

## PRIVACY NOTICE FOR SPEAK-UP LINE AND COMPLIANCE INVESTIGATIONS

Updated 10.12.2025

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](mailto:alv-dataprivacy@autoliv.com)

### WHAT PERSONAL DATA DO WE USE AND WHY?

**Autoliv Helpline and Ethics Case Management (“Speak-up Line” or “Speak-up”)** is a web and phone-based intake system provided by Autoliv AB, open to its employees, former employees, or non-employees (this includes contractors, students, suppliers, partners, member, etc.) (**“Reporters”**) for reporting anonymously or not the suspected violations of laws or regulations, or for certain matters specifically specified in an applicable whistleblowing law as well as for raising a question on ethics or compliance matters or an inquiry regarding a company policy. The personal data processed as part of this process will allow you:

- To report suspected violations of law or company policies, as well as other concerns you may have, and to be able to investigate the alleged misconduct.
- And/or
- To raise a question on ethics or compliance, or an inquiry regarding a company policy, and to be able to offer you all the requested information

The following personal data will be processed:

Purpose	Personal Data	Legal Basis	Retention period
To create user accounts for employees managing the system	Contact Information (name, email, job title, function, phone number, location, company/personal email)	Legitimate interest	For the duration of employment or as long as you have responsibilities to manage the intake system
To identify yourself for reporting suspected violations or matters under the whistleblowing law		Legal Obligation	Date of Resolution + 10 Year
To provide support/help desk		Legitimate interest	For the duration of employment or as long as you have responsibilities to manage the intake system
To report suspected violations, to raise ethics or compliance questions, to communicate with the compliance department, to retain investigation evidence, to report to auditors or authorities, and to comply with laws or court orders	Investigation Data (description of alleged misconduct, social media data, interview notes, evidence, investigation report, remediation plan, disciplinary/judicial measures)	Legal obligation	Date of Resolution + 10 Year
Same purposes as investigation data; If irrelevant, will not be further processed	Sensitive Personal Data (voluntarily provided during reporting)	Legal Obligation/	Date of Resolution + 10 Year

		Legitimate Interest	
To enable communication between the reporter and the organization, and to get access to the case status	Access Credentials (access number/password, reporting party communication section)	Legal obligation	Date of Resolution + 10 Year
For security and authentication purposes	Electronic Device Data (user credentials, usage logs, user activity, and user timestamps in the system)	Legitimate interest	Backups retained for max 35 days from creation  Logs are retained for as long as the company has the agreement in place with the vendor, but no longer than 60 days after termination/expiration of the contractual agreement

### 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. For processing and investigating the alleged misconduct and 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, including Management, Human Resources, Finance, IT, Internal Audit, Legal, Compliance, etc.
- System providers that Autoliv Group engages as processors. The personal information Autoliv collects from you is stored in one or more databases hosted by third parties. These third parties do not use or have access to your personal information for any purpose other than technical support.
- Subcontractors/consultants engaged by Autoliv to investigate under local applicable laws (e.g. legal advisors, lawyers, investigation companies)
- Authorities and law enforcement agencies, if requested for audit purposes or to verify compliance with legal requirements
- 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 in accordance with 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.

## 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](mailto:alv-dataprivacy@autoliv.com)

## WHAT RIGHTS DO 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](mailto: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 can also 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 the 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**  
Where we process your data based on your consent, you have the right to withdraw that consent at any time.

- **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](mailto: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 Notice available [here](#).

#### 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.

#### 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](mailto: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**

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

