

PRIVACY NOTICE FOR AUTOLIV CRM- HubSpot

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At Autoliv, we care about the safety of your data. In this notice, you will find information about how we manage information about you and how to exercise your data protection rights.

WHO IS RESPONSIBLE FOR YOUR DATA?

Autoliv AB („Autoliv”), registered with the Swedish Companies Registration Office under company number 556687-7345 and with registered office at Klarabergsviadukten 70, Section B7, 111 64, Stockholm, is processing your data on behalf of all legal entities in the Autoliv Group. Controllershship and responsibility will be assumed by all Autoliv companies; please find a list of these at the end of this notice, in Annex No. 1.

All personal data processing is done following the applicable privacy legislation. If you have any questions regarding the use of your data, please contact our team at the Autoliv Global Privacy Office at alv-dataprivacy@autoliv.com

WHAT PERSONAL DATA DO WE USE AND WHY?

Autoliv has contracted HubSpot Inc (HubSpot), a Software as a Service (“SaaS”) company that offers a full platform and variety of software products for marketing, sales, customer service, operations, and CRM. Autoliv has adopted HubSpot CRM to standardize and automate prospects and customer relationship management, marketing campaigns, sales tracking, and customer support. This streamlines workflow ensures seamless and efficient data management processes, enabling better customer service and operational efficiency. HubSpot is the processors acting on behalf of Autoliv, the data controller.

Personal data is used to grant you access in HubSpot and to standardize and automate Autoliv's prospects & customer relationship management, marketing campaigns, sales tracking, and customer & user support. The detailed table below informs on how Autoliv is handling the data subjects' data in HubSpot:

Purpose	Data subject	Personal data	Lawful basis	Retention period
Account creation in HubSpot platform and management of the account	Employees Collaborators	From other sources: Contact information including First and last name, Email, Job Title, City, Department and company phone are automatically imported from the Azure Active Directory.	Legitimate interest	As long as you have an active account but no longer than the duration of the Agreement we have in place with the Processor (plus 30 days following termination). User data is erased from HubSpot when it's not a member of any AD group related to HubSpot
To provide User Technical Support and for security reasons	Employees Collaborators	From data subject: Activity within the platform, user account details, user activity/usage logs/IP	Legitimate interest	As long as you have an active account but no longer than the duration of the Agreement we have in place with the Processor (plus 30 days following termination),
to participate for the internal competitions/campaigns organized by Autoliv	Employees	From data subject: personal data collected through forms which may include first name, last name, work ID, work e-mail, city & country, personal/company mobile phone, nomination (picture or video for the related challenge according to the Campaign rules)	Consent	According to the retention period stipulated in the specific Privacy Notice made available at the point of Data Collection
Managing customers & prospects inquiries and providing support	Customers prospects	From data subject: personal data collected through forms which include: Contact information (including First and last name, work Email, Job Title, Company name, Country, your request)	Consent	According to Autoliv retention schedule For customers& prospects MKT- 20:- Date No Longer Active, In Use or Superseded + 7 Years- Customer Correspondence affecting proposals, product production specifications, According to Autoliv retention schedule MKT21- Customer Correspondence

		Communication History		affecting the order/Customer Requests for Quotations, Sales Orders- Creation + 26 Years
Creating targeted and effective marketing campaigns	Prospects Customers	Directly fom data subject (prospect/customer): Contact information (First and last name, work Email, Job Title, Company name, Country, your request), Feedback and Support Tickets Communication History Customer Preferences Purchase History	Consent	According to Autoliv retention schedule MKT-11 Date No Longer Active, In Use or Superseded + 7 Years
Enhanced Reporting and Analytics for better tracking and reporting of CRM activities, helping us to analyze performance and make data-driven decisions.	Prospects Customers	The work produced by users in the platform, Communication with customer/prospects and All the data listed above for the other purposes	Legitimate interest	According to Autoliv retention schedule MKT-11 Date No Longer Active, In Use or Superseded + 7 Years
To keep a repository for Centralized Data Management, Security and Compliance purpose A repository acts as a centralized hub for all CRM-related data, including communication history, sales funnels, analytics, and prospect/customer profiles. This ensures that all team members have access to the most up-to-date information and in case of an incident/control/litigation, evidence could be provided.	Employees Collaborators Prospects Customers	The work produced by users in the platform, communication with customer/prospects and all the data listed above for the other purposes	Legitimate interest	MKT21- Customer Correspondence affecting the order Customer Requests for Quotations Sales Orders- Creation + 26 Years

