

# CALIFORNIA CONSUMER PRIVACY STATEMENT

**Effective: August 30, 2024**

This California Consumer Privacy Statement (“Statement”) supplements the VFS US LLC Privacy Policy and applies solely to California consumers, including personnel of our business customers, dealers, business partners (e.g., vendors) and job applicants. This Statement does not apply to Volvo Financial Services (“VFS”) personnel.

This Statement uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018 (the “CCPA”), as amended by the California Privacy Rights Act of 2020 (the “CPRA”), and its implementing regulations (the “CCPA/CPRA”).

## **1. Notice of Collection and Use of Personal Information**

We may collect (and may have collected during the 12-month period prior to the effective date of this Statement) the following categories of personal information about you:

- **Identifiers:** identifiers such as a real name, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, telephone number and other forms of persistent or probabilistic identifiers), online identifier, internet protocol address, email address, account name, Social Security number, driver’s license number, and other similar identifiers
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, state identification card number, insurance policy number, education, bank account number, credit card number, and other financial information
- **Protected Classifications:** characteristics of protected classifications under California or federal law, such as age, sex, gender, marital status, citizenship status, and military and veteran status
- **Commercial Information:** commercial information, including records of personal property
- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements
- **Sensory Information:** audio, electronic, visual, and similar information
- **Employment Information:** professional or employment-related information
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We may use (and may have used during the 12-month period prior to the effective date of this Statement) your personal information for the purposes described in our VFS Privacy Policy and for the following business purposes specified in the CCPA/CPRA:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytics services, providing storage, or providing similar services
- Providing advertising and marketing services to you, except for cross-context behavioral advertising (which is addressed in Section 4 of this Statement)

- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance
- Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with us
- Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes. Debugging to identify and repair errors that impair existing intended functionality
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us

We do not collect or process sensitive personal information with the purpose of inferring characteristics about California consumers covered by this Statement.

## **2. Retention of Personal Information**

We will retain your personal information for the period reasonably necessary to achieve the purposes described in our Privacy Policy and this Statement, or any other notice provided at the time of collection, taking into account applicable statutes of limitation and records retention requirements under applicable law.

## **3. Sources of Personal Information**

During the 12-month period prior to the effective date of this Statement, we may have obtained personal information about you from the following categories of sources:

- Directly from you, for example, when you act as a guarantor on a business loan or lease agreement and provide us with your contact information
- Your devices, such as when you visit our website
- Other individuals, for example, when one of our business customers lists you as a credit reference, guarantor or includes you on a joint personal financial statement
- Banks and other creditors and lenders
- Our affiliates and subsidiaries
- Vendors who provide services on our behalf
- Your employer if you are a representative of a business customer, dealer or business partner
- Career placement services
- Government entities
- Data brokers or background check services

#### **4. Sale or Sharing of Personal Information**

We do not sell your personal information in exchange for monetary compensation. We may disclose your personal information by allowing certain third parties (such as social networks and online advertising services) to collect your personal information via automated technologies on our Site for social networking and cross-context behavioral advertising purposes. Under California law, these kinds of disclosures may be considered a “sale” when the personal information is exchanged for non-monetary consideration, or “sharing” when the personal information is disclosed for cross-context behavioral advertising purposes. You have the right to opt out of these types of disclosures of your information.

During the 12-month period prior to the effective date of this Statement, we may have sold or shared the following categories of personal information to the following categories of third parties:

<b>Category of Personal Information</b>	<b>Category of Third Party</b>
Identifiers	<ul style="list-style-type: none"><li>• Online advertising services and advertising networks</li><li>• Social networks</li><li>• Data brokers or background check services</li></ul>
Online Activity	<ul style="list-style-type: none"><li>• Online advertising services and advertising networks</li><li>• Social networks</li><li>• Data brokers</li></ul>
Inferences	<ul style="list-style-type: none"><li>• Online advertising services and advertising networks</li><li>• Social networks</li><li>• Data brokers or background check services</li></ul>

We do not have actual knowledge that we sell, or share for cross-context behavioral advertising purposes, the personal information of minors under 16 years of age.

#### **5. Disclosure of Personal Information**

During the 12-month period prior to the effective date of this Statement, we may have disclosed the following categories of personal information about you for a business purpose to the following categories of third parties:

<b>Category of Personal Information</b>	<b>Category of Third Party</b>
Identifiers	<ul style="list-style-type: none"><li>• Our affiliates and subsidiaries</li><li>• Vendors who provide services on our behalf</li><li>• Syndication banks</li><li>• Professional services organizations, such as auditors and law firms</li><li>• Online advertising services and advertising networks</li><li>• Internet service providers</li><li>• Data analytics providers</li><li>• Operating systems and platforms</li><li>• Social networks</li><li>• Data brokers, background check services</li></ul>
Additional Data Subject to Cal. Civ. Code § 1798.80 Law	<ul style="list-style-type: none"><li>• Our affiliates and subsidiaries</li><li>• Vendors who provide services on our behalf</li><li>• Syndication banks</li><li>• Professional services organizations, such as auditors and law firms</li></ul>

