

# Information on data processing in the use of the Car2X function

## A. General information

With this Privacy Policy, we would like to inform you about the processing of your data for the use of the Car2X function, provided your vehicle is equipped with Car2X and Car2X is active. You can also find information on data processing in your vehicle outside of Car2X use in the Privacy Policy for the use of mobile online services (Car-Net and We Connect).

You can view the current Privacy Policies at any time at <https://portal.volkswagen-we.com>.

The entity responsible for data processing linked to the Car2X function built into your vehicle is:

### **Volkswagen AG**

Berliner Ring 2

38440 Wolfsburg

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

entered in the Commercial Register of the District Court of Braunschweig under number HRB 100484 (" \_ Volkswagen AG \_ ")

## B. Car2X communications

### I. Principles

Your vehicle is equipped with a Car2X function. If you activate this function, your vehicle is capable of exchanging important traffic information, e.g. regarding accidents or traffic jams, with other road users or infrastructure, as long as they also support Car2X functionality. This makes it even safer for you to use the road.

Communication takes place directly between your vehicle and other road users or infrastructure in a surrounding area of around 200 to 800 metres. This range may vary depending on the surrounding environment, e.g. in tunnels or towns.

### II. Technical availability and security

To provide the Car2X function, your vehicle uses certain basic functions which also process personal data.

#### 1. Technical availability

To guarantee secure communication with your vehicle and ensure that you can use all services and functions acquired with your vehicle or booked additionally, your vehicle's VIN and IP address and the time stored in your vehicle are compared with our database. To protect your identity and data, the VIN is pseudonymised as far as possible. This data is processed on the basis of our legitimate interests in being able to provide you with services and functions while preventing unauthorised use of our services and functions. The legal basis for processing is Article 6, paragraph 1, letter f of the General Data Protection Regulation ( \_ GDPR \_ ).

## **2. Data servers**

The data is processed on the following processors' servers at our instruction:

Audi AG  
Auto-Union-Straße 1  
85057 Ingolstadt  
Germany

Amazon Web Services, Inc. ('AWS')  
410 Terry Av. North  
Seattle WA 98109  
United States

At AWS, the data is encrypted according to agreements made with us and exclusively processed on data servers in the European Union. As AWS is based in the United States, (read) access to data from the United States cannot be ruled out. A corresponding EU standard data protection agreement (appropriate guarantee for data processing in non-European countries) was concluded accordingly to ensure sufficient protection of your personal data.

## **3. IT support service providers**

We also use various IT service providers who assist us with maintenance and technical support services. If they obtain access to your personal data, they process this exclusively on our behalf and at our instruction. Contracts for data processing are concluded with them in accordance with Article 28 of the GDPR, ensuring that your data is also subject to our high level of protection with data processors.

## **III. Car2X functionalities**

Car2X may assist you in the following situations:

### **1. Local hazard point warning**

The Car2X function checks the area around your vehicle described above to inform you of relevant local hazard points. For this purpose, driving information is received from other Car2X users and evaluated. If a vehicle in front starts an emergency braking process and sends this information via Car2X, for example, your vehicle can display a warning. Please note: your vehicle will not perform any automatic driving actions as a result of these warnings; it will not start emergency braking by itself, for instance.

### **2. Adaptive cruise control expansion**

The Car2X technology can expand your vehicle's predictive sensor system (e.g. radar and camera systems) and identify traffic situations even sooner so that you can react to them even sooner. With more precise information on a traffic situation, for example, the adaptive cruise control can react to the end of a traffic jam in conjunction with speed control and automatically adapt the speed. Furthermore, the manual lane change support function is improved, for example.

### **3. Additional functionalities**

Additional Car2X functions may be developed in future. We shall inform you separately of data processing linked to new Car2X functions.

## **IV. Data transfer**

When you activate the Car2X system, this sends general traffic information to other Car2X users (e.g. other vehicles, infrastructure) on an ongoing basis and allows them to assess the current traffic situation. The following data is transmitted for these purposes: Information on the Car2X sender (temporary ID, type, direction of travel, speed), vehicle information (vehicle dimensions), journey-specific information (acceleration, geographic location), information from vehicle sensors (yaw rate, bend progression, light status, pedal status and steering angle) and route (waypoints, i.e. positioning data on the last 200 to 500 metres of the journey).

The activated Car2X system also transmits additional data to other Car2X users when certain events occur. The events include, in particular, a vehicle stopping, breakdowns, accidents, initiation of an active safety system and the end of traffic jams. Transmission only takes place when an event occurs. The following data is also transmitted: Event information (event type, event time and message time, geographic location, event area, direction of travel) and route (waypoints, i.e. positioning data on the last 600 to 1,000 metres of the journey).

Data sent to other Car2X users is pseudonymised, which means that you are not shown as the sender of the information to other Car2X users.

Volkswagen AG has no access to this data and does not store it.

