Privacy Policy in the context of test drives for research, development and testing purposes under the joint responsibility of Volkswagen AG and Mobileye Vision Technologies Ltd.

In the following, we inform you about the processing of your personal data ("data") by us and the claims and rights to which you are entitled under the data protection regulations.

Version: July 2026

A. Who is responsible for data processing?

The processing activities described below are performed in joint controllership pursuant to Article 26 GDPR between the

Volkswagen AG
Berliner Ring 2, 38440 Wolfsburg
privacy@volkswagen.de

registered in the commercial register of the Braunschweig District Court under the number HRB 100484 ("Volkswagen AG").

and

Mobileye Vision Technologies Ltd.
13 Hartom St. Har Hotzvim
9777513 Jerusalem
Israel
privacy@mobileye.com

registered in the commercial register of the Local Court Israel Companies Authority under the registration number HRB 560030884 ("Mobileye")

B. Collection, processing and use of your data

I. What data do we process and from which sources does it originate?

We process data that we generally receive from you. Relevant data includes in particular the following data categories:

- **Recordings**
  - Video and film recordings
  - Image and photo recordings

In addition, to the extent necessary for the performance of obligations imposed by law or the authorities, we process data that we have lawfully received from authorities (e.g. on the basis of legal authority, to execute orders, to fulfil contracts or on the basis of consent given by you).

II. Is there an obligation to provide data?

Please note that the identification of individual persons is not provided for at any time in connection with road tests and is not required for the purposes listed below. Without active input and provision of further data, we will not be able to assign the collected data to a natural person.

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III. For what purposes and on what legal basis do we process your data?

1. General information on the legal bases for data processing

Volkswagen AG processes data exclusively for specified and legitimate purposes and only if a legal basis under data protection law exists. The GDPR provides for various legal bases on which the processing activities described in this privacy policy may be based. Which legal basis applies in an individual case depends on the respective purpose and the specific processing context.

Processing based on consent is carried out for clearly defined purposes of which the data subject has been informed in advance; consent may be withdrawn at any time with effect for the future without affecting the lawfulness of processing carried out up to that point (Art. 6 para 1 lit (a) GDPR).

In addition, data may be processed if this is necessary for the initiation, performance or termination of contractual relationships or for the implementation of pre-contractual measures (Art. 6 para 1 lit (b) GDPR), or to comply with legal obligations, for example arising from commercial, tax or regulatory requirements (Art. 6 para 1 lit (c) GDPR). In narrowly defined exceptional cases, processing may be necessary to protect vital interests (Art. 6 para 1 lit (d) GDPR).

Processing may be based on Art. 6 para 1 lit. (f) GDPR if it is necessary to safeguard the legitimate interests of Volkswagen AG or a third party and no overriding interests of the data subject prevail. The relevant legitimate interests are set out in the tabular overview below.

Where special categories of personal data are processed, this is carried out exclusively subject to the additional requirements of Art. 9 para 2 GDPR and therefore only in legally narrowly defined exceptional cases.

2. Data processing

Purpose of processing	Processing examples	Legal bases under the GDPR
Data collection in the context of research, (further) development and testing as well as validation of vehicles, functions and systems as well as other services **under sole or joint responsibility**	Test of test vehicles under real environmental and traffic conditions as well as agile driving situations Real-time accident prevention Compilation and evaluation, including collection, processing and storage of video and image recordings of data recordings from the vehicle's surroundings (Further) Development of vehicle assist functions / automated assistance functions Statistical research and analysis (e.g. validation of development processes in the context of re-simulations) as well as for (further) development	Art. 6 para 1 lit. (f) GDPR Research, (further) development and testing as well as validation of vehicles, functions and systems as well as other services. In particular, the development and validation of driver assistance systems and partially or fully automated driving functions in order to increase road safety on public roads as well as to enhance the user experience. Based on the knowledge gained in the process, the comfort and user experience as well as product, vehicle and road safety are improved in order to prevent future traffic accidents.

