









CARE BY VOLVO

Privacy Notice

| Topic | Page number |
|--|--|
| GENERAL |  2 |
| USEFUL WORDS AND PHRASES |  5 |
| WHAT INFORMATION DO ALLIANZ AND VOLVO COLLECT? |  7 |
| WHY DO ALLIANZ AND VOLVO PROCESS YOUR PERSONAL DATA? |  10 |
| HOW IS PROCESSING YOUR DATA LAWFUL? |  12 |
| WHEN WILL ALLIANZ AND VOLVO DELETE YOUR DATA? |  14 |
| WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA? |  15 |
| YOUR RIGHTS |  17 |



GENERAL

This privacy notice sets out how Volvo and its partners and providers collect use and protect your personal information in order to provide the Care by Volvo Services as part of your overall Care by Volvo package. As this involves several different companies, the table below summarises who is who, the service they offer and what their role is in processing your data:

| Company | Element of Care by Volvo Services | Data Processing role |
|---|---|----------------------|
| Volvo Car UK Limited (" Volvo ") | Care by Volvo Services – all of the services below | Controller |
| AWP Assistance UK Ltd (" Allianz ") | Care by Volvo Concierge Service - Access to a Care by Volvo specialist to help you with your car journey, such as obtaining directions, restaurant or hotel reservations, booking your Volvo XC40 annual service or Volvo Car Exchange | Controller |
| Trinsic Limited (" Trinsic ") | Inclusive Data SIM: A data SIM card for use in the Volvo XC40 with 30GB of data per month provided by Vodafone | Processor |
| Endeavour Automotive Group trading as Volvo Cars London (" Retailer ") | Care by Volvo Car Exchange – provision of another Volvo vehicle instead of your Volvo XC40 for up to 14 days per year] | Processor |

This privacy notice is provided by Allianz and Volvo, who are separate 'data controllers' for the purposes of the Data Protection Act 1998 and, after 25th May 2018, the General Data Protection Regulation (EU) 2016/679 ("**Data Protection Laws**").

Please note that you should receive separate privacy notices from Volvo Car Financial Services and VEREX which cover the hire of your Volvo XC40 and the insurance services.

Allianz and Volvo take your privacy very seriously. We ask that you read this privacy notice carefully as it contains important information on:

- your Rights
- the personal information Allianz and Volvo collect about you
- what Allianz and Volvo do with your information, and
- who your information might be shared with.

If you need extra help

If you have any queries about how Volvo or Allianz uses your personal data, or if you would like help to understand this notice you can contact us by email, post or telephone as follows:

➤ Allianz's contact details:

- AWP Assistance UK Ltd , Data Protection Officer:
- Address: 102 George Street, Croydon, Surrey CR9 6HD
- Telephone number: 0208 681 2525
- Email: AzPUKDP@Allianz.com

➤ Volvo's contact details:

- Name: Volvo Car UK Limited
- Address: Scandinavia House, Norreys Drive, Maidenhead, Berkshire, SL6 4FL
- Telephone number: 01628 422522
- Email: globaldpo@volvocars.com

Changes to this Privacy Notice

Allianz or Volvo may change this privacy notice from time to time. You should check this Privacy Notice occasionally to ensure you are aware of the most recent version that will apply each time you access this website.

USEFUL WORDS AND PHRASES



Please familiarise yourself with the following words and phrases as they have particular meanings in the Data Protection Laws and are used throughout this privacy notice:

| | |
|--|---|
| Personal Data | <p>This means any information from which a <u>living individual</u> can be identified.</p> <p>This will include information such as telephone numbers, names, addresses, e-mail addresses, photographs, voice recordings. It will also include expressions of opinion and indications of intentions about data subjects (and their own expressions of opinion/intentions).</p> <p>It will also cover information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future.</p> |
| Sensitive Personal Data or Special Categories of Data | <p>This means any information relating to:</p> <ul style="list-style-type: none">• Racial or ethnic origin;• Political opinions;• Religious beliefs or beliefs of a similar nature;• Trade union membership;• Physical or mental health or condition;• Sexual life;• Genetic data or biometric data for the purpose of uniquely identifying you; or <p>Offences or alleged offences or information relating to any offences committed or allegedly committed.</p> |
| Processing | <p>This covers virtually anything anyone can do with personal data, including:</p> <ul style="list-style-type: none">• obtaining, recording, retrieving, consulting or holding it;• organising, adapting or altering it;• disclosing, disseminating or otherwise making it available; and <p>aligning, blocking, erasing or destroying it.</p> |

| | |
|---------------------------------|---|
| Data Subject | The person whom the data is about. |
| Information Commissioner | The UK Information Commissioner is responsible for implementing, overseeing and enforcing the Data Protection Laws. |
| Data Controller | This means any person who determines the purposes for which, and the manner in which, any personal data are processed. Allianz and Volvo are both independent Data Controllers in their own right |
| Data Processor | This means any person who processes the data on behalf of the data controller. Volvo London Cars and Trinsic are Data Processors. |
| Data Protection Laws | This means the laws which govern the handling of data. This includes the Data Protection Act 1998 and from 25 th May 2018, the General Data Protection Regulation (EU) 2016/679. |

WHAT INFORMATION DO ALLIANZ AND VOLVO COLLECT?



