



# **“Sales, Services and Marketing Measures” Privacy Policy in the European market**

Dear customer,

As part of your visit, your Volkswagen dealership carries out all the processes necessary to provide the stipulated service and to satisfy your requirements. This typically leads to a series of processes in which information about you as a customer and your vehicle is processed and in which Volkswagen AG is involved as the manufacturer of your vehicle. In particular, this involves executing service processes and new car or used car purchases, or conducting customer surveys. We will inform you of the relevant data processing by Volkswagen AG in the following sections.

## **A. Controller**

This privacy policy provides information on the collection, processing and use of your personal data by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany, [kundenbetreuung@volkswagen.de](mailto:kundenbetreuung@volkswagen.de), entered in the register of companies at Braunschweig District Court under the register no. HRB 100484 (“Volkswagen AG”).

## **B. Collecting, processing and use of your personal data**

### **I. General information**

Electronic control units are installed in your vehicle. Control units process data that they receive from vehicle sensors, generate themselves or exchange with other control units, for example. Some control units are required for the safe functioning of your vehicle, others support you while driving (driver assist systems), and others enable convenience or infotainment functions. In particular, the control units required for the functioning of your vehicle play an important role in services such as repair and maintenance orders.

If you make use of services, the operating data stored can be read out and used together with the vehicle identification number (“VIN”) if necessary. It can be read out from the vehicle by employees of the service network (e.g. workshops, manufacturers) or third parties (e.g. breakdown services). The same applies to guarantee claims and quality assurance measures.

Volkswagen AG may also process your personal data in individual cases as part of new or used car purchase processing or when conducting customer surveys.



## **II. Reference to a specific person**

In order to be able to provide certain services for your vehicle, it is necessary to have knowledge of your vehicle's vehicle-specific information. Information regarding the so-called "basic vehicle data", including the VIN, equipment features and construction status, is stored by us as the manufacturer of your vehicle to enable services such as the repair or replacement of vehicle parts over the entire service life of a vehicle.

Therefore, the data generated or processed by control units can be personal – or can be considered personal under certain conditions.

## **III. Data processing by Volkswagen AG**

Below you will find the specific processing purposes, the personal data that Volkswagen AG processes for these purposes, and the legal basis and storage period of the data.

### **1. Fulfilment of statutory requirements**

In order to comply with statutory requirements, Volkswagen AG processes your name, address, VIN, the construction status of your vehicle and, if necessary, other personal data.

Volkswagen AG is subject to various statutory requirements that it must meet. These can result, for example, from statutory customs, tax and vehicle registration regulations.

For example, Volkswagen AG processes the VIN to check and ensure legal CO<sub>2</sub> emissions compliant with EU legislation for monitoring CO<sub>2</sub> emissions from passenger cars and commercial vehicles. It receives the relevant VIN from the authorised Volkswagen repairer in the event of changes to the construction status of the vehicle and the resulting changes to the vehicle documents. If bodywork or completions are carried out on light commercial vehicles, WLPT results are transmitted to the converter for the purpose of ensuring legally compliant CO<sub>2</sub> emissions. In accordance with EU Regulation 2019/621, Volkswagen AG holds VIN-related data records for use in regular technical inspections.

Data processing is necessary to fulfil legal obligations (see Article 6 (1) (c) of the GDPR) or on the basis of an overriding legitimate interest (see Article 6 (1) (f) GDPR) if the processing of the customer data is used for processing the bonus payment to the dealership.

The retention period depends on the respective processing purpose prescribed by the legal requirements.

This data is processed on the basis of the fulfilment of contracts in accordance with Article 6 (1) (b) of the GDPR if the customer is a natural person (individual customer) or on the basis of the overriding legitimate interest (Article 6 (1) (f) of the GDPR) if the customer is an employee of a fleet customer. The legitimate interest, including in the interests of customer satisfaction, involves complying with existing claims for old price billing and compliance with the dealership contract.

For tax law reasons, the data is stored for 15 years from the event.



## **2. Warranty and guarantee claims, maintenance and wear packages, and goodwill**

In order to check and process guarantee and warranty claims, as well as maintenance and wear packages, Volkswagen AG processes your name, address, VIN, repair and invoice data and the construction status of your vehicle.

