



Volvo Car
Financial Services

ONLINE PRIVACY POLICY

Last Updated: February 22, 2023

This Online Privacy Policy describes the privacy practices of Volvo Car Financial Services LLC (“VCFS”, “we”, “our”, or “us”) with respect to the processing of personal information collected through our websites located at <https://www.volvocarfinancialservices.com> and <https://www.polestarfinancialservices.com> and when you use our mobile applications and other online services (collectively referred to as “digital platforms”). This Policy sets forth how we:

- collect your personal information and why;
- use your personal information;
- share your personal information with our affiliates and authorized vehicle retailers;
- give you privacy rights under applicable laws;
- protect your personal information;
- process children’s information;
- 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 general processing of personal financial information under applicable laws and regulations, please read our [VCFS Privacy Notice](#).

This Online Privacy Policy does not apply to authorized vehicle retailers, authorized franchise retailers, or third parties to whom 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 are responsible for their own collection of information. Please refer directly to those entities and their respective privacy policies for more information. This Online Privacy Policy does not apply to content posted on social media channels.

HOW DOES VCFS COLLECT MY PERSONAL INFORMATION?

VCFS collects certain personal information when you use our digital platforms and when you generally interact with us. “Personal information” is information that identifies, relates to, or could reasonably be linked with an individual or household. Some personal information we collect directly from you, such as when you:

- Open an account.
- Apply for a lease.
- Apply for financing.
- Use your debit card.
- Provide account information.

- Give us your contact information.
- Access and use our websites, mobile applications, and other digital platforms.

We may also obtain your information from third parties that interact with us in connection to the services we perform, such as:

- Volvo Car USA LLC and other Volvo Cars affiliates.
- Authorized vehicle retailers.
- Credit bureaus, banking partners, and other service providers.

We also collect the following categories and types of personal information:

- *Identifiers*, such as your name, postal address, telephone number, e-mail address, or other similar identifiers.
- *Identifiers considered Sensitive Personal Information*, such as bank account, credit card, debit card numbers or any other personal financial information.
- *Characteristics of protected classifications under state and federal laws*, such as age (40 years and older), race, color, ancestry, national origin, citizenship, marital status, or veteran or military status.
- *Commercial information*, such as products or services purchased, obtained, or considered and other purchasing or consuming histories or tendencies with VCFS.
- *Internet information*, including, but not limited to, electronic network activity and information on our websites or mobile application interactions.
- *Professional or employment-related information*, such as current or past job history.
- *Non-public educational information*, such as educational 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.

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 us 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 sent you by e-mail or SMS text messages, information and marketing communications about our products and services;
- for joint marketing efforts with our affiliates and other financial services companies;
- for our authorized vehicle retailer purposes, such as to administrate or check your eligibility for programs related to your vehicle lease or purchase or to 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 first providing you with prior notice and obtaining your consent to use your information for those purposes.

You can opt-out of receiving e-mails at any time by clicking the “Unsubscribe” 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.

SHARING OF PERSONAL INFORMATION

Below are the ways in which we share your personal information and the purposes for which we share your information that are common across all our digital platforms.

In each case, we may share your personal information with the following parties, for the following purposes:

General Sharing:

- **As a result of a change in our corporate structure:** If we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, acquisition, sale, joint venture, assignment, consolidation, transfer, change of control, or other disposition of all or any part of our business, assets, or stock, we would share any personal information collected about you with third parties, including the buyer or target (and their agents and advisors) for the purpose of facilitating and completing the transaction. We will share personal information with third parties if we undergo bankruptcy or liquidation, in the course of such proceedings;
- **To prevent harm:** We will share personal information if we believe it is necessary to detect, investigate, prevent, or act against illegal activities, fraud, or situation(s) involving potential threats to the rights, property, or personal safety of any person(s);
- **For legal purposes:** We will share personal information where we are legally required to do so, such as in response to court orders, law enforcement, or legal process, including for national security purposes; to establish, protect, or exercise our legal rights, as required to investigate potential violations or enforcement of our terms and conditions or other contracts; to defend against legal claims or demands; or to comply with the requirements of applicable law; to detect, prevent, or disclose fraud or other security issues; and
- **With your consent:** Apart from the reasons identified above, we may ask your permission to share your personal information for a specific purpose. We will contact you and ask for your consent before you give us your personal information or before the personal information you already provided is shared for such purpose.

