



“Sales, Services and Marketing Measures” Privacy Policy

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 handling 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, 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, for example, they receive from vehicle sensors, generate themselves or exchange with other control units. 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 warranty 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 in individual cases.

II. Reference to a specific person

In order to be able to provide certain services for your vehicle, it is necessary to collect vehicle-specific information about your vehicle. Information regarding the 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.

Each vehicle is identified by a unique VIN. In Germany, this information can be traced back to the current and former owners of the vehicle by obtaining the corresponding information from the Federal Motor Transport Authority.

The data generated or processed by control units can therefore be personal – or can be 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 CO₂ emissions compliant with EU legislation for monitoring CO₂ emissions from passenger cars and light commercial vehicles. It receives the relevant VIN from the Volkswagen dealerships in the event of changes to the construction status of the vehicle and the resulting changes to the vehicle documents.

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 premium payment to the dealership.

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

In the event of price changes at short notice according to section 309 of the German Civil Code, the customer is entitled to the previous price if the vehicle was ordered before the effective date of the price increase. General vehicle data such as the VIN, the model, and the engine power is required to determine the entitlement.

This data is processed on the basis of the fulfilment of contracts in accordance with Article 6 (1) (b) GDPR if the customer is a natural person (individual customer) or on the basis of the overriding legitimate interest (Article 6 (1) (f) GDPR) if the customer is an employee of a major customer. The legitimate interest involves fulfilling existing claims for old price billing, including in the interests of customer satisfaction, and 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 are excluded, 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 handling guarantee and warranty claims as well as goodwill cases will be deleted, at the latest, 15 years after processing the transaction.

3. Mobility guarantee

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 Volkswagen ID family vehicle. The content of the mobility guarantee can be found in the warranty conditions provided. If you claim services from this warranty, your personal 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 under their own responsibility.

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

When processing and settling breakdowns, such as the process of accepting the customer's request over the telephone or processing the internal settlement of the costs, Volkswagen AG uses Volkswagen Vertriebsbetreuungsgesellschaft GmbH and Volkswagen Group Service GmbH as processors. In certain cases (e.g. when the vehicle has to be transported or if a service needs to be invoiced), it may be necessary for Allgemeiner Deutscher Automobil-Club e.V. (ADAC) to act as the processor for Volkswagen AG. After handling and offsetting 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 in order to handle and settle 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 spare parts are ordered, Volkswagen AG receives the VIN of your vehicle, the equipment features and condition 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, equipment 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.

Volkswagen AG is subject to a legal obligation when processing data (see Article 6 (1) (c) GDPR).

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

6. 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.

7. Service quality and customer care

In order to answer any enquiries relating to a new or used car purchase or customer care and to guarantee you a high quality of service, Volkswagen AG processes the general data of your vehicle, such as the VIN and data about repairs to your vehicle that have already been carried out.

In this way, Volkswagen AG enables importers, dealerships and workshops to handle 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 sound answers to enquiries in your interest with the assistance of Volkswagen AG.

Volkswagen AG draws on an overriding legitimate interest in this regard (see Article 6 (1) (f) GDPR). This interest involves enabling dealerships or workshops and customer care to provide you with the best possible service.

The data processed in this case is usually deleted directly after answering an enquiry or, in case of repair, after 15 years.

8. 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, Volkswagen AG processes your vehicle's VIN, equipment features, construction status, repair data and complaints.

Volkswagen AG draws on an overriding legitimate interest in this regard (see Article 6 (1) (f) GDPR). This is founded in the identification, analysis, implementation of measures and the use of measures in the case of key issues identified for improving the product and customer satisfaction.

The data processed for ensuring and improving product quality will usually be deleted after 15 years.

9. 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 evidence, such as your driver's licence.

The data is processed in the context of processing your claiming of 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.

10. Customer satisfaction survey and market research

For the purposes of customer satisfaction surveys and market research, Volkswagen AG processes the following data:

- Private contact and identification data (e.g. first name, surname, address, year of birth, language)
- General vehicle data (e.g. VIN)
- Contract data (e.g. country code, brand code, membership of customer club, selected membership / care programme, club card recipient)
- Credit rating and bank details (e.g. customer account, IBAN, BIC)

Data is processed on the basis of your consent (see Article 6 (1) (a) GDPR) or an overriding legitimate interest (see Article 6 (1) (f) GDPR).

If you provided consent to Volkswagen AG, you can revoke it at any time with future effect. You can find more detailed information on this in **Section C**.

