

Privacy Policy for the Volkswagen We Park service

This Privacy Policy issued by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany, entered in the Register of Companies of the District Court of Braunschweig under number HRB 100484, (hereinafter: "we") informs you about the collection, processing and use of your personal data when using the "Volkswagen We Park" mobile application ("app").

A. General Information

Your personal data (such as your name, email address and mobile telephone number) are always collected, processed and used in accordance with the applicable data privacy regulations.

I. Volkswagen ID

To use this service, you need a central Volkswagen ID user account. If you already have a Volkswagen ID user account, you can log in using your current login details. If you do not wish to use your existing Volkswagen ID to log into this service, or if you do not yet have a Volkswagen ID, you can create another Volkswagen ID or register for the first time [here](#). To register, you need your email address and a password of your choice. You can use the central user account to log into numerous services (e.g. websites and apps). Instead of having to register again, you can access the services using the data entered when you first registered. If you do this, the services will be linked to the central user account. If you add another service to the central user account, you must agree to the use of the personal data already stored in the central user account. As a rule, the personal data will only be passed on to a service if it is essential for performance of the service. Further information on data processing in relation to the central user account can be found in the [Privacy Policy](#) for the central user account.

II. Transmission of Geodata

Transmission of geodata is required for use of various services within the app (e.g. to identify the parking zone used and store the location where you have parked your vehicle). Geodata refer here to the positioning data of the mobile end device. Geodata will only be transmitted if you have activated the relevant function in the app. Consent to activation is requested upon first using the app and may be withdrawn at any time as follows: for iOS: Settings -> Privacy -> Location Services -> We Park; for Android: Settings -> Apps -> App permissions -> Location -> We Park.

III. Receipt of Messages (push notifications)

For some fields, the app offers the option of transmitting information via push notification (push technology or server push is the name given to a type of communication where data are transmitted even though the receiving app is running in the background), such as reminders about current parking tickets at the end of a period subject to fees or about a failed payment transaction. You can configure this function and enable or disable notifications via the settings menu of your end device. For messages to be delivered, we have to store a push token from your mobile end device.

IV. Sharing of Data

Personal data will be only be shared with third parties insofar as it is necessary for performance of the contract and, in particular, for provision of the We Park service:

- The display of the vehicle location, suggested geolocations and navigation between the two are displayed on the map using the Google Maps service of Google Inc. ("Google"). For further information about data processing at Google, please see: <http://www.google.com/analytics/terms/de.html> and/or <http://www.google.com/intl/de/analytics/privacyoverview.html>
- For settlement of parking fees with municipalities, the start and end date and time of the parking transaction, the vehicle registration number and the unique user ID (user ID) will be sent to our parking service provider Sunhill Technologies. For further information, please see: <https://sunhill-technologies.com>.

V. Use of Tracking and Analysis Tools

adjust

This app uses the "adjust" analysis technology of adjust GmbH ("adjust") to measure marketing efficiency. For the purpose of the analysis, adjust collects, processes and uses the IP and Mac address – which are anonymised using hashing (fingerprint) – of your mobile end device. The information stored on the adjust servers cannot therefore be identified with a particular person. You may withdraw your consent to the collection and processing of this data at any time with effect for the future by deactivating "Crash reporting and usage statistics" under the "settings" menu option.

B. Services

I. Registration Numbers

You may manage your vehicles under the "Registration numbers" menu option. You may enter the vehicle registration number and have the option of entering a name for each of your vehicles. You may modify or delete the data you have entered at any time.

II. Parking

In each vehicle for which you wish to use the app to pay parking fees, a Volkswagen We Park sticker must be displayed in the vehicle on the right-hand side of the windscreen, on the front passenger side, in such a way that it is clearly visible from the outside. We need your postal address in order to send you the sticker by post. For the processing and invoicing of parking transactions, we collect and process the following personal data: start of the parking transaction (date, time), end of the parking transaction (date, time), parking zone or location of the mobile end device, applicable parking fee and registration number of your vehicle. The data will be stored in compliance with the statutory data retention periods and data privacy regulations.

