

Volvo CE Account Privacy Notice (North America)¹

Effective Date: May 25, 2024

1. Your Volvo CE Account

This Volvo CE Account Privacy Notice (the “**Privacy Notice**”) describes how Volvo Construction Equipment North America, LLC, its affiliates and subsidiaries (“**Volvo CE,**” “**we,**” “**us**” and “**our**”), process your personal data. This Privacy Notice is a supplement to the following:

- Volvo CE Privacy Notice available at: <https://www.volvoce.com/united-states/en-us/privacy/>; and
- Volvo Group’s Privacy Policy and Notices available at: <https://www.volvogroup.com/en/tools/privacy.html>.

The data processing referred to in this Privacy Notice refers to the processing of personal data associated with your use, and Volvo CE’s registration and maintenance of your Volvo CE Account (the “**Account**”).

The Account allows you to login to and access various Volvo CE sites and subsites as a representative of a Volvo CE customer. In most cases, you who are reading this will be an employee of such a customer (our “**Customer**”).

Additional privacy information might exist on certain Volvo websites and may have special functions. Such information only applies to the websites where it is displayed and any other websites we specifically describe.

In the event of a conflict between this Privacy Notice, our Volvo CE Privacy Notice and the Volvo Group’s Privacy Policy and Notices, this Privacy Notice shall govern as to your rights and obligations as they relate to your Account.

Depending on your state or province of residence, this Privacy Notice will tell you what rights and choices you may have with respect to your personal data.

Unless otherwise noted, the disclosures contained within this Privacy Notice cover privacy practices and activities in the prior 12 months from the Effective Date and our current practices.

By using your Account, you acknowledge that you have read, understand, and agree to the terms of this Privacy Notice.

2. Personal data we collect

The following are the categories of personal data that we collect:

Identifiers such as your real name, mobile number, associated Customer company, online identifier, IP address, email address, country of operation, work title, or other similar identifiers.

Internet or other electronic network activity data such as browsing history, search history, and data regarding interaction with an internet website application or advertisement.

Geolocation such as your physical location and device location.

We may deidentify or aggregate any of the data we collect, and as permitted by applicable laws, we do not treat deidentified or aggregated data as personal data.

3. How we collect personal data

We obtain the above categories of personal data from the following categories of sources:

Data you provide - We and our service providers collect any data that you provide when you create or use the Account, including when you contact us with a question, comment or request.

Data automatically collected from you - We and our service providers may automatically collect certain technical data from your computer or mobile device when you visit our websites or access your Account.

From third parties, such as our Volvo CE dealers- We and our service providers may collect your personal data from Volvo CE dealers or Customers in connection with registration and use of your Account.

4. How we use personal data

Generally, we process your personal data to be able to provide, maintain and protect the Account and associated functions. This includes using your personal data to set up the Account during registration, to associate the Account

¹ For purposes of this Privacy Notice, North America includes the United States and Canada.

with the relevant Customer, and to send you necessary notifications (e.g., using your registered email address). When the Account registration is initiated by the Customer or by a Volvo CE dealer, we will receive your personal data (e.g., your email address) to send you an invitation to complete the registration process.

We will also log certain Account activities to be able to associate e.g., a request, order, inquiry, or acceptance made with your Account on behalf of our Customer, or to be able to investigate security breaches or breaches of Volvo CE policies.

In rare circumstances, typically if there is a legal dispute between Volvo and our Customer, we may need to use your personal data when it is necessary to exercise or defend against legal claims.

In addition, we may collect, use and disclose your personal data as required or permitted by applicable law, or as directed by you, in accordance with this Privacy Notice. Note that the categories and examples of personal data we collect, the purposes, the recipients of personal data, the sources of your personal data and how we disclose personal data may vary depending on the nature of your interactions with us and may not include all the examples listed herein.

5. How we disclose personal data

We may disclose the above referenced categories of personal data with those who need access to it to enable the activities described above or herein. These include:

- (a) **Volvo CE dealers.** We cooperate with Volvo CE dealers who may need to access data related to you and your use of the Account to deliver a service or otherwise provide support to our Customer.
- (b) **Other Volvo Group companies.** Some of our services and functions are being provided by other companies within the Volvo Group. For that purpose, we may disclose your Account details (e.g., contact information) as required for the service or function to operate.
- (c) **Service providers/suppliers.** We may use service providers/suppliers in connection with them providing their services to us (e.g., analytics providers, advertising partners, IT infrastructure and other IT providers). We may disclose personal data with service providers that may include the categories of personal data listed above in connection with them providing services to us.
- (d) **Regulators, law enforcement and the government.** We may disclose personal data to these entities to comply with applicable legal or regulatory requirements and to exercise or defend against legal claims.

6. Retention of personal data

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data (which includes the categories of personal data set forth above) for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal obligations, or as necessary to resolve disputes. Our retention periods are informed by our legal requirements; the nature and sensitivity of the personal data; the potential risk of harm from unauthorized access; the purposes for which we process your personal data; and whether we can achieve those purposes through other means.

7. What personal data do we sell or share?

We do not “sell” or “share” your personal data for money. We may disclose your personal data to Volvo CE dealers to deliver a service or otherwise support a Customer. For such purposes, you direct Volvo CE to share your personal data with Volvo CE dealers.

