



Volvo Car  
Financial Services

# ONLINE PRIVACY POLICY

**Last Updated:** April 1, 2021

This Privacy Policy describes the privacy practices of Volvo Car Financial Services LLC (“VCFS”, “we”, or “our”) with respect to the processing of personal information collected through our website located at <https://www.volvocarfinancialservices.com>, online services, or mobile applications (collectively referred to as “digital platforms”). This Policy gives our current, former and potential customers (“consumers” or “you”) information about how we:

- collect and process personal information and why;
- share your personal information;
- protect your personal information;
- process children’s information;
- provide your privacy rights under applicable laws, such as the California Consumer Privacy Act (CCPA);
- use Cookies and address Do Not Track (DNT);
- make changes to our Privacy Policy; and
- can be contacted for more information or questions.

To learn about the processing of personal financial information under applicable federal and state laws and regulations, please read our [Privacy Notice](#).

This Privacy Policy and various other privacy policies related to specific digital platforms do not apply to authorized Volvo retailers or third parties that you directly provide your information including, but not limited to, subscription services, insurance companies, or other third parties who may offer special rates or products to VCFS customers. These entities are independent of VCFS and responsible for their own collection of information. Please turn directly to those entities and their particular privacy policies for more information. This Privacy Policy does not apply to content you post on social media channels.

## INFORMATION WE COLLECT

VCFS collects certain personal information when you use our website and digital platforms or when you generally interact with us. “Personal information” is information that identifies, relates to, describes, references, is capable of being associated with, or could be reasonably linked, directly or indirectly, with

a particular consumer, household or device. This includes the following categories of personal information in the column on the left below, with our disclosure and sale practices listed in the middle and right columns, respectively:

Categories of Personal Information	Disclosed to Third Parties?	Sold to Third Parties?
<b>Identifiers</b> , such as real name, alias, unique personal identifier, online identifier, E-mail address or other similar identifiers.	YES	NO
<b>Personal Information Categories and Categories Listed in the California Customer Records Statute</b> , such as real name, postal address, telephone number, E-mail address, bank account, credit card, debit card numbers or any other financial information. Some personal information included in this category may overlap with other categories.	YES	NO
<b>Characteristics of Protected Classifications under California or Federal Law</b> , such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, or veteran or military status.	YES	NO
<b>Commercial Information</b> , such as products or services purchased, obtained, or considered or other purchasing or consuming histories or tendencies with VCFS.	YES	NO
<b>Internet Information</b> , including, but not limited to, electronic network activity, and information on VCFS’ website or application interactions.	YES	NO
<b>Professional or Employment-related Information</b> , such as current or past job history.	YES	NO
<b>Non-public Educational Information</b> , such as education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES	NO

Some personal information we collect directly from you, such as when you make a payment on your account, apply for retail or lease financing, and provide us with your account and contact information. We may also obtain your information from third parties that interact with us in connection with the services we perform, such as Volvo Car USA LLC and other Volvo Car affiliates, our authorized Volvo retailers, credit bureaus, banking partners and other service providers.

## USE OF PERSONAL INFORMATION

We may use your personal information for one or more of the following purposes:

- to fulfill or meet the business reason you provided VCFS with your information;
- for our everyday business purposes, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus;
- for our marketing purposes and to send you by e-mail or SMS text message, information and marketing communications about our products and services. You can opt-out of receiving e-mails at any time by clicking the “Unsubscribe” link included in all marketing e-mails. You can opt-out of receiving SMS text marketing communications by replying “OPTOUT” or “STOP” to any SMS text message you receive from us or, as part of joint marketing efforts, our affiliates;
- for joint marketing efforts with our affiliates and other financial services companies;

- for our authorized Volvo retailer purposes, such as to administrate or check your eligibility for programs related to your Volvo vehicle lease or purchase or communicate with you about their products and services; and
- to monitor our digital platforms for security, functionality, and operational quality.

We will not use the personal information we collected for materially different or unrelated purposes without providing you with prior notice.

## **SHARING OF PERSONAL INFORMATION**

In the preceding 12 months, we have shared the personal information described above for the following purposes:

- Among VCFS affiliates related by common ownership or control, such as Volvo Car USA LLC (refer to their [Privacy Policy](#) for more information) to provide you the services you requested.
- With nonaffiliates not related by common ownership or control, such as authorized Volvo retailers, for the purposes of fulfilling or meeting the reason you provided us with the information.
- For joint marketing with other financial companies, such as insurance companies and other financial and nonfinancial service providers, as part of a formal agreement between nonaffiliated financial companies that together marketing financial products or services to you.
- As required by law, such as in connection with a government inquiry, dispute or other legal process or request.
- When we, in good faith, believe that disclosure is necessary to protect our rights, such as investigating potential violations of our terms and conditions or detecting, preventing, or disclosing fraud or other security issues.

We may disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Nonaffiliates, such as credit bureaus and insurance companies.
- Our joint marketing partners.
- Third parties to whom you authorize VCFS to disclosure personal information in connect with the products or services we provide you, such as authorized Volvo retailers.

## **SALE OF PERSONAL INFORMATION**

In the preceding 12 months, we have not sold your personal information.

## **SECURITY OF YOUR PERSONAL INFORMATION**

To protect your personal information from loss or theft and unauthorized access, use or disclosure, we have implemented technical, administrative, and physical security measures, including 256-bit encryption, access controls and secure development processes. Unfortunately, no method of transmission over the Internet or method of electronic storage is 100% secure or impenetrable.

