



Volvo Car Financial Services ONLINE PRIVACY POLICY

Last Updated: June 25, 2020

SCOPE OF THIS POLICY

This Privacy Policy for Volvo Car Financial Services (“VCFS”, “we”, or “our”) provides our current, former and potential customers (“consumers” or “you”) with information on how we collect and process your personal information (defined below), the safeguards we use to protect your personal information and how you can exercise your privacy rights. We follow this Privacy Policy in accordance with applicable laws and regulations and, if required by law, we may give you additional privacy notices. By visiting our website or using our online services or mobile applications (collectively referred to as “digital platforms”), you understand and agree to the terms of this Privacy Policy.

This Privacy Policy does not apply to Volvo Cars authorized retailers, Volvo third parties that you directly provided your information, and content posted on social media channels. These entities are independent of VCFS and responsible for their own collection of information. Please turn directly to those entities for more information.

INFORMATION WE COLLECT

To provide you with our services, we need to process certain personal information. “Personal information” is defined as 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 or device. This includes the following categories of information:

Categories of Personal Information	Disclosed to Third Parties?	Sold to Third Parties?
Identifiers , such as real name, alias, unique personal identifier, online identifier, E-mail address or other similar identifiers.	YES	NO
Personal Information Categories and Categories Listed in the California Customer Records Statute , 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
Characteristics of Protected Classifications under California or Federal Law , 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

Commercial Information , such as products or services purchased, obtained, or considered or other purchasing or consuming histories or tendencies with VCFS.	YES	NO
Internet Information , including, but not limited to, electronic network activity, and information on VCFS' website or application interactions.	YES	NO
Professional or Employment-related Information , such as current or past job history.	YES	NO
Non-public Educational Information , 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

We collect other 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 and we do not respond to Do Not Track (DNT) signals.

HOW WE COLLECT YOUR INFORMATION

We may collect personal information directly from you when you make a payment on your account, apply for retail or lease financing, provide us with your account and contact information and when you use our digital platforms. We also obtain your information from Third-Parties that interact with us in connection with the services we perform, such as credit bureaus, our affiliates, or other companies.

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 offer products and services to you;
- For joint marketing efforts with our affiliates and other financial services companies;
- For our Volvo Cars authorized 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 prior notice.

SHARING OF PERSONAL INFORMATION

VCFS does not sell personal information to Third-Parties. In this context, "selling" personal information means the disclosure of personal information for monetary or other valuable consideration.

We may share your personal information for business 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 the services you requested. They can be financial and nonfinancial companies;
- With nonaffiliates not related by common ownership or control, such as Volvo Cars authorized retailers for the purpose of fulfilling or meeting the reason you provided us with the information. They can be financial and nonfinancial companies;
- For joint marketing with other financial companies as part of a formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our joint marketing partners include insurance companies, other financial and nonfinancial providers/servicers;
- As required by law, such as in connection with a government inquiry dispute, or other legal process or request, and;

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 disclose personal information in connection with the products or services we provide you, such as Volvo Cars authorized retailers.

INFORMATION SECURITY and RETENTION

To protect your personal information from loss, 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. Your information is accessible only by appropriate personnel who have a business need for the information. We provide training and communication programs to educate our personnel about the meaning and requirements of our cybersecurity policy.

We will retain your information for the length of time needed to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

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 Cars 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 non-public personal information subject to the GLBA with companies that are related by common ownership or control (affiliates) and Volvo Cars authorized 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: to access or delete the personal information that we have collected about them, to opt-out of the sale of their personal information by us to a third party, and not to be discriminated against for exercising these rights.

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 through our online form [here](#), via email at 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.

If you are a resident of California, an authorized agent may 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.

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. If you want to opt-out of any potential future sales, please E-mail us at: 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.

CHILDREN'S PRIVACY

Our digital platforms are not intended to be used by children. We do not knowingly solicit or collect any personal information about children under the age of 13 nor knowingly allow children to communicate with us or use any of our online services or mobile applications. 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 13, please tell us 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.

CHANGES TO OUR 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, call 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, call 1-855-537-3334 **Website:** www.volvocarfinancialservices.com