

GENERAL

Your personal integrity is important to VFF Pension. We always strive to maintain a high standard regarding information protection and adherence to relevant legislation. We want you, as the insured party and/or beneficiary, to feel confident and secure about how we handle your personal data. This document describes in detail just how we do so.

GENERAL DATA PROTECTION REGULATION (GDPR)

The General Data Protection Regulation aims to shield the individual's personal integrity when personal data is handled. The Regulation offers stronger protection than before for your personal data and gives you, the insured party, certain rights and imposes certain obligations on us as insurance providers

PERSONAL DATA CONTROLLER

Responsibility for ensuring that any personal data about you is handled in accordance with relevant legislation rests with VFF Pension Tjänstepensionsförening, org. no. 816400-4056.

PERSONAL DATA

All kinds of information that may be directly or indirectly linked to you is classified as personal data. Encrypted data and various kinds of electronic identity are regarded as personal data if they can be linked to physical persons.

The personal data we handle about you are your name, ID number, address and contact details, and information about your insurance policies such as insurance capital, beneficiary clauses and premium payments. Prior to and while your pension is being paid out, we also handle information relating to your bank account and income tax, as well as information about payments made. We also handle corresponding personal data regarding terminated insurance with our former subsidiary VFF Fondförsäkring AB. We also handle information about how you want your pension notices, income statements and payment verifications delivered, and whether you have cancelled our newsletter.

For those of you who are employed by Volvo Cars with subsidiaries in Sweden, Polestar, NOVO, Aurobay and HaleYTEK, we also process information about illness and recovery (not illness information). For Volvo Cars with subsidiaries and for affiliated employers who offer time bank conversion, we also process professional roles, i.e. information about whether you are a salaried employee or worker.

HANDLING OF PERSONAL DATA

Personal data that you submit to VFF Pension or that we obtain upon signing of an insurance agreement or in conjunction with the insurance agreement will be handled by VFF Pension and by companies with which we work in partnership. This is necessary so we can fulfil our obligations as per the insurance agreement, so we can contact you, and in general in order to meet our obligations as your insurance provider. The term "handling of personal data" refers to everything that happens with the information, regardless of whether this takes place automatically or not. Examples of common types of handling include collection, registration, processing, storage, transfer and erasure of information.

THE AIM OF HANDLING PERSONAL DATA

VFF Pension handles personal data to be able to fulfil our responsibility as an insurance provider:

- Administrate the insurance policies you the policyholder have with us, or from which your appointed beneficiaries receive a survivor pension.
- Meet our obligations under applicable legislative and government regulations.
- Give you annual information about changes in the value of your insurance policies.
- To be able to contact you.
- Send you general information about VFF Pension, insurance policies, bonus rates and so on via email.
- Develop our services by using your personal data for analysis and statistical purposes.

LEGAL BASIS FOR HANDLING OF PERSONAL DATA

Your personal data is handled so that VFF Pension can fulfil its obligations as per the insurance agreement, to meet our legal obligations, or because it is essential; in other words, because we have what is known as a justifiable interest and processes your personal data for statistical and analytical purposes.

Most of the processing we do with your personal data is to fulfill our obligations under the agreement. That is; collect, register and administer. We make calculations of your pension capital and pay out your pension.

Examples of justifiable interest are the newsletters we send via email that contain general information about VFF Pension, changes to bonus rates and so on. You may at any time cancel your subscription to these newsletters. In addition, we handle your personal data to meet our obligations vis-a-vis various authorities such as the Swedish Tax Authority and the Swedish Enforcement Authority.

We also process your personal data to fulfill our obligations. This includes producing confirmation letters when taking out new insurance, sending out pension notices and control information in relation to authorities such as the Swedish Tax Agency and as well as seizure to the Swedish Enforcement Authority.

VFF Pension is an occupational pension association in the financial sector and is obliged to check our registered persons against the EU sanctions lists. Such control may mean that personal data about violations of the law is processed. The legal basis for this is to fulfill obligations under laws and government regulations.

INFORMATION THAT VFF PENSION CONTAINS

We collect personal data that is necessary for us to be able to fulfill our mission and laws and regulations. We collect the data directly from you, your employer or from other sources such as SPAR, the Swedish Tax Agency, the Swedish Enforcement Authority, the Swedish Pensions Agency, FORA and other pension administrators.

Information that you provide to us yourself: beneficiary clause, contact information, tax and account information.

