



Privacy Statement "Contract Management and Electronic Signatures"

A. Controller

We are pleased that you are visiting a website of Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany, registered in the Commercial Register of the Amtsgericht Braunschweig (Braunschweig District Court) under No. HRB 100484 ("Volkswagen AG"). This document explains how we collect, process, and use your data.

B. General Information, Protocol Data

You are in general able to visit the websites of Volkswagen AG without telling us who you are. In this case we will only receive the following protocol data:

1. the date and time of your visit.
2. Your identification via your e-mail address
3. IP address

Insofar as the following sections do not contain opposing information, the data processing shall be undertaken exclusively by Volkswagen AG.

C. Collection, Processing, and Use of Your Personal Data

I. Use of Contract Management & Signature Services

When using electronic signature services, Volkswagen sends a document to the "signer." The signer may be required to provide personal information about him or herself in order to complete form fields and electronically sign the document. The SSP and an appropriate Trust Service Provider collect some of this information on behalf of Volkswagen of the document and other information for the purposes of providing the electronic signature service.

Where the SSP or CMSP collects and uses information on behalf Volkswagen of the document, Volkswagen is the controller of this information. This may include, without limitation, information embedded within a document, collected via form fields, or other information regarding the signer's access and use of the electronic signature service such as the date and time of a signature or transaction event, IP address, and other information about the browser or device used to send, sign, delegate, approve, or take other actions with respect to the document. For example, IP address is recorded as part of the "activity log" and/or "audit trail" that is linked to the electronically signed document. The activity log and audit trail are generally made available to Volkswagen, signers, and other "participants" in a document workflow and is retained according to the agreement between the CMSP or SSP and Volkswagen.

Additionally Volkswagen may elect to employ additional authentication methods to apply a more stringent standard for verifying the identity of a "signer." For example, Volkswagen may request that a signer take a photo for identity verification purposes and upload documents (such as a government-issued ID) that help the Volkswagen verify the identity of the signer. To facilitate the sender's verification request, the signer may be asked to provide a mobile number to receive instructions on their mobile device.

For the document upload feature, Volkswagen will receive and store copies of the identification certificates or images provided by the signer, and these may be stored in the audit trail along with the electronically signed copy of the document. If Volkswagen requests that the signer's identity be verified through other identity verification processes (challenge questions or SMS verification code), then additional information may be collected from the signer. As part of this process, information such as the signer's identification details and answers to challenge questions may be passed through the SSP electronic signature service. That information is used only to verify the signer's identity on behalf of Volkswagen. The certificates and images uploaded during the authentication/identity verification process will be retained with Volkswagen for as long as the signed documents need to be retained.

By default the SSP's electronic signature services send a copy of the electronically signed document to Volkswagen and the signer. Volkswagen controls how long documents are stored by the SSP and are available to signer to access or download. Volkswagen will delete all signed documents from the SSP infrastructure after all signatures have been collected. The documents are saved/archived in the CMSP infrastructure or Volkswagen infrastructure according to the retention periods set forth by legislation for contractual document types.

II. Processed Data

In the following, it is discussed in detail for what purpose the input fields on documents to be signed are required:

E-mail address: Your e-Mail address shall be used for the collection of the personal data processed within Volkswagen AG contract and signature process. Moreover, your e-mail address shall also be used for the identification of your person and, as required, for the legitimization of your involvement in contract management and signature processes. Your e-mail address shall be used for the collection and dissemination of the data processed within the Volkswagen AG and for communication with you, e.g. for queries regarding your contracts.

Full Name: Your full name shall be used only for the identification of your person and the collection your personal data processed within Volkswagen AG. Surname, forename and e-Mail address in combination ensures a correct identification as these information are available on all contracts.

Personal signature certificate: Your cloud based signature certificate issued by the TSP shall be used by yourself to sign documents and ensures your personal identification at a trust level required by the document to be signed. It will also include time stamps and IP addresses. It is the legally binding electronic equivalent of a wet signature on paper.

