

## Privacy Policy for the Volkswagen "Maps + More" App

Thank you for taking an interest in a service provided by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany, entered in the register of companies at the Local Court of Brunswick under the number HRB 100484 ("Volkswagen AG" or "we" or "us"). Protecting your data is very important to us. The following policy sets out how your data is collected, processed and used by the "Maps + More" mobile application ("App"). We are the data controller as defined by Art. 4(7) of the EU General Data Protection Regulation ("GDPR").

### A. General information

We only ever collect, process and use your personal data in accordance with the applicable data protection regulations. I. Personal data Whenever you use the App, we collect and process certain data that relates to you as an individual and can be used to identify you (either directly or in combination with other information) or data that relates to other individuals ("personal data"). The personal data that we collect and process falls into the following categories: • Vehicle Identification Number (VIN); • Android or Apple ID of your mobile device; • Geodata; • IP address.

II. Why and on what legal basis do we process your personal data? We process your personal data for the following purposes: • To provide you with services listed in section B below; legal basis: Art. 6(1)(b) GDPR or

• To comply with legal obligations imposed on Volkswagen AG (e.g. needing to supply an authority with personal data should this be required by internal security legislation); legal basis: Art. 6(1)(c) GDPR or

• To safeguard our legitimate interests (e.g. to ensure that our IT systems and App are secure; legal basis: Art. 6(1)(f) GDPR.

III. Who has access to your personal data? Within Volkswagen AG, the only persons who have access to your personal data are management and individuals who require such access for the purposes listed in point II, or to the extent required or permitted by the applicable law. Personal data is only ever transferred to third parties if this is necessary for performance of the contract, and in particular for providing Maps + More services. We exercise due care when selecting external service providers and third parties. We require them to have adequate technical and organisational security measures in place to protect your personal data, and we ensure that they only process your personal data as instructed by us and not for other purposes. We may also disclose your personal data to authorities if this is required or permitted by law. Your personal data will only be disclosed to these third parties if this is necessary or if this is authorised, required or permitted by law in connection with performance of the contract, with the business activities of Volkswagen AG and with the purposes listed in point II above. We will not transfer your data to countries outside the European Union or the European Economic Area ("third countries"). IV. How long do we store your personal data? We will not store your personal data for longer than the period permitted by the applicable data protection laws. The appropriate retention period for personal data depends on the quantity, nature and sensitivity of the data, as well as on the potential risk of damage that unauthorised use or publication of the personal data would pose, on the purposes for which we are processing the personal data and whether we can fulfil these purposes by other means, and on the applicable statutory provisions. We will not store your personal data for longer than is necessary to fulfil the purposes listed in this Privacy Policy, unless the applicable laws or statutory regulations require a longer retention period or a longer retention is justified according to the applicable legal provisions on limitation periods.

### B. Individual services and functions of the App

You can use the individual services contained in this App without telling us who you are. Your personal data will generally only be saved on your mobile device. Sometimes, however, we will need to process and transfer personal data (such as geodata) in order to make our services available to you. The term "geodata" refers to your mobile device's positioning data. Geodata will only be transmitted if you have enabled this function in the App. If you have enabled the geodata function, geodata will be transferred whenever you use the App – even if the specific function you are using does not require geodata transmission.

I. Calls If you have allowed the App access in the settings on your mobile device, "Calls" will enable you to access the contacts you have stored in your address book. Your contacts' details will not be stored in the App. To let you make a call, the App will transfer the selected phone number to the standard telephone app on your mobile device.

II. Travel data The "Travel data" function provides you with useful information about your vehicle (e.g. the duration of your journey, how many kilometres you have driven, your average fuel consumption, your remaining range, your average driving speed).

III. Energy flow (electric vehicles only) The "Energy flow" function displays the energy flow, your recuperation statistics and your remaining electric range. This data is stored locally on your mobile device.

IV. Think Blue. Trainer. The "Think Blue. Trainer." uses your driving behaviour (acceleration, speed, chosen gear, clutch, and data from section B point II) to monitor how you are driving. The result is displayed on screen as a single numerical value (Blue Score) to show you how you can optimise your driving style. This value is continuously recalculated; the values from the last three minutes are stored locally on your mobile device.

V. Media "Media" allows you to view and play media content that is saved on data storage media (USB or SD) connected either to your mobile device or to your vehicle's infotainment system. This service can also be used to control your vehicle's infotainment system.

