



Issuer	Hallgren Emelie	Approved/Reviewed	2022-12-06
Owner	Wåhlin Sara	Classification	Internal
Issued by	Group Privacy Office, AA14110	Version 6.0	Page 1(14)

Retention of personal Data

1. Orientation

If text is extracted from this document to other documents, reference shall be made to the document identification number and issue.

This is the first issue of this guideline.

2. Contents

Contents

- 1. ORIENTATION1
- 2. CONTENTS1
- 3. DEFINITIONS AND ACRONYMS3
- 4. PURPOSE.....3
- 5. SCOPE AND FIELD OF APPLICATION.....3
- 6. RETENTION PERIODS4
 - 6.1. General Principles4
 - 6.1.1. Guiding Principles4
 - 6.1.2. Legal hold4
 - 6.2. Credit information and Financial Records5
 - 6.3. Customer Employees and Representatives and Sole Traders5
 - 6.3.1. Marketing5
 - 6.3.2. Warranty or product liability6
 - 6.3.3. Administration and performance of contract6
 - 6.4. Dealer Employees and Representatives or Sole Traders7
 - 6.4.1. Administration and performance of contract7
 - 6.5. Supplier Employees and Representatives and Sole Traders.....7
 - 6.5.1. Administration and performance of contract7
 - 6.6. Employee and Consultant data8
 - 6.6.1. Before employment/during recruitment process8
 - 6.6.2. During the employment/ consultant engagement8
 - 6.6.3. After the employment/ engagement has ended9
 - 6.7. Personal Data of Employees and Consultants in applications or systems and on related documents 10



6.8.	Vehicle Data	11
6.8.1.	Personal Data located in Volvo Group common IT-systems (e.g. LDA, RDM and EDW etc).....	11
6.8.2.	Personal Data extracted from Volvo Group common IT-systems to be used for research and development.....	11
6.8.3.	Personal Data extracted from Volvo Group common IT-systems to be used for solving quality issues	12
6.8.4.	Personal Data extracted from Volvo Group common IT-systems to be used for warranty purposes	12
6.8.5.	Personal Data extracted from Volvo Group common IT-systems to be used for product liability	12
6.9.	Partners	13
6.10.	Public / visitors on Volvo websites.....	13
7.	MEASUREMENT OF COMPLIANCE	14
8.	DEVIATIONS	14
9.	LANGUAGE.....	14
10.	PERIODIC REVIEW	14
11.	SUPPORTING DOCUMENTS	14



3. Definitions and acronyms

In this guideline the following terms shall have the following meaning:

Partner is defined as a is defined as a legal entity that is not considered a Supplier, Customer or dealer, such as e.g. a partner for Volvo Ocean Race or similar.

4. Purpose

The purpose of this guideline is to establish an internal procedure within the Volvo Group regarding the retention periods that apply when Personal Data is Processed by a Volvo Group company.

This guideline has been developed to support the Directive regarding Personal Data. Terms and expressions defined therein shall have the same meanings when used in this guideline.

This document is an internal document for Volvo Group employees and consultants only. Please see DIR 001-0037 Volvo Group Classification of Information Directive for directions on the handling of internal documents.

5. Scope and field of application

This guideline applies globally to all Volvo Group companies, Employees and Consultants as well as members of the boards of directors of Volvo Group subsidiaries. The general rule is that this guideline shall apply to all Processing of Personal Data within the Volvo Group.



6. Retention periods

6.1. General Principles

The TD/BA/Group Functions are responsible for implementing processes to ensure that Personal Data are not retained longer than permitted in accordance with this guideline and any other applicable directives and/or guidelines.

In accordance with Personal Data Laws, Personal Data may only be retained as long as necessary to fulfill the purposes of the Processing. Accordingly, when determining the appropriate retention periods, the TD/BA/Group Functions shall take into account the purpose/purposes for which the Personal Data is Processed.

Note that if the same Personal Data is Processed for several different purposes then different retention periods may apply for the same Personal Data. This means that the Personal Data may have to be kept for the longest applicable retention period, but may still only be Processed for the duration of the retention period applicable for the relevant purpose.