Volkswagen AG is happy to comply with existing claims arising from guarantee and warranty claims, as well as maintenance and wear packages. For this purpose, Volkswagen AG first checks whether claims are valid or not, for example, due to modifications to the vehicle's construction status (e.g. tuning, conversions etc.) made by an owner. For this check, Volkswagen AG uses your contact and vehicle data.

The VIN, construction status data and mileage are also processed at the importer level to prepare and conduct warranty audits. These audits are required to check the proper application of the manufacturer's warranty specifications.

In addition, Volkswagen AG processes your personal data in the case of goodwill guarantees in the event of major damage (e.g. caused by hail or storm) or in the event of faults in the equipment of new vehicles you have ordered.

Volkswagen AG processes this data to fulfil the terms of your contract (see Article 6 (1) (b) GDPR) or on the basis of an overriding legitimate interest in accordance with Article 6 (1) (f) GDPR.

Your data that we process for processing guarantee and warranty claims as well as goodwill cases will be deleted, at the latest, 15 years after processing the transaction.

## **3. Mobility guarantee**

For the ID models, Volkswagen AG is responsible for the implementation of the mobility guarantee; for all other models in the European region outside Germany, the respective importer is the responsible entity. You can, therefore, obtain further information on data processing from the respective importer.

If you have taken out a mobility guarantee, Volkswagen AG processes your name, contact details and the VIN and data of your vehicle when you use services provided on the basis of this guarantee.

With the aid of this data, Volkswagen AG checks whether you are entitled to the service provided. The data is also required to be able to offer you the specific service.

For example, if you use Roadside Assistance, we will also process your current location and the presumed reason for your vehicle's breakdown.

This data is required to provide immediate telephone assistance or, if necessary, to commission a Volkswagen dealership in the immediate vicinity to provide Roadside Assistance.

A mobility guarantee is automatically linked to the purchase or leasing of a vehicle from the Volkswagen ID family. The content of the mobility guarantee can be found in the guarantee conditions provided. If you claim services from this guarantee, your private identification data, your contact data, your address and your vehicle configuration data will be processed by Volkswagen AG.

With the aid of this data, Volkswagen AG checks whether you are entitled to the service provided. The data is also required to be able to offer you the specific service.



If you use additional services, such as immediate assistance by telephone, courtesy cars or other mobility alternatives, your location data, driving licence information, credit card data and also the personal data of passengers may also be recorded and processed. This data is required to provide immediate telephone assistance or, if necessary, to commission a Volkswagen dealership or contracted provider in the immediate vicinity to provide Roadside Assistance. The Volkswagen dealerships or the contracted providers process the personal data on their own authority.

This data is processed to fulfil the terms of your mobility guarantee claim or mobility guarantee contract (see Article 6 (1) (b) GDPR).

For the processing and cost allocation of breakdowns, such as the acceptance of the customer's request by telephone or the internal cost allocation, Volkswagen AG uses Volkswagen Deutschland GmbH & Co. KG and Volkswagen Group Service GmbH as processors for the German market. In certain cases (e.g. if the vehicle has to be transported or a service has to be invoiced), it may be necessary for arc europe S.A. in Brussels to act as a processor for Volkswagen AG in the European market for the ID models, which themselves commission service providers in the respective country. After processing and cost allocation of the services in the event of a breakdown, your private identification data (VIN) and your vehicle configuration are transferred from the Volkswagen dealership to Volkswagen AG. This transfer is based on the legitimate interest of Volkswagen AG (see Article 6 (1) (f) GDPR).

The legitimate interest of Volkswagen AG is to enable the best possible service for sold vehicles in terms of problem situations and breakdown situations. The vehicles are equipped with a mobility guarantee. This guarantee improves customer retention and also promotes vehicle sales.

Personally identifiable data are recorded for the purposes of processing and cost allocation of breakdown assistance. In doing so, the non-disclosure obligation and all Group data protection rules are taken into account and ensured.

The data is usually deleted six months after the order date. This excludes the deletion of tax-relevant data, which is deleted after a retention period of 15 years.

#### **4. Replacement parts**

When certain replacement parts are ordered, Volkswagen AG receives the VIN of your vehicle, details of the equipment features and construction status of your vehicle, and the part number of the replacement part to be ordered. There are components in the vehicle that are specially manufactured for a vehicle and only fit specific vehicles (e.g. the key). Volkswagen AG requires this data to be able to provide the parts suitable for your vehicle.