## **V. Certificates**

To prevent misuse in Car2X communications, Car2X information is signed with a pseudonymised certificate before being sent out. Based on the signatures, the receiving Car2X system can check whether a Car2X message is authentic, i.e. sent by a legitimate Car2X sender and not manipulated. The vehicle identification number (VIN) of your vehicle is used and transmitted to a Car2X server in order to be able to assign a unique certificate to your Car2X system. This allows the pseudonymised certificates for Car2X communications to be provided. The Car2X server in question is operated on behalf of Volkswagen AG by NEXUS Technology GmbH, Carl-Zeiss-Strasse 2, 76275 Ettlingen, Germany. To continue improving the security of your data, new certificates are issued to your Car2X system at regular intervals.

Data transmitted during access to the Car2X server is stored for five years following expiry of the relevant certificate's validity, along with the control unit certificate, the VIN and the initial certificate generation parameters. It is then deleted automatically.

Data transmitted during access to the Car2X server is stored for five years following expiry of the relevant certificate's validity, along with the control unit certificate, the VIN and the initial certificate generation parameters in accordance with the Certificate Policy for Deployment and Operation of European Cooperative Intelligent Transport Systems (C-ITS). It is then deleted automatically.

## **C. Processing purposes, legal basis and subjects' rights**

Your data is processed for the purposes of providing Car2X functions and promoting traffic safety in your interests and the interests of other road users. The legal basis for data processing is the safeguarding of legitimate interests (Article 6, paragraph 1, letter f of the GDPR).

To protect your privacy, in the provision of Car2X, data is only processed to the most limited extent possible and transmitted to Volkswagen AG exclusively for the purposes of issuing certificates for your Car2X system.

With regard to your data processed by Volkswagen AG, provided legal requirements are met, you have the following rights which you may assert with respect to Volkswagen AG free of charge at any time. You can obtain further information about asserting your rights on the website <https://datenschutz.volkswagen.de>.

## I. Right to information

You have the right to receive information from us regarding the processing of your personal data.

## II. Right to rectification

You have the right to request that we rectify any of your personal data that is incorrect or incomplete.

## III. Right to deletion

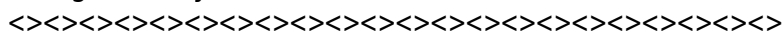
You have the right, in the event that the requirements specified in Article 17 of the GDPR have been met, to demand the deletion of your data. Accordingly, you may request the deletion of your data, for instance, if it is no longer necessary for the purposes for which it was collected. Furthermore, you can also request deletion if we process your data on the basis of your consent and you revoke this consent.

## IV. Right to restrict processing

You have the right to request that the processing of your data be restricted if the requirements of Article 18 of the GDPR are met. This is the case, for example, if you dispute the accuracy of your data. You may then request the restriction of processing of your data while the accuracy of your data is being verified.



## V. Right to object



**Insofar as the processing is predicated by an overriding legitimate interest on the part of Volkswagen AG or a third party (Article 6, paragraph 1, letter f, of the GDPR), you have the right to object to the processing of your data. You can also object to processing if the processing either is carried out in the public interest or in the exercising of official authority (Article 6, paragraph 1, letter e, of the GDPR). In addition, you have the right to object to data processing for the purposes of direct advertising. This also applies to profiling insofar as this is undertaken in conjunction with overriding justifiable grounds (Article 6, paragraph 1, letter f, of the GDPR), and for cases where this is linked to direct advertising. In the event that you object, we request that you inform us of the reasons why you are objecting to the data processing. You can object to the processing of your data for the purposes of direct advertising without providing a reason. You may also object to processing for profiling purposes without giving reason if this is linked to direct advertising.**

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## VI. Right to data portability

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

## **VII. Right of revocation**

Insofar as the data processing is undertaken based upon consent, you have the right to revoke your consent for the data processing, with future effect at any time, free of charge.

## **VIII. Right to lodge a complaint**

You also have the right to lodge a complaint with a supervisory authority (e.g. with the State Data Protection Officer for Lower Saxony) regarding our processing of your data.

## **IX. Restrictions**

Car2X messages exchanged between your vehicle and other road users or road infrastructure are not transmitted to or stored by Volkswagen AG. Please note that, for this reason, we are also unable to offer you any entitlement to information, rectification, deletion or data portability with regard to your Car2X data. If you do not wish for any further processing of your data to take place, you may deactivate the Car2X function of your vehicle at any time. Your data will then no longer be processed, aside from the updating of certificates (B. V.). Data processing for technical availability (B. II. 1.) and updating certificates (B. V.) is necessary even when the Car2X function is deactivated to ensure these functions are available at any time as soon as you (re)activate them. Certificates are not updated and data processing for technical availability does not take place if you have set your vehicle's privacy settings to 'maximum privacy' mode.

## **D. Your contact person**

For information on the person to contact to exercise your rights and for further information on data protection, please visit the following link <https://datenschutz.volkswagen.de>.

The Data Protection Officer of Volkswagen AG is on hand as a contact person for matters related to data protection:

Datenschutzbeauftragter der Volkswagen AG  
Berliner Ring 2, 38440 Wolfsburg  
[datenschutz@volkswagen.de](mailto:datenschutz@volkswagen.de)

Status of displayed information:  
Privacy Policy [October 2019]

The current Privacy Policy may be viewed at any time at <https://portal.volkswagen-we.com>.