

Privacy Policy for the Volkswagen We Park service

A. Controller

This Privacy Policy is intended to inform you about how your personal data is processed by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany, wepark-support@volkswagen.de, registered in the Register of Companies of the Brunswick District Court under No. HRB 100484 ("Volkswagen AG", "we"), with the use of the "We Park" mobile app and In-Car App (hereafter: "smartphone app" and "In-Car App").

B. Processing of your personal data

We process personal data in order to provide you with the We Park service. The legal basis for the data processing is the performance of a contract to which you are a party (provision of the We Park service, Art. 6(1)(b) GDPR) unless otherwise described below.

I. Specific data processed

We process the following data in connection with We Park. Detailed explanations of specific data processing operations can be found in section II:

1. **Volkswagen ID:** To use We Park, you must create a Volkswagen ID user account ("Volkswagen ID") or log in with an existing Volkswagen ID. You can log in to various digital services from Volkswagen AG or third parties using the Volkswagen ID. It acts as a central user account that you can use to manage your personal data centrally. The data processing required for this is performed for the purposes of contract fulfilment (providing the "Volkswagen ID" service, Article 6(1)(1)(b) GDPR). When you give your consent, the data filed under your Volkswagen ID is sent to the We Park service (Article 6(1)(1)(a) GDPR). You can find detailed information on data processing in the context of Volkswagen ID in the Privacy Policy at <https://vwid.vwgroup.io/data-privacy>.
2. **Email address from the Volkswagen ID:** We use your email address to communicate with you about specific services (e.g. to provide invoices). We also use your email address to advise you that your personal data will be deleted automatically if you have not used We Park for one year. The precise terms and scope of the deletion can be found in the section "Storage and deletion of your personal data".
3. **Title from the Volkswagen ID:** We use the title so that we can write to you with the correct and appropriate form of address.
4. **First name and surname from the Volkswagen ID:** We use your first name and surname in order to identify you correctly and appropriately, to address you correctly and appropriately in person and to create a correct invoice.
5. **Address from the Volkswagen ID:** We need the address to issue your invoice correctly and to send you a parking sticker and/or off-street access medium.
6. **Country identifier from the Volkswagen ID:** The country identifier identifies the country in which your registration address is located. We need this in order to charge value added tax correctly.
7. **Language from the Volkswagen ID:** We need the language saved in your Volkswagen ID to address you in the correct language.
8. **Vehicle registration number from the Volkswagen ID:** The vehicle registration number is needed to buy a parking ticket for the vehicle identified using the registration number.

9. **Vehicle data:** We process the last four digits of your vehicle identification number (VIN) in order to differentiate between a user's vehicles when providing support, as a user may have several vehicles and a vehicle may have several users. We also need the type of infotainment system model (e.g. 8 or 9 inches) in order to display We Park correctly. This allows the We Park content to be displayed in the correct size and resolution.
10. **Positioning data:** The geolocation is the positioning data of the mobile device or vehicle. Geolocation data is processed in order to show you the correct parking zone. There is a difference here between the geolocation in the smartphone app and in the vehicle. The geolocation is only transmitted if you have activated this function in the smartphone app or in the privacy settings in the vehicle's infotainment system. In the smartphone, you have the option to select a parking zone without activating geolocation. Consent (Article 6(1)(a) GDPR) for activation is requested the first time the smartphone app is used and can be withdrawn at any time as follows: for iOS: Settings -> Privacy -> Location services -> We Park; for Android: Settings -> Apps -> App permissions -> Location -> We Park. In the vehicle, geolocation is mandatory for the use of We Park. Please also see your privacy settings in the vehicle.
11. **Movement sensor:** To avoid distractions during driving, We Park cannot be used during travel. For this purpose, We Park can tell via an interface with the vehicle whether the vehicle is in motion or not.
12. **Credit card details:** To bill you for the parking sessions, we need your credit card details (credit card number, Card Validation Code and expiry date).
13. **Date/time:** To charge the parking fee, we need the date and time for the start and end of your parking session.

II. Use of personal data

1. Parking

We collect and process the following personal data in order to process and bill for parking sessions:

- The start of the parking session (date and time)
- The end of the parking session (date and time)
- The parking zone or the location of the mobile device
- The parking fee that is due
- Your vehicle registration number
- Credit card details (credit card number, Card Validation Code, expiry date)

Public authorities and municipalities shall receive limited access to your data in the following circumstances:

1. Traffic monitoring by public authorities

In the event of traffic monitoring by the relevant public authority, the following data is transmitted to the requesting public authority when the last three digits of your vehicle registration number are entered using an interface provided by the responsible local authority: the registration number of your vehicle, the start of your parking session and the parking zone. The public authority's query is executed in real time with all possible providers who offer the function of mobile parking for the parking area in question. If there is a valid parking ticket with us, the data fields listed above are transmitted to the responsible public authority.

