

# VFS US LLC

## PRIVACY POLICY

**Effective:** November 2, 2021

We at VFS US LLC (doing business as Volvo Financial Services, Mack Financial Services and North American Transaction Services) (“VFS”) respect your concerns about privacy. This Privacy Policy describes the types of personal information we obtain about you (including when you visit our website or our Customer or Dealer Portals (“collectively, “Websites”)), how we use the information, with whom we may share it and the choices available to you regarding our use of the information. We also describe the measures we take to safeguard the personal information and how you can contact us about our privacy practices. If you are a California resident, please also see our California Consumer Privacy Statement.

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### INFORMATION WE OBTAIN

We may obtain personal information about you in various ways, such as when you visit our Websites. The types of information we obtain include:

- contact information, such as name, email and postal address, and phone number;
- login credentials when you create an account on our Customer or Dealer Portals;
- employer, job title and other professional information;
- information you include on your credit or other applications (e.g., personal financial statements), such as Social Security number, copies of identification documents, and date of birth;
- bank account information, such as account number and routing number;
- payment card information, including card number and expiration date;

- information about your account with us, such as your account number and payment history or transactions;
- information about your credit history and other information we receive from consumer reporting agencies when you submit an application for credit;
- telematics information about our trucks and other VFS equipment used by our customers and dealers, such as geolocation information;
- information you provide in the course of applying for a job with us, such as information about your education, work and military history, legal work eligibility status, background check information, and other information about you; and
- other personal information you submit to us, such as through emails or other communications, surveys, registrations or sign-up forms.

In addition, when you visit our Websites, we may obtain certain information by automated means, such as cookies, web server logs, web beacons, and other technologies. A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and cookies and may be used to transmit information collected through cookies back to a web server.

We may use these automated technologies on our Websites to collect information about your equipment, browsing actions, and usage patterns. The information we obtain in this manner may include your device IP address, identifiers associated with your devices, types of devices connected to our Websites, web browser characteristics, device characteristics, language preferences, referring/exit pages, clickstream data, and dates and times of visits to our Websites. These technologies help us (1) remember your information so you do not have to re-enter it; (2) track and understand how you use and interact with our Websites; (3) tailor the Websites around your preferences; (4) measure the usability of our Websites and the effectiveness of our communications; and (5) otherwise manage and enhance our services, and help ensure they are working properly.

Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of our Websites. For mobile devices, you can manage how your device and browser share certain device data by adjusting the privacy and security settings on your mobile device.

## **HOW WE USE THE INFORMATION WE OBTAIN**

We may use the information we obtain about you to:

- provide our products and services;
- process and fulfill transactions in connection with our products and services;
- communicate with you (including providing you with offers and other communications about our services), respond to your inquires, and offer customer support;
- establish and manage your account with VFS;
- personalize your experience on our Websites;
- establish and manage our business relationships;
- manage career opportunities at VFS, including for recruitment purposes, candidate screening and evaluation, and employee onboarding;

- perform analytics (including market research, trend analysis, financial analysis, and anonymization of personal information);
- operate, evaluate and improve our business (including developing new services; enhancing, improving and analyzing our services; managing our communications; and performing accounting, auditing and other internal functions);
- maintain and enhance the safety and security of our Websites, products and services, and prevent misuse;
- protect against, identify and prevent fraud and other criminal activity, claims and other liabilities; and
- comply with and enforce applicable legal requirements, relevant industry standards and VFS policies.

We also may use the information in other ways for which we provide specific notice at the time of collection.

### *Third-Party Analytics*

We also use third party web analytics services on the Websites, such as those of Hotjar. The service providers that administer these services use technologies such as cookies, web server logs and web beacons to help us analyze how visitors use the Websites. The information collected through these means (including IP address) is disclosed to these service providers, who use the information to evaluate use of the Websites. To learn more about Hotjar and how to opt out, please visit <https://www.hotjar.com/opt-out>.

### *Interest-Based Advertising*

On our Websites, we may obtain information about your online activities to provide you with advertising about services tailored to your interests. This section of our Privacy Policy provides details and explains how to exercise your choices.

You may see our ads on other websites because we use third-party ad services. Through such ad services, we can target our messaging to users considering demographic data, users' inferred interests and browsing context. These services track your online activities over time and across multiple websites by collecting information through automated means, including through the use of cookies, web server logs, web beacons and other similar technologies. The ad services use this information to show you ads that may be tailored to your individual interests. The information ad services may collect includes data about your visits to websites that serve VFS advertisements, such as the pages or ads you view and the actions you take on the websites. This data collection takes place both on our Websites and on third-party websites that participate in these ad services. This process also helps us track the effectiveness of our marketing efforts.

Our Websites are not designed to respond to “do not track” signals from browsers.

To learn how to opt out of interest-based advertising in the U.S., please visit [www.aboutads.info/choices](http://www.aboutads.info/choices) or <http://www.networkadvertising.org/choices/>.

## **INFORMATION WE SHARE**

We may share the information we obtain about you with our affiliates and subsidiaries. We also may share the information we obtain about you with third-party vendors and other entities to perform certain services on our behalf, such as website hosting, data analytics, payment

processing and other services. We also may share your information with (1) credit reporting agencies and services in connection with credit underwriting or to report debts owed to VFS; and (2) to financing sources, including individuals or entities involved in securitization, sales, assignment, or financing of our transactions.

