

# Privacy Policy for Volkswagen ID

## A. Responsible party (Controller)

In this Privacy Policy we inform you about the processing of your personal data by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, email: [vw@volkswagen.de](mailto:vw@volkswagen.de), entered in the register of companies at Brunswick District Court under the register No. HRB 100484 ("Volkswagen AG") in relation to use of the Volkswagen ID user account mobile application.

## B. General information on log files

It is perfectly possible to visit Volkswagen AG services without giving us any information about your identity. In this case, we will only automatically collect the following log data:

- an anonymous cookie ID, which does not allow your IP address to be identified;
- the operating system and web browser you are using, and your selected screen resolution;
- the type of device and browser used (e.g. "iPhone 7 & Safari"), the date, the
- time and the duration of your visit; the services you use during your visit to our website;
- type and time of the action, e.g. login, logout and the selected login method; location from which the login occurs as part of our security strategy.

### Registration for the central Volkswagen ID user account

You have the option of creating a central Volkswagen ID user account at Volkswagen AG. You also have the option of entering other personal data, such as your name, your address or your contact details (phone number, for example), to complete your user account details in advance. With the Volkswagen ID you can register for a number of Volkswagen AG services (e.g. websites or digital services) (Art. 6 (1)(1)(b) GDPR). As a result, you do not need to register again, but can instead use the data you entered for the initial registration when you register for new services.

If you do this, the services will be linked to the central user account. If you add another Volkswagen AG service to the central user account, you must agree to the use of the personal data already stored in the central user account (Art. 6(1)(1)(a) GDPR). As a rule, the personal data will only be passed on to a service if it is essential for performance of the service. If you do not agree to this, you have the option of creating a separate user account to sign into the service that you have selected. If you use the Volkswagen ID in connection with a third party service, the data will only be passed on if this is absolutely necessary for the use of the third party's service and the processing is therefore necessary to fulfil a contract between you and the third party, or is required to carry out pre-contractual measures, or is required for legal reasons.

Volkswagen AG uses the double opt-in process to complete registration, as well as to confirm the consent you have granted in this registration. An email will be sent to you at the email address provided requesting you to confirm.

### Volkswagen ID Portal

Your e-mail address must be saved in your Volkswagen ID user account. All other personal data may be entered voluntarily. Alternatively, you may save other personal data via connected digital services in the Volkswagen ID user account and use this data in other connected digital services. You can manage the personal data and the services associated with the user account on the Volkswagen ID portal (<https://vwid.vwgroup.io>). The personal data displayed in the Volkswagen ID portal relates exclusively to the personal data entered by you during use of the portal.

Your data will be saved in the Volkswagen ID for as long as the Volkswagen ID user account is open. This is done on the basis of the contract fulfilment for the Volkswagen ID. Your personal data is always forwarded to and/or saved by the connected digital services on the basis of your voluntary consent. Based on a balancing of interests by Volkswagen AG, your personal data will be maintained in your Volkswagen ID user account after individual digital services have been unlinked. The aim of the digital services is to inspire customers in a unique manner to take advantage of their available services. The benefits to the customer when using many of the digital services connected with the Volkswagen ID is significantly increased because the data is generally maintained in the Volkswagen user account, thus strengthening the customer relationship as a result of the ease of use.

Customers can view, edit or delete the personal data they have entered in their user account under the menu item "Personal data" and "Contact" in their user account. If the data is still required for the settlement of outstanding transactions, deletion will take place only once these transactions have been settled.

You also have the option of deleting your entire user account via the "Account settings" menu on the Volkswagen ID portal. If you wish, all of your personal data will be deleted unless Volkswagen AG is entitled or obliged to store the data for other reasons (as mentioned above). In this case, the data is erased as soon as this reason becomes invalid. Services that require a Volkswagen ID user account can then only be used if you create a new user account. If you do not log in with your Volkswagen ID for a period of five years, your user account will be fully deleted.

## **I. Confirmation of minimum age**

You must be at least 16 years of age to use Volkswagen ID. We ask about your age when you register for a Volkswagen ID in order to safeguard the interests of Volkswagen AG. The Volkswagen AG digital services are geared towards people who own a vehicle and therefore are of a certain age. Only by determining that an individual meets the minimum age can it be ensured that the digital services are only used by the people for whom these digital services are intended. Furthermore, by requesting an individual's age during the initial registration for the Volkswagen ID, Volkswagen AG meets the special protection provisions pursuant to Art. 8 (1) GDPR.

