



# Privacy Policy for Sales, Services and Marketing Campaigns "German Market"

Dear customer,

as part of your visit, your authorised Volkswagen repairer or other third party 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, as the manufacturer of your vehicle, is involved. In particular, this involves executing service processes and providing services for new vehicle or used vehicle purchases, or conducting customer surveys. We will inform you of the relevant data processing by Volkswagen AG in the following sections.

## A. Controller

Via this Privacy Policy, we wish to inform you of how your personal data will be collected, processed and used.

The responsible office for data processing within the meaning of section 4(7) of the General Data Protection Regulation of the European Union (Regulation (EU) 2016/679 – "GDPR") is Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, [kundenbetreuung@volkswagen.de](mailto:kundenbetreuung@volkswagen.de), entered in the register of companies at Braunschweig District Court under number HRB 100484 ("Volkswagen AG").

In the context of vehicle deliveries, Volkswagen Konzernlogistik GmbH & Co. OHG, Hesslinger Strasse 12, 38436 Wolfsburg, [datenschutz-auskunft.vwag.r.wob@volkswagen.de](mailto:datenschutz-auskunft.vwag.r.wob@volkswagen.de) (hereinafter referred to as Group Logistics), entered in the register of companies at Braunschweig District Court under number HRA 100170, is also the responsible office within the meaning of GDPR; these cases are referred to separately in the Privacy Policy.

## 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.



Likewise, your personal data may be processed by Volkswagen AG and Group Logistics in the course of new or used vehicle purchase transactions (including vehicle deliveries). In the event that customer surveys are carried out, your personal data may also be processed by Volkswagen AG 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 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.

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.

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 that CO<sub>2</sub> emissions are legally compliant with EU legislation for monitoring CO<sub>2</sub> 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. If bodywork or completions are carried out on light commercial vehicles, WLPT results are transmitted to the body manufacturer for the purpose of ensuring legally compliant CO<sub>2</sub> emissions.

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.

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 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**

If you have taken out a LongLife 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.

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. If it is necessary to obtain an authorisation, this third party data will also be processed.



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 or, if necessary, contact the proper emergency services centre abroad as well as support commissioned service providers and track the performance of the emergency roadside assistance. The Volkswagen dealerships, the emergency service centres abroad and the commissioned service providers process the personal data on their own authority.

The personal data that was collected as part of the emergency roadside assistance (such as the vehicle identification number) must be analysed to determine the bases that serve the improvement of the emergency roadside assistance through the emergency service centre and Volkswagen dealerships.

For this purpose, Volkswagen AG creates evaluations for process monitoring, quality control and auditing of invoices for mobility services.

Volkswagen AG processes this data to fulfil your claim for the mobility guarantee and to analyse emergency service matters on the basis of the legitimate interest in being able to assist you in an emergency. (see section 6(1)(f) GDPR) and in case you have purchased the vehicle directly, on the basis of the concluded contract (see section 6(1)(b) GDPR).

Your data will usually be erased after 4 years at the latest.

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. If it is necessary to obtain an authorisation, this third party data will also be 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 and track the execution of the emergency roadside assistance. The authorised Volkswagen repairer or the contracted providers process the personal data on their own authority.

Volkswagen AG processes this data of the registered keeper to fulfil the claim for the mobility guarantee on the basis of the contract (see Section 6(1)(b) GDPR). For third parties, e.g. fellow travellers, this data is processed on the basis of the legitimate interest (see section (6)(1)(f) GDPR), in being able to assist the persons.

The personal data that was collected as part of the emergency roadside assistance (such as the vehicle identification number) must be analysed to determine the bases that serve the improvement of the emergency roadside assistance through the emergency service centre and Volkswagen dealerships,



For this purpose, Volkswagen AG creates evaluations for process monitoring, quality control and auditing of invoices for mobility services.

Volkswagen AG processes this data to analyse emergency service matters on the basis of the legitimate interest (see Section (6)(1)(f) GDPR) in being able to assist you in an emergency.

Your data will usually be erased after 4 years at the latest.

When processing and allocating the cost of breakdowns of Volkswagen vehicles with LongLife mobility guarantee and vehicles of the Volkswagen ID family, such as the process of accepting the customer's request over the telephone or processing the internal allocation of the costs, Volkswagen AG uses Volkswagen Deutschland GmbH & Co. KG 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 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 provided 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 processed for the cost allocation and processing of the roadside assistance will usually be erased after 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 an economically reasonable expense in the interests of the Volkswagen Group and in the interests of the customers.