➤ **Personal information provided by you**

When you apply for Care by Volvo ("**Application**"), the personal data Volvo collects (through the Retailer) from you are your name, e-mail address, address and phone number.

Volvo will share this information with Allianz and the Retailer for them to provide all of the services in the Care by Volvo package.

As you use the Care by Volvo Concierge Service provided by Allianz, you will provide more information about the bookings, travel enquiries etc that you want Allianz to help you with. This may include your date of birth, information about disabilities or allergies or anything else necessary to make the bookings that you require. . Allianz may also collect and process data relating to driving related convictions which may affect our ability to provide a hire car to you. Allianz will handle that data, but will not share this with Volvo.

If you want to use the car exchange service, you will need to provide a copy of your driving licence to the Retailer.

Allianz and Volvo also collect other personal information when you contact Allianz or Volvo, send feedback, post material to Allianz's or Volvo's website, or complete surveys.

➤ **Sensitive personal data provided by you**

Allianz may ask you to provide sensitive personal information. For example, Allianz may ask information about your physical health when making a reservation for a hotel room on your behalf. If such information is requested, Allianz will explain the reason for the request and how it will be used.

➤ **Personal information about other individuals**

If you give Allianz and Volvo information on behalf of someone else, for example to allow a named driver to use an exchange car, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can send us this information.

➤ **Personal information provided by third parties**

Volvo and Allianz will receive information about you from:

- Volvo Car Financial Services in relation to your hire agreement for your Volvo XC40;

- VEREX in relation to your insurance agreement; and
- DVLA,

which Allianz and Volvo will add to the information already held about you in order to help Allianz and Volvo provide our services.

| Type of Data | Reason for Processing |
|--|---|
| Confirmation from each of Volvo Car Financial Services, Volvo and VEREX that each of them has signed their agreement with you, so that the Care by Volvo Services can commence. | The Care by Volvo Services are offered only as a package. All agreements must be accepted by each of Volvo Car Financial Services, Volvo and VEREX for the services to start. |
| If any of the agreements with Volvo Car Financial Services, Volvo or VEREX are terminated by those companies or by you, that company will tell each of the other companies (and Volvo will tell Allianz, Trinsic and the Retailer) so that all Care by Volvo Services are withdrawn. | The Care by Volvo Services are offered only as a package. If one agreement ends, all agreements will end. |
| A driving licence check using the DVLA's online licence check system | To check any driving offences on your driving licence at the point of using the Care by Volvo Car Exchange service. |
| Complaints made related to any element of the Care by Volvo Services | To assist in resolving complaints made by users and generally improve the Care by Volvo Services |
| Over-usage or mis-use of the Care by Volvo Services. | To ensure users comply with the terms of use of the Care by Volvo Services |

WHY DO ALLIANZ AND VOLVO PROCESS YOUR PERSONAL DATA?



Allianz and Volvo use your personal data for the following purposes listed in this section. Allianz and Volvo are allowed to do so on certain legal bases (please see section 'How is processing your data lawful' for further detail).

1. Care by Volvo Services

Volvo collects your information to:

- Process and assist with your registration for Care by Volvo Services;
- Register you as a Care by Volvo customer with Allianz and the Retailer so you can receive the Care by Volvo Concierge Service, Inclusive Data SIM and Care by Volvo Car Exchange;
- Liaise with Volvo Car Financial Services and VEREX about the Care by Volvo scheme;
- Respond to your enquiries;
- Improve our products and services and tailor our offers so that they may be of interest to you; and
- Maintain and administer your Care by Volvo subscription (including informing you of your usage of the included services).

2. Care by Volvo Concierge Services

Allianz collects your information to:

- respond to your requests for assistance, searches, reservations and other enquiries as you require;
- pass your details the to third parties when you authorise us to make reservations on your behalf;
- respond to your enquiries;
- improve the range and nature of products and services offered to you;
- Detect and prevent fraud
- Meet any legal obligations, like tax, accounting and administrative obligations.

