

# Privacy Policy for the invitation to use Volkswagen AG digital services (Privacy Policy for customers)

## A. Controller

Thank you for visiting a website of Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, [connect-support@volkswagen.de](mailto:connect-support@volkswagen.de), entered in the register of companies at Braunschweig District Court under No. HRB 100484 ('Volkswagen AG').

This Privacy Policy contains information regarding the processing of your personal data by Volkswagen AG in conjunction with the invitation to use Volkswagen AG services.

## B. Processing of your personal data

### I. Processing of log files

When you visit our website, we process the following log files pertaining to you:

1. Date and time of day of your visit
2. Type and time of action, e.g.
  - a. Correct or incorrect entry of the code from the invitation after registration/login for/with Volkswagen ID
  - b. Blocking of data processing after the invitation code has been entered incorrectly multiple times after registration/login for/with Volkswagen ID
  - c. Confirmation of your account data

Data is processed in accordance with Article 6, paragraph 1, letter f of the GDPR, as we have a legitimate interest in the processing of this data.

The aim of processing this personal data is to prevent potential IT security risks, e.g. by verifying the customer through the input of an invitation code. The invitation code ensures that even in the event of a misdirected invitation email (e.g. due to an error typing the email address), a third party who receives the invitation cannot access the temporarily stored customer data.

### II. Preparing registration for Volkswagen AG digital services

You can be assisted with registering for a Volkswagen ID or setting up digital services such as e.g. your myVolkswagen customer portal and the mobile online services (VW Connect, We Connect or Car-Net, depending on the vehicle) or We Charge using 'Pre-Delivery Enrollment' (PDE) before your vehicle is even delivered by the Volkswagen dealership.

For this purpose, we receive the following data concerning you from your Volkswagen dealership: First name, surname, email address, invitation code, telephone number, country, language, VIN (vehicle identification number), commission number (order number, including buyer ID and order year) and any charging plan and brand.

The data field 'nickname' is autofilled with your first name and is used for greeting purposes in the vehicle infotainment.

We use this data with support from your Volkswagen dealership to prepare registration and/or the conclusion of a contract for other digital services.

At the beginning of an invitation process, your email address and VIN (and/or commission number) are used to check whether there is already an open invitation for your email address or the vehicle. The Volkswagen dealership functions exclusively as a processor for Volkswagen AG and only processes your personal data at our instruction.

Once your data has been received by the Volkswagen dealership, we shall, in the context of the invitation to create a Volkswagen ID and of the activation of VW Connect, We Connect or Car-Net, inform you via email in good time of the next steps, so you can use the Volkswagen digital services as soon as you get access to your vehicle. These include:

- an email with the invitation for Volkswagen ID registration,
- notifications when an action from you is required in the context of the invitation (e.g. reminder to accept the invitation (maximum 2) or to register and activate VW Connect via app or web service (maximum 2)).
- a notification once your future vehicle has been added to your user account and is shown in the virtual vehicle garage (e.g. that of myVolkswagen),
- an email on the activation process for VW Connect, We Connect or Car-Net.

In the context of the invitation, your Volkswagen dealership is informed of your current registration and activation status so that they can support you at any time.

Your Volkswagen ID is saved in the Volkswagen AG system 'Pre-Delivery Enrollment' to link the data concerning you stored by the Volkswagen dealership and provided by us to your future user account.

To enable your invitation in your preferred language, processing of your private contact and identification data for language also takes place.

The vehicle data VIN and commission number are processed for the following purposes:

- To connect your vehicles with your Volkswagen ID.
- To supply you with vehicle-specific services, such as displaying information on your vehicle's order status (e.g. in the 'myVolkswagen' customer portal).
- To enable the delivery of information emails on the current production status of your new vehicle on order.

Information on the order is found in your commission number.

You also have the option to have your identity verified for the purposes of using security-related vehicle functions which are available subject to your vehicle's configuration and to make an associated nomination as the primary user of your vehicle.

This identity check is performed by your Volkswagen dealership based on your official document (driving licence, personal ID (identity card) or passport).

The following private contact and identification data is processed for this purpose: Type of official document, driving licence number, ID number or passport number, country of issue for the document, and your date of birth.

If you do not wish to undergo verification at this time, you can also do this later at any time independently in the Volkswagen app.

The processing of the data mentioned above under II. is performed as part of contract initiation (Article 6, paragraph 1, letter b GDPR).

In principle, the Volkswagen dealership can view the status of your vehicle order and its configuration in the 'Pre-Delivery Enrollment' service using the VIN and commission number. This allows them to respond more swiftly to any queries throughout the invitation and registration process guided by 'Pre-Delivery Enrollment', including in conjunction with the vehicle order. Data processing takes place on the basis of our legitimate interest (Article 6, paragraph 1, letter f GDPR) in being able to provide you as a customer with professional support.

## **Volkswagen ID**

Additional information on data processing in the context of the Volkswagen ID can be found in the Privacy Policy at: <https://vwid.vwgroup.io/data-privacy>.

## **VW Connect, We Connect and Car-Net**

Once you have set up a Volkswagen ID and a vehicle identification number has been added to your vehicle, you can sign up for VW Connect, We Connect or Car-Net.

Additional information on data processing in the context of use of Volkswagen AG's mobile online services (VW Connect, We Connect and Car-Net) can be found in the Privacy Policies in Chapter XI.