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

If we need to share your data, we ensure that such recipient processes it by this notice, such as by entering into data transfer agreements or data processing agreements with the recipients. Those agreements include all reasonable and appropriate contractual, legal, technical, and organizational measures to ensure that your information is processed with an adequate level of protection and following the applicable law. Categories of recipients include:

- Autoliv companies within the Autoliv Group are listed in Annex 1. To ensure the data management processes, enabling better customer service and operational efficiency, subject to the provisions of local law, the personal data and information you provide may be accessed, processed, and used by the relevant personnel of Autoliv or its affiliates or subsidiaries on need-to-know basis, including Management, Human Resources, Finance, IT, Internal Audit, Legal, Compliance, Marketing, etc.
- Third parties that Autoliv Group engages as processors. HubSpot CRM platform, along with the associated services (collectively referred to as the "Platform"), is provided by HubSpot Inc, a Software as a Service ("SaaS") company with global operations and with principal offices at 25 First Street, Cambridge, MA 02141, USA and their affiliates and subcontractors. For more information on their sub-processors, please access the following link: <https://legal.hubspot.com/sub-processors-page>. These services are offered based on the terms agreed upon in our Corporate Agreement concerning our Subscription Service. The technical support is managed by a third-party IDX., a digital Communication and Marketing Company, corporation with principal offices at Gothenburg (the "IDX"). Generally, IDX acts as the partner and the primary contact for Autoliv inquiries. HubSpot, Inc and IDX are processors acting on behalf of Autoliv, the data controller.
- Subcontractors/consultants engaged by Autoliv to provide technical support under locally applicable laws (e.g. IDX Inc), including our affiliates and vendors which conduct operational, technology and customer or prospects service functions in various jurisdictions.

- Authorities and law enforcement agencies, if requested for audit purposes or to verify compliance with legal requirements
- Financial authorities for fraud prevention and other similar agencies, and other financial institutions, with whom information is shared for credit and money laundering checking and fraud prevention purposes
- Legal or professional advisers, where necessary for the establishment, exercise, or defense of legal claims.

We do not otherwise reveal your data to non-Autoliv persons or businesses for their independent use unless: (1) you request or authorize it; (2) the information is provided to comply with the law (for example, to comply with a search warrant, subpoena, or court order), enforce an agreement we have with you, or to protect our rights, property or safety, or the rights, property or safety of our employees or others; (3) the information is provided to our agents, vendors or service providers who perform functions on our behalf; (4) to address emergencies or acts of God; or (5) to address disputes, claims, or to persons demonstrating legal authority to act on your behalf; Those individuals and official authorities may be in one of the countries from Annex 1.

If we need to share your data, we ensure that such recipient processes it follows this notice, such as by entering into data transfer agreements or data processing agreements with the recipients. Those agreements include all reasonable and appropriate contractual, legal, technical, and organizational measures to ensure that your information is processed with an adequate level of protection and following the applicable law.

HubSpot, Inc as third-party provider, might act as an independent data controller, according to their Privacy Policy for e.g:

- (a) when you sign up for their products and services, visit their websites or interact with them through other channels (for example in person events);
- (b) when they collect and process personal data about individuals in their professional capacity and make that information available to customers for their own sales, marketing, and other business activities. This includes personal data they may collect indirectly about you, such as from publicly available sources, their customers, or other third parties.

When acting as a controller, this third party is responsible for ensuring the security and confidentiality of your data following applicable data protection laws. For more information on how this third party handles your data, please refer to their privacy policy:

<https://legal.hubspot.com/privacy-policy>

HOW DO WE ENSURE APPROPRIATE PROTECTION OF PERSONAL DATA WHEN TRANSFERRED ACROSS BORDERS?

