

## Privacy policy – Information security in Aftersales systems

### 1 Data controller

In this privacy policy, we, Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany, entered in the Commercial Register at the Braunschweig District Court under HRB 100484 ("Volkswagen AG") are providing information to you about the processing of your personal data with regard to the guarantee of information security of the Aftersales systems used by you.

### 2 Processing of your personal data

#### 2.1 Processed personal data, purpose and legal basis

Volkswagen AG, Audi AG, Seat S.A. and Škoda AUTO a.s., as joint controllers, process the following data to detect, analyze and rectify irregularities in IT systems you are using, increase information security, protect personal data, prevent unauthorized access and enable the trouble-free operation and safe use of these systems, and also for cooperation with authorities and courts (collectively: "purposes") (hereafter: "relevant companies"):

- IT usage data (User ID, time and number of call-ups, and system used, organizational association, role of the user)
- job-related contact details and (work) organization data

If you are employed at one of the relevant companies, your data will be processed to execute the employment relationship with the respective relevant company. The legal basis insofar is Art. 6(1)(b) GDPR. In all other cases, data is processed to maintain the legal interests of the relevant companies and users with the guarantee of trouble-free and secure operation and the secure use of the IT systems (Art. 6(1)(f) GDPR).

#### 2.2 Retention periods

The data stated above is stored for a maximum of 2 years and will then be deleted.

#### 2.3 Recipients of your data

In addition to the relevant companies, the data stated above is received by processors who provide support to us for data processing, e.g., as part of IT system hosting, for technical support services

and the project and requirement management. These processors act on the basis of processing agreements and strictly as instructed by us.

We are using processors for hosting, analytical and support services, particularly:

- Volkswagen Gebrauchtfahrzeughandels und Service GmbH
- i3 Systems GmbH
- Alter Solutions Deutschland GmbH
- SIG Software Ltd.
- Hyand Technology GmbH
- Volkswagen Group Services GmbH
- Microsoft Ireland Operations Limited.

## 3 Shared responsibility

The relevant companies have concluded a Joint Controller Agreement (“JCA”):

### **3.1 Parties involved and domicile of the place of business:**

Audi AG, with headquarters in Ingolstadt (Germany); Volkswagen AG, with headquarters in Wolfsburg (Germany), Seat S.A., with headquarters in Martorell - Barcelona (Spain), Škoda Auto a.s., with headquarters in Mladá Boleslav (Czech Republic)

### **3.2 Goals pursued by the responsible parties:**

The responsible parties pursue the goals stated above when processing data (assurance of the security of their IT systems).

### **3.3 Data stocks processed, and place of processing (if applicable):**

The data stated above is always processed within the EU.

### **3.4 Governance of shared responsibility:**

The data stated above is processed jointly by the relevant companies, and the parties assume shared responsibility within the meaning of Art. 26(1) p. 1 GDPR.

### **3.5 Volkswagen AG is in compliance with all information obligations.**

The parties affected can address concerns regarding the processing of their data and their rights to the contacts named under no. 5 . Otherwise, parties affected can also contact any of the relevant companies.

## 4 Your rights

You may exercise the following rights against Volkswagen AG at any time and free of charge. The relevant contact details for exercising your rights are provided in section D.

**Right to obtain 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 have your personal data rectified if this data is incorrect or incomplete.

**Right to erasure:** You have the right to have your personal data erased if the conditions set out in Article 17 GDPR are met. For example, you may have your data erased if it is no longer required for the purposes for which it was collected. You may also request erasure of your data if we process your data on the basis of your consent and you withdraw this consent.

**Right to limitation of processing:** You have the right to request limited processing of your personal data if the conditions set out in Article 18 GDPR are met. This is the case, for example, if you dispute the accuracy of your personal data. In this case, you can request limited processing for the period of time that is required to check the accuracy of the data.

**Right to data portability:** You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit this personal data to another data processor, if the data is processed based on consent or for contract fulfillment, and if automatic processing methods are used.

**Right to objection:** If we process your personal data based on legitimate interests or in the public interest, you have the right to object to the processing of your data for personal reasons. You also have an unrestricted right to objection if we process your data in the case of direct marketing.

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

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

## 5 Contact options

### Contact person for the assertion of your rights

Further information on exercising your rights is available under [www.privacy.volkswagen.com](http://www.privacy.volkswagen.com).

### Data Protection Officer

Our data protection officer will support you as the contact partner for all questions related to data protection law:

Data protection officer of Volkswagen AG

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Berliner Ring 2, 38440 Wolfsburg, GERMANY

[dataprivacy@volkswagen.de](mailto:dataprivacy@volkswagen.de)

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