymize your personal data within six months from the date on which the investigation is closed.

Different retention periods may apply if legal, judicial, or disciplinary proceedings are commenced, or where we are otherwise required by law to retain your personal data.

### **4. Who will have access to personal data**

We treat the identity of individuals who make a report through the Tell Us Reporting Line as confidential information and will take all reasonable steps to limit the disclosure of your identity and personal data. However, it may be necessary to disclose some of your personal data with others who are specifically authorised by us to process data on our behalf as part of our review your Tell Us Report and to investigate suspected legal violations or potential misconduct. This includes:

- I. to specifically authorised individuals within Volvo Cars and its group companies as necessary for the collection, review and inspection of documents and whom are under an obligation of confidentiality;
- II. our external legal counsel and/or independent external investigators, within or outside the EU; and
- III. People in Touch B.V. (Netherlands) and its subprocessors (based in the EU and the UK) which deliver the interface, case management system, platform and transcription and translation services to operate the Tell Us Reporting Line and to enable management of the cases.

In all cases, Volvo Cars remains responsible for the appropriate processing of your personal data. We ensure that each party is limited in their ability to use or further disclose your personal data for any purpose other than as directed by us, by contract or other appropriate mechanism.

We may also disclose your information to law enforcement agencies, courts, supervisory authorities, other governmental bodies or other third parties as necessary for Volvo Cars to comply with legal and regulatory obligations, to protect or defendourselves against legal claims, or to enforce our own such claims.

### **5. How we secure your personal data**

We have implemented appropriate physical, technical, and organizational security measures designed to secure the personal data collected in connection with the Tell Us Reports against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit personal data access to those

individuals that have a legitimate need for such access.

As a general rule, the personal data processed about you (including that collected via the Tell Us Reporting Line, or otherwise) will be stored and processed within the European Union (EU)/European Economic Area (EEA) or any other non-EEA country deemed by the European Commission to offer an adequate level of protection. In some cases, it may be necessary to transfer your personal data to a non-EU/EEA country not considered by the European Commission to offer an adequate level of protection. In such cases, we have put in place additional adequate measures, for instance, ensuring that the recipient is bound by the EU Standard Contractual Clauses (the EU Model Clauses).

## **6. Your rights in relation to the data processing we perform**

You have specific legal rights granted by the General Data Protection Regulation relating to the personal data we process about you. You can withdraw your consent or object to our processing of your data, access the data we hold about you, ask for rectification or restriction of your data, request to have your data ported to another entity, request that we delete your data, and finally you can file a complaint with a data protection supervisory authority.

Details about your rights – what they mean, when and how you can exercise them - can be found in our general [Privacy Policy](#).

## **7. Contact information**

In order to exercise your rights, please use the applicable web form mentioned above. If you have any other questions regarding the subject matter of personal data protection, you can contact us at the following contact details:

Volvo Car Corporation  
Attention: Data Protection Officer  
Assar Gabrielssons Väg, SE-405 31 Gothenburg, Sweden  
E-mail address: globdpo@volvocars.com

## **8. Changes to our Tell Us Reporting Line Notice**

We reserve the right, at our discretion, to modify our privacy practices and update and make changes to this privacy notice at any time. 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.