

PRIVACY POLICY

CMT approved: 23 November 2021

This is the privacy policy ("**Policy**") of Volvo Group Singapore (Pte.) Ltd., Volvo Construction Equipment Singapore (Pte.) Ltd. and Volvo Treasury Asia Ltd. ("**Volvo Singapore**" or "**we**" or "**our**" or "**us**").

We take your privacy very seriously and have in place policies and practices dealing with data protection. We ask that you read this Policy carefully as it contains important information about our collection, use, processing and disclosure of personal data in our possession or under our control, including information on:

- i) our policies and practices for meeting our obligations under laws, regulations and guidelines which concern data protection;
- ii) how you may access, correct or make other requests in relation to your personal data in our possession or control as permitted by applicable laws; and
- iii) details of our data protection complaints procedure.

1. COLLECTION OF PERSONAL DATA

1.1 Personal data that Volvo Singapore collects includes names, contact details, addresses and other information relevant in order for us to provide products and/or services and to share information that may be of interest.

1.2 Personal data may be collected by us, directly or indirectly, for instance:

- 1.2.1** when you respond to our promotions, or subscribe to our mailing lists;
- 1.2.2** when you attend events organised by us;
- 1.2.3** when you visit our websites;
- 1.2.4** when you visit our premises;
- 1.2.5** when your images are captured by us via CCTV cameras while you are within our premises, or when photographs or videos of you are taken when you attend our events or trainings (physically or virtually);
- 1.2.6** when you use our services, sign up for our events or enter into transactions with us, or express any interest in doing so;
- 1.2.7** when you communicate with us by telephone, email, via our website or through other communication channels including social media platforms;
- 1.2.8** when we seek information about you and receive your personal data in connection with your relationship with us; and/or
- 1.2.9** when you submit your personal data to us for any reason.

- 1.3** We also collect personal data from third party sources, for example:
- 1.3.1** from our business partners and third party service providers, such as service provider who provides advertising, marketing, promotional, security services or real estate service to Volvo Singapore;
 - 1.3.2** from your family members or friends who provide your personal data to Volvo Singapore on your behalf;
 - 1.3.3** from visitors to our premises who provide your personal data to Volvo Singapore on your behalf; and/or
 - 1.3.4** from public agencies or other public sources.
- 1.4** In certain circumstances, you may also provide us with personal data of persons other than yourself. If you do so, you warrant that you have informed him/her of the purposes for which we are collecting his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes, including all purposes as set out in this Policy.

2. PURPOSES OF COLLECTION, USE OR DISCLOSURE

- 2.1** We may collect, use, process, store and/or disclose personal data for one or more of the following purposes, depending on your relationship with us:
- 2.1.1** to manage our websites and to maintain availability and functionality of the websites;
 - 2.1.2** to correctly deliver the content requested by you;
 - 2.1.3** for statistical purposes in order to improve our website and its underlying functionalities;
 - 2.1.4** to verify your identity;
 - 2.1.5** to conduct and complete transactions (e.g. processing orders and payments; providing products or services that have been requested), performing our obligations or exercising our rights as set out in binding contractual terms, and otherwise to manage your relationship with us;
 - 2.1.6** to respond to queries or requests;
 - 2.1.7** to conduct research and analysis to improve our products and/or services;
 - 2.1.8** to respond to legal processes or to comply generally with any applicable laws, governmental or regulatory requirements of any relevant jurisdiction (and any applicable rules, codes of practice or guidelines), and requests of any governmental or other regulatory authority with jurisdiction over us, including, without limitation, meeting requirements to disclose under the requirements of any applicable law or assisting in law enforcement and investigations by relevant authorities;
 - 2.1.9** such purposes that may be informed to you when your personal data is collected;
 - 2.1.10** any other reasonable purposes related to the aforesaid or for which you have provided any information to us; and/or

2.1.11 any other incidental business purposes related to or in connection with the above.

2.2 We may also collect, use, process, store and/or disclose personal data for legitimate purposes related to our business and which are not incompatible with the original purposes for which you have provided the personal data, and also in circumstances other than set out in this Policy where required, or permitted, by laws applicable in any relevant jurisdiction, including overseas.