Autoliv always ensures that the same high level of protection applies to your data according to the [EU General Data Protection Regulation](#) [Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons concerning the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC] and other applicable privacy acts, even when the data is transferred and processed outside of the jurisdiction you are operative in. Your rights concerning your data are not affected when data is transferred to a third country.

If you want more information about the technical and organizational measures or the implemented safeguards for third-country transfers, please contact our Privacy Office at alv-dataprivacy@autoliv.com

WHAT RIGHTS TO YOU HAVE RELATED TO THE PROCESSING OF YOUR DATA?

You have several rights related to your data and to receive information directly from us about how we process personal data about you. If you want to know more or meet us to exercise your rights and for other types of privacy questions, please email us at alv-dataprivacy@autoliv.com.

- **The right to have your data deleted**
You have the right to ask us to delete personal data about you, for example, personal data that we no longer need for the purpose it was collected for, or personal data that we process based on a consent that you wish to revoke.
- **Right to be informed**
You have the right to be informed of how we process your data. We inform you through this privacy notice, by general employee privacy notices issued from time to time, and by answering your questions at any given time.
- **Right to receive access to your data**
You have the right to know if Autoliv processes personal data about you, and to receive a copy ("data extract") of such data. Through the data extract, you will receive information about what personal data we hold about you and how we process it.
- **Right to rectification**
You have the right to request that we rectify inaccurate information or complete information about you that you consider is inaccurate or incomplete.
- **Right to restrict processing**
If you believe that your data is inaccurate, that our processing is unlawful, or that we do not need certain information for a specific purpose, you have the right to request that we restrict the processing of such personal data. You also can request that we stop processing your data while we assess your request.
- **Right to object to our processing of your data**
You have the right to object to processing your data, for example when the processing is based on legitimate interest,

by referencing your circumstances. When you object to our processing, you may also request us to restrict the processing of that personal data (as described above) while we make our assessment.

- **Right to object to an automated decision that significantly affects you**
You have the right to object to our use of automated decisions or conclusions if the decision produces legal effects or significantly similarly affects you. Please note that no automated decision-making is being conducted within the scope of the survey.
- **Right to withdraw your consent** – opt out. If marketing materials as newsletters etc are sent out to customers, there will always be an opt-out link the customer can access to block them from further notifications or send outs.

Where we process your data based on your consent, you have the right to withdraw that consent at any time. Autoliv will respect your decision by ceasing the processing of your data and discontinuing its use. For each internal competition/campaign organized by Autoliv a specific consent will be collected and a Privacy Notice will be made available at the Point of Data Collection to ensure transparency and compliance. If you have any concerns or you want to exercise your right to withdraw your consent, please email us at alv-dataprivacy@autoliv.com.

- **Right to lodge a complaint**
If you have complaints about our processing of your personal data, you may lodge a complaint with the lead supervisory authority (<https://www.imy.se/en/individuals/forms-and-e-services/file-a-gdpr-complaint/>). Please email us at alv-dataprivacy@autoliv.com in case you need our support to identify a different lead authority or the proper authority to contact in your country.

Profiling and automated decision-making

Autoliv does not take any solely automated decisions, including those based on profiling, that have a legal or similarly significant effect on you.

HOW DO WE USE COOKIES AND OTHER TYPES OF TRACKING TECHNOLOGY

To provide a good experience and personalized content, we may use cookies in different interfaces, such as on our website. Information about how you can accept or decline cookies, including managing specific cookie preferences, is available in each respective. For a detailed overview of which cookies we have implemented on the Autoliv website, please consult the Autoliv Cookie policy available [here](#).

However, we are using the Platform provided by HubSpot Inc that may use cookies in different interfaces, such as on their website. To find out more about how they use cookies and similar technologies, how they process the information obtained through cookies, and how to reject cookies, see their Global Cookies Policy at <https://legal.hubspot.com/cookie-policy>

UPDATES TO THIS NOTICE

We are constantly working to improve our data protection practices, which may involve modifications to our processing of your data. If that improvement requires a notice or consent following applicable law, you will be notified or allowed to give your consent.

