



# Privacy Policy on Video/Image Recordings for Digital and Analogue Media for Public Relations

## A. Controller

With this privacy policy, we inform you about the collection, processing and use of your personal data by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, registered in the commercial register of the Braunschweig District Court under the number HRB 100484 ("Volkswagen AG").

## B. Collection, processing and use of your personal data

### 1. Principles

The Group Innovation division of Volkswagen AG records video and image data for use in digital and analog media for public relations work. This public relations work is intended to provide an insight into the activities of the employees of Group Innovation at Volkswagen AG. This includes the presentation of research prototypes as well as the publication of events as well as other work related to the activities of Group Innovation.

In order to create a digital/analogue presentation of a research prototype, the processing of your personal data takes place in connection with the recording of video and image data in a public space, in which the research prototypes are recorded in a real traffic and environmental situation. Potentially affected by this data processing is the person who is in the vicinity or recording area of the marked video/photo recording device during the video data / image recording.

The video/image recordings are required for the purpose of creating digital/analogue media in the context of internal and external public relations work (e.g. image films). The recorded raw data is temporarily stored on technically and organizationally secured networks or databases and used for the creation of the corresponding media.

In the final film/image, any connection between you and the recordings is irrevocably severed, i.e. any previously personal data is completely anonymized in the finished film/image, so that no conclusions can be drawn about natural persons. This is achieved through suitable technical measures such as pixelation.

For the purpose of publishing events and other work related to Group Innovation's activities in digital/analogue media, your personal data will be processed in connection with the recording of video and image data. The processing of your personal data takes place exclusively in the context of large gatherings of people. The recordings are processed, published and disseminated by Volkswagen AG exclusively for internal and external public relations purposes, if necessary only in part. The focus of the image and video recordings is on documenting the event and other activities of Group Innovation. Image and video recordings are used to depict large gatherings of people, which reflect the event character and the other activities of Group Innovation. The focus here is on documenting the event/activities.

Volkswagen AG as well as service providers and/or cooperation partners, such as processors of Volkswagen AG, do not identify individual persons in the video data / image recordings at any time.



## 2. Categories of data concerned and processing purposes

For the purpose of creating digital/analogue presentations of research prototypes for public relations (e.g. image film), the following data may be collected and processed:

- Video data / image recordings of road users (vehicles and persons),
- License plates and lettering on vehicles,
- Lettering on shops and street signs,
- Other information in the immediate vicinity of the marked image/video recording device.

The following data is collected and processed for the purpose of publishing events and other work relating to Group Innovation's activities in digital/analogue media for public relations:

- Video data / image recordings and, if applicable, audio recordings of your people within larger groups of people

## 3. Recipients

Within Volkswagen AG, only those persons who need it for the purposes mentioned above under B. 1 and B. 2 have access to your data.

If Volkswagen AG transmits the above-mentioned data with service providers or cooperation partners, this will be done in compliance with applicable data protection law on the basis of corresponding agreements for order processing within the meaning of Art. 28 GDPR.

Service providers (so-called processors) used by Volkswagen AG who receive data may include:

- VW Group companies that provide services to Volkswagen AG,
- Digital media (e.g. film production) and print media service providers,
- Hosting service providers,
- IT service provider.

Volkswagen AG will be happy to provide you with further information on the recipients for the creation of digital/analogue media on request. Please use the contact details below.

If recipients are located in a country outside the European Union or the European Economic Area (so-called third country), the data may be transferred to a country where there may not be an adequate level of data protection, i.e. one comparable to that in the EU. Please note that not all third countries have an adequate level of data protection recognized by the European Commission. For data transfers to third countries where there is no adequate level of data protection, Volkswagen AG has taken appropriate measures, such as the conclusion of so-called EU standard data protection clauses, to protect your personal data.

[Implementing Decision - 2021/914 - EN - EUR-Lex \(europa.eu\)](#)



#### 4. Legal basis for data processing

Your personal data will only be collected, processed and transmitted for a specific purpose and only if there is a relevant legal basis for this.

The following legal basis is the basis for the purposes described above:

The processing of your personal data is carried out on the basis of a balancing of interests in accordance with Art. 6 (1) (f) GDPR.

Volkswagen AG has a legitimate interest in processing your data for the purpose of creating digital/analogue media for public relations purposes.

For information about your rights, including the right to object to the processing of your personal data, please see Section C of this Notice.

#### 5. Duration of processing and deletion of data

If there are no special legal reasons to the contrary, your data will only be stored for as long as is necessary for the processing purposes.

For the purpose of creating digital/analogue presentations of research vehicles, the necessity of storing your personal data expires with the completion of the final film(s), in which any reference to you is irrevocably deleted by complete anonymization.

You can object to personal data of your person processed at any time for the purpose of publishing events and other work relating to the activities of Group Innovation in digital/analogue media for public relations work. The objection does not affect the lawfulness of the processing of your data carried out on the basis of the balancing of interests until the objection. The image, sound, video and/or audio recordings you have made will be deleted after a maximum of 45 years. The documents are usually also used for internal archive purposes.

#### C. Your rights

You can assert your following rights against Volkswagen AG at any time free of charge. The relevant contact details for exercising your rights can be found under Section D.

**Right of access:** 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 the immediate correction of incorrect or incomplete information about your personal data stored by us.

**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 request the restriction of the processing of your data if the requirements of Art. 18 GDPR are met. This is the case, for example, if you dispute the accuracy of your data. For the duration of the verification of the accuracy of the data, you can then demand the restriction of processing.



**Right to object:**

You have the right to object to the processing of your personal data in the following cases:

- When the processing is carried out for direct marketing purposes (including profiling for direct marketing purposes).
- Where the processing (including profiling) is based on one of the following legal bases:
  - The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.
  - The processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.

In the event of such an objection, we ask you to inform us of your reasons for objecting to the data processing. We will no longer process your data in the event of your objection, unless we can demonstrate compelling legitimate grounds for the processing that outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

**Right to lodge a complaint:** You also have the right to complain to a supervisory authority (e.g. the State Commissioner for Data Protection of Lower Saxony) about our processing of your data.

**D. Your contact persons**

**Contact person for exercising your rights in relation to Volkswagen AG**

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

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 238440 Wolfsburg GERMANY  
[dataprivacy@volkswagen.de](mailto:dataprivacy@volkswagen.de)

**Stand: April 2025**