Privacy Policy for the use of VOLKSWAGEN AG MOBILE ONLINE SERVICES (Car-Net, We Connect and VW Connect) and the collection of data to establish an anonymous data pool for developing the automated driving system in Part III

(Version dated: November 2026 – The Privacy Policy is updated regularly. The current version can always be found online at https://consent.vwgroup.io/consent/v1/texts/carnet/gb/en/dataprivacy/latest/html)

This Privacy Policy provides information on the processing of personal data when using Volkswagen AG's "Car Net, We Connect, VW Connect" MOBILE ONLINE SERVICES (in the following combined under "VW Connect") in Volkswagen AG vehicles. It does not apply to the use of MOBILE ONLINE SERVICES in vehicles of the ID. family. The Privacy Policy for the use of MOBILE ONLINE SERVICES in vehicles of the ID. family is available at https://consent.vwgroup.io/consent/v1/texts/weconnect/gb/en/dataprivacy/latest/html.

As a German company, Volkswagen AG is bound to German law and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) ("**GDPR**"). This also applies when Volkswagen AG processes personal data of persons with a permanent residence outside of Germany. **Part I** of this Privacy Policy contains information on the processing of relevant data as required by German law and the GDPR.

To some extent, Volkswagen AG may also be bound by national legislation of other countries. Persons with a permanent residence in one of the countries specified in **Part II** of this Privacy Policy, can find further information in that section.

Contents

Part I:

A. General information on the processing of personal data
I. Controller for data processing
II. Data protection officer
III. Purposes for which data is processed when you use the MOBILE ONLINE SERVICES
IV. Creating evaluations for corporate management
V. Data processing for the purpose of business reporting
VI. Processing for the purposes of Volkswagen AG advertising and contract communication
VII. Erasure and rectification of data
VIII. Data recipients

B. Your rights
I. Right to information

II. Right to rectification
III. Right to erasure
IV. Right to restriction of processing
V. RIGHT TO OBJECT
VI. Right to data portability
VII. Right to withdraw consent
VIII. Right to lodge a complaint

C. Data processing in detail
I. Volkswagen ID
II. Volkswagen Ident
III. Data processing with the use of MOBILE ONLINE SERVICES
IV. Service portfolio

Part I: Information according to the General Data Protection Regulation

A. General information on the processing of personal data

I. Controller for data processing

Controller is Volkswagen AG (hereafter also referred to as “we” or “us”).

Volkswagen AG can be reached at:
Volkswagen AG
Berliner Ring 2
38440 Wolfsburg
Germany
Tel.: +49 - 5361 - 9 - 0
connect-support@volkswagen.de

Register of companies number HRB 100484 (Braunschweig district court)

II. Data protection officer

Our data protection officer is the contact person for all matters relating to data protection and for exercising data subject rights (see Section B. “Your rights”).

Please address requests to:

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

For exercising data subject rights, you can also use the email addresses info-datenschutz@volkswagen.de (Germany) and privacy@volkswagen.de (outside of Germany) or our Volkswagen Privacy Portal https://www.datenschutz.volkswagen.de.

III. Purposes for which data is processed when you use the MOBILE ONLINE SERVICES

1. Conclusion and performance of the contract for MOBILE ONLINE SERVICES

• Contract conclusion

We will process personal data of our customers that our customers have provided to us while registering for the MOBILE ONLINE SERVICES, such as email address, password, S-PIN, name, address, User ID, vehicle identification number, vehicle brand, nickname, preferred language, time the order was placed (Start Timer 14 Days), time of activation, date of birth (VW Ident) and IT usage data, for the purposes of concluding and fulfilling the contract for MOBILE ONLINE SERVICES (Article 6(1)(b) GDPR).

With a view to improving user friendliness, ensuring smooth functionality and enhancing the process of activating the MOBILE ONLINE SERVICES for a vehicle, we will analyse the following data:

• A pseudonymised User ID that is generated by means of a pseudonymisation algorithm, combining the User ID and vehicle identification number.
• IT usage data that is generated in the context of the activation process and allows information to be inferred about the running and status of the activation process.

The data processing described above is based on our legitimate interest to offer our customers and potential customers newly developed as well as improved products and services (Article 6(1)(f) GDPR).

• Data processed when you use the MOBILE ONLINE SERVICES

If the vehicle is used with the MOBILE ONLINE SERVICES activated, we will process personal data from the vehicle, to the extent that this is necessary, for the purpose of providing said services.

If a vehicle user is logged in at the vehicle as the primary user, a secondary user or a guest user, we will process their personal data for the purpose of meeting our contractual obligations (Article 6(1)(b) GDPR). The use of MOBILE ONLINE SERVICES does not require logging in at the vehicle with an account. This requires that the settings in the vehicle are set to the online mode. After that, the personal data of the vehicle user will be processed according to the selected privacy settings. This data processing is based on our legitimate interest to make the MOBILE ONLINE SERVICES available in the vehicle in accordance with the contract (Section 6(1)(f) GDPR). Information on the privacy settings and the user concept is provided in Section “C. Data processing in detail” under “III. 1. Restrict data processing and manage services” and “III. 2. User concept”.

The following will always be processed when using the services: vehicle identification number (VIN), vehicle IP address, SIM data and an internal Volkswagen customer identification number (if available). The additional data that will be processed and information on the privacy settings, user concept and individual user roles, is available in Section C. “Data processing in detail” under “III. 1. Data processing when using MOBILE ONLINE SERVICES.

Customers who have registered for MOBILE ONLINE SERVICES using their Volkswagen ID are also able to log into any Volkswagen AG Internet-enabled vehicle (as a “guest user”) for the purpose of transferring across their personalised settings (such as seat adjustment settings). Guest users can also log in at vehicles without activated MOBILE ONLINE SERVICES to load their personalised

settings in the vehicle. In this case, we will process the vehicle identification number ("VIN") and the IP address of the vehicle. This processing is necessary to ensure the functionality of the MOBILE ONLINE SERVICES. It is carried out in accordance with Article 6(1)(f) GDPR on the basis of our legitimate interest to perform the contract for MOBILE ONLINE SERVICES with the guest user.

The statutory "eCall Emergency System" service is available on the vehicle even if no MOBILE ONLINE SERVICES have been purchased for the vehicle. Data is automatically transmitted to the emergency services control centre on the basis of a legal obligation (Article 6(1)(c) GDPR in conjunction with Regulation (EU) 2015/758 of the European Parliament and of the Council of 29 April 2015 concerning type-approval requirements for the deployment of the eCall in-vehicle system based on the 112 service and amending of Directive 2007/46/EC and Regulation (EU) 2018 /858 to protect vital interests (Article 6(1)(d) GDPR)).

The registration in the vehicle and user identification by us do not apply to Up and eUp vehicles. Only the registered primary user for the vehicle is viewed as the data subject of the data processing, unless the person provides proof that the person has used the vehicle at a specific point in time.

• Over-the-Air-Update/system update (all plans)

This service updates the vehicle software and the data of the infotainment system, e.g. to obtain new functions or get the systems ready for the latest changes relating to road traffic.

Personal data: vehicle identification number (VIN), software versions and hardware versions, as well as the hardware serial numbers and the selected Infotainment system language

The personal data will be erased after a maximum of 15 years.

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: Arvato Supply Chain Solutions SE, Reinhard-Mohn-Str. 22, 33333 Gütersloh, Germany; CARIAD SE, Major-Hirst-Straße 7, 38442 Wolfsburg, Germany (These recipients will process data on our behalf and in accordance with our instructions only.)

• Other proprietary online functionalities and services / data processing in fleet operation

The vehicle comes enabled with online functionalities (such as the digital User Guide) without the need to conclude a separate contract. Information about how data is processed when you use these functions online can be found in the settings for the relevant function. You can view the most recently downloaded versions of the corresponding data privacy statements even when the vehicle is in offline mode.

The vehicle may be equipped with the MOBILE ONLINE SERVICES "VW Connect" and "VW Connect Plus" (some of which may incur a charge), other MOBILE ONLINE SERVICES and digital products of Volkswagen AG (such as certain in-car apps or mobile keys) or connected to the fleet management system "Fleet Interface, Connect Pro". The fleet management system is a solution that enables a fleet operator to derive vehicle data and control vehicle functions from a distance.

In case of a fleet vehicle, the data collection by the fleet operator can, depending on the technology and the equipment of the vehicle) particularly pertain to the following data:

- the vehicle identification number (VIN)
- the maintenance data (e.g. next oil change)
- the route and positioning data

• the fuel tank level and/or state of charge
• the warning lamps
• etc.

In addition, the fleet operator can restrict, block or override the Privacy Settings mode.

The fleet operator decides on the deriving and processing of data under their own responsibility (under data protection legislation). For information on concrete data processing, please contact your fleet operator.

2. Technical availability and security of the MOBILE ONLINE SERVICES

The vehicle normally connects once to the Volkswagen data server before it is handed over to the vehicle purchaser or user at the dealership (but certainly no later than when the vehicle has reached an initial odometer reading of 25 km) so that the software certificates can be updated and the vehicle registered on the Volkswagen data server. The vehicle odometer reading and the vehicle identification number (VIN) are processed for this purpose. This update process is necessary so that the MOBILE ONLINE SERVICES can be made available ready for activation and so that the services already available on the vehicle without concluding a contract for MOBILE ONLINE SERVICES and the legally required "eCall Emergency System" are able to function. If the vehicle was set to "Maximum privacy" in the privacy settings immediately before the start of the update process, it will automatically return to this privacy level on completion of the update process. Data processing is carried out for the purpose of performing the sales contract for the Internet-enabled vehicle between the vehicle purchaser and the dealership, and on the basis of our legal obligation to provide the eCall Emergency System (Article 6(1)(b) and Article 6(1)(c) GDPR).

To enable technical provision of the services following their activation (particularly in order to authenticate the vehicle and establish a secure connection between the vehicle, the user and the Volkswagen data server), the VIN, IP address, SIM data of the vehicle and the internal Volkswagen customer identification number will be processed. This internal customer identification number will be used to uniquely identify the vehicle user and to check that the vehicle user is authorised to use a particular service in the vehicle. The aim of this is to prevent unauthorised persons from gaining access to the services. This data processing is carried out for the purpose of providing the services (Article 6(1)(b) GDPR) and is necessary for authenticating the vehicle and establishing secure communication between the vehicle and the respective vehicle user and the data server.

In addition, when the vehicle is started, the time of the vehicle systems is synchronised with that of the data server. This data is processed to ensure the IT security for the MOBILE ONLINE SERVICES. The vehicle must have the correct time in order to check the validity of the certificates transmitted from the vehicle for secure communication. This is a necessary prerequisite to ensure secure communication with the data server and combat cyber attacks by third parties. Data processing is carried out for the purpose of fulfilling the sales contract for the Internet-enabled vehicle between the vehicle purchaser and the dealership and, if applicable, for initiating the contract or fulfilling the contract for MOBILE ONLINE SERVICES (Article 6(1)(b) GDPR).

In addition, log files containing the VIN, IP address, time stamp and, where applicable, fault information are created and evaluated so that faults, technical malfunctions and security threats can be detected and eliminated early on. Data processing is based on the overriding legitimate interest to warrant the integrity, availability and capacity of the vehicle systems and thereby vehicle security (Article 6(1)(f) GDPR). In the event of a fault being detected, we may process the contact details we hold on file for you if we need to contact you.

Data processing is carried out for the purpose of fulfilling the sales contract for the Internet-enabled vehicle between the vehicle purchaser and the dealership and, if applicable, for initiating the contract or fulfilling the "VW Connect" contract (Article 6(1)(b) GDPR).

3. Identification process

Certain MOBILE ONLINE SERVICES enable access to the vehicle and/or control the vehicle's warning signals, e.g. the Lock & Unlock function. Before these are used for the first time, a one-off identity verification process must be performed. As part of this, personal data provided by the customer to us will be compared with the details on the relevant identification document. Notification of this process occurs in advance. The data will not be processed until the customer has given explicit consent according to (Article 6(1)(a) GDPR) and (Article 9(2)(a) GDPR), if special categories of personal data are processed and for the purpose of enabling the corresponding MOBILE ONLINE SERVICES.

Related details are available in Section C. "Data processing in detail" under "II. Volkswagen Ident".