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 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.



If we are missing information or documents to process your enquiry, we will request the following data or documents on a case-by-case basis:

- Request for further data (e.g. VIN, repair invoice, contact details)
- Proof of vehicle ownership
- Power of Attorney (in case of representation by other persons/third parties, such as wife/husband, attorney)

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 rests on an overriding legitimate interest (see section 6(1)(f) GDPR) or the performance of the contract (see section 6(1)(b) GDPR). The legitimate interest 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 to answer every enquiry 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.

Data is processed on the basis of an overriding legitimate interest (see section 6(1) 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.

## **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, 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.

## **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 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 that 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, last name, address, year of birth, language)
- General vehicle data (e.g. VIN)
- Contract data (e.g. state/country code, brand code, membership of the customer club, membership/care programme selected, 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 processing 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, last name, 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, change of order, delivery, cancellation). Volkswagen AG may contact you using the personal data you provide in connection with the execution of the sales contract. Volkswagen AG processes the above-mentioned information, and further personal data you provide, to fulfil your contract (cf. Article 6 (1) (b) GDPR) or to transfer the data to complete the purchase following conclusion of the purchase contract on the basis of a legitimate interest (cf. Article 6 (1) (f) GDPR) that lies in the fulfilment of the sales activity in connection with exercising of contractual obligations and customer management, as well fraud protection. If there is a justified reason for the rescission from the purchase contract and its execution, the personal data listed above is required for this reason as well.

This also applies in the case of a closed distance selling deal and the intent to exercise the right to withdraw consent (see section 6(1)(b) GDPR).

For the delivery processing, we will, 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 demand notices and debt collection, we involve Volkswagen Financial Services Digital Solutions GmbH, Gifhorner Straße 57, 38112 Braunschweig, Germany, 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 executing the leasing contract in terms of data protection.



The data required for the creation of a request and the execution of a contract (in particular, your private identification data, your contact data, your address and your vehicle configuration) are transferred by Volkswagen AG to Volkswagen Leasing GmbH for the purpose of the initiation of a contract (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 processing the purchase of vehicles by special customers**

Certain customer groups, such as people with disabilities, conclude their sales contract directly with Volkswagen AG. During processing of the purchase process, including clarification of available grants, through to possible purchase cancellations and the associated customer care measures, private contact and identification data (e.g. first name, last name, 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 grants.

Volkswagen AG processes this data to fulfil the terms of your contract (see section 6(1)(b) GDPR) or on the basis of an overriding legitimate interest in accordance with section 6(1)(f) GDPR or on the basis of consent (see section 6(1)(a); section 9 (2)(a) GDPR).

The data processed in this case is usually deleted 15 years after the customer's matter has been processed.

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

To support dealerships 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-related corrections in the context of invoicing, or to check vehicle-specific, dealership-specific goodwill requests with the aim of approving goodwill for sales support measures and allowances for promotional costs if the check is successful, or to analyse potential sales for dealerships, or for delivery. For the delivery processing, we shall, if you wish, involve Autostadt GmbH and/or Volkswagen Sachsen GmbH.

Furthermore, for the purposes described, it may be necessary for Volkswagen AG to add other information about the vehicle to general vehicle data (e.g. VIN, commissioning number).

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

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

Volkswagen AG supports importers, dealerships 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 work-related contact data such as location and contract data, such as the order number, will be processed by Volkswagen AG, for example:

- When granting items such as bonuses or sales promotion measures and the associated discount payments and final invoicing to the partner companies (incl. continuous quality control) to determine the dealer potential
- As part of determining and conducting dealer awards
- When granting of special support (transport costs from regional authorities)
- When creating 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 corporate management**

Volkswagen AG is constantly striving to improve business processes as part of corporate management and to optimise the associated costs. To achieve this goal, it is necessary to analyse web analysis, offer, sale and order data in detail. For this reason, Volkswagen AG processes data from web analysis, offer, sale 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 corporate management, Volkswagen AG carries out analyses of web analysis, offer, sale and order data according to model, sales channel, order status, analyses according to the required variants and equipment and reporting on business key performance indicators using an identification number.