VI. Navigation The "Navigation" function helps you reach your destination. The exact location of your vehicle needs to be determined in order to do this, which requires geodata transmission for the App to be enabled in the settings on your mobile device. The most recent destinations you have driven to are stored locally on your mobile device so that you can use them again at a later date.

VII. Online traffic "Online traffic" gives you the latest travel information and traffic updates so that you can avoid disruptions such as traffic jams in good time. "Online traffic" enables you to plan your route more efficiently by providing you with real-time traffic information. This information is provided by a traffic service commissioned by Volkswagen AG. To update the traffic information you receive, the App transfers your geodata, direction of travel and speed, as well as the date, time and a temporary session number to this traffic service. "Geodata" here refers to your mobile device's positioning data. Geodata can only be transmitted if you have enabled this option for the App in the settings on your mobile device.

#### VIII. Adobe Analytics

This app uses the web analysis service Adobe Analytics to analyse user visits to this app. Data is processed on the basis of the consent that you have granted (Article 6, paragraph 1, letter a, GDPR).

We cannot preclude the possibility that your data will be accessed through Adobe Systems Incorporated having headquarters in the US, such that a corresponding EU standard agreement

(adequate guarantees regarding the processing of data in non-European countries) was concluded. You have the right to be informed of this standard agreement in the course of the disclosure.

You can revoke your consent to the data processing indicated at any time with effect for the future by opening the settings. Disable the analytics setting in the general section to revoke your consent to Adobe Analytics.

The information stored on the Adobe servers cannot be directly traced to an individual because Adobe Analytics is used with the following settings: 'Before Geo-Lookup: Replace visitor's last IP octet with 0' and 'Obfuscate IP-Removed'. The setting 'Before Geo-Lookup: Replace visitor's last IP octet with 0' causes the IP address to be anonymised prior to geo-location by substituting the last octet in the IP address with zeros. For statistical analysis, the user's approximate location is added to the tracking package, which still contains the complete IP address. Before the tracking package is saved, the IP address is then replaced by a single, permanent IP address – referred to as a generic IP address – when the setting 'Obfuscate IP-Removed' is configured. This removes the IP address from the data record that is stored.

C. Automated individual decision-making We will never make decisions for you that are based solely on automated processing (including profiling) and that have legal consequences for you (Art. 22 GDPR).

#### D. Your rights

You can exercise the following rights against Volkswagen AG at any time free of charge. You can find more information about how to exercise your rights at <https://www.datenschutz.volkswagen.de>. Right of access: You have the right to obtain information from us about the processing of your personal data. Right to rectification: You have the right to request that we rectify incomplete or inaccurate personal data concerning you. Right to erasure: If the conditions of Art. 17 GDPR are met, you have the right to request that your data be erased. For example, you can request the erasure of your data if it is no longer needed for the purposes for which it was collected. You can also request erasure if we are processing your data because you gave us permission to do so but you now wish to withdraw your consent. Right to restriction of processing: If the conditions of Art. 18 GDPR are met, you have the right to request that the processing of your data be restricted. This is the case, for example, if you contest the accuracy of your data. You can then request to have processing restricted for the period during which the accuracy of your data is being verified. Right to object: You have the right to object to your data being processed if processing is in the public interest or the exercise of a public authority, or if processing is based on a legitimate interest of Volkswagen AG or a third party. Should you have an objection, please tell us why you object to your data being processed. You also have the right to object to your data being processed for direct marketing purposes. This includes profiling, if carried out in relation to direct marketing. Right to data portability: Where data processing is based on consent or performance of a contract, and such processing is automated, you have the right to obtain 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 this consent at any time, free of charge and with future effect by writing to [info-datenschutz@volkswagen.de](mailto:info-datenschutz@volkswagen.de) or using the contact details listed under "Site notice". Right to lodge a complaint: You also have the right to lodge a complaint with a supervisory authority (e.g. the data protection authority of the state of Lower Saxony) about how we process your data.

E. Your point of contact: Data Protection Officer Our Data Protection Officer is your point of contact if you have any requests concerning data protection or if you would like to exercise your rights. Please address any concerns you have to the Volkswagen AG Data Protection Officer: Volkswagen AG Data Protection Officer Berliner Ring 2, 38440 Wolfsburg, Germany [info-datenschutz@volkswagen.de](mailto:info-datenschutz@volkswagen.de)

F. Changes to this Privacy Policy If we change how we handle personal data or change this Privacy Policy, we will issue a revised Privacy Policy and/or take other measures to make you aware of these changes in accordance with the applicable law. This Privacy Policy takes effect on [31.07.2018].