4. Data processing at the Customer Interaction Center (Volkswagen Customer Care)

There is an option to contact the Customer Interaction Center ("CIC") with concerns about Volkswagen AG apps, services and websites (e.g. by post, email, contact form or telephone). In doing so, Volkswagen AG processes the personal data (e.g. name, email address, address, telephone number, country and language) that is required to respond to requests and provide customer care. Additional information on data protection when using the CIC is provided in the CIC Privacy Policy at https://cic-legal.volkswagen.com.

The CIC may contact individual customers to the extent necessary for the performance of the "VW Connect" contract. In doing so, the contact details on file with us will be processed for the purpose of contract performance (Article 6(1)(b) GDPR).

5. Consultation and Customer Care (authorised workshop / dealership)

For customer-focused support for our MOBILE ONLINE SERVICES, contact your authorised Volkswagen repairer (authorised workshop and/or dealership), which handles the customer care for Volkswagen AG. The following data is included in the transmission to the authorised Volkswagen repairer and processed by the same as a processor: contract data, surname, first name, Volkswagen ID user account (email), VIN and vehicle data, verification status, user status (primary user yes/no), Service scheduling (service active / not active), preferred authorised workshop (service selected / not selected) and further data that you provide to us as part of your request. We will process this data in accordance with Article 6(1)(b) GDPR for the purpose of performing the contract for MOBILE ONLINE SERVICES or – if you are not already a customer – in order to initiate a contract for the use of the MOBILE ONLINE SERVICES.

6. Analysis for the improvement of products

The Section "Analysis for the improvement of products" only applies to customers in Germany, Austria, Denmark, France, Spain, Italy, Ireland, United Kingdom (incl. Northern Ireland), Switzerland, Netherlands, Belgium, Norway and Sweden.

Volkswagen AG continually strives to develop new products and services and improve existing products and services. An in-depth analysis of products and services (analytics) is required to accomplish this goal. For this reason, Volkswagen AG processes data from the Volkswagen ID user account and from "VW Connect", for example:

• Pseudonymous identification data (e.g. a randomly generated pseudonymous user ID)
• Vehicle use data (e.g. charging, driving and parking data, charging and timer settings (eHybrids))
• Contract data (e.g. vehicle equipment such as the engine type)
• IT use data (e.g. User ID, use of "VW Connect" services)
• Location data (e.g. truncated GPS data, charging points)
• Data related to the vehicle state of health (e.g. service intervals, warnings that occurred, activated warning lamps)

In case of vehicles that are stored in the Volkswagen ID user account, Volkswagen AG processes the vehicle identification number and enhances the data listed above with further equipment data of the respective vehicle. In the course of processing, the personal data is pseudonymised. Pseudonymisation involves removing all direct personal identification features (e.g. vehicle identification number). Indirectly traceable identification features (pseudonyms) are retained. In addition, we also truncate the GPS data. The data is only analysed in the Volkswagen AG systems once this pseudonymisation and reduction has been completed.

The processing of pseudonymous data (e.g. User ID, pseudonymised vehicle identification number) is necessary to be able to detect longer term interactions between our customers' use of the vehicle and services and the vehicle health (e.g. battery functionality of eHybrids). Furthermore, evaluations across vehicles and models may be carried out, particularly for the purposes of analysing interactions between vehicle models and vehicle specifications. This is the only way for us to determine suitable new and enhancement measures and offer new and improved products and services to our customers.

For charge-related analyses, temporarily non-truncated GPS data is processed in order to determine charging points. Technical data relating to these charging points is taken from external sources.

Information on where a vehicle was charged is stored without reference to a vehicle identification number or a user. This means that no movement or usage profiles are created. The sole purpose of the processing is technical analysis; for example, which vehicle types demonstrate charging issues at which charging points.

Only the personal data of the primary user will be processed, and only to the extent that the corresponding services from the service portfolio are activated and used. If secondary users or guest users activate and use services provided to them by the primary user, the vehicle data generated through this usage will be assigned to the primary user (see Section C. Data processing in detail under IV. Service portfolio). Vehicle users can also enter individual privacy settings and thereby control the data that can leave the vehicle (see Section C. "Data processing in detail" under "III.2 Restricting data processing and managing services" and "III.3 User concept").

The data processing described above is based on the legitimate interest of Volkswagen AG to offer its customers newly developed as well as improved products and services (Article 6(1)(f) GDPR).

Volkswagen AG erases any pseudonymous data no later than after seven 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.

7. Use of AI

Individual MOBILE ONLINE SERVICES, such as the online IDA voice assistant, use supportive artificial intelligence (AI) technologies to process enquiries more efficiently. Processing always takes place on the basis of a statutory legal basis (e.g. consent or contract fulfilment) and in compliance with GDPR.

With use of AI: automated decisions / profiling (Article 22 GDPR)

Decisions are not exclusively made based on automated processing, that have a legal impact toward you or that adversely affect you in a similar significant way (Article 22 GDPR). AI supported functions (e.g. IDA voice assistant) serve as support and are not executed in form of Article 22 GDPR decisions.

IV. Creating evaluations for corporate management

Volkswagen AG is constantly striving to improve business processes as part of company management and to optimise the associated costs. This requires a well-founded analysis of web analysis, offer, sale and order data. For this reason, Volkswagen AG processes data from web analysis, offer, sale and ordering systems as well as data from services that are linked to the Volkswagen ID. Details on processing this data (e.g. exactly what data is processed and how) are provided in the Volkswagen ID Privacy Policy at https://vwid.vwgroup.io/data-privacy.

V. Data processing for the purpose of business reporting

As part of business reporting, data is processed to manage the business model of MOBILE ONLINE SERVICES and to enhance the customer experience. In doing so, we process data that is used in the vehicle in relation to the digital products and services purchased. Once it has been analysed, the data is made available to the responsible departments within Volkswagen AG only to the extent required for the respective purpose.

The following personal data will thereby be processed:

• Personal contact and identification data (e.g.: User ID)

• Vehicle data (e.g. vehicle identification number (VIN), vehicle equipment, country of delivery (importer))

• Contract data (e.g. customer type (private or business customer), customer ID, contract date, customer history (e.g. interest without conclusion of a contract, conclusions, payments, reimbursements, bonuses, reminders, terminations), customer complaints, information on products purchased (article number, activation status, activation date, duration, country selected on registration, payment method), status of marketing consent declaration, licence data (for example, licences purchased, expiration date))

• IT usage data (e.g. User ID, log file information for service calls, IP addresses)

• Vehicle usage data with VIN/registration number that is of importance in relation to guarantee, warranty, product liability, safe vehicle operation (e.g. country of delivery, chassis number, delivery data, equipment)

The data is processed for the following purposes:

• Analysis for sales control and product improvement

We process data to manage distribution, develop new products and services, and to improve existing ones, by analysing acceptance rates and important performance indicators (KPIs). The corresponding analyses include the tracking of the number of produced, delivered and registered vehicles and the corresponding product licenses as well as the calculation of enrolment and extension rates. For the above stated purpose, your personal data is processed on the basis of our legitimate interest in accordance with Article (6)(1)(f) GDPR. Our legitimate interest is in the estimation of acceptance rates of new products/services, and in the evaluation of the acceptance rates of existing products/services.

• Accounting

For accounting purposes, fault recognition and risk management, we compare shop offers with actual purchases and invoices from payment service providers. Additionally, as measures for quality control, license information and E-Commerce transactions are analysed to correct errors and minimise incorrect offers in the Volkswagen Connect Shop. For the above stated purpose, your personal data is processed on the basis of our legitimate interest in accordance with Article (6)(1)(f) GDPR. Our legitimate interest is in ensuring that accounting processes are error-free and financial documents match the actual transactions, as well as recognising and mitigating risks in relation to incorrect offers or purchases.

• Payment of commissions and compensations to the dealership and importer

For the calculation and payments of commission and compensation to dealerships and importers, we prepare reports by market and dealership with information on purchased products, product life, purchase date, price and commission value. The relevant data is then provided to the importers to derive the sales commissions. For the above stated purpose, your personal data is processed on the basis of our legitimate interest in accordance with Article (6)(1)(f) GDPR. We have a legitimate interest in the precise calculation and payment of commissions, provide the required data to importers and dealerships, and to manage the data specific to the market to ensure operational efficiency.

• Product monitoring, error analysis and implementation of fault rectification measures

We process data on the contract status, including the VIN, to identify and rectify product faults, and to determine if an affected customer is considered for receiving compensation, or to take other measures for fault rectification. For the above stated purpose, your personal data is processed on the basis of our legitimate interest in accordance with Article (6)(1)(f) GDPR. Our legitimate interest is in the monitoring of the product behaviour, analyse and rectify faults as well as determining if affected customers are entitled to compensation.

• Remunerating the service providers that we use for the Mobile Online Services

We internally compare the licenses obtained in the Volkswagen Connect Shop with the license information stored in our systems to settle services utilised by us and process the payments to the service providers. For the above stated purpose, your personal data is processed on the basis of our legitimate interest in accordance with Article (6)(1)(f) GDPR. Our legitimate interest is in ensuring a correct settlement and payment to our service providers by checking and calculating the remuneration on the basis of the purchased licenses and the provided services.

• Transmission of data for statistical purposes and analyses with the aim of ensuring and monitoring data quality (e.g. identification of missing or inconsistent data) in order to ensure error-free communication.

The following data recipients are used as processors:

• Amazon Web Services Inc. (USA) – To provide an analysis and data platform

• Amazon Web Services EMEA SARL (Luxembourg) – To provide an analysis and data platform

• ADASTRA GmbH (Germany) – As a developer of dashboards and reports

• CARIAD SE (Germany) – As a developer of dashboards and reports

• Volkswagen Group Services GmbH (Germany) – To support internal colleagues in communicating with importers

• Bertrandt AG – To support internal colleagues

• VW Group Services GmbH – To support internal colleagues in communicating with importers

• MHP GmbH – As a developer of dashboards and reports

• Capgemini Deutschland GmbH – As a developer of dashboards and reports

• Volkswagen Group Digital Solutions Unipessoal Lda – As a developer of dashboards and reports

Other third parties:

• Importers (as responsible parties) – For remuneration of dealers and importers within the scope of the contractually stipulated profit sharing for sales revenue of digital products

Recipients domiciled in third countries:

• Your personal data will be processed in an Amazon Web Services Cloud operated by Amazon Web Services EMEA SARL ("Amazon") (as processor) in the European Union for the purpose of internal company reporting. Access to personal data by Amazon Web Services, Inc. (as processor), 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.

• You can access the EU standard contractual clauses used at https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32021D0914. Volkswagen AG erases your personal data after 10 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.

VI. Processing for the purposes of Volkswagen AG advertising and contract communication

Volkswagen AG always endeavours to send you information that is personally tailored to you as much as possible and thus improve advertising for the marketing of your products and services. This requires the well-founded analysis of your usage of our products and services. If you have given your consent to do so, Volkswagen AG will therefore process data from the Volkswagen ID user account and from "VW Connect". We also use your data to contact you in the context of contract communication (e.g. if contracts are expiring). Details on processing this data (e.g. exactly what data is processed and how) is provided in the Volkswagen ID Privacy Policy at https://vwid.vwgroup.io/data-privacy.

VII. Erasure and rectification of data

If the personal data is no longer needed for the purpose or purposes for which it was collected, it will be erased by us if there are no statutory archiving obligations that prevent erasure.

Furthermore, our customers can rectify the data they have entered at any time in the settings of their Volkswagen ID – if they have created such an ID.

VIII. Data recipients

1. Data servers

The data may be processed – depending on the model and equipment – on servers of the following service providers on our behalf and in accordance with our instructions:

CARIAD SE
Major-Hirst-Straße 7
38442 Wolfsburg
Germany

Audi AG
Auto-Union-Straße 1
85057 Ingolstadt
Germany

Amazon Web Services, Inc. ("AWS")
410 Terry Ave. North
Seattle WA 98109
USA

Amazon Web Services EMEA SARL
Avenue John F. Kennedy 38
1855 Luxemburg

Microsoft Ireland Operations Limited
One Microsoft Place
South County Business Park
Leopardstown
Dublin 18
D18 P521
Ireland

Cubic Telecom GmbH
Eschersheimer Landstraße 14
60322 Frankfurt am Main
Germany

Vodafone GmbH
Ferdinand-Braun-Platz 1
40549 Düsseldorf
Germany

2. IT support service providers

In addition, we use various IT service providers both within and outside the EU. These assist us with the maintenance of our IT systems and with technical support, for example. Insofar as the service providers have access to personal data, they will process this data on our behalf and in accordance with our instructions only.