Furthermore, Volkswagen AG merges its data with external information such as socio-economic or socio-demographic characteristics. 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. 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. In the case of processing extending beyond this (e.g. the calculation of segments, metrics and key indicators), the data is anonymised in advance.

The described processing of your data takes place on the basis of the legitimate interest of Volkswagen AG to perform evaluations for corporate 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 corporate management purposes. Access to personal data by Amazon Web Services, Inc., based in the USA, cannot be excluded, thus the relevant EU standard contractual clauses (a set of contractual clauses approved by the European Commission that accords the same protection to personal data that it has 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 Volkswagen Deutschland GmbH & Co. KG and CARIAD SE, both based in Germany, as processors in order to safeguard its operations and for further development. You can view the EU standard contractual clauses used via the following link:

[EUR-Lex - 32021D0914 - EN - EUR-Lex \(europa.eu\)](#)

## **15. Analysis of sales activities**

Volkswagen AG is constantly striving to optimise the workflows and business processes of its sales activities, to reduce the costs associated with this and to create decision-making bases for sales activities.

In order to achieve this goal, Volkswagen AG processes personal offer, sale and order data in order to gain knowledge about sales activities, such as:

- Pseudonymous identification data (e.g. a randomly generated pseudonymous user ID)
- Vehicle usage data (e.g. vehicle data)
- Vehicle identification data (e.g. vehicle identification number (VIN), commissioning number)
- Contract data (e.g. vehicle equipment, order data, logistics data, leasing and financing data)
- Delivery details (e.g. pick-up date, delivery date and time)
- Highly aggregated anonymised sales result figures (e.g. sales revenues)

Based on this data, Volkswagen AG conducts in-depth analyses and generates reports and forecasts in relation to new orders, sales and inventories. These reports serve as a medium and long-term planning tool for Volkswagen AG.

Your personal data collected by Volkswagen AG and by third parties will be processed by Volkswagen AG for the above-mentioned purpose. The respective third parties (e.g. Volkswagen dealerships, Volkswagen Financial Services AG) transmit your data to Volkswagen AG for this purpose.

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

The described processing of your data takes place on the basis of the legitimate interest of Volkswagen AG to perform analyses of sales activities (Article 6 (1) (f) GDPR).



Volkswagen AG deletes your data after 10 years at the latest 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 for the purpose of analysing sales activities. Access to personal data by Amazon Web Services, Inc., based in the USA, cannot be excluded, thus the relevant EU standard contractual clauses (a set of contractual clauses approved by the European Commission that accords the same protection to personal data that it has 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, your personal data can be stored in Microsoft software (SharePoint) and transferred to the Volkswagen dealership via Microsoft Outlook for the purpose of a sales management analysis. This is done by Microsoft Ireland Operations Limited in the European Union. Access to personal data by Microsoft Corporation based in the USA cannot be excluded so that the EU standard contractual clauses have been concluded here as well. Microsoft will process your personal data only on our behalf and in accordance with our instructions under a data processing agreement.

In addition, Volkswagen AG will use Volkswagen Deutschland GmbH & Co. KG as well as CARIAD SE, both with headquarters in Germany, as processors in order to safeguard its operations and for further development. You can view the EU standard contractual clauses used via the following link: [EUR-Lex - 32021D0914 - EN - EUR-Lex \(europa.eu\)](#).

#### **16. Systematic market cultivation**

To support the dealership organisation with targeted market cultivation and the strategic alignment of the sales network on the part of Volkswagen AG, the vehicle identification number (VIN) of your vehicle is processed by Volkswagen AG. This data is used to obtain information regarding dealership performance and the leveraging of potential in a market area.

Data processing takes place on the basis of an overriding legitimate interest in accordance with Article 6 (1) (f) GDPR (balancing of interests). Volkswagen AG has a legitimate economic interest in this data, as market cultivation that is targeted in terms of analysis and decision making is only possible with the aid of this type of supply chain data.

The data is deleted when it is overwritten automatically after ten months.

#### **17. Processing customer data in the context of risk management**

In the context of risk management (e.g. the calculation of compensation payments for payments made in the event that the VW partner company becomes insolvent, processing of payment problems, delivery delays, processing of customer data upon termination of a contract), Volkswagen AG processes private and vehicle-specific data such as your customer number, your vehicle identification number (VIN) and your new vehicle commissioning number, as well as your name and postal address.



