

# Privacy Notice - Connected Pave

## 1. Introduction

This privacy notice (the “**Privacy Notice**”) describes how Volvo Construction Equipment AB, reg. no 556021-9338, (“**Volvo CE**”, “**we**”, “**us**” and “**our**”), process your personal data when you use the Connected Pave application (the “**Service**”). The purpose of the Service is to improve the logistic delivery of paving material from asphalt plants to pavers for better efficiency and quality.

Please read this Privacy Notice carefully to make sure that you have understood how your personal data will be used. If you have any questions regarding how Volvo CE processes your personal data, please contact us using the contact information at the end of this document.

We may need to make updates or changes to this Privacy Notice. You can find the latest version of this Privacy Notice [here](#).

## 2. How we process your personal data

In this section we describe the processing of personal data relevant to the Service.

### 2.1 Account management

<b>What we do and why:</b>	<b>The personal data that we process:</b>
We collect your personal data during account registration to set up your account and give you access to the Service. The Service will also generate a universally unique identifier (UUID) for each new installation in association with the vehicle configuration information to identify and connect vehicle configurations.	We process the personal data that we receive from you during registration, which includes your name, e-mail address, UUID and vehicle ID.
<b>Our legal basis for processing:</b>	
Legitimate interest: We have a legitimate interest to deliver the Service in accordance with the agreement between Volvo CE and our customer.	
<b>How we share and transfer your data:</b>	
Your personal data will be shared with our IT service providers to the extent it is necessary for them to perform their service to us.	
Volvo CE will not transfer your personal data to a country outside the European Union (“ <b>EU</b> ”)/European Economic Area (“ <b>EEA</b> ”). However, our IT service providers make use of suppliers belonging to company groups headquartered in the United States which therefore may, e.g., for technical support purposes, grant remote access to personal data stored within the EU/EEA.	

<b>How long we keep your data:</b>
We will process your personal data as long as it is necessary for us to provide the Service to you and for a maximum of two (2) years thereafter.

## 2.2

### Delivering the Service

<b>What we do and why:</b>	<b>The personal data that we process:</b>
When using the Service, your device will be tracked in real-time and visualized on a site map. The location is used to visualize your location in order to (a) provide route guidance, (b) share the routes to the other users of the Service, (c) determine if you are within the boundary of the predefined geofence area, (d) share the last position of the vehicle within the geofence area of the construction site in order to allow users of the Service to use a search function to find vehicles on the construction site, and (e) provide time stamps from the start and end of the eTicket.	We process the personal data generated from your device when you drive within the geofence or outside the geofence if you have an active eTicket, which includes your alias of choice and GPS coordinates.
<b>Our legal basis for processing:</b>	
Legitimate interest: We have a legitimate interest to deliver the Service in accordance with the agreement between Volvo CE and our customer.	
<b>How we share and transfer your data:</b>	
Your personal data will be shared with our IT service providers to the extent it is necessary for them to perform their service to us.	
Volvo CE will not transfer your personal data to a country outside the European Union ("EU")/European Economic Area ("EEA"). However, our IT service providers make use of suppliers belonging to company groups headquartered in the United States which therefore may, e.g., for technical support purposes, grant remote access to personal data stored within the EU/EEA.	
<b>How long we keep your data:</b>	
We will process your personal data as long as it is necessary for us to provide the Service to you and for a maximum of two (2) years thereafter unless otherwise specified below:	
<ol style="list-style-type: none"> <li>1. Last location will only be stored for thirty (30) days.</li> </ol>	

- 2. Timestamps for the eTickets are stored for five (5) years from the date of issuance.
- 3. GPS location data is not stored. You may at any time turn off the location data tracking on the device by denying or revoking the app permissions in the device settings, however limiting the functionality of the Service.

**2.3 Service optimization and product development**

What we do and why:	The personal data that we process:
<p>We derive aggregated and generalized data about how the Service is used and performs, which allows us to analyse it and gain insights into how we can optimize and develop our services and products. We will process the data in a highly aggregated and/or obfuscated format making it practically anonymous.</p>	<p>We process technical and statistical data derived from the performance and utilization of the Service, including data from activity logs, information relating to the conditions and performance of associated operating machines and devices, and information relating to operational productivity.</p>
<b>Our legal basis for processing:</b>	
<p>Legitimate interest: We have a legitimate interest in improving and developing our products and services.</p>	
<b>How we share and transfer your data:</b>	
<p>Your personal data will be shared with our IT service providers to the extent it is necessary for them to perform their service to us.</p> <p>Volvo CE will not transfer your personal data to a country outside the European Union (“EU”)/European Economic Area (“EEA”). However, our IT service providers make use of suppliers belonging to company groups headquartered in the United States which therefore may, e.g., for technical support purposes, grant remote access to personal data stored within the EU/EEA.</p>	
<b>How long we keep your data:</b>	
<p>We will keep personal data in a format enabling identification only for as long as it takes to effectively turn it into aggregated and generalized data. Aggregated data may be kept indefinitely.</p>	