IT support is provided in particular by the following service provider:

CARIAD SE
Major-Hirst-Straße 7
38442 Wolfsburg
Germany

Volkswagen Infotainment GmbH
Rensingstraße 15
44807 Bochum
Germany

dx.one GmbH
Wolfsburger Landstraße 22
38442 Wolfsburg
Germany

3. Other MOBILE ONLINE SERVICES users of the vehicle

Some services may allow vehicle users who have been assigned the primary and secondary user roles to view certain vehicle usage data (where applicable: including vehicle position data) via their personal login area in the web browser and/or via the "Volkswagen" app. To prevent access, vehicle users can deactivate relevant services in the settings. In addition, each vehicle user can restrict this data processing in the privacy settings. Detailed information on the privacy settings is provided in Section "C. Data processing in detail, III. Data processing when using MOBILE ONLINE SERVICES" under number "1. Restricting data processing and managing services" and number "2. User concept". Detailed information on data processing as part of the individual services is also available in Section "IV. Service portfolio".

4. Other recipients

Personal and/or vehicle-related data will also be forwarded to third parties where this is necessary for improving our online presence or performing the contract, particularly for providing the MOBILE ONLINE SERVICES. See Section C. "Data processing in detail" for information about how data is forwarded to third parties in the context of providing specific MOBILE ONLINE SERVICES.

5. Recipients domiciled in third countries

For the purposes outlined in this Privacy Policy, Volkswagen AG also transfers personal data to recipients and processors domiciled outside the EU. Volkswagen AG agrees to EU standard contractual clauses with recipients in unsafe third countries to ensure that personal data is adequately protected. The EU standard contractual clauses can be accessed in the EU languages under the following URL https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32021D0914y.

If required by the applicable data protection legislation, other protective measures (such as encryption and additional contractual provisions) are also put in place to ensure that personal data is adequately protected.

6. Legal requirements for the disclosure of data

Insofar as legal regulations apply, we are obliged to hand over data stored by us to the necessary extent at the request of government agencies (e.g., in the investigation of a criminal offence). The legal basis for the transfer of data to the respective government agency is provided by the respective legal obligation (Article 6(1)(c) GDPR in conjunction with the respective legal obligation).

B. Your rights

You can exercise the following rights with respect to Volkswagen AG at any time and free of charge.

If a primary user has activated MOBILE ONLINE SERVICES for a vehicle that you then use without logging in with your own Volkswagen ID, we will not be able to identify you while you are using it. If you assert data subject rights, we will have to check your identity and may ask you to provide additional information or clarification where necessary (in particular, information relating to the period or other circumstances of vehicle use). We can request this additional information so that we can identify the relevant personal data and make it available to you. We must also ensure when we provide personal data that we do not infringe the rights of other vehicle users.

More information on asserting your rights can be found at: https://datenschutz.volkswagen.de/.

I. Right to information

You have the right to request confirmation from us as to whether or not personal data concerning you is being processed and – if it is – to be informed what personal data concerning you is being processed, and also which third parties within and outside the EU have had your data forwarded to them. You also have the right to obtain a copy of the personal data concerning you that is being processed by us.

II. Right to rectification

You have the right to have incorrect or incomplete personal data concerning you rectified by us.

III. Right to erasure

You have the right to demand erasure of your data if the requirements stated in Article 17 GDPR are met. According to this, you can request, for example, that your data be 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.

IV. Right to restriction of processing

you have the right to request restricted processing of your data if the requirements stated in Article 18 GDPR are met. This is the case, for example, if you dispute the accuracy of your data. You can request that processing is restricted for the period during which the accuracy of the data is being checked.

V. RIGHT TO OBJECT

you have the right to object to the processing of your personal data in the following cases:

- **If processing takes place for direct marketing purposes (including profiling for direct marketing purposes).**

- **If processing (including profiling) takes place on the following legal bases:**

  - **Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us (Article 6(1)(e) GDPR).**

  - **Processing is necessary for the protection of our legitimate interests and those of a third party (Article 6(1)(f) GDPR). If you do raise any objection of this kind, we kindly request that you inform us of the reasons why you are objecting to data processing. If you object, we will no longer process your data unless we can prove compelling reasons for processing that outweigh your interests, rights and freedoms, or the processing serves the assertion, exercise or defence of legal claims.**

VI. Right to data portability

If data processing is based on consent or contract performance and processing takes place using automated means, you have the right to obtain your data in a structured, commonly used and machine-readable format and to transmit this data to another controller. In addition, you have the right to have the personal data transmitted directly by us to another controller.

VII. Right to withdraw consent

Where data processing is based on consent, you have the right to withdraw your consent, free of charge, at any time with effect for the future by sending an email to info-datenschutz@volkswagen.de (Germany); privacy@volkswagen.de (outside of Germany), at our Volkswagen Privacy Portal https://www.datenschutz.volkswagen.de or through the contact details in the site notice.

VIII. Right to lodge a complaint

You also have the right to lodge a complaint with a data protection supervisory authority or another competent data protection authority about our processing of your data. This can, for example, be the data protection authority in your country of residence. A list of all data protection authorities in the European Union and the European Economic Area can be found here: https://edpb.europa.eu/about-edpb/about-edpb/members_en#member-gb.

C. Data processing in detail

I. Volkswagen ID

The Volkswagen ID provides our customers with the option to log in at various services, apps and websites of Volkswagen AG or third parties. The data processing necessary for this is carried out for the performance of a contract (Article 6(1)(b) GDPR). The Volkswagen ID acts as a central user account where our customers can centrally manage their personal data. In order to use a MOBILE ONLINE SERVICE, it is necessary to create a Volkswagen ID or to log in with an existing one. The service selected by the customer is linked with the Volkswagen ID of the customer. This linking will only take place if the customer has given consent for this (Article 6(1)(a) GDPR). Information on data processing in relation to the Volkswagen ID is available in the Privacy Policy, which can be

accessed online under https://consent.vwgroup.io/consent/v1/texts/IdentityKit/de/en/volkswagen-dataPrivacy/latest/html.

II. Volkswagen Ident

An identity check (Volkswagen Ident) is required before using MOBILE ONLINE SERVICES that allow access to the vehicle (such as by "Lock & Unlock").

Recorded verifications can be exchanged among the companies within Volkswagen AG (the Group) to prevent the user having to perform verifications multiple times.

1. Volkswagen Ident process using AutoIdent via the MyVolkswagen portal and the Volkswagen app

AutoIdent by IDnow is an identification solution that enables customers to identify themselves online and in real time. The customer uploads a machine-readable identification document, such as an identity card, passport or driving licence (depending on the applicable requirements in the country of the customer) and records a short selfie-video. The AutoIdent software then automatically checks the authenticity of the document and compares it with the video to ensure that this is the actual person who wants to identify themselves. As soon as the identity has been checked successfully, customers can verify their identity online and use MOBILE ONLINE SERVICES, such as those permitting access to the vehicle (e.g. "Lock & Unlock").

The Volkswagen ID (internal identification number enabling the unique assignment of customer data) will be sent to the commissioned service provider.

This identification number will be enriched with further data (e.g. portrait image) by the commissioned service provider during the identification process. The customer will be notified of this separately in advance and must expressly consent before we are allowed to process the data in this way. In this case, the data will be processed by virtue of the customer's consent on the basis of Article 6(1)(a) GDPR and Article 9(2)(a) GDPR solely for the purpose of identifying the customer in order to activate MOBILE ONLINE SERVICES for which unique identification is required. The data will be transmitted exclusively in encrypted format.

On conclusion of the identification process, the service provider will send the customer's surname, first name, date of birth and Volkswagen ID, as well as the time of identification, back to us for the purpose of documenting the result and enabling the MOBILE ONLINE SERVICES. In addition, the following will be sent for the purpose of documenting which identification document was used to identify the customer: type of document, the document number, country of issue, date of issue and date of expiry.

We analyse whether the Volkswagen Ident processes have been completed successfully or aborted. This is why we store the status of the verification process of a customer.

The front and back of the document, recorded security features of the identification document and photos of the face are stored by IDnow for evidence purposes and erased after a maximum of ten (10) days.

Volkswagen will store the personal data until the customer deletes the Volkswagen ID user account.

Third-party provider information:

IDnow GmbH
Auenstraße 100
80469 München
Germany

This recipient will process the personal data only on our behalf and in accordance with our instructions.

2. Volkswagen Ident process at your Volkswagen authorised workshop

As an alternative to online identification (AutoIdent), customers can verify their identity at a Volkswagen authorised workshop where this service is available. The identity check is used for activation of certain security-relevant MOBILE ONLINE SERVICES that allow access to the vehicle (e.g. "Lock & Unlock", "Mobile Key").

Customers must have a Volkswagen ID and must be registered in the customer portal. At the Volkswagen authorised workshop, the customer's identity is checked using an official identification document (driving licence, identity card or passport) from the customer when they are invited to use digital services of Volkswagen AG (Pre-Delivery Enrolment). For more detailed information on data processing in relation to the PDE process, see the "Privacy Policy for the invitation to use Volkswagen AG digital services (PDE Privacy Policy)", available online at https://consent.vwgroup.io/consent/v1/texts/pre-delivery-enrolment/gb/en-gb/data-protection/latest/html .

The Volkswagen authorised workshop thus acts as the processor of VOLKSWAGEN AG and processes personal data solely in accordance with our instructions and for the purposes of checking the customer's identity and enabling use of security-relevant MOBILE ONLINE SERVICES. The data is transmitted to VOLKSWAGEN AG in encrypted form. The Volkswagen authorised workshop does not permanently store any data.

The legal basis for the processing of personal data in relation to this identity check is Art. 6(1)(b) GDPR (contract or contract initiation for the use of MOBILE ONLINE SERVICES).

III. Data processing with the use of MOBILE ONLINE SERVICES

Where stipulated by law, the eCall ("eCall Emergency System") will be available to vehicle users even if they have not concluded a contract for MOBILE ONLINE SERVICES.

To activate more MOBILE ONLINE SERVICES in the vehicle, a Volkswagen ID, a contract for MOBILE ONLINE SERVICES and a registration as the primary user of the vehicle are required.

When using MOBILE ONLINE SERVICES, the vehicle communicates with the Volkswagen AG data server. In the course of this, personal data (such as the vehicle identification number (VIN)) and technical data will be processed.

Privacy settings allow you to restrict the connection and, in turn, the processing of personal data. However, it may not be possible for MOBILE ONLINE SERVICES to be provided in full while data processing remains restricted.

1. Legally required transfer of vehicle data (OBFCM and OBM) (Reg. (EU) 2019/631 in conjunction with Implementing Regulation (EU) 2021/392):

• Transmission of OBFCM data (on-board fuel and energy consumption monitoring)

During on-board fuel and energy consumption monitoring (OBFCM), certain driving operation data relating to fuel or energy consumption is collected together with the vehicle identification number (VIN) and sent to the manufacturer to ensure compliance with EU legal requirements. In accordance with the relevant EU requirements, registered keepers have the option to refuse to provide this data. This right of refusal does not constitute an objection in accordance with Art. 21 GDPR; it applies only to the OBFCM data that is collected for the purposes of the EU Regulation. If a refusal is submitted, no (further) OBFCM data will be sent to the manufacturer in future. The OBFCM data is sent to the European Commission and the European Environment Agency (EEA) as part of the legally prescribed reporting process on the basis of Implementing Regulation (EU) No. 2021/392. You can submit your refusal in the Privacy Portal at https://datenschutz.volkswagen.de/euro-7-objection following an identity/keeper check (or alternatively by post).

• Transmission of OBM data (on-board monitoring)

To ensure compliance with legal requirements, journey-specific vehicle data regarding exhaust emissions behaviour and battery life from vehicles that fall within the scope of Regulation (EU) 2024/1257, together with the vehicle identification number (VIN), are sent to the manufacturer. There is no option to refuse the transmission of this data. The data is anonymised by Volkswagen AG and sent to the European Commission.

2. Restricting data processing and managing services (privacy settings; available depending on model and equipment)

Privacy settings control the data transfer between the vehicle and the Volkswagen data server. In addition, other vehicle users who have been assigned the primary and secondary user roles may be able to view certain vehicle usage data (where applicable: including vehicle position data), depending on which services are available and have been activated on the vehicle. This, particularly the sharing of vehicle position data, can also be restricted with the privacy settings in the vehicle.