III. Legitimization & Retention Timeframe for Your Issue

The contracts with you are kept at Volkswagen AG in accordance with the statutory deadlines applicable to each contract category. The processing for contract management is based on legal regulations, and the processing for electronic signatures is based on a balancing of interests according to Art. 6 (1) lit. f GDPR. Volkswagen AG represents the following interests in this regard: The interests of Volkswagen AG include the waiver of the particularly sensitive data of the image of a signature, which is also in the interest of the data subjects. Furthermore, it involves preventing media disruptions in the contract lifecycle and expediting the transparent execution of the signature process.

IV. Use of Data processing Companies

Volkswagen is using processors to meet our statutory obligations and to observe our own legitimate interests. When doing so, the data provided by you is always processed within the European Economic Area (EEA).

The following data processor is used as Contract Management Service Provider (CMSP):

- Icertis GmbH

The following data processor is used as Sign Service Provider (SSP):

- Adobe Systems Software Ireland Limited

The Trust Service Provider (TSP) acts as a separate controller, independently verifying the identity of the signer:

- INTESI GROUP S.p.A.

For the support of our IT system the following data processors are used:

- dx.one GmbH
- Volkswagen Group Services GmbH
- NTT DATA Deutschland GmbH

VI. Information collected by the CMSP or SSP to provide services

The SSP or CMSP collects information about how Volkswagen and signers use and access features and capabilities of the electronic signature services. This information is also used to operate, improve, and personalize the electronic signature services.

Information on how the SSP processes personal data is accessible on: [Adobe Privacy Center](#)

Information on how the CMSP processes personal data is accessible on: [Icertis Privacy Statement | Icertis](#)

VII. Information collected by TSP to provide identification services

For the photo verification feature, necessary only for external signers (not being an employee of Volkswagen AG), the Trust Service Provider (TSP) as third-party provider may create biometric information from your photo and/or video (e.g., facial recognition) and/or government-issued ID to perform the identity verification. Volkswagen and the SSP receive a confirmation of the verification from the third-party TSP (e.g., verified or not verified). None of above mentioned biometric information or other information necessary to verify identification of the signer according to eIDAS* standards is shared with Volkswagen or the SSP. The third-party TSP deletes any biometric information or information necessary to verify the identity of the signer according to eIDAS* standard, according to the retention periods set forth in the eIDAS* standards for the applicable electronic signature type.

Information on how the TSP Intesi AG, processes personal data is accessible on: [Privacy Policy - Intesi Group](#)

* **eIDAS** (electronic IDentification, Authentication and trust Services) is an EU regulation ([EU Nr. 910/2014](#)) on electronic identification and trust services for electronic transactions in the European Single Market.

VIII. Purpose

The data provided in this context are used by us exclusively for the purpose of contract management and legally compliant electronic signatures (Art. 6 (1) sentence 1 lit. c GDPR). As the controller within the meaning of the GDPR, we are subject to extensive examination, reporting, and notification obligations under Art. 33 and Art. 34 GDPR.

IX. Disclosure of Data

We will not disclose your personal data to third parties, unless

- you have consented to the transfer of personal data,
- or we are entitled or obliged to transfer data as a result of legal requirements and/or governmental or judicial orders,
- or if transferring the data is necessary in order to fulfil a contract.

In this respect we also point out the following data transfers:

- 1. Transfer of data to affiliated companies in order to investigate and prevent personal data breaches**
Particularly in order to deal with personal data breaches across the Group, we transmit personal data to companies [in Germany and the European Economic Area] that are associated with Volkswagen AG within the meaning of section 15 of the German Stock Corporation Act (AktG).
- 2. Transfer of data to suppliers and customers**
In individual cases we may also transfer your data to suppliers, customers or partners if this is necessary to eliminate or minimise the risk of personal data breaches or if you have given your consent.
- 3. Transfer of data to authorities**
Insofar as we have to transmit your data to the competent authorities in order to fulfil our obligations under Article 33 and Article 34 GDPR or if the competent authorities request this, we will transmit your data accordingly.