For the time necessary to defend or establish legal claims or other undertakings, Personal Data may need to be kept also after the retention time expiration in order to be able to defend ongoing or potential future claims. This becomes a new purpose of processing and the data for relevant individuals & data types should be archived in a way that prevents it from being used in processing for other purposes. The new purpose – e.g. to defend or establish legal claims or other undertakings - should be reflected in the Record of Processing Activities (RoPA).

Personal Data Laws do not set out pre-defined retention periods for different Processing activities. The Personal Data Laws only provide the principles and retention periods must therefore be determined on a case-by-case basis. Applicable legislation in other areas where Personal Data is being Processed may also be relevant for retention periods, such as legislation within employment or finance. Such applicable legislation in each jurisdiction shall therefore also be taken into account when determining the retention period.

At the end of the applicable retention period, the Personal Data shall be deleted or anonymized.

6.1.1. Guiding Principles

Volvo Group has identified guiding principles for specific Personal Data Processing activities that are relevant to its business.

If the TD/BA/Group Function needs to deviate from one of the guiding principles set out below it must follow the deviation process as set out in this guideline.

6.1.2. Legal hold

It may sometimes be necessary to defend or establish legal claims or other undertakings (for example, an agreement containing Personal Data may need to be kept also after the expiration of a warranty period in order to be able to defend potential future claims). In such cases, the retaining of personal data beyond the defined retention period has to be clearly documented, and justified by a specific cause. It is not acceptable to store personal data “just in case”.

The RoPA should be updated to reflect the new purpose, and new retention period. The personal data may not be processed for any other purpose. When the new purpose is no longer valid, the personal data should be deleted or anonymized.



6.2. Credit information and Financial Records

The following retention periods shall apply when a TD/BA/GF processes credit information:

Category of Personal Data	Retention period
Personal Data necessary for credit assessments	Please see [DIR 0001-27-82 Volvo Group Credit Management Directive]
Personal Data relating to a granted credit	
Personal Data relating to a denied credit	
Personal Data relating to an internal credit assessment, i.e. credit information provided to Volvo Group in order to make a credit assessment in its own systems	
Personal Data relating to the retention of company accounts, books of account and records	Please see DIR 0001-27-82 Volvo Group Credit Management Directive.

6.3. Customer Employees and Representatives and Sole Traders

Relevant Personal Data relating to Customers are Personal Data about Customer employees and representatives (such as contact details to these individuals), but also Personal Data about a Customer when the Customer itself is an individual or a sole trader.

6.3.1. Marketing

The following retention periods shall apply when a TD/BA/Group Function processes customer (including end customer) Personal Data for marketing purposes:

Category of Personal Data	Retention period
Customers' Personal Data	One (1) year after the expiration of the customer agreement/relationship or the relevant warranty period if the warranty period expires after the customer agreement (see below for processing for the purposes of fulfilling a warranty obligation).
Prospect representatives' Personal Data	Until the marketing has been concluded or twelve (12) months after the information was collected. However, if the Prospect has provided its Consent, the Personal Data can be stored until the Consent is withdrawn.
Personal Data provided through Consent	Until the Consent is withdrawn (which can be done at any time).



6.3.2. Warranty or product liability

The following retention periods shall apply when a TD/BA/GF processes Customer (including end customer) Personal Data for warranty and/or product liability purposes:

Category of Personal Data	Retention period
Customers' Personal Data (e.g. Customer employee and representative contact details)	Ten (10) years <u>after</u> the expiration or termination of the customer agreement/relationship or the relevant warranty period if the warranty period expires after the customer agreement. The Personal Data may also be retained during an ongoing warranty or product liability dispute.

6.3.3. Administration and performance of contract

The following retention period shall apply when a TD/BA/Group Function processes Customer Personal Data for the performance of a contract, i.e. when providing a product and/or service to the customer (including end customer):

Category of Personal Data	Retention period
Personal Data relating to a, customer or end customer, such as Personal Data in a CRM-system, purchasing records, offers or delivery documents etc.	(i) For the duration of the applicable customer agreement, e.g. when the goods or services have been delivered and fully paid, and the duration of the warranty period and one (1) year thereafter for marketing purposes (see above). (ii) For the time necessary to defend or establish legal claims or other undertakings (for example, an agreement containing Personal Data may need to be kept also after the expiration of a warranty period in order to be able to defend potential future claims). (iii) For ten (10) years after the termination or expiration of the customer agreement.