## **II. Declaration of consent for advertising and market research**

If you would like to receive personally tailored advertising from Volkswagen AG, you must consent to the use of your data for this purpose (Art. 6(1)(a) GDPR). Such consent is voluntary. Only if you consent to receiving tailored advertising and market research from Volkswagen AG will, for example, the following data:

- Personal contact and identification details (e.g. surname, first name, e-mail address, telephone number)
- Transaction data (e.g. completed parking activities)
- Motor vehicle usage data (e.g. vehicle log, fluid levels)
- Contractual data (e.g. vehicle equipment, current contracts with associated services)
- IT usage data (e.g. last login to the services)
- Campaign data (e.g. date since the last campaign was sent)

be used for the following purposes:

- Market research and personally tailored advertising about current and new products (e.g. digital products), discount offers, service and loyalty programmes and the sending of customer magazines (which could include, for example, information about automotive and

related products and services, including information about new technical features, digital products and services for my vehicle (e.g. Volkswagen Connect), accessories, customer and product events, trade fairs and other events).

Volkswagen AG may contact you by e-mail for this purpose.

In order to allow us to better tailor the content of our e-mails to your needs, you also consent to the processing of your personal data with respect to your behaviour in response to the advertising and market research (opening the e-mail and the links in the e-mail). Information about whether you open links or advertising from a certain area is recorded and stored. Volkswagen AG uses this information to determine the topics of greater interest to you. As a result, in future you will receive advertising that is better tailored to your behaviour.

If you revoke this consent, your personal data will no longer be used for advertising and market research purposes. Volkswagen AG deletes your 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.

### **III. Use of data processors**

We commission service providers as part of the processing of your enquiries and your usage of our services. These service providers are contractually obliged to comply with data protection requirements and are not considered third parties pursuant to data protection law. Personal data will be transferred to third parties only insofar as this is necessary for contract execution, and in particular for the provision of services. Personal data is only shared for advertising or market research purposes if you have given your consent to the use of your data for this purpose.

The personal data processed as part of the usage of the Volkswagen ID will only be stored in a web services cloud operated by Amazon Web Services EMEA SARL. Access to the information by Amazon Web Services, Inc., based in the USA, cannot be ruled out, meaning a relevant EU standard contract (appropriate guarantees relating to data processing in non-European countries) has therefore been concluded.

The personal data processed for contractual purposes as well as in the framework of your declaration of consent for advertising and market research is stored in a cloud service operated by Salesforce.com EMEA Limited. Access to the information by Salesforce.com Inc., based in the USA, cannot be ruled out, meaning a relevant EU standard contract (appropriate guarantees relating to data processing in non-European countries) has therefore been concluded. The data processed for contractual purposes is also protected by the EU-US Data Privacy Shield as well as binding corporate rules (BCR). You have the right to information as part of the information provided about this standard contract, the EU-US Data Privacy Shield and BCR.

## **C. Security**

Volkswagen AG takes technical and organisational security measures to protect your data, which we manage against manipulation, loss, destruction, and against access by unauthorised persons. Our security measures are state-of-the-art, and undergo continuous improvement in line with technological development.

## **D. Your rights**

You may exercise the following rights vis-a-vis Volkswagen AG at any time without cost. You can obtain further information about exercising your rights at the following website:

<https://datenschutz.volkswagen.de>.

**Right to information:** you have the right to receive information from us about how your personal data is processed. You have the right to require us to correct any personal data relating to you that is incorrect or incomplete.

**Right to erasure:** If any of the grounds specified in Article 17 of the GDPR apply, you have the right to request erasure of your data. For example, you may request erasure of your data if they are no longer needed for the purpose for which they were collected. You can also request that your data be deleted if we process your data on the basis of your consent and you then revoke this consent.

**Right to restrict data processing:** You have the right to demand processing of your data be restricted, if the prerequisites of Section 18 of the GDPR are satisfied. This could be the case, for example, if you dispute the accuracy of your data. You can then request that processing be restricted while we check whether your data are correct.

**Right to object:** You have the right to object to the processing of your data if the processing is based on an overriding interest or if your data are used for the purpose of direct marketing. An objection is permitted if data is processed either in the public interest or in the exercise of public authority or based on a legitimate interest of Volkswagen AG or a third party. If you object to the processing of your data, please notify us of the grounds for your objection. You also have the right to object to data processing for the purposes of direct marketing. The same applies to profiling, provided that it is related to direct marketing.

**Right of data portability:** You have the right to receive your data in a structured, commonly used and machine-readable format and transfer this data to another data processor, provided that data processing is based on consent or contract fulfilment and that automated processing methods are used.

**Right to withdraw consent:** If data processing is based on consent, you have the right to withdraw your consent to data processing at any time with effect for the future and without cost by contacting [info-datenschutz@volkswagen.de](mailto:info-datenschutz@volkswagen.de) using the contact details provided in the site notice as well as in the Volkswagen ID user account.

**Right to lodge a complaint:** You also have the right to lodge a complaint about our processing of your data with a supervisory authority (such as the Data Protection Commissioner for the Federal State of Lower Saxony).

### **Your contact partner: Data Protection Officer**

Our data protection officer is available to answer all questions about data protection-related concerns as well as about exercising your rights. Please contact:

Datenschutzbeauftragter der Volkswagen AG

Berliner Ring 2, 38440 Wolfsburg

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

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