One of the following settings can be selected:

• Maximum privacy

All MOBILE ONLINE SERVICES are deactivated, except the “eCall Emergency System” and/or “Emergency Call Service” insofar that the statutory “eCall Emergency System” is not available.

The SIM card will only log in at the mobile communications network if an emergency call is triggered by an accident or made manually (for details of how data is processed in this case, see number “IV. “Service portfolio”, under “Emergency Call Service, eCall Emergency System”.

• No position data

This prevents the processing of location data. Processing of other data, such as the vehicle identification number (VIN), is permitted.

• Use my position

The MOBILE ONLINE SERVICES are permitted to use the vehicle position but not to divulge it to any other vehicle user (see next setting “Share my position”).

• Share my position

All MOBILE ONLINE SERVICES are activated. The vehicle position may be visible to other vehicle users within their personal login area in the web browser or in the "Volkswagen" app, insofar as this is permitted by the services. Information on the user concept is provided in the following section.

• **Manage services**

The services can also be activated and deactivated individually by each user. For instance, even before switching to another privacy level, services to be activated and deactivated for that level can be selected.

3. User concept (available depending on model and equipment)

Users of the MOBILE ONLINE SERVICES can (depending on the model and equipment) assume different roles (user roles). Based on the user role, different authorisations are granted for using the MOBILE ONLINE SERVICES and the vehicle:

The **"primary user"** role is intended for the vehicle keeper or someone who is authorised to use the vehicle more than just temporarily (lessee, company car driver, etc.). The primary user is always granted all authorisations. There is only one primary user per vehicle. If a new primary user authenticates themselves for the vehicle, the primary user role is automatically removed from the previous primary user. In the vehicle, each user is shown who the current primary user is and how long they have had that role. This information is displayed in order to fulfil the contract for MOBILE ONLINE SERVICES (Article 6(1)(b) GDPR).

The **"secondary user"** role is intended for users who regularly share use of the vehicle, e.g. as a family member, partner or friend of the primary user. Secondary users obtain their status from the primary user: secondary users have to be approved for the vehicle by the primary user; the primary user can delete the secondary user at any time. If the primary user who granted authorisation to the secondary user loses their primary user status, the secondary user will lose their status as well.

The **"guest user"** role is intended for users who use a vehicle occasionally or only once. Guest users can log into any Volkswagen AG Internet-enabled vehicle themselves for this purpose. Guest users have only limited access to certain MOBILE ONLINE SERVICES.

The primary user can view the nicknames, first names and surnames, and profile photos of the secondary and guest users in their personal login area in the web browser and/or in the "Volkswagen" app.

Primary users have the option to invite a guest user to their personal login area in the web browser for the role of a secondary user. The guest user can either accept or reject the invitation as a secondary user in the personal login area in the web browser or in the "Volkswagen" app. The information is processed to fulfil the contract for the MOBILE ONLINE SERVICES (Article (6)(1)(b) GDPR).

The "guest user" role is not the same as **"anonymous guest"**. which is the role assumed by anyone who uses the vehicle without logging into it with their Volkswagen ID. The anonymous guest starts every journey with the most recent privacy settings that were entered by the anonymous guest ("Maximum privacy", "No position data", "Use my position" or "Share my position"). Services are available to the anonymous guest depending on the privacy settings.

Depending on what privacy level has been set by the current vehicle user, some services (such as the vehicle status service) allow the primary and/or secondary user to view certain data via their "Volkswagen" app or their personal login area in the web browser. In the case of logged-in users,

the data is shared with other users for the purpose of performing a contract (Article 6(1)(b) GDPR) and in the case of anonymous guests, it is shared with other users on the basis of our legitimate interest to make the services available on the vehicle in accordance with the contract (Article 6(1)(f) GDPR).

Details regarding the services are provided under number “IV. Service portfolio”.

IV. Service portfolio

The available services depend on the existing hardware and software in the vehicle, the individual booked services and the country in which the services are used; the scope and availability of the services may therefore vary depending on the country in question or be subject to restrictions.

An overview is provided below of the data processed in the context of the respective service, the legal bases for processing and the respective data recipients. Details of the data recipients who receive data across multiple services are provided in Section “A. General information on the processing of personal data” under “VIII. Data recipients”.

We are providing information about the services and which ones are associated with a particular service package under the following link: http://connect.volkswagen.com.

Services that process the current location of the vehicle user are identified with an *.

1. 3D City Maps

This service offers a detailed model view of specific cities. Some cities are pre-installed on the navigation system of the vehicle while others can be downloaded subsequently or updated online depending on what section of the map is being displayed.

Personal data: Vehicle identification number (VIN), map tile ID, map layer ID, map tile version, map layer version

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: none

2. Departure Times

The “Departure Times” function allows vehicle users to specify when the battery of an electric or hybrid vehicle will be charged and whether this vehicle should be air-conditioned at the desired departure time. The data can be set and accessed by primary users and secondary users via the “Volkswagen” app.

Personal data: vehicle identification number (VIN), departure timer with settings for charging, air conditioning and off-peak electricity

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: none

3. Emergency Call Service, eCall Emergency System (available depending on model and equipment)*

If you have a traffic accident or a medical emergency is detected – regardless of the selected privacy settings – an automatic emergency call will be made. The vehicle detects when an accident has occurred by means of sensors and activates the legally required "eCall Emergency System" in such an event. Using the control located in the roof console (or in the infotainment system) of your vehicle, you can also manually report an emergency involving your own vehicle at any time via the "eCall Emergency System" or request assistance for other road users who are in an emergency situation. In the event of activation of the emergency call system, a voice connection will be established with the emergency services control centre, via which – depending on the individual case – additional personal data may also be requested and transmitted (e.g., in relation to the type and severity of injury).

Emergency Call Service:

Personal data: vehicle identification number (VIN), vehicle type, time, geoposition data, direction of travel, number of people inside the vehicle, selected Infotainment system language, severity of accident, direction in which accident occurred (e.g. frontal or side collision), triggering event, powertrain

Legal basis: Art. 6(1)(d) GDPR (protection of interests that are essential for life), Art. 6(1)(f) GDPR (protection of legitimate interests)

Other data recipients: Bosch Service Solutions GmbH, Mainzer Landstraße 193, 60326 Frankfurt am Main, Germany. (This recipient will process data only on our behalf and in accordance with our instructions.)

The "Emergency Call Service" function can be switched off using the Manage Services function (depending on model and equipment; see Section C.III.1. "Restricting data processing and managing services (privacy settings; available depending on model and equipment)" under "Managing services"). If "Manage services" is not available in the vehicle, the service can be deactivated by any participating Volkswagen authorised workshop.

The personal data will be erased after a maximum of 10 years.

eCall Emergency System (legally required emergency call system):

In the event of an accident, a voice connection will be established with the emergency services control centre, via which – depending on the individual case – additional data may also be requested and transmitted (e.g. in relation to the type and severity of injuries). In addition, the following data will be sent directly from the vehicle to the emergency services control centre using an automated process and without the involvement of the Volkswagen data server: vehicle identification number (VIN), type of activation, vehicle type, drive type, time of emergency call, location, direction of travel, number of people inside the vehicle, speed reduction in case of an accident in longitudinal direction and speed reduction in case of an accident in cross direction (model-dependent). Data is automatically transmitted to the emergency services control centre on the basis of a legal obligation and to protect vital interests (Article 6(1)(c) GDPR in conjunction with Regulation (EU) 2015/758 of the European Parliament and of the Council of 29 April 2015 concerning type-approval requirements for the deployment of the eCall in-vehicle system based on the 112 service and amending Directive 2007/46/EC; Article 6(1)(d) GDPR).

If the vehicle is in offline mode (maximum privacy setting), the compulsory "eCall Emergency System" will be activated, which will make an emergency call via the 2G/3G mobile network. If, due to switched-off mobile networks, the statutory "eCall Emergency System" is not available, an emergency call will be made via the "Emergency Call Service" regardless of the privacy setting if the service is 4G-enabled (depending on the model and equipment) and has a valid licence.

The personal data will be erased after a maximum of 24 hours.

4. Driving Data (Security & Service, We Connect, VW Connect)

This service allows primary or secondary users of the vehicle to have certain driving data displayed in their personal login area in the web browser and in the "Volkswagen" app. At the end of the journey, the aforementioned vehicle data will be sent to Volkswagen AG and will then be available for retrieval in their personal login area in the web browser and via the "Volkswagen" app.

Once your licence expires, there will be a 30-day data deletion period. This involves the relevant data being deleted automatically in the backend.

If the purpose no longer applies, the data will be deleted regardless of whether consent has been withdrawn.

Personal data: vehicle identification number (VIN), average speed, duration of journey, distance covered (not the actual route), average overall consumption

Legal basis: For the primary and secondary users: Article 6(1)(b) GDPR (for contract performance); for every other vehicle user: Article 6(1)(f) GDPR (legitimate interests: provision of the service for the primary and secondary users in accordance with the contract)

Other data recipients: none

5. Vehicle Status

The "Vehicle Status" function allows the primary or secondary user to display various items of status data for the vehicle in the "Volkswagen" app.

Personal data: vehicle identification number (VIN), drive type, state of charge, tank levels, remaining range, mileage (km), window, door and gate status, central locking system status, light status, time stamp

Legal basis: For the primary and secondary users: Article 6(1)(b) GDPR (for contract performance); for every other vehicle user: Article 6(1)(f) GDPR (legitimate interests: provision of the service for the primary and secondary users in accordance with the contract)

Other data recipients: none

6. Vehicle Health Report

The "Vehicle Health Report" informs primary users or secondary users about the current condition of the vehicle. This allows users to have current driver messages relating to the vehicle and/or any servicing requirements additionally displayed in their personal login area in the web browser and the "Volkswagen" app. This service only displays a limited selection of all warning lamps from the vehicle. The driver messages (warning and fault messages) indicated directly in the vehicle remain the sole source of authoritative information.

Personal data: vehicle identification number (VIN), mileage (km), time and distance remaining until next service, driver messages

Legal basis: For primary and secondary users: Article 6(1)(b) GDPR (for contract performance); for every other vehicle user: Article 6(1)(f) GDPR (legitimate interests: provision of the in-vehicle service for the primary and secondary users in accordance with the contract)

Other data recipients: none

7. Area Alert *

With the "Area Alert", the primary user can request a notification if the primary user himself /herself, the secondary user or the guest user (with the exception of the anonymous guest) travels into or out of an area specified by the primary user. Every registered user of the vehicle can deactivate "Area Alert" at any time via the in-vehicle settings, thereby preventing that the primary user receives an area alert. The primary user can view the activity log for this service in the personal login area in the web browser. This service is also available via the "Volkswagen" app.

Once your licence expires, there will be a 30-day data deletion period. This involves the relevant data being deleted automatically in the backend.

If the purpose no longer applies, the data will be deleted regardless of whether consent has been withdrawn.

Personal data: vehicle identification number (VIN), the defined area as well as time period, geoposition of the vehicle during the journey (the geoposition remains in the vehicle and is not forwarded.)

Legal basis: for the primary user: Art. 6(1)(b) GDPR (for contract performance); for the secondary user and the guest user: Art. 6(1)(a) GDPR (consent)

Other data recipients: none (with the exception of the primary user)

8. Speed Alert *

With the "Speed Alert", the primary user can request a notification if the primary user himself /herself, the secondary user or the guest user (with the exception of the anonymous guest) exceeds a vehicle speed specified by the primary user. Every registered user can deactivate "Speed Alert" at any time via the in-vehicle settings, thereby preventing the primary user from receiving a speed alert. Depending on the infotainment system, every user can manage the service via myVolkswagen. To activate or deactivate the function, the user must log into http://myVolkswagen.net with their Volkswagen ID (VW ID). They must then click on their profile initials in the top right and select "Profile and settings". Under "Adjust data", there is an option to manage the vehicle consent management. The primary user can view the activity log for this service in the personal login area in the web browser. This service is also available via the "Volkswagen" app.

Once your licence expires, there will be a 30-day data deletion period. This involves the relevant data being deleted automatically in the backend.

If the purpose no longer applies, the data will be deleted regardless of whether consent has been withdrawn.

Personal data: vehicle identification number (VIN), speed specified by the primary user

Legal basis: for the primary user: Art. 6(1)(b) GDPR (for contract performance); for the secondary user and the guest user: Art. 6(1)(a) GDPR (consent)

Other data recipients: none (with the exception of the primary user)

9. Google Earth™ *

"Google Earth™" allows vehicle users to discover a large number of new places and, thanks to the realistic display of the surroundings, to experience a new navigation format.