As soon as the authorisation to process your data by Volkswagen AG ends, your data will be deleted. This is the case, for example, if you revoke the declaration(s) granted on your part and if there are no longer any statutory retention periods and your data will not be required to prevent legal claims.

Your data processed within the scope of the overriding legitimate interest will be deleted four years from creation.

11. Initiating and completing the purchase of an ID model

To initiate and process the purchase of an ID model, the Volkswagen dealership and Volkswagen AG must process your personal data (e.g. first name, surname, date of birth, postal address, telephone and mobile phone number). This relates to the creation of offers and the execution of the sales contract (vehicle order, order change, delivery, cancellation). In connection with sales contract processing, Volkswagen AG may contact you using the personal data you provide. Volkswagen AG processes the above-mentioned personal data and, if necessary, other personal data you provide to fulfil the terms of your contract (see Article 6 (1) (b) GDPR).

For the delivery processing, we shall, if you wish, involve Autostadt GmbH and/or Volkswagen Sachsen GmbH and/or the delivering dealership. In such cases, a corresponding data transfer takes place for the purpose of providing the contractual service (see Article 6 (1) (b) GDPR). In the event of a delayed payment and any subsequent dunning and debt collection, we involve Volkswagen Financial Services Digital Solutions GmbH, Gifhorner Straße 57, 38112 Braunschweig to process the matter on behalf of Volkswagen AG.

The deletion and retention period for your data in the sales system in the case of a concluded sales contract is a maximum of ten years after delivery and a maximum of 15 years for the order data in the Volkswagen AG ordering system. After the deadline has expired, the corresponding data will be deleted routinely, as long as it is no longer required to fulfil the terms of the contract or to initiate the contract and/or there is no basis for further storage on our part.

If you choose a leasing contract, Volkswagen Leasing GmbH, Gifhorner Straße 57, 38112 Braunschweig, Germany, info@volkswagenleasing.de, entered in the register of companies at Braunschweig District Court under the register no. HRB 1858, is responsible for initiating, implementing and processing the leasing contract in terms of data



protection. The data required for the creation of a request (in particular, your personal identification data, your contact data, your address and your vehicle configuration) are transferred by Volkswagen AG to Volkswagen Leasing GmbH for the purpose of contract initiation (see Article 6 (1) (1) (b) GDPR). You can find detailed information about data processing in the data protection information of Volkswagen Leasing GmbH. If you conclude a leasing contract, only the vehicle configuration and leasing contract number are transferred to Volkswagen AG and stored and processed there.

12. Initiating and completing the purchase of vehicles by special customers

Certain customer groups such as people with disabilities conclude a sales contract directly with Volkswagen AG. During processing of the purchase process incl. clarification of funding measures, through to possible purchase cancellations, and the associated customer care measures, private contact and identification data (e.g. first name, surname, address), general vehicle data (e.g. VIN) and particularly sensitive data (e.g. disability status) will be processed. Processing of particularly sensitive data is necessary to check whether the purchase transaction is eligible for special funding.

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 or on the basis of consent (see Article 6 (1) (a); Article 9 (2) (a) GDPR).

The data processed here is usually deleted 15 years after processing the customer issue.

13. Manufacturer support for sales, service and marketing measures by dealerships and authorised workshops

To support dealers and authorised workshops, it may be necessary to forward general vehicle data (e.g. VIN, commissioning number) and contract data (e.g. collection date) to Volkswagen AG in order, for example, to make vehicle corrections in the context of invoicing, or to check vehicle-specific, dealer-specific goodwill requests with the aim of approving goodwill for sales support measures and advertising cost subsidies if the check is successful, or to analyse potential sales for dealerships, or for delivery. For delivery processing, we will, if you wish, involve Autostadt GmbH.

Data processing takes place on the basis of an overriding legitimate interest in accordance with Article 6 (1) (f) GDPR or consent (see Article 6 (1) (a) GDPR) or on the basis of a contract or contract initiation (see Article 6 (1) (b) GDPR).

The data will be deleted after a maximum of 15 years.

Volkswagen AG supports importers, dealers and authorised workshops in managing and carrying out their processes by providing IT systems. In this context, it also provides IT support services to partner companies in which customer data is recorded during ticket acceptance for recording malfunctions, for example.

The legal basis for this is an overriding legitimate interest in accordance with Article 6 (1) (f) GDPR, which is founded, among other things, on allocating work results in order to be able to pose targeted questions.

