

# **Privacy Policy VW Park Assist Pro App**

## **A. Controller**

With this privacy policy, we inform you about the processing of your personal data by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, kundenbetreuung@volkswagen.de, registered in the commercial register of the Braunschweig District Court under the number HRB 100484 ("Volkswagen AG", "we" or "us"), when using the mobile application VW Park Assist Pro App ("app").

For the purposes of ensuring smooth operation and enhancement, Volkswagen AG also uses CARIAD SE, with headquarters in Germany, as a processor.

## **B. General information**

### **I. Services without login**

When using services of this app that do not require a login, your data will only be stored locally on your mobile device, and no personal data shall be processed by Volkswagen AG ; isofar as non-personal data is processed by us for the provision of services, we refer to this in the section "The individual services without login" (see below under C).

### **II. Services with login**

When using services that require a login, in particular the pairing with a Touareg from model year 2024 onwards, your personal data will be processed by Volkswagen AG. Personal

data is transferred to our data server, processed there and – depending on the respective service – stored in your Volkswagen user account (see D below).

In this context, the legal basis for the processing of personal data is the contract concluded with you after you have downloaded the app and before you use the app for the first time (Art. 6 (1) (b) GDPR).

The purpose of the processing is to establish a coupling between the vehicle and the user's smartphone as a basic requirement for the "remote-controlled parking with the VW Park Assist Pro App" function. In the event that a user opts not to provide the requested information, it might result in the unavailability or limited access to those particular services. However, we affirm that the decision to share personal data remains entirely voluntary, and users retain the right to withhold such information without facing any adverse consequences within the scope of our platform's offerings

## **C. The individual services without login**

Please note that, depending on the vehicle model and model year, the use of the app does not require Volkswagen AG to process your personal data.

However, we would like to point out that while using the app, it accesses the location function via Bluetooth Low Energy of your phone. If your vehicle is in your vicinity, it can be detected via the location function and then a secure connection can be established with it. Your mobile device

accesses your location for this purpose, without this function the app cannot be used. However, your location will not be transmitted to Volkswagen AG or third parties, no data processing will take place by Volkswagen AG, and location access will only take place locally on your device.

## **I. Pairing a vehicle with the smartphone**

Depending on the vehicle model and model year, the pairing process takes place without the processing of personal data, namely by exchanging keys using Bluetooth pairing or by means of a QR code procedure. Here, the vehicle and smartphone exchange anonymized keys in order to identify each other when approaching. This data is only stored locally on your smartphone. This pairing information can be deleted at any time via the vehicle's HMI, the app and the Bluetooth settings of your smartphone.

In order to improve pairing via QR code procedure on Android mobile phones even under unfavorable conditions (e.g. poor camera resolution or lighting conditions), the app uses a special technology (barcode scanner from Google ML Kit). The camera image is processed exclusively on your device. When using this technology, usage and device data (e.g. manufacturer, device model, operating system version, hardware, mobile operator, time zone, language settings, device ID, app version, number of scans, error messages) generated when using the interface are logged within the operating system and transmitted to a Google server for further development of the technology. It cannot be ruled out that this data will be transmitted to a third country (e.g. USA). The legal basis for the processing of your personal data is your consent in accordance with Art. 6 Paragraph 1 Clause 1 Letter a of GDPR. You can revoke your consent to the use of the Google ML Kit (Google Ireland Ltd.) in the app at any time by deactivating the slider below the data protection declaration. For more information, see the [Google Privacy Policy](#).

## **II. Remote parking of a vehicle**

The app offers the option of transferring a parking process (parking assistant started in the vehicle, gap detected by the vehicle, gap selected by the user in the vehicle, parking process in the infotainment system transferred from the user to smartphone by the user) to the user's smartphone or the app via the vehicle's infotainment system. To do this, the vehicle must be paired with the smartphone (see "Pairing a vehicle with the smartphone").

If the vehicle is successfully paired with the user's smartphone, the user can monitor or control the parking process in the app.

## **III. Remote pulling out of a vehicle**

The app offers the possibility to pull out a parked vehicle remotely. For this purpose, it is necessary that the vehicle is already paired with the user's smartphone (see "Pairing a vehicle with the smartphone"). Using Bluetooth Low Energy, the app on the smartphone then detects when a paired vehicle in the vicinity is ready to be parked. The user can then start and monitor the parking process in the app.