Information from your employer: personal number, professional category, sick and healthy notification (not sick information).

Information from other sources: contact information, tax information, seizure decisions, insurance information.

INFORMATION THAT VFF PENSION PROVIDES

We provide information about your insurance policies to My Pension (where you can see your entire pension and make pension forecasts), and if you are employed by the Volvo Group, Volvo Cars, GKN or Polestar, to each respective employer's HR portal. We submit income statements to the Swedish Tax Authority relating to pensions that we have paid and insurance transfers. Upon request we also provide information to holders of a power of attorney, such as insurance brokers, registered proxies and legally appointed trustees, and to the Swedish Enforcement Authority, the Swedish Insurance Institute and the Social Insurance Institution in Finland. If you have a SAFLO contractual pension with us, information about this is also submitted to FORA. VFF Pension also provides personal data to contractors/personal data users hired by VFF Pension.

TRANSFER TO THIRD COUNTRIES

We mainly store and process your personal data within the EU/EEA. There is no deliberate transfer of personal data to third countries, however, to a limited extent, we employ assistants who have subcontractors in third countries, USA and India. These may request access to your personal data stored within the EU/EEA. We then ensure that the personal data is protected by entering into a personal data processing agreement with supplementary protection measures.

If you live outside the EU/EEA, your personal data is transferred via letter because it is necessary to fulfill the insurance agreement between you and VFF Pension.

DATA RETENTION DURATION

Personal data is retained for ten years after the final payment to the insured party/beneficiary as per the insurance agreement, or for a longer time if this is necessary in order to deal with a claim submitted for insurance compensation.

E-mail between you and VFF Pension (group account or individual employee's e-mail account) is saved for a maximum of one year in addition to the current year.

INFORMATION THAT VFF PENSION SENDS TO YOU ABOUT YOUR INSURANCE POLICIES

As the policyholder/beneficiary, you will receive information in the form of annual pension notices and if you have one or more insurance policies currently being paid out, you will also receive income statements. This information is provided via your personal page on the VFF Pension website. If you want this information via the postal service, please contact us by phone or email. In addition, you also receive letters from us when the time comes to start paying out your pension and at the last payment.

YOUR RIGHTS

According to the General Data Protection Regulation, once registered you have specified rights regarding the way your personal data is handled. Your rights are as follows:

- Access to the information we handle about you; see the section entitled "INFORMATION AT YOUR REQUEST" below.
- Amendments to incorrect or incomplete information in our registers.
- Erasure – in certain cases, the right to request that we erase your personal data.
- Limitations on or objection to data handling – the right to request that we temporarily or permanently discontinue handling all or some of your personal data, and objection to handling of your personal data.
- Data portability – the right to request copies of your personal data in electronic format, if this is technically feasible.

Information about how VFF Pension handles your personal data



If you feel that an item of information in our registers is incorrect or that the information is too comprehensive or incomplete, you have the right to demand that we amend this. In such a case, contact us and we will investigate what should apply so that any errors can be corrected.

INFORMATION AT YOUR REQUEST -" REGISTERUTDRAG"

The General Data Protection Regulation gives you the right to know what information we handle about you and the way it is used. You may therefore request – and obtain free of charge – a register record showing a summary of your personal data handled by VFF Pension. You should normally receive this register record within one month of submitting your request. If more time is required, we will inform you accordingly.

COOKIES

VFF Pension's use of cookies on its public website and your personal page is in no way linked to personally identifiable information; cookies are only used to develop the website by analyzing how it is used. If you do not want cookies to be stored on your computer, you can switch off this alternative via Settings in your web browser.

For detailed information about VFF Pension's use of cookies, see "about the website and cookies" on our website: www.vffpension.se

CHANGES TO THIS INFORMATION

VFF Pension may make changes to this information. The most recent update is always available on our website: www.vffpension.se

CONTACT

To exercise your rights as above or if you have any questions about VFF Pension's processing of your personal data, please contact us:

VFF Pension
TSG: 5
405 08 Gothenburg, Sweden

Phone: +46 31 66 12 10
E-mail: vff@volvo.com

VFF Pension has appointed a data protection officer to whom you can contact if you are not satisfied with how VFF Pension processes your personal data:

VFF Pension Data Protection Officer
TSG:5 405 08 Gothenburg

E-mail: dpovff@volvo.com

You also have the right to file a complaint with the Swedish Data Protection Authority:

Website: www.imy.se