Volkswagen AG processes this data to be able to fulfil the terms of your contract (see Article 6 (1) (b) GDPR).

In addition, when ordering such vehicle parts, a check is made as to whether the vehicle has been reported as scrapped or stolen. In these cases, the order is not executed.

This data processing is both in the legitimate interest of Volkswagen AG and the interests of those affected (see Article 6 (1) (f) GDPR). Volkswagen AG has an interest in preventing unauthorised access to your vehicle, initiating the necessary steps for an investigation and preventing the unauthorised enforcement of claims arising from a guarantee or warranty.



Your data is usually deleted 12 months after the order date. This excludes the deletion of tax-relevant data, which is deleted after a retention period of 15 years.

## **5. Product liability and field monitoring**

For the purposes of product liability and field monitoring, Volkswagen AG receives the VIN, the construction status, details of the equipment, software version, vehicle operating values, other vehicle health data and data about repairs to your vehicle that have already been carried out.

Volkswagen AG is required by law to continuously monitor the products it places on the market during their life cycle in order to detect any possible defects promptly and to rectify them as quickly as possible. These include the obligations of product monitoring and hazard prevention. The product monitoring obligation includes the collection and evaluation of various information.

The data processing is necessary for the fulfilment of a legal obligation (see Article 6 (1) (c) GDPR) or on the basis of an overriding legitimate interest (see Article 6 (1) (f) GDPR). For the identification and analysis of anomalies and errors, the data of your vehicle and other vehicles are merged by Volkswagen AG. Only by taking a holistic view can a high level of quality and freedom from defects of the products brought to market be ensured at economically reasonable expense in the interest of the Volkswagen Group and in the interest of the customers.

For the purposes of field monitoring, data from satisfaction surveys (reviews, ratings, VIN) of the dealer organisation are also merged with the vehicle data of Volkswagen AG on the basis of consent (see Article 6 (1) (a) GDPR).

The data processed for product liability and field monitoring will usually be deleted after 15 years.

## **6. Service Core Process – Field Campaigns**

The “Field Campaigns” service core process is used to manage software updates, functional updates and control unit updates so that authorised repairers (workshops) can be notified of the availability of updates. Only VIN and status messages are hereby processed.

The processing of your personal data is based on our legitimate interest in accordance with Article 6(1)(f) GDPR. The reason for this is the fastest possible elimination of identified risks for traffic safety or the environment.

The aforementioned data will be stored for 10 years after the update measure has been fully completed and will then be deleted.

## **7. Audit checks**

In order to conduct internal audits, Volkswagen AG processes your name, contact data, VIN, contract data and additional data about your vehicle, depending on the internal process to be audited.

Volkswagen AG regularly carries out audits in order to check internal processes. It may be that your personal data specified above is required in order to assess a specific process.

Volkswagen AG draws on a legitimate interest in this regard (see Article 6 (1) (f) GDPR). The grounds for this interest are the fact that internal processes are audited for their legal compliance and effectiveness to improve them if necessary.

Your personal data will only be included in internal audit reports if this is necessary. Deletion usually takes place a maximum of 15 years after creation. This is to ensure that verification obligations are met.



## 8. Service quality and customer care

In order to respond to any enquiries you may have in connection with the purchase of a new or used car or for customer support purposes, and in order to provide you with a high quality of service, Volkswagen AG processes the following personal data, such as your name, email address, address, telephone number, fax number and general data relating to your vehicle, such as the vehicle identification number and data relating to any repairs already carried out on your vehicle.

In this way, Volkswagen AG enables importers, dealerships and workshops to execute services in the most efficient way. This has the advantage for you that you can expect a high repair quality and avoid repeat repairs. In addition, the importer is able to provide competent answers to enquiries in your interest with the assistance of Volkswagen AG.

Volkswagen AG only processes the necessary personal data that you provide in this context within the framework of Customer Care. Volkswagen AG thereby relies on a predominant legitimate interest (see Article 6(1)(f) GDPR) and/or the fulfilment of the contract (see Article 6(1)(b) GDPR). This legitimate interest lies in enabling the dealerships and/or qualified workshops and Volkswagen Customer Care to achieve the highest possible level of customer satisfaction (in the German market) and to reply to each request individually.