## **D. The individual services with login**

Please note that for Touareg facelift from model year 2024 onwards ("TOUAREG FACELIFT") the login with the Volkswagen ID is required in order to pair the vehicle with the app. That requires the processing of personal data.

While using the app, it accesses the location function via Bluetooth Low Energy of your phone as described in section C.

## **I. Processed personal data**

Based on the legal basis mentioned under B. II the app processes the following personal data after successful login with the Volkswagen ID:

- User ID (primary and secondary users) used for Login
- VIN (vehicle identification number) used for pairing
- Capabilities of the vehicle (check of technical prerequisites) used for pairing
- Keys (key exchange between vehicle and smartphone) used for pairing
- Agreement (for automatic user identification) used for pairing
- Symbolic picture of the vehicle (display in the app) used for identification
- Name of the vehicle (display in the app) used for identification
- Name of the user (display in the profile section of the app) used for identification
- Email of the user (display in the profile section of the app) used for identification
- Preferred language (language settings of the app) used for communication

for the purpose of establishing a pairing between the vehicle and the smartphone as a basic requirement for the "remote-controlled parking via VW Park Assist Pro App" function.

With the exception of the agreement for automatic identification, the personal data fields mentioned here above are not stored in a backend. The backend (for frontend) is only used for the purpose of exchanging the keys between the vehicle and the smartphone.

The agreement is stored in your Volkswagen ID and can be withdrawn there or in the profile section of your app at any time. Please see section D. III .

Of the above-mentioned data only the following are temporally stored locally on your smartphone in order to reduce loading times (caching):

- Keys
- Name of user
- Symbolic vehicle image
- Vehicle nick name

## **II. Deletion periods**

The data temporarily stored on the smartphone (see above) will be retained for as long as the purpose of its processing and storage continues, because the user continues to use the app in logged-in state. The login session expires after an hour if the user does not use the app or if the user does not have an active internet connection over that period.

If the user is logged out, for example because the account has become invalid or because it was not possible to refresh the login information, the data cached on the smartphone will also be deleted immediately.

If the app is deleted from the smartphone by the user or if the app's cache is deleted by the user, the data cached on the smartphone will also be deleted immediately.

If the user withdraws the given consent to data processing in the profile portal, the data processing will be stopped and data stored in the backend will be deleted according to the guidelines of VOLKSWAGEN ID.

If the user deletes their VOLKSWAGEN ID used for login, the data stored in the backend will be deleted according to the guidelines of VOLKSWAGEN ID.

### **III. Pairing of a vehicle using the BLEident method**

When the smartphone is paired with the vehicle, anonymized keys are exchanged. This key exchange takes place with or without processing of personal data by Volkswagen AG, depending on the vehicle and model year.

In the case of vehicles where the keys are exchanged using the so-called Bluetooth Low Energy Ident (BLEident) procedure, the keys are exchanged via the vehicle backend. To do this, it is necessary for the user to be logged in to the app on his smartphone with his Volkswagen ID so that the relationship between the user and the vehicle can be retrieved from Vehicle User Management (VUM). Subsequently, the information is retrieved for the user's vehicles identified in this way as to whether the vehicles support the remote parking function. In this way, only those vehicles that meet the technical requirements are displayed in the app.

The user then selects one of the displayed vehicles for pairing and gives permission to be automatically identified by the vehicle when approaching it. The user can revoke this permission at any time in the settings of the app. However, in this case, there is no key exchange. The vehicle can therefore not be paired.

After selecting the button "Proceed" and giving permission for identification when approaching, the keys are exchanged between the vehicle and the user's smartphone via the vehicle backend (MBB).

If the user then approaches the vehicle paired in this way, the connection is automatically established via Bluetooth Low Energy and the stored key data. This feature can be disabled at any time in the app profile settings. However, this means that there can be no key exchange between the vehicle and the user's smartphone. This means that the remote parking function cannot be used either.

### **IV. Remote parking of a vehicle**

The app offers the option of transferring a parking process (parking assistant started in the vehicle, gap detected by the vehicle, gap selected by the user in the vehicle, parking process in the infotainment system transferred from the user to smartphone by the user) to the user's smartphone or the app via the vehicle's infotainment system. For this purpose, the vehicle must be paired with the smartphone, which requires a login (see "Pairing a vehicle using the BLEident procedure").

If the vehicle is successfully paired with the user's smartphone, the user can monitor or control the parking process in the app.