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	and validation of vehicles, functions and systems as well as other services	Recognising relevant situations and subsequently training the systems and functions is an important part of their continuous further development.
Evaluation of the recorded data recordings – including the collection, processing and storage of video and image recordings – from public transport operations **under sole or joint responsibility**	In real traffic and environmental situations, comfort and safety as well as the user experience of the vehicles can be improved in particular. In addition, autonomous vehicles and the associated systems as well as other services for compliant and safe traffic participation can be developed, tested and secured.	Art. 6 para 1 lit. (f) GDPR The processing of the collected data, e.g. traffic infrastructure and the detection of vehicle surroundings, obstacles and environmental conditions (e.g. road grip or limited visibility due to air pollutants) as well as road users including their direction of movement are necessary in order to be able to derive the correct vehicle reaction from this.
Safeguarding and defending our rights and disclosure in the context of governmental/judicial measures	Exercising and asserting rights and claims Disclosure in the context of official/judicial measures for the purpose of gathering evidence, prosecution and enforcement of civil law claims Disclosure in the context of regulatory/judicial measures in connection with securities trading	Art. 6 para lit. (c) GDPR Art. 6 para 1 lit. (f) GDPR Asserting and defending our rights and complying with legal and regulatory requirements
Compliance with legal requirements / processing based on legal provisions	Archiving on the basis of tax and commercial retention obligations Fraud and money laundering prevention Processing of data subject requests according to GDPR Processing of reports of potential personal data breaches	Art. 6 para. 1 lit. (c) GDPR

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IV. Who receives your data?

Within Volkswagen AG, only those departments will have access to your data that need it to fulfil the above-mentioned purposes.

A transfer to third parties will only take place if this is necessary for the aforementioned purposes and a legal basis exists or if you have given your prior consent. If Volkswagen AG has commissioned service providers for the processing of data or the associated provision of services, the transfer is usually carried out on the basis of a data processing agreement in accordance with Art. 28 GDPR or there are professional obligations that ensure a sufficient level of data protection.

The following categories of recipients may receive data:

- **Service providers/suppliers**
  - Vehicle/component manufacturers and suppliers
  - Hosting service providers
  - Technical support service providers
  - Transportation service providers
  - Technical development service providers
- **Insurance companies**
- **Public authorities**
  - Supervisory authorities
- **Public law entities and interest groups**
  - Associations/societies
- **Mandate holders – legal, economic and financial**
  - Technical examiners
- **Group companies**
  - Group company of the respective brand parent company
  - Volkswagen Group companies other than the respective brand parent company

V. Will your data be transferred to a third country or to an international organization?

As a rule, your data will be processed within the EEA (European Economic Area), to which the GDPR applies without restriction. As a globally active company, it is necessary in exceptional cases to store and process data outside the EU. In individual cases, data may also be passed on to authorities and courts in third countries. Please note that not all third countries have an adequate level of data protection recognised by the European Commission. Unless an adequacy decision has been made by the European Commission, Volkswagen AG will only transfer your data to third countries if this is permissible under Art. 44 – 49 GDPR. To the extent that Volkswagen AG relies on appropriate safeguards in accordance with Art. 46 para. 2 GDPR for the transfer to third countries (e.g. standard contractual clauses or binding corporate rules), Volkswagen AG will take additional technical and/or organizational measures if this is necessary to maintain adequate protection of your data. The agreements with processors regularly provide for the conclusion of standard contractual clauses of the European Commission to ensure an adequate level of data protection. You can obtain a copy of the specifically applicable or agreed regulations to ensure the appropriate level of data protection from us. Please use the information in section B. VII for this purpose.

VI. How long will your data be stored?

Personal data will be stored only for as long as this is necessary for the respective purposes of processing. Once these purposes cease to apply, the data will be deleted or anonymized.

As a rule, the retention period for development-relevant documents is up to 15 years.

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Irrespective of the cessation of the respective processing purpose, personal data may be stored on the basis of statutory retention and documentation obligations, in particular under commercial and tax law, as well as for the assertion, exercise or defence of legal claims.

