



Privacy Statement "Sales, Services and Marketing Measures"

Dear customer,

As part of your visit, your Volkswagen dealership carries out all 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. This relates in particular to the handling of service processes and new car or used car purchases, or the performance of customer surveys. We will inform you of the relevant data processing by Volkswagen AG in the following sections.

A. Responsible party

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, 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 assistance systems), 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, features and construction status, is stored by us as the manufacturer of your vehicle to enable services such as 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 as well as the legal basis and the storage period of the data.

1. Fulfilment of statutory requirements

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

Volkswagen AG is subject to various statutory requirements that it must meet. These may arise, for example, from requirements regarding customs, tax and vehicle registration law.

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 statutory obligations (see Article 6 (1) (c) GDPR).

The retention period depends on the respective processing purpose prescribed by the statutory provisions.

2. Guarantee and warranty claims, maintenance and wear packages as well as 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 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 case of new vehicles you have ordered.

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

Your data that we process for handling guarantee and warranty claims as well as goodwill cases will usually be deleted 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 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.

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

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, equipment features and condition of your vehicle, as well as 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 for 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 unauthorised enforcement of claims arising from 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 on 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 observation 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 as well as 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 previously stated personal data 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 seven years after creation. This is to ensure that verification obligations are met.

7. Service quality and customer care

In order to provide you with a high service quality and in order to answer any customer-related enquiries, Volkswagen AG processes the VIN and data on repairs of your vehicle that have already been carried out.

In this way, Volkswagen AG enables workshops and importers to handle services in the most efficient way. This has the advantage for you that you can expect a high repair quality and the avoidance of 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 a predominant legitimate interest in this regard (see Article 6 (1) (f) GDPR). This is to enable 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 a predominant 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, 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 the taking up 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 your consent (see Article 6 (1) (a) GDPR).

The retention period depends on the statutory retention periods, for example, 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 your name, address, telephone number and email address as well as other data specified in your statement of consent.

Data is processed on the basis of your consent (see Article 6 (1) (a) of the GDPR).

You may revoke the consent you gave to Volkswagen AG at any time with future effect, free of charge. 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.

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, integrate 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 delay in 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 of 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 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 the sense 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 for the purposes of contract initiation (see Article 6 (1) (1) (b) GDPR). You can find detailed information on 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.

IV. Recipient of the data outside Volkswagen AG

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

For example, Volkswagen AG commissions 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 support e.g. by hosting IT systems, 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 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 jurisdictions present 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 transmission to third countries

When transferring data to so-called third countries (such 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 EU 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 EU 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 under the contact details listed in **Section D**.

C. Your rights

You may exercise the following rights vis-a-vis Volkswagen AG at any time free of charge. You can obtain further information about asserting your rights in **Section D**.

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 obtain erasure of your data if the conditions set out in Article 17 of the GDPR are met. For example, you may ask for your data to be deleted if it is no longer necessary for the purposes for which it was collected. You may also ask for your data to be deleted if we process your data based on your consent and you withdraw that consent.

Right to restriction of processing: You have the right to obtain restriction of the processing of your data if the conditions set out in Article 18 GDPR are met. That is the case, for example, if you dispute the accuracy of your data. You can then demand a restriction of processing for the period it takes to verify the accuracy of the data.

Right to object: You have the right to object to the processing of your data if the processing is based on an overriding interest or if your data is used for the purpose of direct marketing. 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 grounds for your objection. You also have the right to object to data processing for the purposes of direct marketing. The same applies to profiling, insofar as it is related 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: Provided data processing is based on your consent, you have the right to withdraw that consent free of charge at any time, and with effect for the future.

Right to lodge a 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 Federal State of Lower Saxony [Landesbeauftragte für den Datenschutz Niedersachsen]).

D. Your contacts

Contact persons 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

If you have any data protection concerns, contact our Data Protection Officer:

Data Protection Officer of Volkswagen AG
Berliner Ring 2, 38440 Wolfsburg, Germany
datenschutz@volkswagen.de

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