## **CHILDREN'S PRIVACY**

Our products and services are not intended to be used by children. We do not knowingly solicit or collect any personal information about children under the age of sixteen (16) nor knowingly allow children to order our products, communicate with us or use our website or digital platforms. If a child has provided us with personal information, a parent or guardian of that child may contact us to have that information deleted from our records. If you believe that we might have any information from a child under the age of sixteen (16), please tell us by using the “Contact Information” below. We will take all reasonable steps to delete the child’s information as soon as possible except where necessary to protect the safety of the child or others as required by law.

VCFS does not have actual knowledge that it sells personal information of minors under the age of sixteen (16) years.

## **YOUR RIGHTS AND CHOICES**

This Privacy Policy pertains to nonpublic personal information under the federal Gramm-Leach Bliley Act (the “GLBA”). We may share your nonpublic personal information subject to the GLBA with VCFS affiliates and authorized Volvo retailers. Under federal law, you have the right to limit information sharing with VCFS affiliates and nonaffiliates only as it relates to information about your creditworthiness and to opt-out of our affiliates and nonaffiliates direct marketing. State laws (see below) and individual companies may give you additional rights to limit sharing. To make a request to limit the sharing of your information or to opt-out, please see the below “Contact Information”.

### *California Residents*

The State of California has enacted the California Financial Information Privacy Act which states that the policies intended to protect financial privacy imposed by the GLBA are inadequate to meet the privacy concerns of California residents. We may share your nonpublic personal information subject to the GLBA with companies that are related by common ownership or control (affiliates) and authorized Volvo retailers.

A separate California law, the California Consumer Privacy Act of 2018 (the “CCPA”), addresses information that is covered by the CCPA which excludes information subject to the GLBA. Under the CCPA, consumers residing in California are granted certain rights with respect to the personal information about them that we collect and sell. These rights include:

Right to Access: You have the right to request what personal information we have collected, used, shared for a business purpose, and sold about you within the preceding 12 months. Once we receive your request and confirm your identity, we will disclose to you the information we have collected about you.

Right to Deletion: You have the right to request the deletion of your personal information that we collect about you, subject to certain exceptions. Once we receive your request and confirm your identity, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies under applicable law.

Right to Opt-Out: You have the right to opt-out of the future sale of your personal information by us to third parties for monetary or other valuable consideration. We will disclose if we sell personal

information in this Privacy Policy. In the event that we do sell your personal information, you may [opt-out](#).

**Right to Non-Discrimination:** You have the right to not receive discriminatory treatment if and when you exercise your rights to access, delete, or opt-out. For example, this means we cannot deny goods or services to you or charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties, due to you having exercised your rights.

To exercise your right to access, delete, or opt-out of the future sale of your personal information, you may submit a request using our [webform](#), [e-mail](#) to [vcuscare@volvocars.com](mailto:vcuscare@volvocars.com), or by calling us at 1(800) 550-5658. You may only make a request for access twice within a 12-month period.

The [webform](#) contains the information that we need to verify your identity and review your request. For requests submitted via e-mail or telephone, you must provide us with sufficient information that allows us to reasonably verify you are the person about whom we collected the personal information and describe your request with sufficient detail to allow us to properly evaluate and respond to it. If we are not able to verify your identity for access and deletion requests with the information provided, we may ask you for additional pieces of information. Any additional pieces of information we may request will only be used to verify your identity and for no other purposes.

California residents may use an authorized agent to make a verifiable consumer rights request related to your personal information. If you are an authorized agent making a request on behalf of a consumer, you must provide us with signed permission by the consumer that you are authorized to act on behalf of that consumer. If you are a legal entity, you must also provide us with documentation of your registration with the California Secretary of State. To make such a request, please send us an [e-mail](#) to [vcuscare@volvocars.com](mailto:vcuscare@volvocars.com). Please include "Authorized Agent-Directed CCPA Request" in the subject line and attach your supporting documentation.

We aim to respond to your request for access, correction, or deletion within the time required by applicable law. If we need more time to respond to your request, we will let you know of the reason and the extension period in writing.

#### *Nevada Residents*

We do not sell personal information collected through our website for monetary consideration. Under Nevada law, you may opt-out of future sales of your personal information collected through our website for monetary consideration. If you want to opt-out of any potential future sales, please [e-mail](#) us at: [vcuscare@volvocars.com](mailto:vcuscare@volvocars.com) with "Opt-Out of Future Sale of Personal Information" in the subject line and body of your message.

#### *Texas Residents*

VCFS is licensed and examined under the laws of the State of Texas and by state law is subject to regulatory oversight by the Office of Consumer Credit Commissioner.

#### *Vermont Residents*

VCFS will not share any of the personal information that we collect about you without your express written consent.

### **COOKIES AND DO NOT TRACK (DNT)**

We collect electronic information when you visit our website, such as your Internet Protocol (IP) address, your browser type and language, and the URLs you visited. We use cookies and other tracking technologies designed to collect anonymous information on how you have used our website or to give you a personalized web experience. We do not track our consumers over time and across third party websites to provide targeted advertising. We do not respond to Do Not Track (DNT) signals.

### **CHANGES TO OUR ONLINE PRIVACY POLICY**

VCFS reserves the right to amend this Privacy Policy at our discretion and at any time. When we make changes to this Privacy Policy, we will post the updated policy on the website and update the policy's "Last Updated" date. Your continued use of our digital services following the posting of changes constitutes your acceptance of such changes.

### **CONTACT INFORMATION**

If you wish to limit our sharing, please call us at 1(855) 537-3341 – our menu will prompt you through your choice(s). Please note when you are no longer our customer, we continue to share your information as described in this Privacy Policy. However, you can contact us at any time to limit our sharing.

If you have any questions, please do not hesitate to call us at 1(855) 537-3334, e-mail [vcuscare@volvocars.com](mailto:vcuscare@volvocars.com) or visit our website found at [www.volvocarfinancialservices.com](http://www.volvocarfinancialservices.com).