2. Complaints monitoring by the local authority

If you make a complaint to the responsible local authority (e.g. if you have incorrectly received a penalty decision), the local authority may subsequently check whether a valid parking ticket was in place. In that event, the local authority can see for 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 in the past. The following data can be viewed by the local authority: the start of the parking session (date and time), the end of the parking session (date and time), the parking zone, the parking fee billed and the registration number of your vehicle.

2. Parking history

You can view your past parking sessions via the "Parking history" menu option. The entire parking history is stored on our data server (for up to 16 years), subject to legal retention periods and data protection provisions. You can find information on the individual data in section "1. Parking". You can remove the individual parking sessions from the display on your mobile device or in the vehicle by swiping left and clicking the recycling bin icon. This only deletes the display of the parking session in the relevant app. Volkswagen AG will continue to store the parking session data in order to invoice for the parking session (see section III.).

3. Invite friends (only on smartphone)

In the "Invite friends" menu option you can 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 leads to a new friend registering. The amount of the voucher and the conditions can be found in the promotion and the associated terms and conditions of participation.

The recommendation is made via the "Invite friends" menu option, which enables you to edit the suggested text and send it to selected individuals via a communications channel available on your mobile device.

Depending on whether there is an active voucher promotion for "Invite friends", we collect, process, store and use personal data as part of this process.

In the event that there is no active voucher promotion, we do not collect, process, store or use any personal data.

In the event that there is an active voucher promotion, we collect, store and use the following data:

- User: Volkswagen ID, voucher code (including duration of validity), parking costs incurred to offset the voucher
- Friend: Volkswagen ID, date of registration, voucher code (including duration of validity), parking costs incurred to offset the voucher

The parking credit is also credited by matching up the voucher code sent by the recommending user and the code entered by the friend on registration. Data is collected solely for the purpose of successfully crediting the parking credit to the recommending user and their friend. The data for this matching process is stored until the voucher expires and is then deleted.

4. Payment and billing

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

You commission us to process the payment of parking and transaction fees. To process the payment, the credit card you entered is charged or you store your PayPal account. The relevant payment services save the payment data in a payment database so you do not have to re-enter your data for every parking session.

1. Payment by credit card

In this process, we transmit the following data to the payment services: surname, first name, credit card details (credit card number, Card Validation Code and expiry date). If the payment service responsible for processing your payments should change, the data is transferred from the former payment service to the new payment service. We collect the credit card details for transmission to the payment services and it is otherwise only used by the payment services for payment processing. The payment services store your credit card details to process payments for parking sessions. Once they have been entered for the first time during registration, the credit card details are verified by a payment service. For this purpose, the payment service conducts a credit card authorisation for a few cents with the issuer of your credit card. You are not charged the amount. If the check reveals that the credit card number is incorrect, the Card Validation Code does not match the credit card number, the date of validity has expired or the credit card has been stolen, these error messages are transmitted to us from the relevant payment service so that we can display these to you in the smartphone app or In-Car App.

2. Payment with PayPal

PayPal is a payment method provided by PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, 2449 Luxembourg. When PayPal is selected as the payment method, you are forwarded to the PayPal website in the in-app browser in order to log in to your account or create a new one. The We Park app on the mobile phone and in the vehicle is identified in the background with PayPal using what is known as a token, so that PayPal can inform us of successful registration and payment at a later time. On the PayPal page, you supply further personal data and authorise a payment service to charge payments to your PayPal account. PayPal is responsible for processing data entered on registration. When using PayPal, you are bound by the PayPal terms of use and privacy policy.

On the basis of a consideration of interests (Article 6(1)(f) GDPR) this service provider receives the following data: surname, first name, email address, billing and delivery address, account ID (email), IP address. The interest of the commissioned payment service provider and our interest is in avoiding the risk of default and fraud and protecting your We Park account from misuse. We also verify your place of residence so that we can prove to tax authorities that we have charged the correct VAT due.

3. Charges and reversed charges

With the debit order, we send the relevant payment service a charge text that will appear on your account statement, as well as the amount. The text includes the charge period and billing number.

If a debit fails, for instance because the credit card used does not have sufficient funds, the period of validity has expired or your PayPal account has been closed, we will be informed of this by the payment service. In that event, we are sent the reason for the error and your user ID that was generated by us.

In the event of a reverse charge you have not personally authorised, for instance if a debit was reversed due to insufficient funds, you authorise us to perform the debit again at a later point in time.