If you, as a customer, have a repair made by an authorised Volkswagen repairer in a foreign country in a goodwill or warranty case, it may be necessary to involve the importer residing in the country of the authorised repairer to clarify your concern. As part of this clarification, your personal data will be exchanged between us and the respective importer.

Volkswagen AG is required by law to continuously monitor the products it places on the market during their life cycle in order to detect any possible defects promptly and to rectify them as quickly as possible. For this purpose, Volkswagen AG uses the following criteria to analyse customer concerns: type of concern, customer expectation in connection with vehicle-specific equipment features, such as model or engine types, communication channels, volume of enquiries, main topics. These analyses as part of market monitoring and determination of main topics require processing of personal data you have provided to us as part of your enquiries (e.g. your VIN). To determine basic principles that serve the improvement of product quality, data collected as part of customer care must be merged with other data on repair focus points.

Based on the respective purpose, there are different types of evaluations that also differ in the use of the personal data. For the examination of specific circumstances for company management, personal data is only required as part of the analysis.

Reports on these evaluations then no longer contain personal data of any kind. However, as part of market monitoring and identifying focus points, it is generally necessary to process personal data (e.g. vehicle identification number, VIN) in the analysis and show it in the report itself. Otherwise, it would not be possible to establish a relation to the fault cause and to derive measures for specifically affected vehicles.

The data is processed on the basis of a predominant legitimate interest (see Article 6(1)(f) GDPR) of Volkswagen AG. The main objective is to enable the dealerships or qualified workshops as well as Customer Care to achieve the highest possible level of customer satisfaction in the German market and meet your responsibilities as a manufacturer.

All data processed in this way will be deleted immediately after the legal basis ceases to exist, if it is no longer required for the purposes stated or if the purposes stated cease to exist and if there is no other legal basis (e.g., retention periods under commercial and tax law); otherwise, after the other legal basis ceases to exist, at the latest after 15 years.



Furthermore, Volkswagen AG provides importers, dealerships and workshops with information based on the VIN on the status of the digital products of your vehicle, to the extent that the vehicle is technically enabled for the use of the digital products. The aim is to allow enquiries relating to a new or used car purchase or in the workshop to be answered with a high level of service quality and to address customers actively in order to inform them of any usage restrictions, such as online navigation, voice control or the possibility of over the air updates if you have not installed the product portfolio or do not have the full product portfolio or when the initial licence period is about to expire.

Volkswagen AG thereby relies on a predominant legitimate interest (see Article 6(1)(f) GDPR). This interest lies in enabling the dealerships and workshops to provide the best possible advisory and support services for you.

The data processed in this case is deleted in accordance with the legal requirements.

### **9. Ensuring and improving product quality and fault rectification**

In order to ensure the quality of our products, to improve them where necessary and to detect and remedy faults as quickly as possible, as well as develop new products, Volkswagen AG processes your vehicle's VIN, equipment features, construction status, repair data, complaints and consumption values. Volkswagen AG draws on an overriding legitimate interest in this regard (see Article 6 (1) (f) GDPR). This interest lies in the identification, analysis, implementation of measures and the use of measures in the case of key issues identified for developing and improving the product as needed and customer satisfaction.

The data processed for ensuring product quality and for rectifying faults will usually be deleted after 15 years. The data processed for product development will usually be deleted after 10 years.

### **10. Special promotions for products and services**

In order to process and check your entitlement to special conditions, Volkswagen AG processes your name, email address, telephone number, address, the VIN of your vehicle and, if applicable, copies of proof, such as your driving licence.

The data is processed in the context of processing your claim for special conditions in order to execute the contract concluded with you (see Article 6 (1) (b) GDPR).

Volkswagen AG offers you certain products and services at special conditions at regular intervals. These offers are special conditions that are offered to you either directly by your Volkswagen dealership or which you may claim from Volkswagen AG.

Volkswagen AG also processes your data for the purpose of checking your entitlement to special conditions offered to you by your Volkswagen dealership on the basis of an overriding legitimate interest (see Article 6 (1) (f) GDPR).

The retention period depends on the statutory retention periods, for example those arising from tax law regulations.