Protected Classifications	<ul style="list-style-type: none"> <li>• Our affiliates and subsidiaries</li> <li>• Vendors who provide services on our behalf</li> <li>• Syndication banks</li> <li>• Professional services organizations, such as auditors and law firms</li> <li>• Online advertising services and advertising networks</li> <li>• Internet service providers</li> <li>• Data analytics providers</li> </ul>
Commercial Information	<ul style="list-style-type: none"> <li>• Our affiliates and subsidiaries</li> <li>• Vendors who provide services on our behalf</li> <li>• Syndication banks</li> <li>• Professional services organizations, such as auditors and law firms</li> </ul>
Online Activity	<ul style="list-style-type: none"> <li>• Our affiliates and subsidiaries</li> <li>• Vendors who provide services on our behalf</li> <li>• Professional services organizations, such as auditors and law firms</li> <li>• Online advertising services and advertising networks</li> <li>• Internet service providers</li> <li>• Data analytics providers</li> <li>• Operating systems and platforms</li> <li>• Social networks</li> <li>• Data brokers</li> </ul>
Sensory Information	<ul style="list-style-type: none"> <li>• Our affiliates and subsidiaries</li> <li>• Vendors who provide services on our behalf</li> <li>• Syndication banks</li> <li>• Professional services organizations, such as auditors and law firms</li> <li>• Online advertising services and advertising networks</li> <li>• Internet service providers</li> <li>• Data analytics providers</li> <li>• Operating systems and platforms</li> <li>• Social networks</li> </ul>
Employment Information	<ul style="list-style-type: none"> <li>• Our affiliates and subsidiaries</li> <li>• Vendors who provide services on our behalf</li> <li>• Syndication banks</li> <li>• Professional services organizations, such as auditors and law firms</li> <li>• Internet service providers</li> </ul>
Inferences	<ul style="list-style-type: none"> <li>• Our affiliates and subsidiaries</li> <li>• Vendors who provide services on our behalf</li> <li>• Syndication banks</li> <li>• Professional services organizations, such as auditors and law firms</li> <li>• Online advertising services and advertising networks</li> <li>• Internet service providers</li> <li>• Data analytics providers</li> <li>• Operating systems and platforms</li> <li>• Social networks</li> <li>• Data brokers</li> </ul>

In addition to the categories of third parties identified above, during the 12-month period prior to the effective date of this Statement, we may have disclosed personal information about you to government entities, such as in response to a request from law enforcement authorities.

## **6. California Consumer Privacy Rights**

You have certain choices regarding your personal information, as described below (with some exceptions).

**Access:** You have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed and sold or shared about you during the past 12 months.

**Correction:** You have the right to request that we correct the personal information we maintain about you, if that information is inaccurate.

**Deletion:** You have the right to request that we delete certain personal information we have collected from you.

**Limit:** You can direct businesses to only use your sensitive personal information (for example, your social security number, financial account information, your precise geolocation data, or your genetic data) for limited purposes, such as providing you with the services you requested.

**Opt-Out of Sale or Sharing:** You have the right to opt-out of the sale of your personal information or the sharing of your personal information for cross-context behavioral advertising purposes.

**How to Submit a Request.** To submit an access, correction or deletion request please contact us at [vfs.dataprivacy.us@volvo.com](mailto:vfs.dataprivacy.us@volvo.com) or call us at 877.865.8623, extension 3905. To opt-out of the sale of your personal information, or the sharing of your personal information for cross-context behavioral advertising purposes, click [HERE](#) to visit Volvo Financial Services website and click the blue shield icon (Cookie settings) at the bottom left corner of each page (you may also visit the 'Cookie preference center' within the [Cookie Notice](#)) or email us at [vfs.dataprivacy.us@volvo.com](mailto:vfs.dataprivacy.us@volvo.com). To submit a request as an authorized agent on behalf of a consumer, please email us at [vfs.dataprivacy.us@volvo.com](mailto:vfs.dataprivacy.us@volvo.com). For questions or concerns about our privacy policies and practices, please contact us as described in the How to Contact Us section of our Privacy Policy.

**Verifying Requests.** To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you do not have an email address or other direct contact information on file with us (e.g., if you passively visit our website), then there is no reasonable method by which we can verify your identity to the level of certainty required by the CCPA/CPRA. The reason for this is that VFS historically has not linked IP addresses, device identifiers or other information collected through automated means to named actual persons. Accordingly, if you do not have an email address or other direct contact information on file with us, and you request access to or deletion of your personal information, we will not be able to process your request at this time.

If you have an email address or other direct contact information on file with us, and request access to or deletion of your personal information, we may require you to provide any of the following information: last four digits of SSN, billing address, business phone number, guarantors/co-makers listed on the account, and/or name of customer's dealer. In addition, if you ask us to provide you with specific pieces of personal information, we may require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.

**Additional Information.** If you choose to exercise any of your rights under the CCPA/CPRA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.