For the data processing specified above, Volkswagen AG draws on an overriding legitimate interest (see section 6(1)(f) GDPR). The legitimate interest involves handling the necessary cash flows and processes in the event that a partner company becomes insolvent.

The data processed is usually retained for up to 15 years for tax law reasons and is then deleted.

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

For compliance with legal requirements (Commission Implementing Regulation (EU) No. 2021/392), vehicle data recording fuel consumption and kilometres driven (known as on-board fuel consumption monitoring data) is read out when vehicles are taken in for service or repairs and sent to the European Commission together with the vehicle identification number.

Data processing, transfer and storage is regulated by the provisions of this legal requirement; customers may withdraw their consent to such activities prior to the data being read out at the authorised workshop.

Your data is deleted after 15 years at the latest 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.

#### **19. Data collection for the statistical assessment for insurance classification**

To achieve a favourable classification of Volkswagen AG vehicles and thereby provide our customers with vehicles that are inexpensive to insure, Volkswagen AG transfers the specific information relating to the installed driver assistance systems to GDV-Dienstleistungs-GmbH with headquarters in Germany. This information is transferred and evaluated in pseudonymised form. GDV-Dienstleistungs-GmbH then presents the analysis results to the Classification Commission, made up of members of the Federal Motor Transport Authority (KBA), for example, who check these and may subsequently take them into account in the initial classification of new vehicle models.

Volkswagen AG processes this data on the basis of an overriding legitimate interest in accordance with section 6(1)(f) GDPR.

The legitimate interest of Volkswagen AG is constituted by the fact that the advantage and benefit of data transfer from installed driver assistance systems by the manufacturer to GDV Dienstleistungs-GmbH could, in the best case, produce a possible bonus in the insurance classification for comprehensive, partially comprehensive, and third-party liability premiums, for example. This could very probably result in a lower insurance premium for the customer.

Your data that is processed in the effectiveness study for driver assistance systems under realistic accident situations will be deleted 1 year after creation at the latest.



## 20. Information security

To ensure information security in IT systems and/or to protect your customer data in workshop systems, the vehicle identification number (VIN) of your vehicle may be processed under the joint responsibility of Volkswagen AG, Audi, Seat and Skoda. This data helps to detect and resolve errors and/or prohibited activities in IT systems.

Data processing takes place on the basis of a legitimate interest in accordance with Article 6 (1) (f) GDPR (balancing of interests). Volkswagen AG and its brands have a legitimate interest in processing the VIN, as it is only with this that abnormalities can be detected in order to ensure information security in workshop systems.

For information security purposes, the data is processed under the joint responsibility of the brands Volkswagen AG, Audi, Seat and Skoda in the form of analytical work.

A Joint Controller Agreement (JCA) has been concluded between Audi AG, Volkswagen AG, Seat S.A. and Škoda Auto a.s. for this purpose. The following details about the JCA:

- 1) Participants and branch main office: Audi AG, main office in Ingolstadt (Germany), Volkswagen AG, main office Wolfsburg in (Germany), Seat S.A., main office in Martorell - Barcelona (Spain), Škoda Auto a.s., main office in Mladá Boleslav (Czech Republic)
- 2) Purposes of the joint controllers: joint control of after sales and joint execution of processing. Object and role of joint control over after sales: detect cyber attacks in after sales group systems and respond, find the cause and take action if necessary. This also serves to protect your data (customer data) in workshop systems.
- 3) Data sets that are administered and, where applicable, processed on site: the following data category is processed: vehicle usage data (VIN) for the purpose of identifying system abnormalities as well as analysing and resolving events.
- 4) Governance of joint responsibility: personal data is viewed and processed jointly by the companies listed above. The parties assume joint responsibility in data processing within the meaning of Article 26 (1) 1 of the GDPR.

You may contact any of the companies regarding basic questions. See no. 6 for further information.

5) Volkswagen AG fulfils all of its information obligations.

6) Data subjects can contact the following:

Volkswagen AG  
Berliner Ring 2, 38440 Wolfsburg  
Email: [kundenbetreuung@volkswagen.de](mailto:kundenbetreuung@volkswagen.de)

The data will be stored for no more than 7 months for the purposes of documentation, event resolution, verifiability and ability to provide information, and then deleted.



