



# Privacy Policy Regarding Video Data Recording in the Course of Road Testing

## A. Person responsible

With this privacy policy, we are informing you of the collection, processing, and use of your personal data by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany, entered in the Commercial Register of the District Court of Braunschweig under no. HRB 100484 ("Volkswagen AG") and ADC Automotive Distance Control Systems GmbH, Peter-Dornier-Straße 10, 88131 Lindau, Germany und Continental Automotive Technologies GmbH, Vahrenwalder Str. 9, 30165 Hannover, Germany (referred to as joint controllers in the following).

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

### 1. Principles

The joint controllers use so-called test vehicles to develop, enhance, test, and validate advanced driver assistance systems, driver information systems, automated driving functions, convenience features, and other services. In the specially marked test vehicles, data recordings are made using sensors, measuring equipment, and video measurement technology.

Your personal data is thereby processed in the context of creating and evaluating video recordings from public traffic operations during the performance and analysis of the joint controllers' development and quality validation road tests. Potentially, this data processing may affect individuals who are present in the vicinity of the one of the marked test vehicle during the testing and validation operations.

The data recordings are required for development purposes. They are aimed at improving product, vehicle, and road safety as well as preventing road traffic accidents.

The recorded environmental data is then stored in a secure database and used to develop, enhance, and validate advanced driver assistance systems, driver information systems, automated driving functions, and convenience features.

Specifically, on the basis of this data in the context of real-life traffic conditions and environmental situations, the comfort and safety of the vehicles are improved, as well as autonomous vehicles and the associated systems developed, tested, and validated for safe road use compliant with the pertinent regulations.

The recorded video data are also used to verify the functionality of the vehicle. Processing of the traffic infrastructure at hand and detection of the vehicle surroundings, obstacles, and environmental conditions (e.g., road grip characteristics or restriction of visibility due to air pollutants), as well as other road users, including their direction of movement, are necessary in order to derive the correct vehicle response for the current situation.

The joint controllers will not identify individuals in the data sets at any time.



## 2. Affected data categories and purposes for processing

For the purposes of developing, enhancing, testing, and validating advanced driver assistance systems, driver information systems, automated driving functions, convenience features, and other services, including implementation of quality assurance measures, the following data are collected and processed:

- Video recordings of other road users (vehicles and persons)
- License plates and lettering on vehicles
- Text on retail stores, shops, and street signs
- Other information in the direct vicinity of the test vehicles that is captured by cameras.:

## 3. Recipient

Within the joint controllers, only those individuals who require your data for the purposes listed above in section II have access to your data.

If the joint controllers share the data mentioned above with service providers and/or other business partners, this sharing take place in compliance with applicable data privacy laws based on corresponding data-processing agreements in the sense of Article 28 of the General Data Protection Regulation (GDPR).

Service providers (so-called processors) that are used by the joint controllers 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 safety-relevant advanced driver assistance system components
- Hosting service providers
- IT service providers

These companies are each involved in product development and the evaluation of tests. Further information on the recipients of data from actual test drives will be provided by the joint controllers upon request. Please use the contact information listed below for this purpose.

If a recipient is located in a country outside the European Union or outside the European Economic Area ("third country"), the data could be transmitted to a country that might not have commensurate data protection regulations, i.e., data protection regulations comparable to those in the EU. Please be aware that not all third countries have data protection regulations that are recognized as commensurate by the European Commission. For the transmission of data to third countries that do not have commensurate data protection regulations, the joint controllers will take appropriate measures to protect your personal data, e.g., by signing agreements with EU standard data protection clauses with the recipients of the data.



#### 4. Legal basis for data processing

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

The above described purposes have the following legal basis:

The processing of your personal data is carried out on the basis of a weighing of interests as per Article 6, paragraph 1, lit. f of the GDPR.

The joint controllers have a legitimate interest in the processing of your data for the purposes of development, testing, and validation as well as for the implementation of quality assurance measures. This applies in particular to the development and validation of advanced driver assistance systems and partially or fully automated driving functions, in order to increase traffic safety on public roads.

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 deletion of data

Unless specific legal reasons exist to the contrary, your data are only stored for as long as required for processing purposes.

Storage of your data for a longer duration may be necessary for the purposes of quality assurance and troubleshooting of the aforementioned systems after launch. Furthermore, we store your data in certain circumstances to preserve evidence for the purpose of asserting or defending against legal claims. Your data will always be deleted by the expiration of the applicable statutory limitation period at the latest.

#### C. Your rights

You can assert the following rights toward the joint controllers at any time, free of charge. The corresponding contact details for exercising 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 to 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 deletion of your data, subject to the requirements in Article 17 of the GDPR. Accordingly, for example, you can request deletion of your data if these data are no longer required for the purposes for which they were collected. You can also request deletion 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, subject to the requirements in Article 18 of the GDPR. 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 to object:** If the data processing is based on an overriding interest, you have the right to object to processing of your data. An objection is permissible if processing is in the public interest or is carried out in the exercise of official authority, or takes place based on a legitimate interest of the joint controllers or a third party. In the case of an objection, we ask you to share with us your reasons for objecting to data processing.

**Right of complaint:** You also have the right to raise a complaint at a regulatory body (e.g., Data Protection Supervisor for the state of Lower Saxony) regarding our processing of your data.



#### **D. Your contacts**

##### **Contact for exercising your rights at Volkswagen AG**

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

Our Data Protection Officer is available as your contact for matters relating to data protection:

Datenschutzbeauftragter der Volkswagen AG  
(Data Protection Officer of Volkswagen AG)  
Berliner Ring 2  
38440 Wolfsburg  
GERMANY  
[dataprivacy@volkswagen.de](mailto:dataprivacy@volkswagen.de)

##### **Contact for exercising your rights at Continental Automotive Technologies GmbH und ADC Continental Automotive Distance Control Systems GmbH:**

Data Protection Officer  
Our Data Protection Officer is available as your contact for matters relating to data protection:  
Data Protection Officer of Continental Automotive business domain:  
[dataprotection@conti.de](mailto:dataprotection@conti.de)

Continental Automotive Technologies GmbH  
Vahrenwalder Straße 9, 30165 Hannover, Germany

ADC Continental Automotive Distance Control Systems GmbH  
Peter-Dornier-Straße 10, 88131 Lindau, Germany

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