Online Sharing:

- **Among VCFS affiliates:** We will share personal information with VCFS affiliates related by common ownership or control, such as Volvo Car USA LLC, to provide you with the services you requested. Please refer to Volvo Car USA’s [General Privacy Statement](#) for more information.
- **Among non-affiliates:** We will share personal information with non-affiliates not related by common ownership or control, such as authorized vehicle retailers, for the purposes of fulfilling or meeting the reason you provided us with your information.
- **For joint marketing:** We will share personal information with other financial companies, such as insurance companies and other financial and non-financial service providers, as part of a formal agreement between non-affiliated financial companies that together conduct marketing of financial products or services to you.

Sharing excludes text messaging originator opt-in data and consent; this information will not be shared with any third parties.

If you wish to limit our sharing, please read our [VCFS Privacy Notice](#) or 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 Online Privacy Policy.

YOUR PERSONAL INFORMATION PRIVACY RIGHTS

As a current or prospective customer, we offer you the choice to exercise certain privacy rights regarding our processing of your personal information.

- **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. Once we receive your request and confirm your identity, we will disclose to you the information we have collected about you.
- **Right to Correct Inaccurate Information:** You have the right to correct inaccurate personal information. Once we receive your request and confirm your identity, we will correct (and direct our service providers to correct) your personal information in our records.
- **Right to Delete:** You have the right to request the deletion of some or all the personal information that we collected 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 Limit the Use or Disclosure of Personal Information and/or Opt-out of Profiling:** You have the right to opt-out of the sale of your personal information for monetary or other valuable consideration. You may also ask us not to use or disclose your information for the purposes of targeting advertising to you based on your personal data obtained from your activity across different businesses, services, websites, etc.
- **Right to Opt-Out of Sale or Sharing of Personal Information:** You have the right to opt-out of the sale of your personal information by us to third parties for monetary or other valuable consideration. You also have the right to opt-out of the “sharing” of your information relating to online targeted advertising (or cross-context behavioral advertising). Each of the individual Service Privacy Policies sets out whether or not we sell personal information as such action is defined under relevant privacy law in connection with such service. In the event that we do sell your personal information, you may [opt-out](#).

To exercise your privacy rights, you may submit a request using our [Personal Information Privacy Rights Request Form](#) or by clicking “Do Not Sell or Share My Personal Information” at the bottom of this webpage. You may also submit a request by e-mail at vcuscare@volvocars.com or by calling us at 1(800) 550-5658. You may only submit two privacy rights requests within a 12-month period.

If you live in a state that gives you enhanced privacy rights – such as the [California Privacy Rights Act \(CPRA\)](#) - we will respond to all requests as required by law. If you live in a state that does not give you enhanced privacy rights, we will respond to all requests at our earliest opportunity. If we need more time to respond to your request, we will let you know of the reason and the extension period in writing.

Our Personal Information Privacy Rights Request Form contains the information 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. If we deny your privacy rights request due to a lack of identifiable information or other legal reason, you may appeal our decision by contacting us by e-mail at vcuscare@volvocars.com.

INFORMATION SECURITY

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.

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 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 sixteen (16), please tell us using the Contact Information listed 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.

Volvo Car Financial Services LLC does not have actual knowledge that it sells personal information of minors under the age of sixteen (16) years.

COOKIES AND DO NOT TRACK (DNT)

We collect electronic information when you visit our websites, 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 websites 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. Our website does not respond to Do Not Track (DNT) signals.

CHANGES TO OUR ONLINE PRIVACY POLICY

VCFS reserves the right to amend this Online Privacy Policy at our discretion and at any time. When we make changes, we will post the updated policy on our 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 have any questions or comments about this Online Privacy Policy, please don't hesitate to contact us at 1(855) 537-3334, e-mail us at vcuscare@volvocars.com, or visit our websites found at www.volvocarfinancialservices.com and www.polestarfinancialservices.com.