6.4. Dealer Employees and Representatives or Sole Traders

6.4.1. Administration and performance of contract

The following retention period shall apply when a TD/BA/Group Function processes dealer Personal Data for the performance of a contract, i.e. when providing a product and/or service to the dealer:

Category of Personal Data	Retention period
Personal Data relating to a dealer, such as Personal Data in a CRM-system, purchasing records, offers or delivery documents etc.	<ul style="list-style-type: none">(i) For the duration of the applicable agreement with the dealer, and one (1) year thereafter for marketing purposes (see above).(ii) For the time necessary to defend or establish legal claims or other undertakings (for example, an agreement containing Personal Data may need to be kept also after the expiration of a warranty period in order to be able to defend potential future claims).(iii) For ten (10) years after the termination or expiration of the agreement with the dealer.

6.5. Supplier Employees and Representatives and Sole Traders

6.5.1. Administration and performance of contract

The following retention period shall apply when a TD/BA/Group Function processes Supplier Personal Data for the performance of a contract, i.e. when purchasing a product and/or service:

Category of Personal Data	Retention period
Personal Data relating to a Supplier employee, representatives or a Supplier which is a sole trader, such as Personal Data in a relationship management-system, purchasing records, offers or delivery documents etc.	<ul style="list-style-type: none">(i) For the duration of the applicable agreement, e.g. when the goods or services have been delivered and fully paid, and the duration of the warranty period.(ii) For the time necessary to defend or establish legal claims or other undertakings (for example, an agreement containing Personal Data may need to be kept also after the expiration of a warranty period in order to be able to defend potential future claims).(iii) For ten (10) years after the termination or expiration of the agreement with the Supplier.



6.6. Employee and Consultant data

The following retention periods shall apply when a TD/BA/Group Function processes Personal data about Employees/ Consultant:

6.6.1. Before employment/during recruitment process

Category of Personal Data	Retention period
Personal Data relating to job applicants and consultant that are of interest to Volvo	<ul style="list-style-type: none">(i) <i>Employees</i>: Until the recruitment process has been concluded and two (2) years (or longer depending on applicable employment legislation – for reference, please consult HR Country retention instructions) thereafter in case of a possible dispute (e.g. on grounds for discrimination), or(ii) <i>Consultants</i>: Until the process of engaging the consultant has been concluded, or(iii) if Consent has been given to keep such Personal Data for future needs, until a future recruitment/engagement of the applicant is no longer relevant and/or until such Consent has been withdrawn.

6.6.2. During the employment/ consultant engagement

Category of Personal Data	Retention period
Personal Data relating to Volvo Group Employees/ Consultant which is absolutely necessary for administrative purposes.	For as long as necessary for the relevant administrative purpose.
Personal Data relating to Volvo Group Employees/ consultant in case of an ongoing dispute.	For as long as a dispute with such Employee/Consultant is ongoing or may be expected (given that there are indications that a dispute can be expected), provided that the Personal Data is relevant for the dispute.
Employee's/ Consultant's use of internet and e-mail where there are certain surveillance purposes and that specific routines has been established for such Processing	Until the Personal Data loses its meaning in relation to the established purpose. For example, if Volvo Group reviews the employee's/consultant's internet and e-mail usage once a month, the information may be stored for three (3) months in order to allow the review to be finalized.
Employee's/ Consultant's use of internet and e-mail where there are no surveillance purposes or specific routines, i.e. Volvo	One (1) month after such data was collected.



Group does not collect the Employee's/Consultant's Personal Data to monitor the Employee's/Consultant's internet and e-mail usage	
Employees' / Consultant's Personal Data relating to bank details	For the duration of the employment/engagement and until the Employee/consultant has received all payments that Volvo Group is obligated to pay
Personal Data relating to Employees' (Consultant's) next-of-kin in case of emergencies	For the duration of the employment/engagement.
Other Personal Data relating to Volvo Group Employees/Consultants.	For the duration of the employment/engagement if required for the relevant legitimate purpose (this needs to be determined in relation to each Processing activity and if the Personal Data is no longer required it should be deleted or anonymized).

