

# Data Privacy Notice

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This Data Privacy Notice will inform you about how we process your data and what your rights are in particular with respect to the General Data Protection Regulation (EU) 2016/679 ("GDPR") in relation to your FINANCIAL SERVICES ID. If you are below the age of sixteen (16) years, you shall not use the FINANCIAL SERVICES ID service.

## 1. Processing of personal data and purposes of processing operations

Volkswagen and its affiliates (each of which a "VW entity") are aiming at providing you with the best possible service. In order to ease transactions between VW entities and to give you access to connected products and services of the VW group, you can be provided with a FINANCIAL SERVICES ID consisting of your first name, last name, email address, password and –if applicable– phone number ("your data"). Your data are collected either directly from you or via a VW entity (as the case may be). In case you do not provide all the personal data requested during the process of the creation of your FINANCIAL SERVICES ID, we may not be able to provide the FINANCIAL SERVICES ID service to you.

For such purposes, your data shall be processed by Volkswagen Payments S.A., an electronic money institute incorporated under the laws of Luxembourg and registered with the Luxembourg Trade Register (Registre de Commerce et des Sociétés de Luxembourg) under number B215079, established and having its registered office at L-8009 Strassen, Route d'Arlon 19-21 in Luxembourg, acting as the data controller ("we", "us", "our").

The processing of your data by us is lawful insofar as (i) you have given your consent to such processing, or if (ii) such processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract. Where the processing of your data is based on your consent, you have the right to withdraw your consent at any time by sending an email to [DataProtectionVWFSLux@vwfs.com](mailto:DataProtectionVWFSLux@vwfs.com). The withdrawal of your consent shall however not affect the lawfulness of processing based on your consent before its withdrawal. As a matter of principle, we do not perform automated decision-making or profiling in the context of the FINANCIAL SERVICES ID service.

## 2. Disclosure of your data to third parties

If you use your FINANCIAL SERVICES ID to buy a product or service on a website or platform of a VW entity, we will disclose your data to that VW entity. Such processing of your data is lawful as it is necessary in order to take steps at your request prior to entering into a contract, or subject to your consent.

We will also disclose your data to our data processor Volkswagen AG IdentityKit (located in the European Union) which acts as the technical operator of the identification platform.

As a matter of principle, your data are stored and processed in the European Union and we do not intend to transfer your data to a third country or international organization.

## 3. Data security and storage

We employ appropriate technical and organisational security measures in order to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against

unauthorised access by third parties. Our security measures are continuously improved to keep pace with technological development.

We will store your data in a form which permits identification for no longer than is necessary for the purposes set out in this Data Privacy Notice. We will erase your data in a secure manner if the storage of your data is no longer necessary. We will also erase your data in a secure manner at the latest one (1) month after you have withdrawn your consent as described in point 1. above and one (1) year after you have last used your FINANCIAL SERVICES ID.

#### **4. Data subjects' rights**

As a data subject, you have the following rights:

- Right of access to your data (article 15 of the GDPR);
- Right to modify inaccurate or incomplete data (article 16 of the GDPR);
- Right to erase your data, unless that processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims (article 17 of the GDPR);
- Right to limit processing where the accuracy of your data is contested by you, the processing is unlawful and you oppose the erasure of the personal data; where we no longer need your data, but you need them for the establishment, exercise or defence of legal claims or you have objected to such processing in accordance with article 21 of the GDPR;
- Right to the portability of your data (article 20 of the GDPR);
- Right to object at any time to the processing of your data concerning on grounds relating to your personal situation (article 21 of the GDPR).

Should you wish to exercise your rights as a data subject, please send an email to [DataProtectionVWFSLux@vwfs.com](mailto:DataProtectionVWFSLux@vwfs.com).

If you are not satisfied with our response or action, you have the right to lodge a complaint with the Luxembourg supervisory authority, namely the National Commission for Data Protection ("CNPD") having its headquarters at L-4370 Belvaux (Luxembourg), 15, boulevard du Jazz (<https://cnpd.public.lu/fr.html>).

#### **5. Data Privacy Notice updates and changes**

By further developing our website and offerings through the site or due to changing statutory and regulatory requirements, it might be necessary to amend this Data Privacy Notice. You are invited to regularly check whether changes have been made to this Data Privacy Notice and acknowledge that it is your responsibility to regularly review this Data Privacy Policy and to inform yourself of its changes.