In the event that you initiate a reverse charge procedure or we grant you a refund, the relevant amount is charged back by the payment service. We transmit the following data to the payment service for this purpose: amount, the reason for the reverse charge, your user ID and the transaction ID generated by us and allocated to the parking session.

4. Billing

You will usually receive a monthly transaction overview (parking fees including VAT if necessary) and an invoice (transaction fees including VAT) from us. For this purpose and for the purposes of customer service (e.g. processing orders for refunds), we use the following data: surname, first name, address, email address, parking zones and times, vehicle registration number, parking and transaction fees and the time at which these were paid or charged unsuccessfully.

5. Managing a credit card

You can change the credit card details you entered on registration at a later point in your user account under "Payment method". As part of this process, the following data is transmitted to payment services we work with to process your payments: surname, first name, credit card details (credit card number, Card Validation Code and expiry date).

5. Customer Care

1. You can contact our Customer Care service by email or telephone. This is processed by our contracted data processors.

2. If you contact Customer Care, the information and data you provide (including personal data) is recorded in an electronic case file so that your matter can be dealt with.

2.a. The legal basis for the processing of your data by Volkswagen AG is to fulfil a contract to which you are party or to take steps at your request prior to entering into a contract (Article 6 (1)(b) GDPR).

We store your data only for as long as necessary for the respective purposes for which we process your data. If your data is required and processed for multiple purposes, as soon as the last specific purpose has been fulfilled your data is automatically deleted or stored in anonymised form, which prevents the data from being associated directly with you.

Volkswagen AG has drawn up an internal deletion concept to ensure that all of your data is deleted in accordance with the principle of data minimisation. The fundamental principles that this deletion concept stipulates for deletion of your personal data are:

The data is used in Customer Care. Our customers have high expectations regarding the quality of our products and services, and with good reason. For us to live up to this standard and to offer you the best possible service, we store the data collected from you for six months to ten years after the relevant intended use, unless you wish this data to be deleted and there are no contractual or legal retention obligations conflicting with this deletion request.

2.b. If you contact Customer Care by telephone, you will be asked for at least the following data: surname, first name, email address, telephone number, country and language. If you contact Customer Care by email, at least the following data is collected: email address, country and language.

We will ask for further information depending on the matter in question. This information includes: data regarding your smartphone (model, manufacturer, operating system and version of the operating system), data regarding the app (version, version number, country, set language), information regarding the parking session (start of parking session, end of parking session, parking zone), data regarding invoices and transactions (invoice/transaction number), information regarding vouchers (Where did the voucher come from?, voucher value), data regarding your vehicle (VIN) and information about your case (What is the problem? What led to the problem? What is the effect of the problem? Can the problem be reproduced or did it only occur once? When did the problem first occur?).

6. Exchange of data between app and web app

To make things as convenient as possible for you, the smartphone app and In-Car App communicate with each other. This means that you can see all the information about your parking session both on your smartphone and in the vehicle. For example, you can use your smartphone to easily extend or end a parking session that has been started in the vehicle. This only works if the same vehicle registration number is used in both apps.

III. Deletion and storage periods for data

Your personal data generated during use of We Park is stored in the We Park back end (hereafter also referred to simply as "in We Park"). This personal data is not stored in your Volkswagen ID user account. Your personal data stored in We Park is deleted automatically if you have not used We Park for over a year. In that event, we will inform you in good time that we are deleting your data stored in We Park. You then have the option of preventing the deletion of your data. The Volkswagen ID and the data in your Volkswagen ID user account cannot be deleted via We Park.

An overview of all the data processed in connection with the use of We Park can be found in the "**Specific data processed**" section. An overview of the data generated by We Park during use can be found in the "**Use of personal data**" section.

You can delete your data stored in We Park by withdrawing your consent for data to be transmitted from the Volkswagen ID to We Park by using the Volkswagen ID service at <https://vwid.vwgroup.io/>. Please note that if there are outstanding bills or invoices, we will continue to store the specific data needed for the billing or invoicing even if you have withdrawn your consent as described above. This data will be deleted once the invoice has been fully settled, provided we are not required to continue storing it due to other retention obligations, if:

- You do not use the app for a year, the data is automatically deleted if you do not respond to the email telling you about the deletion of the data beforehand.
- You delete your Volkswagen ID.