## **V. Remote pulling-out of a vehicle**

The app offers the possibility to pull-out a parked vehicle remotely. For this purpose, it is necessary that the vehicle is paired with the user's smartphone, which in turn requires the user to log in (see "Pairing a vehicle using the BLEident procedure").

## **VI. Automatic user identification via Bluetooth Low Energy**

When the user approaches the paired vehicle, the connection is automatically established via Bluetooth Low Energy and the stored key data (see Pairing a vehicle). This function can be deactivated at any time in the app, but this means that there can be no key exchange between the vehicle and the user's smartphone.

## **VII. Viewing the vehicle image**

If the user is logged in to the app, an image of his vehicle (system-generated image based on the vehicle identification number (VIN)) is displayed in the app, depending on technical availability. This image is cached locally in the app.

## **VIII. View the profile data**

The user has at any time the possibility to view his profile data (surname, first name, e-mail address) in the app. For this purpose, a so-called webview of his Volkswagen ID profile is opened. It is not stored in the app.

## **E. Tracking Tools**

The app does not use any tracking tools based on personal data.

## **F. Your rights**

You can assert your following rights against Volkswagen AG at any time free of charge. For more information on exercising your rights, please refer to Section G.

**Right of access:** You have the right to receive information from us about the processing of your personal data.

**Right to rectification:** You have the right to obtain from us the rectification of inaccurate or incomplete personal data concerning you.

**Right to erasure:** You have the right to object to the processing of the data referred to in Art. 17 GDPR to request the erasure of your data. After that, you can, for example, request the deletion of your data, insofar as 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 revoke this consent.

**Right to restriction of processing:** You have the right to obtain the restriction of the processing of your data if the requirements of Art. 18 GDPR have been met. This is the case, for example, if you dispute the accuracy of your data. For the duration of the verification of the accuracy of the data, you can then request the restriction of processing.

**Right to object:** If the processing is based on an overriding legitimate interest or your data is used for the purpose of direct marketing, you have the right to object to the processing of your data. In the event of an objection, we ask you to inform us of your reasons for objecting to data processing. In addition, you have the right to object to data processing for direct marketing purposes. This also applies to profiling insofar as it is related to direct marketing.

**Right to data portability:** If the data processing is based on consent or the performance of a contract and this is also carried out using automated processing, you have the right to receive your data in a structured, common and machine-readable format and to transmit it to another data controller.

**Right to withdraw your consent:** If the data processing is based on consent, you have the right to revoke the data processing within the scope of a consent with effect for the future at any time free of charge.

**Right to lodge a complaint:** You also have the right to complain to a supervisory authority (e.g. the State Commissioner for Data Protection of Lower Saxony) about our processing of your data. 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](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

If you are a customer in the UK, you have the right to lodge a complaint with the UK Information Commissioner's Office (ICO), the UK regulator for data protection issues, who can be contacted via [www. https://ico.org.uk/](https://ico.org.uk/).

## **G. Your contact persons**

### **I. Contact person for exercising your rights**

The contact persons for exercising your rights and further information can easily be found on the following website <https://datenschutz.volkswagen.de/>.

### **II. Data protection officer**

Our data protection officer is available to you as a contact person for data protection-related concerns:

Data Protection Officer of Volkswagen AG

Berliner Ring 2, 38440 Wolfsburg

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

Representatives of the responsible data protection officer:

Albania	Data Protection Officer (DPO)	<a href="#"><u>Porsche Albania Sh.p.k Autostrada Tirane-Durres Km. 3, Tirane,1051</u></a>
Bosnia	DPO	BOSNA I HERCEGOVINA Porsche BH d.o.o. Sarajevo Porsche Inter Auto BH d.o.o. Sarajevo BIH-71000 Sarajevo   Bulevar Meše Selimovića 16
Montenegro	Data Protection Representative (DPR)	Porsche Leasing doo Member of Porsche Bank Group Josipa Broza Tita 67 81000 Podgorica Montenegro
Serbia	DPR	PORSCHE SCG DOO BEOGRAD Zrenjaninski put 11 11210 Beograd
North Macedonia	DPR	Porsche Macedonia DOOEL, Skopje  Blvd. Bosna i Hercegovina 4  1000 Skopje  North Macedonia
United Kingdom	DPR	Volkswagen Group United Kingdom Limited Yeomans Drive Blakelands Milton Keynes, MK14 5AN United Kingdom

As of May 2024. This privacy policy may be updated from time to time. The current privacy policy can always be found in the app itself.