## **11. Reading out on-board fuel consumption monitoring data (OBFCM data)**

For compliance with Implementing Regulation (EU) No. 2021/392, vehicle data on fuel consumption and kilometres driven (known as on-board fuel consumption monitoring data) are read out by the workshop from vehicles within the scope of application of Implementing Regulation (EU) No. 2021/392 during workshop visits and transmitted to the manufacturer together with the vehicle identification number, unless the respective vehicle owner has declared his refusal to the workshop.

Volkswagen AG receives this data from the workshops, stores it and transmits it together with the vehicle identification number to the European Commission on the basis of Implementing Regulation (EU) No. 2021/392. If Volkswagen AG has received several data records for a vehicle in a calendar year, it will only transmit the data record for which the greatest distance was covered overall. The data are deleted after transmission to the European Commission.

## **12. Information security**

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

The vehicle identification number ("VIN") of your vehicle may be processed, with Volkswagen AG, Audi AG, Seat S.A. and Škoda AUTO a.s. (hereinafter referred to as the "relevant companies") acting as joint data controllers, in order to identify, analyse and resolve anomalies in workshop IT systems, increase information security, protect personal data (particularly your customer data), prevent unauthorised access, enable error-free operation and secure use of these systems, and cooperate with authorities and courts (hereinafter referred to as "purposes").

The VIN is provided to us via your workshop or the importer responsible for your area (please also observe the Privacy Policy of your workshop or importer in this respect).

### **Storage period**

The data referred to above will be stored for a maximum of 2 years and then erased.

### **Data recipients**

In addition to the relevant companies, recipients of the data referred to above include processors that provide us with support in providing data processing services; for example, as part of hosting IT systems, technical support services and project and requirements management. They act strictly according to our instructions on the basis of order processing agreements.

We use processors for hosting, analytics and support services; in particular, these are:

- Volkswagen Gebrauchtfahrzeughandels und Service GmbH
- SIG Software Ltd
- Hyand Technology GmbH
- Volkswagen Group Services GmbH
- Microsoft Ireland Operations Limited



### Joint controllers

A joint controller agreement (JCA) has been concluded between the relevant companies.

1) Parties involved and office location: Audi AG, headquartered in Ingolstadt (Germany), Volkswagen AG, headquartered in Wolfsburg (Germany), Seat S.A., headquartered in Martorell, Barcelona (Spain), Škoda Auto a.s., headquartered in Mladá Boleslav (Czech Republic)

2) Purposes pursued by the controllers: During data processing, the controllers pursue the purposes referred to above (ensuring the security of your IT systems).

3) Databases that are processed and, where applicable, location of processing: The data referred to above is processed exclusively within the EU.

4) Governance for joint controllers: The data referred to above is processed jointly by the relevant companies and the parties act as joint controllers as defined by Article 26(1) sentence 1 of the General Data Protection Regulation (GDPR).

5) Volkswagen AG fulfils all of its information obligations.

6) Data subjects may contact the following with regard to data processing and their rights:

**Volkswagen AG**

**Berliner Ring 2**

**38440 Wolfsburg**

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

Otherwise, data subjects may also contact any of the relevant companies.

### **13. Data distribution of vehicle-related data to third parties via system interface**

Volkswagen AG uses system interfaces to forward vehicle-related data in connection with the vehicle identification number (VIN), such as equipment features, model year, vehicle commission number, model key and model phase, from internal IT systems to third parties (e.g. financial services providers, loss appraisers, fleet operators).

The provision of the VIN-related data is intended to support and simplify the processes between you and third parties. For example, this can be used to simplify vehicle financing, damage calculation, residual value calculation (e.g. by providing the booked customisable function (Functions on Demand)) or fleet management for you.

The data is extracted on the basis of a contract or contract negotiations (cf. Article 6(1)(b) of the GDPR), legitimate interest (cf. Article 6(1)(f) of the GDPR) or on the basis of existing legal obligations (cf. Article 6(1)(c) of the GDPR).

The data that is transferred as part of the data distribution will be deleted no later than 24 hours after the data has been distributed to third parties.

Please refer to the privacy policy of the respective third party for further information on the processing by the third parties described above.