For automatic identification via the app of which parking zone you are in, the transmission of geodata for the app must be activated in the settings of your mobile end device. Naturally you also have the option of selecting a parking zone without activating the geolocation function.

Public order offices and municipalities obtain limited access to your data in the cases described below:

1. Traffic inspection by the public order office

In the case of traffic inspection by the relevant public order office, by entering the last three digits of your vehicle registration number via an interface provided by the relevant local authority, the following data are sent to the public order office making the query: the registration number of your vehicle, the start date and time of your parking transaction and the parking zone. The query of the public order office will be sent in real time to all providers that offer a mobile phone parking service for the given parking area. If there is a valid parking ticket with our service, the aforementioned data will be sent to the relevant public order office.

2. Complaint investigation by the local authority

If you file a complaint with the relevant local authority (e.g. because you have mistakenly been issued a fine notice), the local authority may subsequently check whether you had a valid parking ticket. In that case the local authority may check up to 60 days after the end of the month whether there was a valid parking ticket for your vehicle in the relevant parking area. The following data are visible to the local authority: the start of the parking transaction (date, time), the end of the parking transaction (date, time), the parking zone, the parking fee charged and the registration number of your vehicle.

III. Parking History

You may view your previous parking transactions under the "Parking history" menu option. The entire parking history is stored on our data server (for up to 16 years) in compliance with the statutory retention periods and data privacy regulations. For information about the various data, see Section II ("Parking").

IV. Invite Friends

Under the "Invite friends" menu option, you may recommend the Volkswagen We Park app to your friends. If there is an active voucher promotion, you and your friend will receive a voucher for parking credit for each recommendation that results in the new registration of a friend. Please see the voucher promotion and the associated terms of participation for the value of the voucher and the terms and conditions.

Recommendations may be made using the "Invite friends" menu option by sending an editable suggested text to persons selected by you via a communications channel available on your mobile end device.

Depending on whether there is an active voucher promotion for "Invite friends", personal data will be collected, processed, stored and used by us.

If there is no active voucher promotion, no personal data will be collected, processed, stored or used by us.

If there is an active voucher promotion, the following data will be collected, stored and used by us:

- User: Volkswagen ID, voucher code (including validity period), incurred parking costs for crediting the value of the voucher against them
- Friend: Volkswagen ID, registration date, voucher code (including validity period), incurred parking costs for crediting the value of the voucher against them.

In addition, the parking credit will be redeemed by matching the voucher code sent by the recommender and the voucher code entered by the friend upon registration. Data are solely collected for the purpose of successfully redeeming parking credit for the recommender and the friend. The data used for matching will be stored until expiry of the voucher and then erased.

V. Payment and Invoicing

We process the payment of parking fees and transaction fees in conjunction with one or more payment service providers (payment services).

1. Payment

You authorise us to process the payment of parking fees and transaction fees. To process your payment, either your credit card will be charged, or you may enter details of your PayPal account. To avoid you having to re-enter your details for every parking transaction, the relevant payment services store payment data in a payment data repository.

Payment with Credit Card

We transfer the following data to the payment services for that purpose: name, surname, credit card details (credit card number, CVC code (card verification code) and expiry date). If the relevant payment service for processing of your payments changes, the details will be transferred from the previous payment service to the subsequent payment service.

The credit card details will be collected by us for transfer to the payment services and will otherwise only be used by the payment services for processing of the payment. The payment services store your credit card details for the purpose of processing payment of parking transactions.

Upon being entered for the first time during registration, the validity of the credit card details will be checked by a payment service, which will perform a credit card authorisation in the amount of a few cents with the issuer of your credit card for that purpose. That amount will not be charged to your credit card. If the check finds that the credit card number is incorrect, the CVC code (card verification code) does not match the credit card number, the card has expired or the credit card is stolen, the relevant error message will be sent to us by the given payment service so that we can display it in the app.