For certain processing scenarios, different retention periods may apply, in particular shorter retention periods, for example in the case of image or video recordings or comparable time-limited processing activities.

Where processing is based on consent, personal data will be stored for the duration of the purpose limitation of the consent and, subject to statutory retention obligations, at the latest until the consent is withdrawn.

VII. Data Protection Officer and Rights of Data Subjects

If you have general questions about this privacy policy or the processing of your data by Volkswagen AG, or about the processing of your personal data under joint controllership, you can contact our **Data Protection Officer**, Dr. Oliver Draf, using your own language, via:

Volkswagen AG

- Postal address: Volkswagen AG, Data Protection Officer, Berliner Ring 2, 38440 Wolfsburg, Germany
- E-mail: privacy@volkswagen.de
- Phone: 00800-8932836724889 (00800-VWDATENSCHUTZ)

Mobileye

- Postal address: Mobileye Vision Technologies Ltd., Hartom 13, Jerusalem 9777513, Israel
- Postal address (in the European Economic Area): Mobileye Germany GmbH (European Data Protection Officer), Lütticher Str. 132, 40547 Düsseldorf, Germany
- E-mail: privacy@mobileye.com

What rights do you have?

You have the following rights vis-à-vis us, subject to the respective legal requirements:

- Right to information (Art. 15 GDPR)
- Right to rectification (Art. 16 GDPR)
- Right to erasure or "right to be forgotten" (Art. 17 GDPR)
- Right to restriction of processing (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR).

Furthermore, you have the right to contact a data protection supervisory authority at any time in accordance with Art. 77 GDPR if you believe that the processing of the data concerning you violates applicable law. The address of the data protection supervisory authority responsible for Volkswagen AG is:

Der Landesbeauftragte für den Datenschutz Niedersachsen
Prinzenstraße 5
30159 Hannover
Deutschland / Germany

However, you can also lodge a complaint with any other data protection supervisory authority competent for you within or outside the EU, in particular with the one in the Member state of your habitual residence, place of work or place of the alleged infringement. Please find hereinafter a link where you can find all contact details of the national authorities in all member states: https://edpb.europa.eu/about-edpb/board/members_en.

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Right to object

You have the right to object to the processing of your data,

- **if the processing is carried out for direct marketing purposes (including profiling for direct marketing purposes) or**
- **if the processing (including profiling) is necessary to protect the legitimate interests of us or a third party (Art. 6 para. 1 lit. f GDPR). 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.**

Please send your objection and, if necessary, the reasons for it to Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, by e-mail to privacy@volkswagen.de or via our data protection portal https://datenschutz.volkswagen.de/.

Asserting your rights

If you want to assert your rights as a data subject, please use the data protection portal or the other contact options provided.

Volkswagen AG

- https://datenschutz.volkswagen.de/
- via mail: Volkswagen AG, Privacy Team, Berliner Ring 2, 38440 Wolfsburg, Germany
- via e-mail: privacy@volkswagen.de
- via telephone: 00800-8932836724889 (00800-VWDATENSCHUTZ)

Mobileye

- via mail: Mobileye Vision Technologies Ltd., Hartom 13, Jerusalem 9777513, Israel
- via mail (in the European Economic Area): Mobileye Germany GmbH (European Data Protection Officer), Lütticher Str. 132, 40547 Düsseldorf, Germany
- via e-mail: privacy@mobileye.com

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C. Amendments to country specific data protection regulations

The material requirements of the GDPR constitute binding legal obligations under European data protection law. Irrespective of their direct applicability, Volkswagen AG applies these requirements as a global minimum standard for the protection of personal data. The following country-specific supplements contain solely such additional information and specific provisions that arise from applicable national data protection laws and go beyond this minimum level of protection. They relate in particular to supplementary or deviating data subject rights, specific national requirements for the processing of personal data and, where necessary, additional information on competent data protection supervisory authorities or local points of contact.

Israel

The data subject rights listed above under the GDPR apply mutatis mutandis to the Protection of Privacy Law, 5741-1981 and the regulations enacted therefrom.

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