

# VGA Privacy Policy

## 1 Privacy

### PRIVACY

*Volvo Group takes privacy seriously. We value the trust that you place in us by providing us your personal information. We will always use your personal information in a way that is fair and worthy of that trust.*

We shall always be transparent with you about what information we collect, what we do with it, with whom we share it and who you should contact if you have any concerns.

In this policy, **personal data** includes “personal data” or “personal information”, as those terms are defined in applicable data protection laws, and **process** or **processing** includes the collection, holding, use and disclosure of personal data.

#### 1.1 General website privacy

You can use the Volvo Group website universe without disclosing your identity. Details of the information that we gather as standard when you access the websites is described below. If you register for any of our services or contact us via forms, there will be detailed information about how your data is processed in connection to your registration.

#### 1.2 Identity of the controller

Volvo Group Australia Pty Ltd (ABN 27 000 761 259) and its related bodies corporate, including AB Volvo (“VOLVO”, “Volvo Group”, “we” or “us”), as controller of personal data, is responsible for the processing of personal data that relate to you under applicable data protection laws.

If you have questions regarding the processing of your personal data, please contact VOLVO’s data protection officer at the contact details set out below in this policy.

#### 1.3 What categories of personal data will VOLVO process, and for what purposes?

When you access any VOLVO website, your web browser is technically configured to automatically transmit the following data (“log data”) to our web server, which we then capture in log files:

- Date of access
- Time of access
- URL of the referring website
- File retrieved
- Data volume transmitted
- Browser type and version
- Operating system
- IP address
- Domain name of your internet access provider

Log data is exclusively information which does not allow you to be identified. This information is necessary for technical purposes in order to correctly deliver the content requested by you and its collection is an unavoidable aspect of using websites. The log data is analyzed purely for statistical purposes in order to improve our website and its underlying functionality. However, if you are reasonably identifiable by us in connection with the log data, we will treat the log data as personal data in accordance with this privacy policy and applicable data protection laws.

#### 1.4 Cookies

We use cookies and tracking pixels to gather data regarding your use of the website in order to tailor the website to its users’ needs. The gathering of this usage data and the creation of a usage profile is carried out on an anonymized basis using a cookie ID. We create and store these usage profiles solely in anonymized form and do not combine them with your name or with any other information such as your email address which may reveal your identity.

Cookies cannot be used to run programs or deliver viruses to your computer. With the information contained in cookies, we can simplify navigation and facilitate the correct display of our websites. Each website has its own cookies statement where you as a user can see the exact cookies usage for that specific site. If you disable or opt out of receiving cookies we may not be able to provide certain functions or features on our website.

### **1.5 How will VOLVO share your personal data? Will it be transferred outside Australia?**

VOLVO may share your personal data with Volvo Group companies, including Volvo Group companies located outside of Australia. VOLVO may also share your personal data with third parties, including third parties located outside of Australia, if necessary to fulfill the purposes for processing the personal data or any reasonably expected secondary purposes, or where required or authorised by applicable law or regulation. Such third parties may include:

- **Independent dealers**, such as Volvo Group's private dealers for the purposes of managing and developing the business relationship with a customer or a customer lead;
- **Professional advisors** such as insurers, lawyers and other professional advisors in connection with insurance claims, audits and the receipt of advisory services.
- **Counterparties and their advisors**, such as in connection with business transactions and other projects or collaborations (including merger and acquisition projects).
- **Emergency service providers**, such as the police, fire brigade, ambulance and roadside assistance to protect the vital interest of you and other such as in connection with emergency assistance.
- **Law enforcement**, regulatory authorities and other public and judicial bodies in connection with legal obligations such as court orders or legal reporting requirements or if considered necessary in exceptional cases to protect the vital interest of you or others.

We work with a range of different service providers to deliver the Volvo Group website universe. VOLVO will take reasonable steps to ensure that appropriate safeguards are in place which provide adequate levels of protection of your personal data as required by applicable data protection laws when sharing your personal data with Volvo Group companies or third parties. For example, this may include the use of intercompany or external data processing agreements or other mechanisms in compliance with applicable data protection laws.

### **1.6 How will VOLVO hold your personal data, and offshore locations**

VOLVO will take reasonable steps to protect your personal data from misuse, interference and loss, as well as unauthorized access, modification or disclosure, including by storing your personal data in an environment protected by a combination of physical and technological security measures. Your personal data may be held and processed in Australia, or in other jurisdictions outside of Australia where Volvo Group companies or their third party suppliers or business partners operate. Although it is not reasonably practicable to list all the jurisdictions outside of Australia in which your personal data may be processed, such jurisdictions may include Sweden, the US, France, China, Brazil, Poland, Belgium and the Netherlands.

### **1.7 Links to other websites**

Our websites may contain links to other websites. We have no influence on the compliance or non-compliance of the operators of these sites with the data protection provisions.

### **1.8 For how long will VOLVO keep your personal data?**

VOLVO will keep your personal data as long as required to fulfill the purposes for which the personal data was collected. When your personal data is no longer required to fulfill the purposes for which it was collected, unless otherwise required or authorised by applicable law, VOLVO will take reasonable steps to destroy or permanently de-identify your personal data.

### **1.9 Your data protection rights, complaints and VOLVO contact details**

You have the right to request from VOLVO information about your personal data processed by VOLVO and access to such personal data. You also have a right to request correction of your personal data if it is incorrect.

If you would like to request access to, or correction of, your personal data, or have queries or complaints regarding the processing of your personal data, please contact VOLVO's data protection officer at:

Email: [hrsc.au@volvo.com](mailto:hrsc.au@volvo.com)

Address: 41 Bivouac Place, Wacol Qld 4076

Telephone: +61 7 3718 3500

If we fail to adequately address your complaint within 30 days, you may lodge a complaint with the Australian Information Commissioner (telephone: +61 1300 363 992 or email [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)).