6.6.3. After the employment/ engagement has ended

Category of Personal Data	Retention period
Personal Data relating to former Volvo Group Employees	<ul style="list-style-type: none"> (i) For as long as a dispute with such Employee/Consultant or concerning the Employee/Consultant is ongoing or may be expected (given that there are indications that a dispute can be expected), provided that the Personal Data is relevant for the dispute, (ii) If the Personal Data is absolutely necessary for administrative purposes, such Personal Data may be kept as long as necessary for the relevant administrative purpose, and (iii) If the Personal Data is absolutely necessary for legal requirements or authority's possibility to make audit/investigation, and (iv) To the extent the Personal Data is purely factual information about the Employee/Consultant such as "termination due to redundancy", ("termination due to breach of agreement" "dismissal" and "termination due to personal reasons", the retention period needs to be considered on a case-by-case basis if Volvo Group wants to keep the Personal Data after the employment relationship has ended.



6.7. Personal Data of Employees and Consultants in applications or systems and on related documents

The following retention periods shall apply when a TD/BA/GF processes Employee and Consultant Data in applications or systems and on related documents:

Category of Personal Data	Retention period
Personal Data relating to Employees' and Consultants' log in details	For fifty (50) years after the termination of the employment contract and the Personal Data is necessary for administrative purposes.
Personal Data relating to Employees' and Consultants' logged data inside applications or systems for validation purposes	For fifty (50) years after termination of the employment contract, or, if upon review a longer period is deemed necessary due to the legitimate interest of Volvo related to the content of the relevant document and/or the validation of such document
Personal Data relating to Employees' and Consultants' on documents drafted by an Employee or Consultant	Forever (which is based on the fact that Volvo is obliged under copyright law to name the creator of a work during seventy (70) years after the passing of the specific Employee or Consultant and the information is thereafter not Personal Data)
Personal Data relating to Employees' and Consultants on other documents relating to the performance of work tasks (decision material, reports, presentations, meeting and project documentation etc.)	For a period as deemed necessary due to the legitimate interest of Volvo related to the content of the relevant document



6.8. Vehicle Data¹

6.8.1. Personal Data located in Volvo Group common IT-systems (e.g. LDA, RDM and EDW etc)

The following retention periods shall apply when a TD/BA/GF processes Personal Data that is located in so called Volvo Group common IT-systems (e.g. LDA, RDM and EDW etc.):

Category of Personal Data	Retention period
Vehicle Data	<p>The retention period for Vehicle Data stored in Volvo Group common IT-systems (e.g. LDA, RDM and EDW etc.), is 25 years or the life cycle of each product type from the creation of the Vehicle Data if this is longer than 25 years.</p> <p>The retention period is primarily based on Volvo Group obligations in relation to fulfilment of emission and product liability legislations, which may persist during longer periods, e.g. up to twenty (20) years, or even be unlimited in time.</p>

6.8.2. Personal Data extracted from Volvo Group common IT-systems to be used for research and development

The following retention periods shall apply when a TD/BA/Group Function processes Personal Data for research and development purposes, e.g. product quality improvement or business strategies:

Category of Personal Data	Retention period
Vehicle Data, extracted from Volvo Group common IT-systems	Needs to be considered on a case-by-case basis. May not be retained longer than necessary to fulfill the purposes of the research and development activity (and shall be anonymized when possible) as a general rule five (5) years from when the research and development activity is finalized.
Personal Data relating to camera surveillance for which a permit has been granted	In accordance with the retention period set out in the applicable permit from the supervisory authority.
Video recordings of a driver	For the duration of the relevant study or research project, e.g. a field test study, and for a reasonable period thereafter as necessary to use the results (e.g. three months) or during the time when a Consent is valid (if Consent has been used as legal basis).

¹ Defined in the General Directive as: any data generated from the vehicle and/or telematics services that, in combination with other data, directly or indirectly could identify the individual driver or operator of a Volvo Group vehicle. The Vehicle Data will then be considered as Personal Data.