If you have not personally initiated the payment reversal, e.g. if the payment reversal is made due to lack of cover, you authorise us to have the payment charged again to your credit card at a later point in time.

If you initiate a payment reversal or if we grant you a refund, the relevant amount will be re-credited by the payment service. For that purpose, we will send the payment service the following

data: the amount, the reason for the payment reversal, your user ID and the transaction ID generated by us and assigned to the parking transaction.

The payment services will erase your personal data once you permanently delete your user account for the Volkswagen We Park service or if the payment service is no longer in charge of processing your payments, there are no outstanding amounts to be collected and payment reversal and statutory retention periods have expired.

Payment with PayPal

PayPal is a means of payment provided by PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg. To select PayPal as means of payment, the in-app browser will redirect you to the PayPal website where you can log in to your existing account or set up a new account.

The We Park app on your mobile phone identifies itself with PayPal in the background using a so-called token, allowing PayPal to confirm successful registration and payment. On the PayPal page, you enter your personal data and authorise a payment service to book payments from your PayPal account. PayPal is responsible for processing the data entered during registration. When you use PayPal, you are subject to the PayPal [Terms of Use](#) and [Privacy Policy](#). On the basis of a balance of interests (GDPR Article 6 Paragraph 1, Letter f), this service provider will receive the following data from PayPal: surname, first name, e-mail address, invoice and delivery address, account ID (e-mail address), IP address.

The interest of the contracted payment service provider and of ourselves is firstly to minimise the risk of default and fraud, and so to protect your We Park account against misuse. Secondly, we confirm your place of residence to allow us to verify to the tax authorities that we have correctly paid the value added tax due.

Payments and payment reversal

Together with the instruction to charge the payment, we send the relevant payment service the amount due and a descriptor to appear on your account statement. That text contains the accounting period and invoice number.

If the relevant amount cannot be charged to your credit card, for example because the credit card used does not have sufficient cover, because it is no longer valid or because your PayPal account has been closed, we will be notified by the payment service. We will be sent the reason for the failure and your user ID generated by us.

2. Invoicing

As a rule, we will send you a monthly transaction statement (parking fees, including VAT where applicable) and a monthly invoice (transaction fees, including VAT). We will use the following data for that purpose and for customer service purposes (e.g. processing of refund requests):

name, surname, address, email address, parking zones and times, vehicle registration numbers, parking and transaction fees and the time when these were paid or the payment transaction failed. Volkswagen AG will store and archive the accounting and invoice details in compliance with statutory requirements.

VI. Manage your Credit Card

Under "payment method" in your user account, you may subsequently modify the credit card details that you entered during registration. The following data will be sent to the payment service partners we use for processing of your payments: name, surname, credit card details (credit card number, CVC code (card verification code) and expiry date).

C. Your Rights

You may exercise the following rights vis-a-vis Volkswagen AG at any time without cost:

Right to information: You have the right to receive information from us about the processing of your personal data via your central VW ID user account at <https://vwid.vwgroup.io/landing-page>

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

Right to erasure: If any of the grounds specified in Article 17 of the GDPR apply, you have the right to obtain erasure of your data. For example, you may obtain 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 restriction of processing: If any of the grounds specified in Article 18 of the GDPR apply, you have the right to obtain restriction of the processing of your data, 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 to data portability: If data processing is based on consent or performance of a contract and the processing is performed by automated means, you have the right to receive your data in a structured, commonly used and machine-readable format and to transmit those data to another data processor.

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 or using the contact details provided in the site notice.

D. Your Contact Person: our Data Protection Officer

Our Data Protection Officer is available as your contact person for any matters concerning data protection. You may also contact our Data Protection Officer to exercise your rights. Please contact:

Volkswagen AG
Data Protection Officer
Berliner Ring 2,
38440 Wolfsburg, Germany
info-datenschutz@volkswagen.de

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