3. Monitoring and recording communications

Allianz and Volvo may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

4. Marketing

Volvo may, occasionally, send you information by electronic means (this includes email, telephone, text message (SMS) or automated calls about other products and services, competitions and special offers which may be of interest to you.

If you have consented to receive marketing from Volvo you can opt out at any time. See ['Your Rights'](#) for further information.

HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL?



Allianz and Volvo are allowed to process your personal data for the following reasons and on the following legal basis:

➤ **Consent**

You have given consent for the following purposes:

| Purpose for which consent was obtained from you: | How you have given your consent: |
|---|---|
| To allow Volvo to communicate with you about their products and services and provide you with marketing information send direct marketing | Read and signed the consent box for this purpose. |

➤ **Contract**

It is necessary for the performance of the contract you have agreed to enter with Volvo for the Care by Volvo Services. If you do not provide your personal data to Allianz and Volvo, they will not be able to provide you with their services.

➤ **Legal obligation**

Allianz and Volvo are subject to legal obligations to process your data for the purposes of complying with applicable accounting rules, checking your driving licence when you take a hire vehicle and to make mandatory disclosures to law enforcement.

➤ **Public Interest**

Allianz and Volvo may use it for public interest reasons, for instance for fraud or crime prevention purposes

Sensitive Personal Data

We will only process your **sensitive personal data** for the following reasons.

➤ **Explicit Consent**

You have given your explicit consent to Allianz.

➤ **Manifestly public personal data**

The data has been manifestly made public.

➤ **Legal claims**

Allianz and Volvo are establishing or defending a legal claim.

➤ **Criminal Convictions**

We may be required to process data for the purposes of compliance with regulatory obligations and criminal reporting requirements that we are subject to. This includes compliance with police procedures in connection with various investigations.

How Volvo and Allianz keep your data secure

Volvo and Allianz strive to implement appropriate technical and organisational measures in order to protect your personal data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of processing. We aim to ensure that the level of security and the measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data.

While Volvo and Allianz will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason Allianz and Volvo cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact Allianz or Volvo (see 'How you can contact us?' above).

WHEN WILL ALLIANZ AND VOLVO DELETE YOUR DATA?



Volvo will process your Personal Data for as long as you are registered with the Care by Volvo Services and then for a further period of 2 years after the termination of the Care by Volvo Services. There is one exception which is that your driving licence will only be processed for a period of 90 days after you provide it to the Retailer.

Allianz will retain your personal data for a maximum of seven years from the date the concierge relationship ends. If we are able to do so we will delete or anonymise certain areas of your personal data as soon as that information is no longer required for the purposes for which it was obtained.

WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?



Allianz may disclose your personal data to:

| Personal Data | Who information is shared with |
|---|---|
| <p>Name, address, email address, telephone number, age, passport details, dietary requirements, disability information.</p> <p>Note that personal data may also relate to others who want to make a booking with you. e.g. for a flight</p> | <p>Volvo and the third party providing a service that you have authorised us to enquire about or book. This will include the Retailer for servicing for your car, the restaurant, taxi companies etc.</p> |
| <p>All of the personal data set out above.</p> | <p>IT related service providers to Allianz who host and maintain systems on which Allianz runs its business, technical consultants, experts, lawyers, loss adjustors and service companies to discharge operations (claims, postal, document management).</p> |
| <p>All of the personal data set out above,</p> | <p>Other Allianz Group companies, industry governing bodies, regulators, fraud prevention agencies and claims databases, for underwriting and fraud prevention purposes.</p> |

Volvo may disclose your personal data to:

| Personal Data | Who information is shared with |
|--|--|
| Information provided by you at Application | Allianz and the Retailer in order that they can register you as a customer for the Care by Volvo Services. |
| Information provided by you at Application | Volvo Car Corporation (Volvo's parent company, registered in Sweden) and IT related service providers to Volvo who host and maintain systems on which Volvo runs its business. |

➤ **Transfers of your information out of the EEA**

Volvo will not transfer your Personal Data outside the European Economic Area (EEA).

Allianz will process your personal data both inside and outside of the EEA subject always to contractual restrictions regarding confidentiality and security in line with applicable data protection laws and regulations. We will not disclose your personal data to parties who are not authorised to process it. Whenever we transfer your personal data for processing outside of the EEA by another Allianz Group company, we will do so on the basis of Allianz's approved binding corporate rules known as the Allianz Privacy Standard (Allianz's BCRs) which set out our commitment to maintain the same high level of protection for personal information regardless of where it is processed. The BCR's and are legally binding on all Allianz Group companies.