#### **14. Data processing for the defence of our rights**

Data processing of personal data, such as your name and your vehicle identification number, may be required as part of safeguarding and defending our rights and/or for disclosure in the course of official/judicial measures. For this purpose, only personal data that is required for the respective legal matter will be processed. For example, we process this data for disclosure in the course of official/judicial measures with the purpose of collecting evidence. If the data is processed for a purpose other than the originally intended purpose, we will notify you of this change in purpose accordingly in accordance with Article 13(3) GDPR. This may also require that we receive data from an affiliated company or one of our national sales companies. Your data will only be disclosed when this is required for the purpose of prosecution and a corresponding legal basis exists.

The data is processed based on the legitimate interests of the defence and assertion of our rights (Article 6(1)(f) GDPR) or based on official and statutory regulations (Article 6(1)(c) GDPR).

To the extent that this is necessary, we will process and save your data for the named purposes of the processing. If the purpose has been fulfilled and if no retention periods are required by law, the data is erased regularly.

#### **IV. Recipients of the data outside Volkswagen AG**

Volkswagen AG will only pass on your personal data to processors or third parties if a legal basis exists for this. Volkswagen AG uses processors for data processing.

They support Volkswagen AG in the above-mentioned processes. Order processing contracts have been concluded with the processors in accordance with Article 28 of the GDPR so that your data is also subject to the high level of protection of Volkswagen AG in the area of protection of the processor.

The processors provide support e.g. by hosting IT systems, providing technical support and customer care.

Furthermore, in a few cases, Volkswagen AG will pass on your data to other offices responsible under the terms of data protection law. For example, Volkswagen AG is legally obliged to pass on the VIN and the construction status of your vehicle to damage assessors. They determine the current value of the vehicle on your behalf.

Additionally, data will be transferred to financial services providers for the purpose of contract origination or fulfilment of contracts (e.g. vehicle financing transactions with financial institutions).

As part of orderly business operations of Volkswagen AG and as part of business correspondence, data is regularly transmitted to development and production facilities as well as to importers. For example, Volkswagen AG may pass on your VIN to foreign production sites as part of rectifying product faults and improving products.

In order to fulfil its obligation arising from EU regulation 2019/621, Volkswagen AG makes VIN-related data records available for retrieval by persons and organisations commissioned to perform regular technical inspections (vehicle safety inspections).

Investigating authorities and courts present specific requests to Volkswagen AG relating to motor vehicles that are affected by investigations. In this context, your personal data may be passed on to the aforementioned offices.



## V. Data transfer to third countries

When transferring data to so-called third countries (countries that are neither a member of the European Union nor the European Economic Area), Volkswagen AG strictly complies with the relevant data protection regulations. Thus Volkswagen AG only transmits data to recipients (e.g. IT service providers who provide technical support or production facilities which perform quality inspections on vehicle models manufactured there) in third countries if the European Commission has deemed this appropriate for the respective third country or if the data transfer is adequately protected by the conclusion of EU standard contract clauses, as created by the European Commission, with the recipient of the data.

You have the option of obtaining a copy of the appropriate guarantees that we conclude to ensure an adequate level of data protection. Please contact us in this regard via the contact details listed in **Section D**.

## C. Your rights

You can exercise the following rights with respect to Volkswagen AG at any time and free of charge. You can find further information on exercising your rights on the following website: <https://privacy.volkswagen.com>

**Right to information:** you have the right to obtain information from us about how we process 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 have your data erased if the conditions set out in Article 17 of the GDPR are met. According to this, you can request, for example, that your data is erased if it is no longer necessary for the purposes for which it was collected. In addition, you can 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 conditions set out in Article 18 of the GDPR are met. This is the case, for example, if you dispute the accuracy of your data. You can request restriction of processing for the period during which the accuracy of the data is being checked.

**Right to object:** You have the right to object to the processing of your data if processing is based on an overriding interest or your data is used for the purposes of direct advertising. An objection is permitted if processing is conducted either in the public interest or for the exercising of official authority, or if it is conducted based on a legitimate interest of Volkswagen AG or of a third party. If you object to the processing of your data, please notify us of the reasons for your objection. Furthermore, you have the right to object to data processing for the purposes of direct marketing. This also applies to profiling where this is connected to direct marketing.

**Right to data portability:** if data processing is based on consent or performance of a contract and the processing is performed by automated means, you have the right to receive your data in a structured, commonly used and machine-readable format and to transmit this data to another data processor.

**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 persons for exercising your rights**

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

##### **Data protection officer**

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

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

**Version dated: February 2026**