Personal data: vehicle identification number (VIN), geoposition, IP address, selected navigation system language

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland

10. Horn & Turn Signals *

"Horn & Turn Signals" allows the primary user and secondary user to control the hazard warning lights and the horn of the vehicle remotely via the "Volkswagen" app if the user is within visual range (approx. 100 metres) of the vehicle, and also to display the current turn signal and horn status. The primary user and each secondary user can view the activity log for this service in their personal login area in the web browser.

Personal data: vehicle identification number (VIN), position of the vehicle and of your mobile device

The personal data will be erased after a maximum of 15 years.

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: none

11. Information Call *

Using the control located in the roof console of the vehicle, the vehicle user can initiate the information call and contact customer service for vehicles of Volkswagen AG. This service is not available in the following countries, where only a recorded message will be played: Albania, Belgium, Bosnia and Herzegovina, Bulgaria, Estonia, Finland, Latvia, Lithuania, Malta, North Macedonia, Ukraine.

Personal data: telephone number of the SIM card integrated into the vehicle and other personal data that the vehicle user shares during the call

The personal data will be erased after a maximum of 24 hours.

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: in Germany, Volkswagen Group Services GmbH, Major-Hirst-Str. 11, 38442 Wolfsburg, Germany; outside Germany, the national sales company (importer) responsible for the respective country (the recipients process data only on our behalf and in accordance with our instructions).

12. Air Conditioning

"Air Conditioning" gives primary users and secondary users the ability to control the temperature inside of the electric or hybrid vehicle before they enter it using the air conditioning system (stationary air conditioning) and to activate (or deactivate) the window heating without having to be physically near the vehicle. The data can be set and accessed via the "Volkswagen" app.

Personal data: vehicle identification number (VIN), air conditioning status and settings, window heating status

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: none

13. Charging

"Charging" allows primary users and secondary users to control charging of the electric or hybrid vehicle's battery, configure the charging process and check the charge level. The data can then be set and accessed via the "Volkswagen" app.

Personal data: vehicle identification number (VIN), charging status and settings

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: none

14. Digital Key

This service enables primary users to install a digital vehicle key on their smartphone or send one to other MOBILE ONLINE SERVICES customers via the "Volkswagen" app. MOBILE ONLINE SERVICES customers can view existing mobile keys for the vehicle via the personal login area in the web browser, and also delete or rename mobile keys.

Personal data: vehicle identification number (VIN), User ID, email address (for assigning a key to other users), only if the key is changed on the vehicle: key type, key ID, mileage (km), service card status, status of the "Mobile Key" function on the vehicle (activated or deactivated); IDs of the secure environments on the device

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: Thales DIS Deutschland GmbH, Werinherstraße 81, 81541 München, Germany (This recipient will process data only on our behalf and in accordance with our instructions.)

15. News

This service allows customers to set their own news station (Newsfeed) and import it from their personal login area in the web browser to the vehicle.

Personal data: Vehicle identification number (VIN), favourites list of desired news channels (news feeds)

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: none

16. Navigation: Online Map Update *

This service allows the map material to be updated online directly on the vehicle. For this purpose, the vehicle analyses which regions in a country are relevant for the vehicle / travelled most frequently.

Personal data: vehicle identification number (VIN), the most frequented regions (only in the case of an automatic update); version number of the currently stored map data

The personal data will be erased after a maximum of 24 hours.

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Additional data recipients: HERE Europe B.V., Kennedyplein 222 – 226, 5611 ZT Eindhoven, Netherlands; for Japanese customers instead of HERE Europe B.V.: Alibaba Group AutoNavi Software Co. Ltd., 7/F Shou Kai Square, NO. 10 Fu Rong Street, Wangjing, Chaoyang District, Beijing, China. (These recipients will process data on our behalf and in accordance with our instructions only.)

17. Navigation: Online Route Calculation *

This service calculates the best route for the vehicle, taking into account the current traffic situation.

Personal data: vehicle identification number (VIN), location, destination entered, navigation data version, time stamp, route criteria settings

The personal data will be erased after a maximum of 24 hours.

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: Joynext GmbH, Gewerbepark Merbitz Nr. 5, 01156 Dresden, Germany. (This recipient will process data only on our behalf and in accordance with our instructions.)

18. Navigation: Parking Spaces *

"Parking Spaces" searches for suitable parking spaces in the vicinity of the current vehicle location. The application provides information about price, opening hours, distances and telephone numbers.

Personal data: vehicle identification number (VIN), location

The personal data will be erased after a maximum of 24 hours.

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: Parkopedia Ltd. 232 Sladepool Farm Road, Birmingham, B14 5EE, United Kingdom; Joynext GmbH, Gewerbepark Merbitz Nr. 5, 01156 Dresden, Germany. (These recipients will process data on our behalf and in accordance with our instructions only.)

19. Navigation: Filling Stations and Charging Stations *

This service searches for suitable filling stations and charging stations in the vicinity of the current vehicle location. The application also shows the total number of charging stations and which ones are available. The application also provides information about the price, opening hours, distances and telephone numbers.

Personal data: vehicle identification number (VIN), location

The personal data will be erased after a maximum of 24 hours.

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: Joynext GmbH, Gewerbepark Merbitz Nr. 5, 01156 Dresden, Germany. (This recipient will process data only on our behalf and in accordance with our instructions.)

20. Online Anti-Theft Alarm

"Online Anti-Theft Alarm" allows primary users and secondary users to activate the service in their personal login area in a web browser or in the "Volkswagen" app. After activating the service, they will be informed whenever the anti-theft alarm system is triggered. The option to be notified via email will be deactivated at the end of 2026. After this point, users will be notified exclusively via a push notification in the "Volkswagen" app. The primary user and each secondary user can view the activity log for this service in their personal login area in the web browser.

Personal data: vehicle identification number (VIN), User ID, reason why and time when system was triggered

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: none

21. Online POI Search *

The "Online POI Search" function (text/voice) allows the vehicle user to search for specific points of interest according to personal favourites.

Personal data: vehicle identification number (VIN), location, search radius, selected Infotainment system language

The personal data will be erased after a maximum of 24 hours.

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland (This recipient will process data only on our behalf and in accordance with our instructions.)

22. Online Auxiliary Heater

"Online Auxiliary Heater" allows primary users and secondary users to control the auxiliary heater via the "Volkswagen" app.

Personal data: Vehicle identification number (VIN), departure times, air conditioning status and settings

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: none

23. Remote Ventilation Control

"Remote Ventilation Control" allows primary users and secondary users to control the auxiliary ventilation via the "Volkswagen" app.

Personal data: vehicle identification number (VIN), departure times, ventilation status and settings

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: none

24. Online Traffic Information *

The "Online Traffic Information" service provides information about current traffic events and shows the traffic flow on the map and along the route of the navigation system.

Personal data: vehicle identification number (VIN), location, position accuracy, direction of travel, speed, gradient, desired destination, traffic information settings, detected event type, time stamp, app version

The personal data will be erased after a maximum of 24 hours.

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: none

25. Online Destination Import/Online Route Import

This service allows primary users and secondary users to send individual points of interest (POI) that have been stored in the "Volkswagen" app, as well as routes that have been created, to the vehicle's navigation system even before the start of a journey. The destination or route sent is displayed in the navigation system for the current user of the vehicle as soon as the vehicle is used online.

Personal data: vehicle identification number (VIN), search term, map section coordinates, created routes, POI/destinations sent, selected infotainment system language, IP address, User ID

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland (This recipient will process data only on our behalf and in accordance with our instructions.)

26. Breakdown Call *

The Breakdown Call function can be triggered by the vehicle user in the event of both breakdown events (with or without a warning lamp lighting up) and minor accidental damage below the level required to trigger the restraint systems (such as the airbag and belt tensioner). Once the airbag control unit has detected a minor accident of this kind, the function offers the vehicle user the option of establishing an audio connection with the Emergency Call Service or Breakdown Call via the Infotainment system. As part of this, certain data will be transmitted automatically, such as details of the vehicle equipment, to help the Breakdown Call Centre employees and, where

applicable, those of the towing company to provide rapid and effective assistance. This service is not supported in the following countries, where only a recorded message will be played: Albania, Malta, Ukraine.

There is also the convenient option to report the breakdown or vehicle damage directly to an authorised Volkswagen repairer via the "Volkswagen" app. This report can be made by telephone to a call centre or by completing the form in the app.

We process the data in order to provide the service so that you receive rapid support in the event of an accident or vehicle breakdown. For the purposes of service provision, the importer, or Volkswagen Deutschland GmbH & Co. KG for the German market, will pass on the data to your authorised Volkswagen repairer and potentially to your insurance company (depending on availability).

We process your data to improve our products and business processes, customer functionality of the breakdown call, optimise customer benefit and to eliminate product faults. We will analyse your data for the purpose of product improvement and quality assurance of the breakdown call and to prevent interruptions or delays in the process sequence of processing requests. For example, we check for faults in the transmission of data to your authorised workshop (such as incomplete data or delays within the data transmission) for early detection and elimination. This allows us to offer the best possible customised service and increase customer satisfaction with digital services. Furthermore, the indicated data is forwarded to the responsible importer for their country for process management and improvement, such as by way of quality audits.

Personal data: vehicle identification number (VIN), phone number of the integrated SIM card in the vehicle, title, form of address, name, date of birth, address, country, phone number, email address, number plate, vehicle data (brand, mileage (km), remaining range, model name, model year, colour, gearbox, powertrain, year of manufacture, vehicle type, equipment features), insurance details (name of insurance provider of the party reporting the accident, insurance policy number of the party reporting the accident, nature of damage, name of the other party's insurance provider), case details (impact zone, severity of impact, date of accident, time of accident, cause, warning lamps, event memory entries, vehicle position data, nature of damage, date of damage assessment, preliminary damage costing, service schedule, most recent service) and any other personal data shared by the vehicle user during the call; for data processing as part of the analysis: vehicle identification number (VIN), service requirement category, send date of the breakdown call data, the selected authorised workshop and information on the agreed appointment. Additionally, the relevant authorised workshop transmits the following data: vehicle identification number, time of lead acceptance, time of contact and time of lead closing.

The personal data will be erased after a maximum of 24 hours.

Legal basis: for primary users, secondary users and guest users: Article 6(1)(b) GDPR (for contract performance); with regard to data of an anonymous guest, Article (6)(1)(f) GDPR (legitimate interests: provision of the in-vehicle service in accordance with the contract); for data processing as part of the analysis: Article 6(1)(f) (legitimate interests: improvement of the products and business processes, customer functionality of the breakdown call, optimisation of customer use; elimination of product faults; process control and improvement in trade; increase of customer satisfaction with the services)

Other data recipients: A call centre appointed by the sales company for the respective country (importer, in the case of the German market Deutschland Volkswagen Deutschland GmbH & Co. KG, Berliner Ring 2, 38440 Wolfsburg), where applicable, an authorised Volkswagen repairer or a towing company, as well as your insurance company, after you have given your consent.

If the service has been deactivated, the Breakdown Call is still available offline; however, in this case, automatic transmission of data from the vehicle to the call centre does not take place.

27. Parking Position *

"Parking Position" allows the primary and secondary users to retrieve the last known vehicle location via the Volkswagen app.

Personal Data: vehicle identification number (VIN), most recent parking position when vehicle was switched off (removal of key, operation of starter button), position of the mobile device

The personal data will be erased after a maximum of 15 years.

Legal basis: for primary and secondary users: Article 6(1)(b) GDPR (for contract performance); for every other vehicle user: Article 6(1)(f) GDPR (legitimate interests: provision of the in-vehicle service in accordance with the contract)

Other data recipients: none

28. Online Personalisation

With this function, the primary, secondary and guest users can save their respective individual vehicle settings and "transfer" them to other Volkswagen vehicles that are equipped with MOBILE ONLINE SERVICES. The vehicle settings for numerous systems are saved automatically and depending on the equipment, from seat and mirror positions to lights, air conditioning and driver assistance. The user-specific vehicle settings are kept synchronised via the backend in all vehicles in which a user is registered. This requires that the respective vehicle is online (privacy settings are not set to "Maximum privacy" and personalisation has not been deactivated by disabling an individual service.