## **21. VILMA – Vehicle Image Library Media Access**

Volkswagen AG provides its customers with various digital services, such as the WeConnect app, the OneShop and used car platforms. For such services that display images of specific vehicles for illustration and for marketing purposes, interior and exterior views of the vehicles created by digital means will be provided. These are the same media used in the vehicle configurator. For this purpose, the VIN of the vehicle will be assigned to vehicle images in a spreadsheet so that media can be matched to vehicles. Volkswagen AG processes this data on the basis of an overriding legitimate interest in accordance with Article 6 (1) (f) GDPR. This allows the best possible customer experience through the display of the individual vehicle configuration as image material, where relevant. The data will be deleted 25 years after the vehicle's delivery. This is consistent with the vehicle's estimated life cycle. It is the only way to guarantee that media will be available later on, such as for the purpose of selling vehicles on used car platforms.

## **22. Processing of customer data for a buildability check and production process tracking of the vehicles**

To ensure that the vehicles can be produced with selected equipment as configured and specified by the customer, Volkswagen AG carries out a buildability check for the ordered vehicles. For the buildability check, contract data such as order number, ordering dealership, delivery location, order type, customer type and order type is processed in addition to the technical components of the configuration to make it possible to allocate the configured vehicle to the customer order and to be able to allocate the corresponding result of the buildability check to the order. The buildability check is essential for the production of a vehicle. During the production process, the progress of the production of the customer vehicle is tracked and communicated to the dealership. Data processing during the buildability check ensures that Volkswagen builds only vehicles that it has the capability to actually produce and that do not violate contractual or statutory principles such as requirements or regulatory limitations.

Volkswagen AG processes this data on the basis of an overriding legitimate interest in accordance with Article 6 (1) (f) GDPR.

Your data is deleted after 15 years at the latest 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.

## **23. Processing of customer data for a buildability check and production process tracking of the vehicles**

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/or build status, from internal IT systems to third parties (e.g. financial services providers, loss appraisers).

The provision of the VIN related data is intended to support and simplify the processes between you and third parties. For example, it simplifies financing of your vehicle.

The data is distributed based on a contract and/or contract origination (see Section 6(1)(b) GDPR) or due to existing legal requirements (see Section 6(1)(c) 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 third parties described above.

#### **IV. Processing of personal data by Group Logistics**

Personal data (personal contact and identification data and vehicle usage data, in particular the VIN) may be processed by Group Logistics as part of the timely and efficient processing of vehicle deliveries.

Data processing takes place on the basis of an overriding legitimate interest in accordance with Article 6 (1) (f) GDPR (balancing of interests). The overriding interests of Group Logistics are to enable simple and timely processing of vehicle deliveries.

Vehicles to be delivered are assigned to a transport destination via the VIN and delivered accordingly.

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

#### **V. 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. These 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.

Investigating authorities and courts present specific requests 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 offices.

In the context of vehicle deliveries, Volkswagen AG may pass on your data to the Group Logistics (Chapter IV).



## VI. Data transmission to third countries

Volkswagen AG and Group Logistics strictly observe the relevant data protection requirements when transferring data to "third countries" (those that are neither members of the European Union nor the European Economic Area). Thus Volkswagen AG or Group Logistics 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 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 obtain further information about exercising your rights on the following website:  
<https://datenschutz.volkswagen.de>.

You are also entitled to the following rights when your data is processed by Group Logistics and you can exercise these rights free of charge at any time. For more information please contact: datenschutz-auskunft.vwag.r.wob@volkswagen.de

**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 the processing is based on an overriding interest or if your data is used for the purposes of direct marketing. 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 contact persons for exercising your rights and further information can be found at the following website <https://datenschutz.volkswagen.de>.

You are also entitled to the following rights when your data is processed by Group Logistics and you can exercise these rights free of charge at any time. For more information please contact: [datenschutz-auskunft.vwag.r.wob@volkswagen.de](mailto:datenschutz-auskunft.vwag.r.wob@volkswagen.de)

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

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

Data Protection Officer, Volkswagen AG Berliner

Ring 2, 38440 Wolfsburg

GERMANY

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

**Version dated: November 2023**