6.8.3. Personal Data extracted from Volvo Group common IT-systems to be used for solving quality issues

The following retention periods shall apply when a TD/BA/GF processes Personal Data by extracting Vehicle Data from the Volvo Group common IT-systems (e.g. LDA, RDM and EDW etc.) for solving quality issues:

Category of Personal Data	Retention period
Vehicle Data, extracted from Volvo Group common IT-systems	Needs to be considered on a case-by-case basis. May not be retained longer than necessary to fulfill the purposes of the solving quality activity (and shall be anonymized when possible), as a general rule five (5) years from when the solving quality issue activity was finalized.

6.8.4. Personal Data extracted from Volvo Group common IT-systems to be used for warranty purposes

The following retention periods shall apply when a TD/BA/GF processes Personal Data by extracting Vehicle Data from the Volvo Group common IT-systems (e.g. LDA, RDM and EDW etc.) for warranty purposes:

Category of Personal Data	Retention period
Vehicle Data extracted from Volvo Group common IT-systems	May not be retained longer than necessary to fulfill the purposes of the warranty activity (and shall be anonymized when possible). When the warranty activity is finalized, the applicable Personal Data shall be deleted after five (5) years.

6.8.5. Personal Data extracted from Volvo Group common IT-systems to be used for product liability

The following retention periods shall apply when a TD/BA/GF processes Personal Data by extracting Vehicle Data from the Volvo Group common IT-systems (e.g. LDA, RDM and EDW etc.) for product liability purposes:

Category of Personal Data	Retention period
Vehicle Data extracted from Volvo Group common IT-systems	Shall be considered on a case-by-case basis. May not be retained longer than necessary to fulfill the purposes of the product liability (and shall be anonymized when possible). When the product liability obligation is no longer at hand, the Personal Data shall be deleted.



6.9. Partners

Administration and performance of contract The following retention period shall apply when a TD/BA/Group Function processes Personal Data for the performance of a contract in relation to a Partner:

Category of Personal Data	Retention period
Personal Data relating to a partner, such as Personal Data in a CRM-system, agreements etc.	<ul style="list-style-type: none">(i) For the duration of the applicable agreement.(ii) For the time necessary to defend or establish legal claims or other undertakings (for example, an agreement containing Personal Data may need to be kept also after the expiration of a warranty period in order to be able to defend potential future claims); or(iii) For ten (10) years after the termination of the agreement with the Partner.

6.10. Public / visitors on Volvo websites

The following applies to Personal Data that is collected from individuals who have signed-up on a Volvo web-page mainly for marketing/information purposes.

Category of Personal Data	Retention period
Volvo web-page Visitor's Personal Data	The Personal Data may be retained for six (6) months, or until the visitor had opted out from newsletters/information is withdrawn
Personal Data provided through Consent	Until the Consent is withdrawn (which can be done at any time).



7. Measurement of compliance

Compliance will be measured based on the audits carried out in accordance with the Directive regarding Personal Data.

8. Deviations

This guideline provides high-level guidance on retention period. If a TD/BA/GF would like to deviate from these guidelines, the following conditions shall apply:

- The applicable TD/BA/GF must be able to present legitimate grounds for such deviation on a case-by-case basis and the deviation must comply with applicable laws of the country/countries involved;
- The applicable TD/BA/GF must have the responsible SVP or other appropriate decision-making forum approve the deviation and document such approval;
- The applicable TD/BA/GF must request and follow guidance from the applicable TD/BA/GF Compliance Officer with the assistance of the Data Protection Representative, if appointed,; and
- Determine a new retention period based on the above.

The guidance from the applicable Compliance Officer with the assistance of the Data Protection Representative, if appointed, can be in the form of guidelines or form a part of the TD/BA/GF's authorization schedule. For specific advice in individual cases, please contact the Compliance Officer of the applicable TD/BA/GF, country or the Chief Compliance Officer.

9. Language

The original language of this document is English. If translated into other languages, the English version is decisive in case of dispute.

10. Periodic review

This guideline and its supportive documents shall be subject to review at least once in every two years.

11. Supporting Documents

This guideline supports or is supported by the following documents some of which are issued ancillary or in consolidation herewith:

[Directive regarding Personal Data \[0001-27-593\]](#)