The exact retention periods for the particular data types can be found in the following table:

Data: Retention period

Geoposition at the start of the parking session: 45 days

Start date of the parking session, ID, name, city and country of the parking zone, End date and duration of the parking session, Registration number: 1 year

Creation date, information and status of the payment, ID and history of the invoice, Gross and net total amount and value added tax included: 3 years

IV. Sharing of data

Personal data is only passed on to third parties if this is required for contract processing, particularly for providing the We Park service:

1. The display of the vehicle location, geolocation suggestions and navigation between the two are displayed on a map using the Google Maps and Google Places service from Google Inc. ("Google"). More information on data processing at Google can be found at: <https://www.google.com/analytics/terms/gb.html> or at <http://www.google.com/intl/gb/analytics/privacyoverview.html>.
2. The map view in the vehicle is provided by HERE Global B.V. Further information on data processing by Here is available at: <https://legal.here.com/en-gb/terms> or <https://legal.here.com/en-gb/privacy>.
3. To bill for parking fees with municipal authorities, the start and stop time of the parking session, the selected parking zone, the vehicle registration number and the unique user ID (Volkswagen ID) are passed on to our parking provider sunhill technologies. Further information about our parking provider sunhill technologies is available here: <https://sunhill-technologies.com>.

The personal data processed for the contractual purpose of responding to Customer Care support requests is processed in a cloud operated by Salesforce.com EMEA Limited. This data is encrypted using a standardised procedure and is hosted in Europe and in the USA by Salesforce. We cannot preclude the possibility that the data hosted in Europe will be accessed from the USA through Salesforce.com Inc., having headquarters in the USA. Corresponding EU standard data protection agreements for transferring personal data to processors in third countries (appropriate guarantee for data processing in non-European countries) have been concluded to ensure sufficient protection of your personal data. You can download the EU standard contractual clauses from the URL <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087>.

V. Receiving messages (push notifications)

1. Notifications

The smartphone app and the in-car app offer the option to be informed deliberately by push notification (push technology or server push describes a type of communication in which data is transmitted although the receiving app is running in the background) for individual areas, for instance, as a reminder to purchase a parking ticket, about ongoing parking tickets, when the end of a period for which parking fees are charged has been reached or for information on a failed payment transaction. You can activate and deactivate this function via the "Notifications" setting of your smartphone or in-car app. For messages to be sent, we need to store a push token from your mobile device. This data processing is done based on your agreement according to art. 6, art. 1 lit. a) GDPR.

2. Automated ending of parking processes

In addition, the in-car app offers the option to automatically end parking processes. As part of this function, you'll receive a separate push notification in order to inform you when the parking process has been ended. This notification is therefor activated automatically when you want to use the feature "automated ending of parking processes". However, you can activate and deactivate this function at any time in your in-car app in the settings for "automated ending". This data processing is done based on the procesing of contracts according to art. 6, art. 1 lit. b) GDPR and only in so far you are using the function "automated ending of parking processes".

VI. Use of tracking and analytics tools (smartphone only)

Adjust

The We Park app uses "adjust" analytics technology from adjust GmbH ("adjust") to measure marketing efficiency. adjust collects, processes and uses the IP and Mac address of your mobile device, which are anonymised through a hashing procedure (fingerprint), for analytics purposes. This means that the information saved on the adjust servers cannot be linked to individuals. When you register for the We Park service, you can grant consent for the use of adjust. You may refuse data collection and processing at any time with effect for the future by deactivating the "Campaign tracking" option in the "Settings" menu option.

VII. Your rights

You may assert the following rights vis-à-vis Volkswagen AG at any time free ofcharge. Additional information on exercising your rights can be found in section G.

Right to information:

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

Right to rectification:

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

Right to erasure:

You have the right, in the event that the requirements specified in Article 17 GDPR have been met, to demand the erasure of your data. Accordingly, you may request the erasure 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.

Right to restriction of processing:

You have the right to request the restriction of the processing of your personal data if the requirements specified under Article 18 GDPR have been met.

This is the case, for example, if you dispute the accuracy of your data. You may request that processing is restricted for as long as it takes to examine the correctness of your data.

Right to object:

If processing is based on an overriding interest or if your data is used for the purpose of direct marketing, you have the right to object to the processing of your data. An objection shall be permissible if the processing either is carried out in the public interest or in the exercising of official authority or owing to a legitimate interest of Volkswagen AG or of a third party. In the event of objection, we ask you to inform us of the reasons for which you object to data processing.

In addition, you have the right to object to the data processing for the purposes of direct advertising. The same applies to profiling, if this is related to direct marketing.

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 this data to another data processing service provider.

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.

Right to lodge a complaint:

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

VII. Contacts

a. Points of contact for the exercise of your rights

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

b. Data protection officer

Our data protection officer is your point of contact for issues related to data protection:

Volkswagen AG Data Protection Officer

Berliner Ring 2, 38440 Wolfsburg, Germany

datenschutz@volkswagen.de

Version dated: February 2020, Version 14.1.