We may share your information with REIN Connected Insurance Agency, LLC or other insurance brokers or with insurance carriers to evaluate your eligibility for potential insurance options. Please note that these entities will use your information in accordance with their own privacy policies.

We also may disclose personal information (1) if we are required to do so by law or legal process (such as a court order or subpoena); (2) in response to requests by government agencies, such as law enforcement authorities; (3) to establish, exercise or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (5) in connection with an investigation of suspected or actual illegal activity; or (6) otherwise with your consent or as directed by your representative (including other institutions with which you apply for credit).

We reserve the right to transfer any personal information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation) or as part of the diligence process for such a transaction.

## **YOUR RIGHTS AND CHOICES**

We offer you certain choices in connection with the personal information we collect from you. To update your preferences, limit the communications you receive from us, or submit a request, please contact us as indicated in the “How To Contact Us” section of this Privacy Policy. You can unsubscribe from our marketing mailing lists by following the “Unsubscribe” link in our emails or contacting us as specified in the “How To Contact Us” section below. We will apply your preferences going forward.

If you have an account with us on our Customer or Dealer Portals, you can review your account information by visiting your account profile page. If you believe our records contain inaccurate or incomplete information, please contact us as indicated in the “How To Contact Us” section of this Privacy Policy.

If you are a California consumer, for more information about your privacy rights, please see the section of this Privacy Policy called “California Consumer Privacy Statement.”

## **HOW WE PROTECT PERSONAL INFORMATION**

We maintain administrative, technical and physical safeguards designed to protect personal information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

## **CHILDREN’S PRIVACY**

Our Websites are intended for a general audience and are not directed to children. We do not knowingly collect personal information online from children under the age of 13, or such other age as may be stipulated by applicable law.

## EXTERNAL ONLINE SERVICES AND FEATURES

For your convenience and information, our Websites may provide links to other online services, and may include third-party features such as apps, tools, widgets and plug-ins. These online services and third-party features may operate independently from us. The privacy practices of the relevant third parties, including details on the information they may collect about you, is subject to the privacy statements of these parties, which we strongly suggest you review. To the extent any linked online services or third-party features are not owned or controlled by VFS, we are not responsible for these third parties' information practices.

## UPDATES TO OUR PRIVACY POLICY

This Privacy Policy may be updated periodically and to reflect changes in our personal information practices. We will post a notice on our Websites to notify you of significant changes to our Privacy Policy and indicate at the top of the Privacy Policy when it was most recently updated.

## HOW TO CONTACT US

If you are a customer or dealer and have any questions or comments about this Privacy Policy, please contact us at [vfs.us.dataprivacy@vfsc.com](mailto:vfs.us.dataprivacy@vfsc.com) or call us at 877.865.8623, extension 3905. For general inquiries about our Privacy Policy, please contact us at [vfs.us.dataprivacy@vfsc.com](mailto:vfs.us.dataprivacy@vfsc.com).

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## CALIFORNIA CONSUMER PRIVACY STATEMENT

**Effective:** November 2, 2021

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

This Statement uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018 and its implementing regulations (the “CCPA”).

### 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:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services
- Auditing related to a current interaction with you and concurrent transactions, including, but not limited 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, the contextual customization of ads shown as part of the same interaction
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- 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

## 2. **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
- Government entities
- Data brokers

### **3. Sale of Personal Information**

We do not sell your personal information in exchange for monetary compensation. We may allow certain third parties (such as online advertising services) to collect your personal information via automated technologies on our Site in exchange for non-monetary consideration. We share the categories of personal information listed below to serve you content and advertisements that may be of interest to you. You have the right to opt out of this disclosure of your information, which may be considered a “sale” under California law.

During the 12-month period prior to the effective date of this Statement, we may have sold 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</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</li> </ul>

We do not have actual knowledge that we sell personal information of minors under 16 years of age.

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

During the 12-month period prior to the effective date of this Statement, we may have shared your personal information with certain categories of third parties, as described below.

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 provides 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> </ul>

	<ul style="list-style-type: none"> <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>
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 provides 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 provides 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 provides 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 provides 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 provides 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> </ul>

	<ul style="list-style-type: none"> <li>• Vendors who provides 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 provides 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 shared personal information about you with government entities, such as in response to a request from law enforcement authorities.

## 5. California Consumer Privacy Rights

You have certain choices regarding your personal information, as described below.

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 about you during the past 12 months.

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

Opt-Out of Sale: You have the right to opt-out of the sale of your personal information.

**How to Submit a Request.** To submit an access or deletion request please contact us at [vfs.us.dataprivacy@vfsc.com](mailto:vfs.us.dataprivacy@vfsc.com) or call us at 877.865.8623, extension 3905. To opt-out of the sale of your personal information in connection with third-party advertising cookies and similar technologies on our Site, click [HERE](#) to visit Volvo Financial Services website and click 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.us.dataprivacy@vfsc.com](mailto:vfs.us.dataprivacy@vfsc.com). To submit a request as an authorized agent on behalf of a consumer, please email us at [vfs.us.dataprivacy@vfsc.com](mailto:vfs.us.dataprivacy@vfsc.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. 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 will 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, 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.