Personal data: vehicle identification number (VIN), User ID, current privacy settings on vehicle, current personal vehicle settings (including air conditioning system, seat, lighting, mirrors, driver assist settings), most recently used radio stations/applications, frequent routes, most recent destinations, home address, work address, favourite destinations, preferred POI categories

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: none

29. Satellite Maps *

This service allows the vehicle user to display a high-resolution navigation map with satellite images. The necessary data is transmitted to our service provider Google without the service provider being able to associate it with the vehicle user or the vehicle.

Personal data: vehicle identification number (VIN), time stamp, information about the software versions used, map or map tile versions used, positioning data

The personal data will be erased after a maximum of 24 hours.

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: HERE Europe B.V., Kennedyplein 222 – 226, 5611 ZT Eindhoven, Netherlands. (The recipient processes data solely on our behalf and in accordance with our

instructions.) Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland (the only data transmitted is positioning data or the requested map tile, including the zoom level)

30. Manage services (available depending on the model and equipment)

"Manage services" allows vehicle users to activate and deactivate the MOBILE ONLINE SERVICES and the vehicle functions available on the vehicle, and to obtain detailed information about the service plans that have been subscribed to and the duration of the associated contracts.

If available in the vehicle, individual privacy settings can be entered. This allows control of the data that can leave the vehicle. Furthermore, the purchased and enabled "Upgrades" functions and the In-Car Apps are displayed in the personal login area in the web browser. Additionally, the vehicle user receives a notice in the app if the vehicle user does not have a "VW Connect" licence.

Personal data: vehicle identification number (VIN), activation status of services, privacy level (depending on model)

Legal basis: Article 6(1)(b) GDPR (performance of a contract or initiation of a contract); Article 6(1)(f) GDPR for the notice when a VW Connect licence is not available. (legitimate interests: advertising alert for the customers)

Other data recipients: none

31. Service Scheduling

If the "Service Scheduling" service has been activated by the primary user, the Volkswagen authorised workshop (or where applicable: a national sales company appointed by the Volkswagen authorised workshop or a call centre) will contact the primary user via their selected communication channel (email or telephone) in the event of any necessary service work (oil changes, inspections and specific driver messages as selected by Volkswagen AG) for the purpose of scheduling an appointment.

If the authorised workshop specified by the primary user ceases trading or stops operating a Volkswagen authorised workshop as part of its business activities and the primary user has not yet selected any other Volkswagen authorised workshop, the national sales company with responsibility for the respective country will contact the primary user if any service work becomes necessary to offer an appointment with a suitable Volkswagen authorised workshop.

The primary user can deactivate the "Service Scheduling" service and the associated data transfer of servicing requirements at any time in the primary user's personal login area in the web browser or in the settings of the "Volkswagen" app. Here, the primary user can also select, change or delete the primary user's desired communication channel or preferred Volkswagen authorised workshop.

Personal data: in particular, the vehicle identification number (VIN), mileage (km), brand, model, model year, engine code, gearbox code, inspection service interval, oil change service interval, driver messages, form of address, title, first name/surname, desired communication channel (telephone/email)

Storage period: The provided data will be erased after five years.

As part of the "Service Scheduling" service, future service and repair requirements are determined on the basis of your vehicle and the generation of MOBILE ONLINE SERVICES you are using: for example, servicing and repair requirements for the brakes or starter battery of your vehicle. If a

service and repair requirement is identified, this means that you can be contacted in order to schedule an appointment.

To identify potential servicing and repair requirements, Volkswagen AG processes data relating to the vehicle and derived from the use of the vehicle (such as the age of the vehicle and individual components, vehicle sensor data and service history) so that it can be analysed for any anomalies that may be present. Using these values and on the basis of algorithm-generated calculations, it is possible to identify the probability of a service and repair requirement occurring over a foreseeable period in the future.

For some of these calculations, we use artificial intelligence (AI) processes, particularly machine learning, to identify patterns in the data that is collected and calculate the probability of wear. Additionally, AI training is conducted in order to continually improve AI-based predictions. The data used for this and the training outcomes in the AI are fully anonymous. This means that the data cannot be attributed to any natural person.

Personal data: vehicle identification number (VIN), data for identifying the vehicle (such as the brand, model, model year and model code), the private contact details and basic data of the primary user (such as their first name/surname, address, desired communication channel, telephone number and email address), vehicle usage and operating data (including vehicle sensor data with time stamps, such as the electrical system battery voltage, brake pressure and speed) and vehicle service status (such as the time and distance remaining until the next service event and the type of service event); detailed information on the expected component failure identified (such as the vehicle health and descriptions of the identified imminent component failure or servicing requirement).

Legal basis: for the primary user: Article 6(1)(b) GDPR (for contract performance) and, where applicable, Section 6(1)(f) GDPR (for transferring data to the relevant national sales company if the selected authorised workshop has ceased trading or stops operating a Volkswagen authorised workshop as part of its business activities; see above); for every other vehicle user: Article 6(1)(f) GDPR (legitimate interests: provision of the in-car service in accordance with the contract); for anonymisation in order to perform AI training: Article 6(1)(f); our legitimate interest is in enabling and improving the AI function for predicting future service and repair requirements as part of our services.

The data for identifying future service and repair requirements, including AI training, will only be stored for as long as is necessary for the specified purposes, but no longer than 3 years after it is collected.

Additionally, the status of the service scheduling requests will be transmitted back to the initiating service to identify and rectify product faults. This return transmission enables Volkswagen AG to identify process faults and their related causes early on.

We process the data of their service scheduling request to improve our products and business processes, customer functionality of service scheduling, optimise customer benefit and to eliminate product defects.

We will analyse your previously indicated data for the purpose of product improvement and quality assurance of the service scheduling request and to prevent interruptions or delays in the process sequence of processing requests. For example, we check for faults in the transmission of data to your authorised workshop (such as incomplete data or delays within the data transmission) for early detection and elimination. This allows us to respond to the customer request for a service appointment in the best possible way and improve customer satisfaction with the digital services.

In addition, the specified data will be forwarded to the sales company responsible for the relevant country (for Germany, this is Volkswagen Deutschland GmbH & Co. KG) for the purpose of process control and improvement, e.g. through quality audits. The provided data will be erased after five years.

Personal data: for data processing as part of analysis: vehicle identification number (VIN), servicing requirement category, date the service appointment request was sent, the selected authorised workshop and information on the agreed service appointment. In addition, the respective authorised workshop transmits the following data to us: vehicle identification number, time of lead initiation, time of contact initiation and time of lead closing.

Legal basis: for data processing as part of analysis: Article 6(1)(f) GDPR (legitimate interests: improvement of the products and business processes, customer functionality of service scheduling; for the return transmission of the service scheduling request status for the identification, analysis and elimination of product faults / flaws; optimisation of the customer benefit; process control and improvement in trade; increase of customer satisfaction with the services)

The following information applies to the aforementioned activities:

Other data recipients: we will transmit the servicing requirements to the primary user's selected Volkswagen authorised workshop or to a national sales company with responsibility for the respective country and, where applicable, to a call centre appointed by the Volkswagen authorised workshop or a national sales company appointed by the Volkswagen authorised workshop (in the event of being appointed by the Volkswagen authorised workshop, the respective call centre or respective national sales company will process your data on behalf of and in accordance with the instructions of the Volkswagen authorised workshop only)

The data associated with identifying future service and repair requirements and the continuous improvement of AI-based predictions will be processed by our processors CARIAD SE (Major-Hirst-Straße 7, 38442 Wolfsburg, Germany) and Škoda Auto a.s. (tř. Václava Klementa 869, Mladá Boleslav II, 293 01 Mladá Boleslav, Czech Republic).

If the selected authorised workshop has ceased trading or stops operating a Volkswagen authorised workshop as part of its business activities, Volkswagen Deutschland GmbH & Co. KG (Berliner Ring 2, 38440 Wolfsburg, Germany) will act as processor for us.

If the primary user has chosen a preferred authorised workshop located in Germany, Great Britain, Italy, France, Japan, Ireland, Czech Republic, Spain (and the Canary Islands), Belgium, Switzerland, Sweden, Poland, Denmark, Finland, Norway, Portugal, Luxembourg, Hungary, Austria, Estonia, Latvia, Lithuania, Slovenia, Romania, Bulgaria, Greece, Slovakia, the Netherlands, Serbia, Montenegro, Bosnia and Herzegovina, Croatia, Albania, North Macedonia, Iceland, Malta, Cyprus, Liechtenstein or Ukraine, Volkswagen AG will use the following processors: Volkswagen Software Asset Management (SAM) GmbH (Berliner Ring 2, 38440 Wolfsburg, Germany), dx.one GmbH (Berliner Ring 2, 38440 Wolfsburg, Germany) and Salesforce.com Germany GmbH, (Erika-Mann-Straße 31, 80636 München, Germany).

In relation to the use of processors, it is not possible to rule out that sub-processors based outside the EU/EEA may access the data. In order to guarantee an adequate level of protection for your personal data, Volkswagen AG safeguards this data transfer with appropriate guarantees or obliges its processors to do so where necessary. If required by the applicable data protection legislation, other protective measures (such as encryption and additional contractual provisions) are also put in place in order to ensure that your personal data is adequately protected. If processors or sub-processors located in the USA are certified in accordance with the Data Privacy

Framework between the EU and USA, the EU-US adequacy decision applies accordingly, and the USA is considered a safe third country in this regard.

32. Online Voice Control / online IDA voice assistant (available depending on model and equipment)

With the MOBILE ONLINE SERVICES of "VW Connect Plus / We Connect Plus", primary or secondary users and guest users as well as anonymous guests of the vehicle also have Online Voice Control / the online IDA voice assistant available in addition to offline voice control / the offline IDA voice assistant in the vehicle (only available in the following languages: English (UK), English (US), German, French, Italian, Spanish, Czech, Dutch, Polish, Portuguese, Swedish, Danish, Norwegian) (model and equipment dependent).

The voice control / IDA voice assistant can be activated via the push-to-talk button on the steering wheel or via the activation word in order to then formulate a request. Other vehicle occupants can also use the voice control / IDA voice assistant by means of the activation word. A background service runs on the vehicle's infotainment system to enable use of the activation word. This service detects when the activation word is spoken. Every now and then, this background service may falsely detect the activation word.

As soon as the voice control / IDA voice assistant has been activated by the push-to-talk button or activation word, this is indicated by a graphic symbol on the infotainment system screen. The voice control / IDA voice assistant can also be paused with the voice command "Pause". While it is paused, it does not transmit any data or use the voice function to relay information in the vehicle. It can be unpaused by saying the activation word again or pressing the push-to-talk button on the steering wheel.

The advantage of Online Voice Control / the online IDA voice assistant compared to offline voice control / the IDA offline voice assistant is better speech recognition in general and the option to control online content using voice control; for example, streaming services (Internet Radio), points of interest for navigation as well as the option to call up information on weather, news, knowledge, sports, flight status and the stock market. If the customer additionally consents to processing of location data for Online Voice Control / the online IDA voice assistant, the customer will receive navigation results even faster and can call up information on their surrounding area (depending on model and equipment and depending on the system language setting). Online Voice Control / the online IDA voice assistant function will remain covered by the contractually guaranteed scope even if consent is withdrawn.

The online IDA voice assistant is enhanced with the connection to ChatGPT, whereby requests that the online IDA voice assistant cannot answer are forwarded to ChatGPT. For this, the service provider Cerence GmbH checks if the voice request can be answered. If this is not the case, the voice request is forwarded in text format to ChatGPT. ChatGPT sends a reply in text format to the service provider Cerence GmbH and from there back to the vehicle. When the reply is output in the vehicle, it is made clear that the result was generated by ChatGPT. When the voice request is processed via ChatGPT, the location data is not forwarded to ChatGPT.

If the vehicle is used in offline mode, the voice data will be processed solely in the vehicle. No location data is processed (offline voice control / offline IDA voice assistant). The online functionality can be deactivated in the infotainment system at any time. In addition, the recognition of the activation word can be deactivated in the infotainment system so that voice control / the IDA voice assistant can only be used via the push-to-talk button.

Personal data for online connection: vehicle identification number (VIN), country or current vehicle position stored in the system (if the respective customer has also given consent to the processing

of location data for Online Voice Control / the online IDA voice assistant), selected infotainment system language, vehicle brand, User ID, regional code and version number of the infotainment software, voice control and the voice output (only for the languages EN-US, EN-GB, DE, FR, ES, IT, CZ, NL, PL, PT, SE, DK, NO)

The personal data will be erased after a maximum of 30 days.