2.4

**Driving analytics**

What we do and why:	The personal data that we process:
<p>We analyse your driving using the Service to enable you and other users of the Service to gain insights into how you can optimize your driving.</p>	<p>We process statistical data derived from your driving performance, such as driving and idling time.</p>
<b>Our legal basis for processing:</b>	
<p>Legitimate interest: We have a legitimate interest in providing our users of the Service with driving analytics.</p>	
<b>How we share and transfer your data:</b>	
<p>Your personal data will be shared with our IT service providers to the extent it is necessary for them to perform their service to us.</p> <p>Volvo CE will not transfer your personal data to a country outside the European Union (“EU”)/European Economic Area (“EEA”). However, our IT service providers make use of suppliers belonging to company groups headquartered in the United States which therefore may, e.g., for technical support purposes, grant remote access to personal data stored within the EU/EEA.</p>	
<b>How long we keep your data:</b>	
<p>We will process your personal data as long as it is necessary for us to provide the Service to you and for a maximum of two (2) years thereafter. This feature is optional and may be switched off by the user of the Service. You may at any time turn off the feature in the settings of the app, however limiting the functionality of the Service.</p>	

2.5

**Administer the relationship with you**

What we do and why:	The personal data that we process:
<p>We process your personal data to administer the relationship with you and respond to your inquiries.</p>	<p>We process the information you provide to us which include name, e-mail address and telephone number.</p>

<b>Our legal basis for processing:</b>
Legitimate interest: We have a legitimate interest to respond to inquiries and to provide customer service.
<b>How we share and transfer your data:</b>
Your personal data will be shared with our IT service providers to the extent it is necessary for them to perform their service to us.  Volvo CE will not transfer your personal data to a country outside the European Union (“EU”)/European Economic Area (“EEA”). However, our IT service providers make use of suppliers belonging to company groups headquartered in the United States which therefore may, e.g., for technical support purposes, grant remote access to personal data stored within the EU/EEA.
<b>How long we keep your data:</b>
Until the inquiry is completed and for one (1) year thereafter.

## 2.6 Additional processing purposes

In addition to the processing purposes listed above, we may be required to process personal data for additional purposes. We may also be required to keep certain personal data for longer periods of time e.g., to be able to establish, exercise, and/or defend against legal claims. We will generally process such personal data for ten (10) years from creation or for the time necessary to fulfil the purpose in the relevant case. This processing of your personal data is based on our legitimate interest of establishing and/or defending legal claims. Additionally, we may also be required to process personal data to comply with legal obligations e.g., relating to bookkeeping or tax legislation, or if we are ordered to process personal data (including disclosing it) by a competent court or government authority.

## 2.7 Third country transfers

We always require that our IT service providers ensure that any transfers of personal data to countries outside the EU/EEA are performed in accordance with all applicable legal requirements including, where required, entering into an agreement with their suppliers based on the EU Commission’s standard contractual clauses.

[Here](#), you can find the standard contract clauses applicable to transfers of personal data to a recipient outside of the EU/EEA.

## **2.8 From where will Volvo CE obtain your personal data?**

We obtain your personal data;

- a) interactively over the wireless network in connection with the use of Volvo vehicles (via the telematics gateway); or
- b) from you if you have manually entered personal data in connection with your use of the app or otherwise contact us.

## **3. Your rights**

In this section we describe your rights as a data subject. You can exercise them by contacting us using the contact information at the end of this document. Please note that not all rights listed below are absolute and there are exemptions which can be valid. Your rights are the following:

### **3.1 Right of access.**

You have the right upon request to get a copy of your personal data which we process and to get complementary information regarding our processing of your personal data.

### **3.2 Right of rectification.**

You have the right to have your personal data rectified and/or complemented if they are wrong and/or incomplete.

### **3.3 Right to erasure.**

You have the right to request that we erase your personal data without undue delay in the following circumstances: (i) the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) you withdraw your consent on which the processing is based (if applicable) and there is no other legal ground for the processing; (iii) you object to our processing of personal data, and we do not have any overriding legitimate grounds for the processing; (iv) the processed personal data is unlawfully processed; or (v) the processed personal data has to be erased for compliance with legal obligations.

### **3.4 Right to restriction.**

You have the right to restrict the processing of your personal data in the following circumstances: (i) you contest the accuracy of the personal data during a period enabling us to verify the accuracy of such data; (ii) the processing is unlawful, and you oppose erasure of the personal data and request restriction instead; (iii) the personal data is no longer needed for the purposes of the processing, but are necessary for you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the processing of the personal data, pending the verification whether our legitimate grounds for our processing override your interests, rights and freedoms.

### **3.5 Right to data portability.**

If your personal data has been provided by you and our processing of your personal data is based on your consent or on the performance of a contract with you, you have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format in order to transmit these to another service provider where it would be technically feasible and can be carried out by automated means.

**3.6 Right to object.**

You have the general right to object to our processing of your personal data when it is based on our legitimate interest. If you object and we believe that we may still process your personal data, we must demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

**3.7 Right to object to direct marketing.**

You have the right to at any time object to processing which is done for the purpose of direct marketing. If you object to such processing, we will no longer process your data for such purposes.

**3.8 Right to withdraw consent.**

When our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Please note that the lawfulness of any processing based on your consent before its withdrawal is not affected by the withdrawal.

**4. Complaints to the supervisory authority**

The data protection authority in Sweden is 'Integritetsskyddsmyndigheten'. If you believe that our processing is performed in breach of applicable data protection legislation, we encourage you in first-hand to contact us in order for us to oversee your complaints. You may at any time also file a complaint with the supervisory authority.

**5. Contact details**

If you have any questions about the processing of your personal data or want to exercise any of your rights, please contact us at:

Email: [gpo.office@volvo.com](mailto:gpo.office@volvo.com)

Post: AB Volvo, Att: Group Privacy Office, Dept AA14100, VGHQ, SE-405 08 Göteborg, Sweden

Phone: +46 (0)31 66 00 00