

Information about how VFF Pension handles your personal data

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 (which replaced the Personal Data Act as of 25 May 2018) 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.

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 so as 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. 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 in order to meet our obligations vis-a-vis various authorities such as the Swedish Tax Authority and the Swedish Enforcement Authority.

INFORMATION THAT VFF PENSION CONTAINS

We obtain information primarily from your employer when you sign an insurance policy as per the collective agreement; that is to say a Volvo Företagspension occupational pension, a SAFLO contractual pension or an ITP T10 contractual

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pension. Other information that we obtain from you, irrespective of which insurance policies you have with us, includes for example beneficiary clauses, email address, your wishes regarding paying out of pension funds, and tax- and account-related information. We also obtain information from other sources, for instance from the Swedish Civil Registration Authority for up-to-date addresses.

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 AB Volvo, Volvo Cars or GKN, 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 brokers, registered proxies and legally appointed trustees, and also 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.

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.

INFORMATION TO WHICH YOU HAVE ACCESS

Using your BankID you can log in to your personal page on the VFF Pension website. It contains information about your insurance policies and contact details, as well as pension notices, income statements and so on.

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.

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

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.

INFORMATION SECURITY

In order to protect your personal data from unintentional or illegal destruction, loss or amendment, unauthorised revelation or unauthorised access, VFF Pension has implemented a number of technological and organisational security measures. Only those people specifically appointed by VFF Pension, such as employees and consultants who need access to personal data in the pursuit of their work, and those specified external personal data users who have corresponding needs, shall have access to your personal data.

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Those people at VFF Pension who handle your personal data shall be familiar with and shall follow our internal guidelines and instructions. For outside users such as printers that we partner with for distribution of pension notices and income statements, special agreements are signed whereby such outside users undertake to maintain a suitable security level by adopting necessary technological and organisational security measures.

VFF Pension purchases infrastructure, server operation, data storage and communication services from HCL/Volvo IT. They are responsible for intrusion prevention both for various security zones and for specific technical equipment such as PC clients and servers.

When you contact us, we will need to ask you certain questions to verify your identity. If information needs to be submitted to brokers or anyone else representing you, they must have your power of attorney.

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 analysing 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.

MORE INFORMATION

If you do not find the information you are looking for in this information about how we handle your personal data, you are welcome to contact our GDPR coordinator; see contact details below.

Information about the General Data Protection Regulation and your rights are available on the Swedish Authority for Privacy Protection's website: <https://www.imy.se/lagar--regler/dataskyddsfordningen/>

COMPLAINTS

If you are dissatisfied with the way VFF Pension handles your personal data or if you believe that we handle them incorrectly, please contact our GDPR coordinator; see contact details below. You can also contact VFF Pension's Data Protection Officer; see below for contact details.

You also have the right to submit complaints to the Swedish Authority for Privacy Protection: www.imy.se, phone +46 (0)8-657 61 00.

GDPR COORDINATOR

You can contact VFF Pension's GDPR coordinator, currently Camilla Bågenholm, who coordinates our work with the Data Protection Officer, by phone 031-66 82 52; see also contact information below.

DATA PROTECTION OFFICER

The VFF Pension Data Protection Officer's responsibilities include helping the Association to ensure that our handling of personal data takes place in strict accordance with applicable legislation.

If you cannot find the information you are looking for in this document or if you have other questions about how your personal data is handled by VFF Pension, please contact our Data Protection Officer.

You can also contact the Data Protection Officer to request a register record and/or to request amendments and so on.

CONTACT

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