Legal basis: for primary users, secondary users and guest users: Article 6(1)(b) GDPR (performance of the contract); for the optional processing of the current vehicle position: Article 6(1)(a) GDPR (consent); for other vehicle users (such as anonymous guests) and occupants without a contract for MOBILE ONLINE SERVICES: Article 6(1)(f) GDPR (legitimate interest: performance of the contract for MOBILE ONLINE SERVICES)

Other data recipients: e.solutions GmbH, Despag-Straße 4a, 85055 Ingolstadt, Germany; Cerence GmbH, Jülicher Str. 376, 52070 Aachen, Germany. (These recipients will process data on our behalf and in accordance with our instructions only.)

33. Streaming & Internet: Hybrid Radio *

As part of the "Hybrid Radio" function, the Infotainment system identifies radio stations that are received via a radio signal (FM and DAB) and checks online to see whether any streams or metadata are available for these stations. This allows vehicle users to listen to relevant stations via online streaming if they are not currently able to receive them via the radio signal.

Personal data: Vehicle identification number (VIN), country in which the vehicle is located; radio stations that can currently be received

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: e.solutions GmbH, Despag-Straße 4a, 85055 Ingolstadt, Germany. (This recipient will process data only on our behalf and in accordance with our instructions.)

34. Streaming & Internet: Media Streaming

The "Media Streaming" function allows the use of various music streaming services directly within the Infotainment system in the vehicle without having to connect a smartphone or some other device. To do this, the respective streaming app must first be downloaded and installed by the primary user via the In-Car Shop.

Personal data: Vehicle identification number (VIN), authentication token with the streaming provider, IP address

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: the respective streaming provider

The data privacy statements of the respective streaming service are the authoritative source of information for the processing of data within this context.

35. Streaming & Internet: Internet Radio *

As part of the "Internet Radio" function, the Infotainment system makes available an up-to-date and language-specific catalogue of stations and podcasts. This gives vehicle users the option of listening to thousands of stations and podcast episodes of different kinds via online streaming.

Personal data: vehicle identification number (VIN), country of current geoposition, current system language, software version

The personal data will be erased after a maximum of 30 days.

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: e.solutions GmbH, Despag-Straße 4a, 85055 Ingolstadt, Germany. (This recipient will process data only on our behalf and in accordance with our instructions.)

36. Lock & Unlock

"Lock & Unlock" allows primary users to operate the vehicle's central locking system even if they are not in the immediate vicinity of the vehicle. To do this, the user can display and change the locking status of the doors and the luggage compartment of the vehicle in the "Volkswagen" app. For their own security, primary users must define an S-PIN, which must then be entered prior to each lock or unlock operation. Before this function can be used, the Volkswagen Ident process must first be performed by the primary user.

Personal data: vehicle identification number (VIN); user ID; information concerning whether electric windows, doors, bonnet and boot lid are open or closed and whether the vehicle is locked or unlocked; date and time of unlocking and locking; mileage (km)

Legal basis: Article 6(1)(b) GDPR (for contract performance); as regards the unlocking and locking history: Article 6(1)(f) GDPR (legitimate interests)

Other data recipients: none

37. Weather *

"Weather" provides vehicle users with up-to-date weather data for their current location, their destination or in relation to predefined places. This function is also available in the "Volkswagen" app. It displays the temperature at the location of the vehicle and/or the mobile telephone.

Personal data: vehicle identification number (VIN), location, destination, places requested by the vehicle user, selected Infotainment system language, preferred unit of measurement

The personal data will be erased after a maximum of 30 days.

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: Vaisala GmbH, Notkestr. 11, 22607 Hamburg, Germany. (This recipient will process data only on our behalf and in accordance with our instructions.)

38. Legal Web app

The relevant current legal texts, such as the Privacy Policy, can be viewed under "Legal" in the Infotainment system.

Personal data: vehicle identification number (VIN), IP address, country code and language

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Other data recipients: none

39. Refuelling Recommendations *

The "Refuelling Recommendations" feature of the Live Recommendation service recommends a nearby filling station in case of a low remaining range to you. This takes place via a pop-up in the Infotainment display, which also includes an offer of the respective filling station operator (e.g. fuel filling discount, free coffee, etc.) who cooperates with Volkswagen AG. You can save the offer for a later time or navigate it directly to the filling station. In case of the latter, you will be reminded of the offer when you arrive at the destination and can transfer the voucher you may need to your smartphone in the detail view. The "Refuelling Recommendations" feature can only be used when Volkswagen AG can access the location of the vehicle (geoposition) and process this data. In addition, the pseudonymised vehicle identification number (VIN) is used to allocate offers to your vehicle. The pseudonymisation of the VIN involves removing all direct personal identification features. Indirectly traceable identification features (pseudonyms) are retained. Furthermore, your User ID will be processed to be able to store saved offers for you in the backend.

Volkswagen AG deletes the personal data after three months 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.

This feature is available in the following markets: Germany, Great Britain, France, Italy, Spain, Sweden, Denmark, Norway, Finland, Belgium, the Netherlands, Luxembourg, Austria, Switzerland, Portugal, Poland.

Personal data: pseudonymised VIN, User ID, vehicle master data, geoposition, click and usage behaviour, time stamp

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Analyses and measurements for the service provision

Individual data points along the service utilisation are recorded and processed to continuously monitor the availability of the services for the purposes of a stable service provision and for the identification and rectification of possible irregularities of the service functions. This is only possible if the VIN is also collected as an identifier which, in accordance with legal requirements, also enables the identification of general vehicle features such as the product line. The User ID is additionally recorded to be able to ensure verifiability and fault analysis in case of customer requests related to technical faults. In addition, we will process information on the display of ads as well as the user's interaction with the ad to determine if an ad has appealed to the user and to continue to receive marketing ads from advertising partners on this basis to provide the service.

Volkswagen AG deletes the personal data after three months 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.

Personal data: VIN, User ID, vehicle master data, geoposition, click and usage behaviour, time stamp

Legal basis: Article 6(1)(b) GDPR (for contract performance)

Performance analysis

On the basis of the data collected to provide the service, various performance analyses are performed as part of monthly reports, which are used by Volkswagen AG for the continuous improvement of the service.

Volkswagen AG deletes the personal data after thirteen months 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.

Personal data: VIN, User ID, vehicle master data, geoposition, click and usage behaviour, time stamp

Legal basis: Article (6)(1)(f) GDPR (Volkswagen AG has a legitimate interest in processing the previously stated personal data to be able to continuously improve the Live Recommendations service.)

Preference settings via Volkswagen app

In the Volkswagen app, you can specify the offer categories (e.g. supermarkets, restaurants and cafés or parking) for which you wish to receive recommendations in the vehicle, as well as the frequency of these recommendations (e.g. 3-6 times per week). To do this, you must be registered in the Volkswagen app and you must have linked your vehicle to the app. This function can only be used if Volkswagen AG accesses your User ID in order to save your preferences in the backend.

Volkswagen AG deletes the personal data in accordance with the statutory requirements, for example if the purpose for which the data was collected no longer exists and there are no statutory retention obligations that prevent the data from being deleted.

Personal data: User ID

Legal basis: Article 6(1)(b) GDPR (for contract performance)

We use infrastructure and hosting service providers as processors; they process data exclusively on our behalf and in accordance with our instructions.

Data is generally processed exclusively within the European Union and the European Economic Area. If processing takes place in third countries (i.e. countries that are not members of the European Union or the European Economic Area) for which the European Commission has not identified an appropriate level of data protection, such as the level provided by our processors (or sub-processors), Volkswagen AG will make sure to put in place contractual, technical and/or organisational measures that are appropriate and necessary for ensuring a reasonable level of protection while personal data is being processed. In particular, this may be based on concluding what are known as EU standard contractual clauses, which you can retrieve here.

40. Charging Data / Charging Control

We record data on your vehicle's charging behaviour via "Charging Data" or "Charging Control". This data is sent to Volkswagen Group Info Services AG, which forwards it to the service provider with which you have concluded a contract. This data is provided to the service provider selected by you so that you can successfully use a contractually agreed "Charging" product with your service provider (e.g. statistical evaluation and display of charging behaviour and the applicable charging fees).

Personal data (in relation to Charging Data): vehicle identification number (VIN), Volkswagen ID, ignition status (on/off), vehicle parking position, mileage (km), time stamp (vehicle time, departure time), charging data (current status – SOC, type of charging process (alternating current, direct current), performance, settings, charging target time, charging status, remaining charging time, charging rate), battery range, connection status of (both) charging cable plugs, overall status of windows and doors

Personal data (in relation to Charging Control): charging status (time stamp of last charging status process, charging rate, current SOC, remaining charging time), generic data fields (VIN, subscription ID, vehicle time stamp, start/stop charging process, local time of vehicle, brand of VW vehicle), charging profile (ID, name, SOC min/max, charging timer, departure timer, target SOC), capability check (vehicle capabilities, capabilities of user vehicle, mileage (km))

Legal basis (in relation to Charging Data): Article 6(1)(a) GDPR (consent) or Article 6(1)(b) GDPR (user contract with service provider)

Legal basis (in relation to Charging Control): Article 6(1)(b) GDPR (user contract with service provider)

Other data recipients: Volkswagen Group Info Services AG, Berliner Ring 2, 38440 Wolfsburg, Germany, various cooperation partners (as independent controllers)

41. Plug & Charge

"Plug & Charge" offers vehicle users the option to charge at public charging stations via an automated authentication process by plugging in the charging cable.

In the course of the installation and deinstallation of the vehicle and contract certificate, further IT usage data (e.g. storage index of the contract certificate or transaction data) is processed in addition to the vehicle identification number (VIN).

During the authentication at public charging stations, additional contract data (e.g. identification number of the contract certificate) is processed, which enables the traction current provider to bill the charging process.

For the authentication at a private wall box, IT usage data (e.g. serial number of the vehicle certificate) is also transmitted to the private wall box.

Personal data: vehicle identification number (VIN), IT usage data (e.g. serial number of the vehicle certificate, storage index of the contract certificate, transaction data), contract data (e.g. identification number of the charging current contract (EMAID))

Legal basis: Article 6(1)(b) GDPR (contract performance)

Other data recipients: none

With regard to data processing by the charging station provider, traction current provider and wall box provider, their data protection notices must be observed.

Part II

I. Albania

Besides, from the legal bases described in Part I the legal bases for processing personal data under Albania law is a consent given by the data subjects. The consent of the data subjects is given either by registering for the mobile online services, after they have confirmed that they have read and accepted the Privacy Policy, or by using the vehicle in knowledge of the data processing.

Data controller representative in Albania:

Porsche Albania Sh.p.k
Autostrada Tirane-Durres
Km. 3, Tirane,1051
dataprotection@porsche.al

II. Belgium

We are legally obliged to publish mileages (km) of networked vehicles at regular intervals (usually once every quarter) on request from Car-Pass vzw. The data is retained by Car-Pass vzw in a "Car-Pass" so that relevant information about a vehicle can be provided to potential purchasers when buying and selling used cars.

Personal data processed: Vehicle identification number (VIN), mileage (km), time of data collection in the vehicle

Legal basis: Article (6)(1)(c) GDPR in conjunction with Art. 6 Act of 11 June 2004 and Article 3/1, § 2 Royal Decree of 26 August 2006

Recipients: Car-Pass vzw, Woluwedal 46/2, 1200 BRUSSELS, BELGIUM; D'Ieteren Automotive SA /NV, Leuvensesteenweg 639, 3071 KORTENBERG, BELGIUM; CARIAD SE, Major-Hirst-Straße 7, 38442 WOLFSBURG, GERMANY; Audi AG, Auto-Union-Straße 1, 85057 INGOLSTADT, GERMANY (all recipients with the exception of Car-Pass vzw process data solely on our behalf and in accordance with our instructions)

III. Bosnia and Herzegovina

In deviation from the legal bases described in Part I the legal bases for processing personal data under the law of Bosnia and Herzegovina is a consent given by the data subjects. The consent of the data subjects is given either by registering for the mobile online services, after they have confirmed that they have read and accepted the Privacy Policy, or by using the vehicle in knowledge of the data processing.

Data controller representative in Bosnia and Herzegovina:

PORSCHE BOSNA I HERCEGOVINA
Porsche BH d.o.o. Sarajevo
Porsche Inter Auto BH d.o.o. Sarajevo
BIH-71000 SARAJEVO | Bulevar Meše Selimovića 16
zastita.podataka@porschebh.ba

IV. Japan

Personal information obtained from residents in Japan ("Personal Data") shall be handled in accordance with the following rules in addition to the rules set forth in Part I of this Privacy Policy.

