



Privacy Policy for Data Processing in the Context of Testing and Validation of Infotainment Systems

A. Controller

This privacy policy serves as a notice, informing you below about the processing of your personal data and about your rights as a data subject in the context of testing and validation of infotainment systems, which are carried out by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany, registered in the commercial register of the Braunschweig Local Court under HRB 100484 ("Volkswagen AG").

Your personal data is processed exclusively within the framework of the legal provisions of data protection law, in particular the EU General Data Protection Regulation ("GDPR").

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

1. Basic principles

As part of the development of infotainment systems, including the associated troubleshooting, testing is carried out in which Volkswagen AG connects non-work mobile devices and work mobile devices that are also used for private purposes (hereinafter referred to as "mobile devices") to the vehicle (via Bluetooth or CarPlay).

This is to ensure that the functions for connecting mobile devices to the infotainment system of Volkswagen AG vehicles are extensively tested, enhanced, and validated for release and subsequent series production. The aim is to guarantee communication and data transmission so the product offered to customers can be as flawless as possible. Volkswagen AG will not identify individuals in the data sets at any time.

If you make a phone call to a mobile device of a test driver or vehicle occupant during a test drive when this mobile device is connected to the vehicle, your phone number and, depending on the connected mobile device, your first and last name, if applicable, will be shown on the display of the infotainment system and saved in the built-in data logger.

The collection of this data is necessary for the comprehensive verification and testing of the functions to ensure that the infotainment system in Volkswagen AG vehicles is suitable for use in customer vehicles and flawless when connecting mobile devices.

2. Affected data categories and purposes for processing

The following personal data is gathered and processed for the purpose of testing and validation of infotainment systems in the context of connecting mobile devices:

Contact details (first name, last name, and phone number)

Your contact details are processed solely for the purpose of the developing flawless infotainment systems in order to guarantee customers experience trouble-free phone connection and communication.

The usefulness of testing the connection does not focus on your data, but on the controlling and functionality of apps, navigation systems, and music on the mobile device. The collection and processing of your contact data is not the focus of Volkswagen AG's activities, but may be necessary, as testing of the infotainment



system under non-simulated conditions (i.e., with various mobile devices in various environmental scenarios) is necessary in order to assess the functionality in its entirety and to correct any flaws before market launch.

3. Recipients

Within Volkswagen AG, only those individuals who require your data for the purposes listed above in section B.2 have access to your data.

If Volkswagen AG shares the data mentioned above with service providers and/or other business partners, this sharing takes place in compliance with applicable data privacy laws based on corresponding data-processing agreements in the sense of GDPR Article 28.

Service providers (i.e., processors) that are used by Volkswagen AG and receive data include:

- Companies of the Volkswagen Group that render services (e.g., development services) for Volkswagen AG
- Development service providers outside the Volkswagen Group
- Suppliers of infotainment systems

These companies are each involved in product development and the evaluation of tests. Volkswagen AG will provide further information on the recipients in the context of the technical analysis of data from actual test drives upon request. Please use the contact information listed below for this purpose.

4. Legal basis for data processing

Your personal data is only collected, processed, and transmitted for specific purposes if the pertinent legal basis for this exists.

The purposes described above have the following legal basis: The processing of your personal data is carried out on the basis of a weighing of interests as per GDPR Article 6, paragraph 1, lit. f.

Volkswagen AG has a legitimate interest in the processing of your data in the context of testing and validation in order to extensively test, enhance, and validate infotainment systems for release and subsequent series production (error elimination process as part of the Product Emergence Process) in order to bring products to market that are as flawless as possible and to be able to offer them to customers.

Information on your rights, including your right to object to the processing of your personal data, can be found in section C of this statement.

5. Duration of processing and erasure of personal data

Your data is processed exclusively in secure databases.

Unless specific legal reasons exist to the contrary, your data is only stored for as long as required for processing purposes. Your data will then be deleted.

Your data may need to be stored for a longer period of time for quality assurance and troubleshooting purposes. Your data is usually deleted after around 250 days by being overwritten in a circular buffer.



C. Your rights

You can assert the following rights with respect to Volkswagen AG at any time, free of charge. The corresponding contact details for asserting your rights can be found in section D.

Right of access: You have the right to receive from us information regarding the processing of your personal data.

Right of rectification: You have the right to request immediate correction of incorrect or incomplete details of your personal data that we have stored.

Right to erasure: You have the right to request erasure of your data, if the requirements in Article 17 of the GDPR are met. Accordingly, for example, you can request erasure of your data if this data is no longer required 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 a restriction of the processing of your data, if the requirements in Article 18 of the GDPR are fulfilled. This may be the case, for example, if you contest the accuracy of your data. In such cases, you can request that processing be restricted for the duration of the review concerning the accuracy of the data.

Right of object: If the data processing is based on an overriding interest, you have the right to object to the processing of your data on grounds relating to your particular situation. In the case of an objection, we ask that you share with us your reasons based on your personal situation that lead you to object to data processing. An objection is permissible if processing is either in the public interest or is carried out in the exercise of official authority, or takes place based on a legitimate interest of Volkswagen AG or a third party.

Right of complaint: You also have the right to file a complaint with a supervisory authority (e.g., Data Protection Authority for the state of Lower Saxony) regarding our processing of your data.

D. Contacts

Contacts for asserting your rights

The contacts for asserting your rights and further information can be found at the following website:
<https://datenschutz.volkswagen.de>.

Data protection officer

Our data protection officer is available as your contact for matters relating to data protection:



Data protection officer of Volkswagen AG
Berliner Ring 2
38440 Wolfsburg
GERMANY
dataprivacy@volkswagen.de

Version: November 2024