D. Use of Cookies

Volkswagen AG uses various cookies on its websites. Cookies are small files containing configuration information that are stored on your end device. There are basically three categories of cookies.

- 1.** -called **Functional Cookies** are essential for the functionality of the website. The processing of the Functional Cookies is necessary to enable your visit to the website (cf. Article 6 paragraph 1 letter b GDPR).
- 2.** So The comfort of a website visit is increased by so-called **Comfort Cookies**, which save your language settings, for example. The legal basis for Comfort Cookies is a legitimate interest (Article 6 paragraph 1 letter f GDPR). The legitimate interest is providing comfort when visiting the website. You can object to data processing at any time with effect for the future. Further information can be found in section F. Your Rights
- 3.** So-called **Tracking Cookies** are used to create a pseudonymized user profile. Tracking Cookies are only set if the website visitor has given their consent (Article 6 paragraph 1 letter a GDPR). Consent is given via the so-called cookie banner, which must be actively clicked on. Further information on the tracking tools used and how you can revoke your consent can be found in section F. Your Rights.

For more information about our cookies, please see the Cookie Policy on our website [privacy.volkswagen.com](https://www.volkswagen.com/privacy).

E. Your Rights

You may assert your rights below against Volkswagen AG at any time upon a free-of-charge basis. For further information concerning the exercise of your rights, please see section G.

Right of Access by the Data Subject: You shall have the right to receive information from us regarding the processing of your personal data.

Right to Rectification: You shall have the right to demand that we correct your personal data, which are incorrect and/or incomplete.

Right to Erasure: You shall have the right, in the event that the requirements specified in Article 17 GDPR have been met, to demand the erasure of your data. Thus, in accordance with this Article 17, for example, you may demand the erasure of your data insofar as these data are no longer required for the purposes for which they were collected. Furthermore, you may demand the deletion of these data if we process your data based upon the consent, which you have granted, and you then withdraw this consent.

Right to Restriction of Processing: You shall have the right to demand the restriction of the processing of your data if the requirements specified in Article 18 GDPR have been fulfilled. This is, for example, the case if you dispute the correctness of your data. For the duration of the verification of the correctness of the data, you may demand the restriction of the processing.

Right to Object: Insofar as the processing is undertaken based upon an overriding interest or your data are used for the purposes of direct advertising, you shall have the right to object to the processing of your data. An objection shall be permissible (*sic!*) if the processing either is carried out in the public interest or in the exercising of official authority or owing to a justified interest of Volkswagen AG or of a third party. In the event that you object, we request that you state your reasons to us regarding why you are objecting to the data processing. In addition, you shall have the right to object to the data processing for the purposes of direct advertising. This shall also be valid for profiling insofar as this is undertaken in conjunction with the direct advertising.

Right to Data Portability: Insofar as the data processing is undertaken based upon a consent or a fulfilment of a contractual agreement and this is also undertaken while using an automated processing system, you shall have the right to receive your data in a structured, commonplace and machine-readable format and to transfer these data to another data processing service provider.

Right to Revocation: Insofar as the data processing is undertaken based upon a consent, you shall have the right to withdraw your consent for the data processing, with effectiveness for the future, at any time and upon a free-of-charge basis.

Right to Lodge a Complaint: You shall also have the right to lodge a complaint to a government supervisory authority (e.g. to the State Data Protection Officer for Lower Saxony, Germany) regarding our processing of your data.

F. Your Contact Persons

Contact Person for Exercise of Your Rights

For further information concerning the exercise of your rights, please see privacy.volkswagen.com.

Data Protection Officer

Our Data Protection Officer shall support you as your contact person on all data protection-related matters:

Datenschutzbeauftragter der Volkswagen AG
Berliner Ring 2
38440 Wolfsburg
GERMANY
dataprivacy@volkswagen.de

Stand: September 2023