



Privacy Policy for Data Processing in Connection with a Driving Behavior-Based Insurance Rate (Pay How You Drive)

A. Controller

With this data protection declaration, we inform you about the collection, processing and use of your personal data by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, (info-datenschutz@volkswagen.de), registered in the commercial register of the Braunschweig District Court under the number HRB 100484 ("Volkswagen AG") in connection with a driving behavior-based insurance tariff.

B. Collection, processing and use of your personal data

The purpose of this data processing by VW AG is to provide the following vehicle data for the purpose of determining driving behavior, together with the vehicle identification number and the Volkswagen ID:

- Ignition state (on/off)
- GPS-Location
- Mileage
- Timestamp
- Next inspections (time, distance)
- Charging and refueling information (fill level, consumption)
- Speed information (current, average)
- Braking behavior (e.g. braking, pressure)
- Acceleration parameters

The legal basis for data processing is the contract that you have concluded with the insurance company in accordance with Art. 6 (1) (b) GDPR.

Your personal data (vehicle identification number, Volkswagen ID) will be stored in connection with your insurance product until it is cancelled. The vehicle data will be deleted immediately after it has been made available, but no later than 30 days.

C. Your rights

You can assert your following rights against Volkswagen AG at any time free of charge. For more information on how to exercise your rights, please see Section D.

Right to information: you have the right to obtain information from us about the processing of your personal data.

Right to rectification: you have the right to request that we rectify any of your personal data that may be inaccurate or incomplete.



Right to erasure: you have the right to request the deletion of your data if the conditions specified in Art. 17 GDPR are met. After that, you can, for example, request the deletion of your data if it is no longer necessary for the purposes for which it was collected. You can also request erasure if we process your data on the basis of your consent and you withdraw this consent.

Right to restriction of processing: you have the right to ask for a restriction of the processing of your data if the conditions set out in Article 18 of the GDPR are met. That is the case, for example, if you dispute the accuracy of your data. You can then demand a restriction of processing for the period it takes to verify the accuracy of the data.

Right to object: if the processing is carried out on the basis of a legitimate interest of Volkswagen AG or a third party, or is in the public interest or is carried out in the exercise of official authority, you have the right to object to the processing of your data on grounds relating to your particular situation. In the event of an objection, we ask you to inform us of your reasons for objecting to data processing. In addition, you have the right to object to data processing for direct marketing purposes. This also applies to profiling, as far as it is related to direct advertising.

Right to data portability: you have the right to receive your data in a structured, commonly used and machine-readable format and to transfer the data to another data processor, provided that data processing is based on consent or contract fulfilment and that automated processing methods are used.

Right to withdraw consent: where data processing is based on consent, you have the right to withdraw your consent to data processing, with future effect, at any time free of charge.

Right of complaint: you also have the right to lodge a complaint about our processing of your data with a supervisory authority (such as the Data Protection Commissioner for the State of Lower Saxony [Landesbeauftragte für den Datenschutz Niedersachsen]).

D. Your contact persons

Contact person for exercising your rights

The contact persons for exercising your rights and further information can be found on the following website datenschutz.volkswagen.de.

Data protection officer

Our data protection officer is available to you as a contact person for data protection-related concerns:

Data Protection Officer of Volkswagen AG
Berliner Ring 2
38440 Wolfsburg
GERMANY
dataprivacy@volkswagen.de

Version dated: February 2025