The data will be deleted after a maximum of 4 years.

Within the framework of dealership and service management, general vehicle data (e.g. VIN, commissioning number), private and/or professional contact data such as location and contract data, such as the order number, will be processed by Volkswagen AG, for example:



- To grant bonuses or sales promotion measures and the associated discount payments and final invoicing to the partner companies, for example
- To determine dealership potential
- As part of determining and conducting dealer awards
- For the granting of special support (transport costs from regional authorities)
- For evaluations for retail

The data will be deleted after a maximum of 15 years.

The legal basis for this is an overriding legitimate interest according to Article 6 (1) (f) GDPR or the fulfilment of your contract (see Article 6 (1) (b) GDPR).

14. Creating evaluations for company management

Volkswagen AG is constantly striving to improve business processes as part of company management and to optimise the associated costs. To achieve this goal, it is necessary to analyse offer, sales and order data in detail. For this reason, Volkswagen AG processes data from offer, sales and ordering systems, e.g.

- Pseudonymous identification data (e.g. a randomly generated pseudonymous user ID)
- Private contact and identification data (address)
- Contract data (e.g. vehicle equipment, order data, logistics data)
- Vehicle usage data (e.g. vehicle data)
- IT usage data (e.g. last login to the services, use of functions).

The purposes of processing, the processing itself and the corresponding legal basis are described in detail below.

In order to create evaluations for company management, Volkswagen AG carries out analyses of offer, sales and order data according to model, sales channel, ordering status, analyses according to the required variants and equipment and reporting on key business figures using an identification number. In the course of processing, your personal data is pseudonymised. Pseudonymisation involves removing all direct personal identification features (e.g. name, email, telephone number, vehicle identification number). Indirectly traceable identification features (pseudonyms) are retained. The data is only analysed in the Volkswagen AG analytics systems once this pseudonymisation has been completed. Furthermore, Volkswagen AG merges its data with external information such as socio-economic or socio-demographic characteristics. The direct reference to a specific person is not restored at any time. The results of the analysis (especially metrics and key figures) are completely anonymous.

The described processing of your data takes place on the basis of the legitimate interest of Volkswagen AG to perform evaluations for company management (Article 6 (1) (f) GDPR).

Volkswagen AG deletes your pseudonymous data after three years or in accordance with the legal requirements, e.g. as soon as the purpose for which the data was collected no longer applies and provided that there are no other retention obligations.

Your personal data is processed in an Amazon Web Services cloud operated by Amazon Web Services EMEA SARL ("Amazon") in the European Union to create evaluations for company management purposes. Access to personal data by Amazon Web Services, Inc. based in the USA cannot be excluded, so that the relevant EU standard contractual clauses (a contract approved by the European Commission that accords the same protection to personal data that they have in the EU during data processing in non-EU countries) have been concluded. Amazon will process your personal data only on our behalf and in accordance with our instructions under a data processing agreement. In addition,



Volkswagen AG shall use CARIAD SE, Adastra GmbH and Deloitte Consulting GmbH, all based in Germany, as processors in order to safeguard operation and for further development.

You can view the EU standard contractual clauses used via the following link: <https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX%3A32010D0087>.

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.

For example, Volkswagen AG uses order processors for data processing. They support Volkswagen AG in the above-mentioned processes. Order processing contracts have been concluded with the order 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 order processor.

The order 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. These determine the current value of the vehicle on your behalf.

As part of orderly business operations by 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 eliminating product faults and improving products.

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

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. For example, Volkswagen AG only transmits data to recipients (e.g. IT service providers who provide technical support or production facilities that 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 these 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 may exercise the following rights vis-à-vis Volkswagen AG at any time, free of charge. You can obtain further information about exercising your rights on the following website: <https://datenschutz.volkswagen.de>

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

Right to rectification: You have the right to obtain from us the rectification of any inaccurate or incomplete personal data concerning yourself.



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 demand, 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 demand 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 ask for 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 demand restriction of processing for the period during which 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 in either the public interest or for the exercise of official authority, or if it is conducted for 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 contacts

Contacts for exercising your rights

The contact persons for exercising your rights, along with further information, can be found on the following website: <https://datenschutz.volkswagen.de>.

Data protection officer

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

Data protection officer at Volkswagen AG
Berliner Ring 2, 38440 Wolfsburg, Germany
datenschutz@volkswagen.de

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