Under the privacy laws in some jurisdictions, the manner in which we may use cookies may constitute a “sale.” In those jurisdictions, we only sell or share the following categories of personal data: identifiers and internet or other electronic network activity data. We will only share or sell this personal data through our use of cookies and other tracking technologies (such as web beacons) to our analytics and advertising partners for advertising purposes. You may have the right to opt out of the sale of personal data depending on how your state defines “sale.”

Depending on where you reside, you may opt out by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC), available at <https://globalprivacycontrol.org/orgs>. If you choose to use the GPC signal, you will need to ensure that the browser or browser extension you use supports the GPC signal. If you do not have a Volvo CE account or if you are not logged into your Volvo CE account, your request to opt-out of sale/sharing will be linked to your browser identifier only and not linked to any account information because the connection between your browser and the account is not known to us. If you would like us to make the connection between the browser and your account and you have not yet opted out of sale/sharing, you may contact us to submit a request related to your personal data as set forth below.

We do not knowingly share or sell the personal data of persons we know are under 16.

8. How is personal data secured?

We strive to maintain reasonable administrative, technical, and physical safeguards designed to safeguard personal data collected by the website. However, no information system can be 100% secure, so we cannot guarantee the absolute security of personal data. Moreover, we are not responsible for the security of personal data you transmit to our websites over networks that we do not control, including the Internet and wireless networks.

9. How do we handle children's personal data?

Our Services are not directed to, nor do we knowingly collect personal data from, children under the age of 13. If you become aware that your child or any child under your care has provided us with personal data without your consent, please contact us immediately at the contact information listed below.

10. How to submit a request related to personal data

You may have certain rights related to your personal data depending on your jurisdiction. You have the right to submit certain requests relating to your personal data as described below. To exercise any of these rights, please submit a request: by email to gpo.office@volvo.com - use the Subject Line: Volvo CE Account Privacy Notice (North America); or by mailing your request to AB Volvo, Attn: Group Privacy Office, Dept AA14100, VGHQ, SE-405 08 Göteborg, Sweden. Depending on the nature of your request, you may be asked to provide information to verify your identity before your request can be processed. You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed.

Please note that due to the different requirements of the applicable laws, our response times may vary depending on the specific type(s) of information sought. We respond to all verifiable requests for information as soon as we reasonably can and no later than legally required.

(a) **Right to know.** You may submit a request to know the following: (i) the specific pieces of personal data we have collected about you; (ii) the categories of personal data we collected about you; (iii) the categories of personal data we sold or shared about you and the categories of third parties to which each category of personal data was sold or shared; and (iv) the categories of personal data we disclosed about you for a business purpose and the categories of persons to which it was disclosed.

(b) **Right to correct inaccurate personal data.** You may request that we correct inaccurate personal data that we maintain about you. Upon receipt of a verifiable request to correct inaccurate personal data, we will take into account the nature of the personal data and the purposes for which we process it. We may require documentation from you in order to process your request where we have reliable documentation showing the accuracy of the personal data.

(c) **Right to request deletion of personal data.** You may also have the right to request that we delete personal data collected or maintained by us. Following receipt of a verifiable request to delete, we will let you know what, if any, personal data we can delete from our records. We will also notify our service providers and any third parties to which we transferred your personal data about your request to delete. If we cannot delete all of your personal data, we will provide an explanation.

(d) **Right to limit the use and disclosure of sensitive personal data.** We do not use or disclose sensitive personal data for the purpose of inferring characteristics about you, or for any other reasons besides the permitted purposes including: to provide our goods and services; as needed to ensure security and integrity; to prevent fraud or illegal activity; for physical safety; for short-term, transient use, including for non-personalized advertising; to perform services on behalf of the business; and to verify or maintain the quality or safety of a service or device owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance such services or devices. For this reason, we do not treat the sensitive personal data we process as subject to a limit use and disclosure request and, therefore, we do not offer a way for you to submit such a request.

(e) **Right to opt-out of the sale and sharing of personal data.** You may have the right to opt out of the sale and sharing of your personal data.

(f) **Right to appeal decision.** You may also have the right to submit an appeal about our decision to your request regarding your personal data. We respond to all appeal requests as soon as we reasonably can and no later than legally required.

(g) **Right to non-discrimination for the exercise of privacy rights.** If you choose to exercise any of the privacy

rights described above, we will not discriminate against you. This means that, consistent with applicable privacy law, we will not deny providing our products or services to you, charge you different prices, or provide a different level or quality of products or services to you unless those differences are related to the value of your personal data.

11. California “Shine the Light” Law

Under California’s “Shine the Light” law (Cal. Civ. Code § 1798.83), California residents who provide us certain personal data are entitled to request and obtain from us, free of charge, information about the personal data (if any) we have shared with third parties for their own direct marketing use. Such requests may be made once per calendar year for information about any relevant third party sharing in the prior calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to gpo.office@volvo.com. In your request, please attest to the fact that you are a California resident and provide a current California address.

12. Changes to this Privacy Notice

If we update this Privacy Notice, we will notify you by posting a new Privacy Notice on <https://www.volvoce.com/global/en/terms-and-conditions/>. If we make any revisions that materially change the ways in which we use or disclose the personal data previously collected from you, we will notify you.

13. Contact us

You can contact us regarding our privacy practices at any of the following:

- (a) Address: AB Volvo, Attn: Group Privacy Office, Dept AA14100, VGHQ, SE-405 08 Göteborg, Sweden.
- (b) Email address: gpo.office@volvo.com – use the Subject Line: Volvo CE Account Privacy Notice (North America).
- (c) Toll-free telephone number: 1-855-235-6014.