

# VFF PENSION PRIVACY POLICY

## GENERAL

Your personal integrity is important to VFF Pension. We always aim to maintain a high standard regarding information protection and adherence to relevant legislation. We want you, as the insured part and/or beneficiary, to feel confident and secure about how we handle your personal data. This Integrity Policy provides details about how we do so.

## GENERAL DATA PROTECTION REGULATION

The General Data Protection Regulation (which replaced the Personal Data Act on 25 May 2018) aims to shield the individual's personal integrity when personal data is handled (for instance when it is obtained, processed, stored or passed on). The Regulation gives the insured party certain rights and it imposes certain obligations on us as insurance providers.

## PERSONAL DATA OFFICER

Responsibility for ensuring that any personal data about you is handled in accordance with relevant legislation rests with: VFF Pension Försäkringsförening, 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 related to your bank account and income tax, as well as information about payments made. For terminated insurance policies we also have information about when the insurance began and the reason why it was terminated.

In addition we handle information about how you want your value statements delivered, income statements and payment verifications, 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 that we obtain in conjunction with the insurance agreement will be handled by VFF Pension or 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 meet our obligations as your insurance provider.

## REASONS FOR HANDLING OF PERSONAL DATA

VFF Pension handles personal data in order 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 according to the relevant legislative and government regulations.
- Give you annual information about the changes in value of your insurance policies.
- Be able to contact you.
- Send you general information about VFF Pension, insurances, interest 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 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 interest 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 WE OBTAIN

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, or a SAFLO and T10 – or ITP – contractual pension. When signing a new PLUSpension, which is a private pension insurance, we obtain information from you. Other information that we obtain from you, irrespective of which insurance policies you have with us, relate for example to beneficiary clauses, email addresses, 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.

## VFF PENSION PRIVACY POLICY

### INFORMATION THAT WE PROVIDE

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, private pension savings, and your insurance transfers, if any. 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 contractors/external 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.

### INFORMATION THAT WE SEND OUT

As the policyholder/recipient, you will receive information in the form of annual value statements 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 our website. If you want this information via snail-mail, please contact us by phone or email.

### INFORMATION TO WHICH YOU HAVE ACCESS

Using your BankID you can go to the VFF Pension website and log in to your personal page. It contains information about your insurance policies and contact details, as well as value statements, 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. These are your rights:

- 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, get in touch with us and we will work out what needs to be included and amend any errors.

### 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 will normally receive this register record within one month of submitting your request. If more time is required, we will inform you about this.

### INFORMATION SECURITY

VFF Pension has internal guidelines and instructions governing the handling of personal data. Employees, consultants and other people hired by VFF Pension shall be familiar with and follow these guidelines and instructions. Special external user contracts are signed with external personal data users such as printers that we use for distribution of value statements and income statements.

Only people specifically appointed by VFF Pension, such as employees and consultants who need access to personal data in the pursuit of their work, and the specified external personal data users, who have corresponding needs, shall have access to your personal data.

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.

## VFF PENSION PRIVACY POLICY

### 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 in your web browser.

### COMPLAINTS

If you are dissatisfied with the way VFF Pension handles your personal data, or if you feel we are treating your information in an inappropriate way, please contact us so we can work out any misunderstandings.

You also have the right to submit complaints to the Swedish Data Protection Authority, [www.datainspektionen.se](http://www.datainspektionen.se), phone +46 (0)8-657 61 00.

### CHANGES TO THIS PRIVACY POLICY

VFF Pension may make changes to this Integrity Policy. The most recent update is always available on our website: [www.vffpension.se](http://www.vffpension.se).

### MORE INFORMATION

Information about the General Data Protection Regulation and your rights are available on the Swedish Data Protection Authority website: [www.datainspektionen.se/dataskyddsreformen/dataskyddsforordningen/de-registrerades-rattigheter/](http://www.datainspektionen.se/dataskyddsreformen/dataskyddsforordningen/de-registrerades-rattigheter/)

### DATA PROTECTION OFFICER

The VFF Pension Data Protection Officer has a range of responsibilities, including ensuring that our use of personal data takes place in strict accordance with applicable legislation. If you cannot find the information you are looking for in this Privacy Policy or if you have other questions about how your information 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 INFORMATION

VFF Pension  
Data Protection Officer  
M2.7,  
405 08 Gothenburg, Sweden

Phone: +46 31 66 12 10 Email: [dpovff@volvo.com](mailto:dpovff@volvo.com)