1. Purpose: We will handle the Personal Data in accordance with the Purposes set forth in Part I of this Privacy Policy ("Purposes"), and not use Personal Data for any purpose other than such

Purposes. We shall promptly notify the relevant data subjects, or disclose to the public of the Purposes (and any subsequent changes thereof), unless the Purposes have already been disclosed to the public;

2. Collection: We will not obtain any Personal Data through any deceptive, fraudulent, or other wrongful means;

3. Accuracy: We will make reasonable efforts to ensure that Personal Data handled by us is accurate and up to date and within the scope necessary to achieve the Purposes;

4. Retention: We will retain Personal Data in accordance with Section A.IV of Part I, and cease retention as soon as it is reasonable to assume that the Purposes are no longer being served by retention of Personal Data;

5. Protection: We will protect Personal Data in its possession or under its control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal, damage, loss or similar risks. We will adequately supervise processing of Personal Data by our officers, employees, third party vendors and any other parties who process Personal Data on our behalf;

6. Transfer: Without obtaining the prior consent of the relevant data subjects, we will not transfer or provide any part of Personal Data to any individual or entity unless an exception under the APPI applies.

7. Extraterritorial Transfer: Without obtaining the prior consent of the relevant data subjects, we will not transfer or provide any part of Personal Data to any individual or entity located outside Japan, European Union or the United Kingdom unless (a) a transferee is located in a country or area certified by the Personal Information Protection Commission of Japan ("PPC") as having data protection standards equivalent to those of Japan or (b) the transferee has data protection standards equivalent to the standards specified by the PPC; and,

8. Data Subject's Right: If a data subject requests pursuant to the APPI disclosure of Purposes, access to, correction, or deletion of any of Personal Data relevant to such data subject, or lodge a complaint, we will respond to such request or complaint promptly and in accordance with the APPI. Any fee charged to data subjects shall be reasonable.

V. Switzerland

To the extent data processing falls within the scope of the Swiss Federal Act on Data Protection (FADP), (a) the scope of "personal data" shall be determined in accordance with the FADP, and (b) references to the GDPR shall be understood as references to the FADP.

To the extent that the transfer of personal data to recipients outside the EU respectively outside of Switzerland (”third countries”) is safeguarded by the conclusion of standard contractual clauses approved by the European Commission, please note the decision of the Federal Data Protection and Information Commissioner to recognize the EU standard contractual clauses, which is available via the URL https://www.edoeb.admin.ch/edoeb/de/home/datenschutz/arbeit_wirtschaft/datenuebermittlung_ausland.html.

VI. San Marino

To the extent the data processing falls within the scope of the data protection laws of San Marino, pursuant to Article 13(1)(f) of San Marinese Law n. 171 of 2018, we specify that, considering the data controller’s intention to transfer personal data to third countries or international

organisations, the following means by which to obtain a copy of the appropriate or suitable safeguards used or information on where they have been made available are provided:

• You can contact us for exercising your rights, including the right to access your data and to obtain a copy of them, via the contact details provided in Part I ("Data protection officer").
• The EU standard contractual clauses used can be accessed in EU languages at https://eur-lex.europa.eu/legal-content/it/TXT/?uri=CELEX%3A32021D0914.

To the extent the data processing falls within the scope of the data protection laws of San Marino, pursuant to Article 13(2)(d) of San Marinese Law n. 171 of 2018, we specify that the data subject has the right to report or to lodge a complaint with the Data Protection Authority of San Marino (https://www.garanteprivacy.sm).

VII. France

In addition to the rights listed in the section "Your rights" you also have the right to define directives concerning the fate of your personal data after your death (post-mortem right).

Part III

Collection of data for establishing an anonymous data pool to enable the development of automated driving (available depending on model and equipment)

I. Controller

This Privacy Policy provides information on how personal data will be collected, processed and used by

Volkswagen AG
Berliner Ring 2
38440 Wolfsburg
Germany
kundenbetreuung@volkswagen.de

entered in the register of companies of Braunschweig District Court under number HRB 100484 ("Volkswagen AG"), when data transmission is activated for the purpose of establishing an anonymous data pool for the research and development of automated driving.

II. Data processing in detail

The upload function is used to collect measurement data captured by vehicle sensors. This measurement data is transferred to a data server (see above, A.VII.1. Data servers), immediately anonymised and used by Volkswagen and its cooperation partners for researching and developing the automated driving system.

The measurement data is made up of two groups of data:

A. Data of relevance for reconstructing the influences on the vehicle:

• Vehicle position and time stamp:

- Vehicle position
- Time of measurement
- Relative motion data (e.g. wheel rotations, steering wheel angle, vehicle speed and acceleration)
- Drive data of relevance to vehicle motion (e.g. engine drive torque, rpm, braking interventions)

• Data capturing the immediate surroundings as recorded by the following sensors:

- Camera sensors (e.g. signs, lanes, static and dynamic objects detected (but not image and video data))
- Radar sensors (e.g. static reflections from objects, detected dynamic objects)
- Ultrasonic sensors (e.g. lateral distance from objects in the surrounding area)
- Climate, rain, light (e.g. temperature, rain levels, incidence of light)

• Traffic situations detected:

- Traffic hazard alerts (e.g. end of a traffic jam, accidents, breakdowns)
- Condition of roads (e.g. friction coefficient, course of the road)

b. Data of relevance for determining the control action desired by the driver:

• Detected driver behaviour:

- Control movements by the driver (e.g. steering movements, brake, accelerator)
- Use of the vehicle systems that affect movement during travel (e.g. gear changes, operation of the driver assist systems, operation of safety systems)
- Statuses of and interventions by assisted driving functions (e.g. interventions by the cruise control system, triggered emergency braking operations, park assist steering)

As part of this, the only data that will be collected is data required for researching and developing functions for partially and fully automated driving. The anonymised measurement data will also be made available to Volkswagen cooperation partners on the basis of contractual provisions that contain suitable safeguards for data processing. They will likewise use said data for researching and developing the automated driving system.

This data will be used as the basis for creating a simulation environment that will enable future autonomous driving functions to be tested under realistic conditions, in turn, enabling a comparison with the desired behaviour of real drivers. Given that several billion test kilometres will be required in order for autonomous driving to undergo final validation, this database has to be populated with real data. This is the only way of adequately capturing all types of traffic situation to ensure that future autonomous driving functions are safe and robust enough to take the right decisions every time and protect the safety of the vehicle occupants.

Once the data has been collected and transmitted to the data server, the data will be checked for quality and then immediately anonymised on the data server. The data will be stored there for a maximum of twenty-four (24) hours for the purposes of anonymisation and quality assurance. The original data from the vehicle will then be fully deleted. The anonymisation process is continually reviewed and enhanced with regard to its efficiency and effectiveness while taking account of the latest scientific findings and the current state of the art.

III. Legal basis and legitimate interest

Consent to the transmission of data from the vehicle, balancing of interests (Article 6(1)(f) GDPR) for the storage of distributed data to the anonymisation.

The aforementioned objectives of researching, developing and validating autonomous driving functions can only be achieved by having a significant data pool that covers as many different traffic scenarios as possible based on actual journeys. Conventional test drives in the form of endurance runs are no longer sufficient in this context. The data has to encompass as many different driving scenarios as possible, whereby the situation involving the traffic and surroundings can only be captured by the algorithms under real road traffic conditions. Nor is it sufficient to purchase the data from elsewhere in this context because the data is not available in the required quality and very quickly becomes outdated. For these reasons, Volkswagen has a legitimate interest in the processing of the data and the establishment of an anonymous database.

IV. Commencement and duration of data collection

The data transfer is not activated ex factory, instead, it starts with the registration of an active "We Connect" / "VW Connect" primary user in the vehicle, if the primary user has given consent to the transmission of data from the vehicle. The registered user can give and also withdraw this consent in the "MyVolkswagen" portal at a later time, if necessary. The personal data is processed for the purpose of subsequent anonymisation on the legal basis of the balancing of interests (Article 6(1)(f) GDPR). The data collection is only active at the "Use my position" and "Share my position" levels. Depending on the equipment, the "Development automated driving" slider can be used to activate or deactivate the data upload in the vehicle in the area of the Privacy Settings; however, this does not withdraw the consent.

V. Data recipients

1. Data servers

The data is processed on servers of the following service providers only on our behalf and in accordance with our instructions:

CARIAD SE
Major-Hirst-Straße 7
38442 Wolfsburg
Germany

Audi AG
Auto-Union-Straße 1
85057 Ingolstadt
Germany

Microsoft Ireland Operations Limited
One Microsoft Place
South County Business Park
Leopardstown
Dublin 18
D18 P521
Ireland

At Microsoft, data is encrypted in accordance with agreements concluded with us and processed exclusively on data servers located in the EU. As Microsoft has its head office in the United States, the possibility of (read) access to the data from the USA cannot be ruled out. Appropriate EU

standard contractual clauses have been agreed to cover the transfer of personal data to processors in third countries to ensure that your personal data is sufficiently protected. The EU standard contractual clauses used can be accessed on the website of the European Commission under the URL https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32021D0914.

2. IT support service providers

We also use various IT service providers. These assist us with the maintenance of our IT systems and with technical support, for example. Insofar as the service providers have access to personal data, they will process this data on our behalf and in accordance with our instructions only. IT support is provided by the following service providers:

Volkswagen Group Service
Bunsenstraße 5
85053 Ingolstadt
Germany

diconium digital solutions GmbH
Rommelstraße 11
70376 Stuttgart
Germany

Volkswagen Infotainment GmbH
Rensingstraße 15
44807 Bochum
Germany

VI. Your rights

You can exercise the following rights with respect to Volkswagen AG at any time and free of charge. This also applies in cases where we share joint responsibility for the data processing with other companies. More information on asserting your rights can be found at: https://datenschutz.volkswagen.de/.

1. Right to information

You have the right to request confirmation from us as to whether or not personal data concerning you is being processed and – if it is – to be informed what personal data concerning you is being processed, and also which third parties within and outside the EU have had your data forwarded to them. You also have the right to obtain a copy of the personal data concerning you that is being processed by us.

2. Right to rectification

You have the right to have incorrect or incomplete personal data concerning you rectified by us.

3. Right to erasure

You have the right to demand erasure of your data if the requirements stated in Article 17 GDPR are met. According to this, you can request, for example, that your data be 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.

4. Right to restriction of processing

you have the right to request restricted processing of your data if the requirements stated in Article 18 GDPR are met. This is the case, for example, if you dispute the accuracy of your data. You can request that processing is restricted for the period during which the accuracy of the data is being checked.

5. RIGHT TO OBJECT

you have the right to object to the processing of your personal data in the following cases:

- **If processing takes place for direct marketing purposes (including profiling for direct marketing purposes).**
- **If processing (including profiling) takes place on the following legal bases:**
  - **Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us (Article 6(1)(e) GDPR).**
  - **Processing is necessary for the protection of our legitimate interests and those of a third party (Article 6(1)(f) GDPR). If you do raise any objection of this kind, we kindly request that you inform us of the reasons why you are objecting to data processing. If you object, we will no longer process your data unless we can prove compelling reasons for processing that outweigh your interests, rights and freedoms, or the processing serves the assertion, exercise or defence of legal claims.**

6. Right to data portability

If data processing is based on consent or contract performance and processing takes place using automated means, you have the right to obtain your data in a structured, commonly used and machine-readable format and to transmit this data to another controller. In addition, you have the right to have the personal data transmitted directly by us to another controller.

7. Right to withdraw consent

Where data processing is based on consent, you have the right to withdraw your consent, free of charge, at any time with effect for the future by sending an email to info-datenschutz@volkswagen.de (Germany), privacy@volkswagen.de (outside of Germany), at our Volkswagen Privacy Portal https://www.datenschutz.volkswagen.de or through the contact details in the site notice.

Additionally, you can withdraw your consent at any time in your Volkswagen ID user account in “MyVolkswagen”.

8. Right to lodge a complaint

You also have the right to lodge a complaint about our processing of your data with a supervisory authority (e.g. the State Commissioner for Data Protection in Lower Saxony or a supervisory authority responsible for your place of residence).

VII. Who to contact

1. Who to contact to exercise your rights

The contact persons for exercising your rights and further information can be found at the following web page: https://datenschutz.volkswagen.de/.

2. Data protection officer

Please contact our data protection officer regarding matters related to data protection:

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