UPDATING YOUR INFORMATION

You may review or update certain account information by logging into the Platform and select Settings. If you cannot change the incorrect information online, or you need to request changes offline, please update such information by contacting the Super Admin of HubSpot at Autoliv. Please note that certain information, such as your HubSpot license may only be changed through Autoliv, by Super Admin.

MOBILE APPLICATIONS

Our sales team uses the HubSpot mobile application during trade shows and events to efficiently manage business contacts. This app includes a business card scanning feature, which allows us to add contact information directly into our HubSpot system.

When your contact details are added, you will receive an email requesting your consent for the processing of your personal data. This includes consent for communication and, where applicable, marketing purposes. We will not use your data for marketing without your explicit permission.

HOW TO CONTACT THE AUTOLIV GLOBAL PRIVACY OFFICE

Autoliv has a group data protection officer and a team of data protection specialists. You can reach all these individuals at alv-dataprivacy@autoliv.com. If you specifically wish to contact Autoliv's data protection officer, please type so in the subject line.

ANNEX NO.1
LIST OF AUTOLIV LEGAL ENTITIES

Autoliv Europe	
Country	Company Name
Estonia	AS Norma
	SNC
France	Autoliv Isodelta SAS
	Livbag SAS
	NCS Pyrotechnie et Technologies SAS
Germany	Autoliv B.V. & Co. KG
Hungary	Autoliv KFT.
Netherlands	Autoliv ASP B.V.
Poland	Autoliv Poland Sp. z o.o.
Romania	Autoliv Romania SRL
South Africa	Autoliv Southern Africa (Pty) Ltd
	Autoliv BKI SAU.
Spain	Autoliv KLE SAU
	Autoliv Development AB
Sweden	Autoliv Sverige AB
Switzerland	Autoliv Switzerland GmbH
Tunisia	STE ASW3 Nadhour
Turkey	Autoliv Cankor Otomotiv Emniyet Sistemleri Sanayi ve Ticaret A.S
United Kingdom	Airbags International Ltd.
Autoliv Asia	
India	Autoliv India Private Ltd.
	Autoliv Inflator India Private Limited
Indonesia	Autoliv Indonesia, P.T.
Japan	Autoliv Japan LTD.
Malaysia	Autoliv Hirotako SRS Sdn Bhd. Operating JV
Philippines	Autoliv Cebu Safety Manufacturing, Inc.
South Korea	Autoliv Corporation
Thailand	Autoliv (Thailand) Ltd.
	Autoliv Asia ROH Co., Ltd.
Vietnam	AUTOLIV VIETNAM COMPANY LIMITED
Autoliv China	
	Autoliv (Changchun) Vehicle Safety System Co. Ltd.
	Autoliv (Shanghai) Management Co. Ltd.
	Autoliv (Jiangsu) Automotive Safety Components Co., Ltd.
	Autoliv (Shanghai) Vehicle Safety System Co.Ltd.
	Autoliv (China) Steering Wheel Co. Ltd.
	Autoliv Shenda (Tai Cang) Automotive Safety Systems Co. Ltd
China	Autoliv (Jiangsu) Automotive Safety Components Co., Ltd.
	Autoliv (Jiangsu) Automotive Safety Components Co., Ltd.
	Autoliv (China) Automotive Safety Systems Co. Ltd.
	Autoliv Shenda (Nanjing) Automotive Components Co. Ltd.
	Autoliv (Shanghai) Vehicle Safety System Technical Center Co.Ltd.
	Autoliv (Baoding) Vehicle Safety Systems CO., Ltd
	Autoliv (Nanjing) Vehicle Safety Systems Co.Ltd
	Mei-An Autoliv Co. Ltd
Autoliv Americas	
Brazil	Autoliv do Brasil Ltda.
Canada	Autoliv Canada Inc.
	VOA Canada Inc.
Mexico	Autoliv Mexico East S.A. de C.V. Operating - Maquila.
	Autoliv Mexico, S.A. de C.V.
	Autoliv Steering Wheels Mexico S. de R.L de CV
	AUTOLIV SAFETY TECHNOLOGY DE MEXICO, S.A. DE C.V.
United States	Autoliv ASP, Inc.