YOUR RIGHTS



As a data subject, you have the following rights under the Data Protection Laws:

- the right of access to personal data relating to you
- the right to correct any mistakes in your information
- the right to ask Allianz and Volvo to stop contacting you with direct marketing
- rights in relation to automated decision taking
- the right to restrict or prevent your personal data being processed
- the right to have your personal data ported to another data controller (e.g. if you decide to contract with a different supplier).
- the right to erasure

These rights are explained in more detail below, but if you have any comments, concerns or complaints about the use of your personal data by Allianz and Volvo, please contact Allianz and Volvo (please refer to section "How you can contact Allianz and Volvo"). Allianz and Volvo will respond to any rights that

you exercise within a month of receiving your request, unless the request is particularly complex, in which case Allianz and Volvo will respond within three months.

➤ **Right to access personal data relating to you**

You may ask to see what [personal data](#) Allianz and Volvo hold about you and be provided with:

- a copy;
- details of the purpose for which it is being or is to be [processed](#);
- details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;
- the period for which it is held (or the criteria we use to determine how long it is held);
- any information available about the source of that data; and
- whether Allianz and Volvo carry out an automated decision-making, or profiling, and where Allianz and Volvo do information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

Requests for your [personal data](#) must be made to Allianz and Volvo in writing and a copy will be retained on your personnel file.

To help Allianz and Volvo find the information easily, please provide Allianz and Volvo as much information as possible about the type of information you would like to see.

If, to comply with your request, Allianz and Volvo would have to disclose information relating to or identifying another person, Allianz and Volvo may need to obtain the consent of that person if

possible. If Allianz and Volvo cannot obtain consent, they may need to withhold that information or edit the data to remove the identity of that person if possible.

There are certain types of data which we are not obliged to disclose to you, which include [personal data](#) which records our intentions in relation to any negotiations with you where disclosure would be likely to prejudice those negotiations.

➤ **Right to correct any mistakes in your information**

You can require Allianz and Volvo to correct any mistakes in your information which Allianz and Volvo hold free of charge. If you would like to do this, please:

- email, call or write to Allianz and Volvo (see "How you can contact Allianz and Volvo")
- let Allianz and Volvo have enough information to identify you (eg account number, user name, registration details), and
- let Allianz and Volvo know the information that is incorrect and what it should be replaced with.

➤ **Right to ask Allianz and Volvo to stop contacting you with direct marketing**

You can ask Allianz and Volvo to stop contacting you for direct marketing purposes. If you would like to do this, please:

- email, call or write to Allianz and Volvo (see "How you can contact Allianz and Volvo"). You can also click on the 'unsubscribe' button at the bottom of the email newsletter. It may take up to a few business days for this to take place;
- provide proof of your identity and address; and
- provide Allianz and Volvo with details of your preferred method of contact (for example, you may be happy for us to contact you by email but not by telephone).

➤ **Rights in relation to automated decision taking/making**

You may ask Allianz and Volvo to ensure that, if Allianz and Volvo are evaluating you (for example when doing a credit check on you), Allianz and Volvo don't base any decisions solely on an automated process and to have any decision reviewed by a member of staff.

These rights will not apply in all circumstances, for example where the decision is authorised or required by law and steps have been taken to safeguard your interests.

➤ **Right to prevent processing of personal data**

You may request that Allianz and Volvo stop processing your personal data temporarily if:

- you do not think that your data is accurate. Allianz and Volvo will start processing again once Allianz and Volvo have checked whether or not it is accurate;
- the processing is unlawful but you do not want Allianz and Volvo to erase your data;
- Allianz and Volvo no longer need the personal data for our processing, but you need the data to establish, exercise or defend legal claims; or
- you have objected to processing because you believe that your interests should override the legitimate interests of Allianz and Volvo.

➤ **Copies of your personal data (Data portability)**

You may ask for an electronic copy of your personal data which Allianz and Volvo hold electronically and which Allianz and Volvo process when Allianz and Volvo have entered into a contract with you. You can also ask Allianz and Volvo to provide this directly to another party.

➤ **Right to erasure**

You can ask Allianz and Volvo to erase your personal data where:

- you do not believe that Allianz and Volvo need your data in order to process it for the purposes set out in this privacy notice;
- if you had previously given us consent to process your data, you withdraw that consent and Allianz and Volvo cannot otherwise legally process your data;
- you object to our processing and Allianz and Volvo do not have any legitimate interests that mean Allianz and Volvo can continue to process your data; or
- your data has been processed unlawfully or have not been erased when it should have been.

➤ **Complaints to the regulator**

It is important that you ensure you have read this privacy notice - and if you do not think that Allianz and Volvo have processed your data in accordance with this notice - you should let Allianz and Volvo know as soon as possible. Similarly, you may complain to the Information Commissioner's Office. Information about how to do this is available on the website at www.ico.org.uk.