3. TRANSFER OR DISCLOSURE OF PERSONAL DATA

3.1 Volvo Singapore may disclose your personal data to the following parties, whether located within or outside Singapore, for the purposes set out or otherwise referred to in this Policy:

3.1.1 third parties to whom you authorise Volvo Singapore's disclosure of your personal data (through this Policy or otherwise);

3.1.2 Volvo Singapore's related corporations;

3.1.3 Volvo Singapore's auditors, professional consultants, lawyers and other advisors;

3.1.4 Volvo Singapore's business partners;

3.1.5 Volvo Singapore's service providers or agents;

3.1.6 insurers, credit providers, courts, tribunals, law enforcement agencies, regulatory authorities and other governmental agencies as agreed or authorised by law; and

3.1.7 credit reporting or reference agencies or investigators.

4. ACCURACY

4.1 We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing at the contact details provided below.

5. COOKIES AND WEBSITE TRACKING

5.1 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.

5.2 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.

5.3 Each website has its own cookies statement where you as a user can see the exact cookies usage for that specific site.

6. OTHER WEBSITES

- 6.1** Our websites may contain links to other websites. However, this Policy only applies to Volvo Singapore, and if you visit other websites, including through such links, different privacy policies will apply.

7. SECURITY AND RETENTION

- 7.1** To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, and loss of any storage medium or device on which your personal data is stored, we have introduced appropriate administrative, physical and technical measures, including to protect personal data from unintended access.
- 7.2** You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure, and Volvo Singapore cannot and does not guarantee that our systems or applications are invulnerable to security breaches. Volvo Singapore makes no warranty, guarantee, or representation that your use of our systems or applications is safe and protected from viruses, worms, Trojan horses, and other vulnerabilities.
- 7.3** We keep your personal data only for so long as we need the personal data to fulfil the purposes we collected it for, and to satisfy our business and/or legal purposes, including audit, accounting or reporting requirements. In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case we are entitled to retain and use such data without restriction.

8. YOUR RIGHTS

- 8.1** If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, (b) a correction request to correct or update any of your personal data which we hold about you, or (c) other request in relation to your personal data, as permitted by applicable data protection laws, you may submit your request by contacting the Data Protection Officer.
- 8.2** If you wish to exercise your rights, please contact the Data Protection Officer. You may be required to submit certain forms or provide certain information in order for your request to be processed. Where permitted by law, Volvo Singapore may charge you a fee to process your request, and will inform you of the fee before processing your request.
- 8.3** We will respond to your request as soon as reasonably possible, and in accordance with applicable law.

9. CONSENT WITHDRAWALS

- 9.1** The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. An individual may withdraw consent and request us to stop using and/or disclosing their personal data by submitting a request in writing to our Data Protection Officer at the contact details provided below.
- 9.2** If you withdraw your consent to any or all use of your personal data or do not consent to the collection of your personal data by us, we may not be able to provide or continue providing you with products and/or services which you have requested and such withdrawal may also

constitute a termination event which results in legal consequences such as forfeiture of deposits. You understand and agree that in such instances where Volvo Singapore requires your personal data to fulfil a contractual obligation to you and you withdraw your consent to collect, use or disclose the relevant personal data for those purposes, Volvo Singapore cannot be held liable for breach of that agreement. Volvo Singapore's legal rights and remedies in such event are expressly reserved.

- 9.3** Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws in any jurisdiction.

10. CHANGES TO THIS POLICY

- 10.1** We keep this Policy under regular review. If we change this Policy we will post the changes on <https://www.volvoce.com/asia/en-as/privacy/>, so that you may be aware of the information we collect and how we use it at all times. This Policy was last updated in June 2021.

- 10.2** Where you continue to provide personal data to us as described in this Policy, or continue to use our products or services, this will constitute your acknowledgement and acceptance of a revised Policy.

11. HOW TO CONTACT US / DATA PROTECTION OFFICER DETAILS

- 11.1** If you have any queries or comments on this Policy or the use of your personal data, or if you wish to lodge a privacy-related complaint, please contact Volvo Singapore's Data Protection Officers at:

Data Protection Officer

Email address: vgs.dpo@volvo.com (Volvo Group Singapore (Pte.) Ltd.)

Email address: vce.dpo@volvo.com (Volvo Construction Equipment Singapore (Pte.) Ltd.)

Email address: vta.dpo@volvo.com (Volvo Treasury Asia Ltd.)

Volvo Singapore will investigate your queries, comments or complaint, and will use reasonable endeavours to respond, in accordance with applicable laws.