## **III. Selecting a Volkswagen dealership**

You can select your preferred Volkswagen dealership if you wish. For this purpose, your Volkswagen ID is linked to the dealership number, so this can be added to your user account by your Volkswagen dealership. Service Scheduling is also available for activation in selected models. This allows you, for instance, to be contacted automatically by the Volkswagen dealership in the event that service appointments are required. The email address and telephone number given for you on invitation are used to make contact in the context of Service Scheduling.

Service Scheduling is activated automatically on selection of a Volkswagen dealership (depending on country of residence) and may be changed by the customer at any time in myVolkswagen or the Volkswagen app.

Service Scheduling is available, depending on equipment, for vehicles from the second We Connect or VW Connect generation (e.g. not for e-Up!).

Settings for multiple vehicles per invitation:

If multiple vehicles are specified in an invitation, the selection of the preferred Volkswagen dealership and activation of Service Scheduling concerns all vehicles in this invitation accordingly. The legal basis for the processing of your data by Volkswagen AG is the fulfilment of a contract to which you are party or the taking of measures at your request prior to conclusion of a contract (Article 6, paragraph 1, letter b GDPR).

Additional information on data processing in the context of use of Volkswagen AG's mobile online services (VW Connect, We Connect and Car-Net) can be found in the Privacy Policies in Chapter XI.

## **IV. Invitation code to protect your user profile**

To ensure that only you are able to access your customer data, before completing registration of your Volkswagen ID, you will be asked on one single occasion to state the last four digits of the telephone number you provided during invitation as an invitation code.

Your prior recorded personal data will only be assigned to your customer profile once the four-digit invitation code has been entered correctly.

This prevents third parties from accessing your personal data in even in the event of a misdirected invitation email (for instance, due to a typing error in your email address).

The legal basis for the processing of your data by Volkswagen AG is the fulfilment of a contract to which you are party or the taking of measures at your request prior to conclusion of a contract (Article 6, paragraph 1, letter b GDPR).

## **V. Erasure and rectification of data**

Your personal data is erased once it is collected as soon as it is no longer required for the purpose or purposes for which it was collected (see Nos. I.-IV., X and XII), but no later than within the periods stated below, providing there are no legal retention obligations opposing erasure.

- Deletion after no later than 30 days: Log files (Chapter I 1., 2.a.-2.b.)
- Deletion after no later than 3 years:
  - First name, surname, country, language, brand, charging plan (Chapt. II); email address (Chapt. II, XII); preferred Volkswagen dealership (Chapt. III); invitation code, telephone number (Chapt. IV.); document type, document number, country of issue and date of birth, and primary user nomination and We Charge selection (Chapt. II);
  - Log files (Chapter I 2.c.)
- Deletion after no later than 5 years: VIN, commission number, Volkswagen ID (Chapter II, XII); invitation status, order information (Chapter II, X)

If you do not consent to the Terms and Conditions of 'Pre-Delivery Enrollment', the above personal data shall be deleted after 30 days.

If you have not registered for the Volkswagen ID in the meantime, erasure of your transferred personal data indicated above in the context of the invitation shall take place in principle after no more than 3 years.

If you have registered for the Volkswagen ID or other services provided by Volkswagen AG, your personal data may be stored for longer periods of time in accordance with applicable data protection provisions.

Additional information on your rights can be found in Section D.

## **VI. Customer Care**

You can contact our Customer Care service by email or telephone. This is processed by our contracted data processors. If you make contact with Customer Care, the details and data you provide (including personal data) will be held in an electronic case file to help process your request. If you make telephone contact with Customer Care, the following data is requested at a minimum: Surname, first name, email address, telephone number, country and language.

If you contact Customer Care via email, the following data will be collected at a minimum: Email address, country and language. We will ask for further information depending on the matter in question. This information includes: Data on your Internet browser, Internet browser version, operating system and version of operating system, set language, data on your vehicle (VIN, commission no.) and information about your case (What is the problem? What led to the problem? What is the effect of the problem? Does the problem occur reproducibly or did it only occur once? When did the problem first occur?).

The provision of the above personal data is required to perform effective Customer Care. If this personal data is not indicated, it is possible that customer services may not be provided effectively. 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 measures at your request prior to conclusion of a contract (Article 6, paragraph 1, letter b, GDPR). We may anonymise your data on the basis of our legitimate interest in managing, assessing and improving our services and performance (Article 6, paragraph 1, letter f GDPR).

We save your data only for as long as this is necessary for the relevant purposes for which we process your data. The relevant retention period may vary from three months (e.g. for simple questions or complaints) to a period of 5 years (e.g. for disputes) to up to 10 years (e.g. for claims for damages in connection with 'production certificates'), unless you wish this data to be erased and there are no contractual or legal grounds for retention which oppose this request for erasure. If your data is required and processed for multiple purposes according to this Privacy Policy, 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. In the event of a complaint, or if we are of the view that there is the prospect of a legal dispute with regard to our relationship with you, we may retain your data for a longer period.

## **VII. Use of processors**

We commission service providers to facilitate the processing of your queries and your use of our services. These service providers are contractually obliged to comply with provisions of data protection law and are not considered third parties as defined by data protection law. Personal data is only passed on to third parties if this is required for contract processing, particularly for providing services.

When conducting the invitation to use Volkswagen AG services, your Volkswagen dealership also acts as a processor for Volkswagen AG. If your Volkswagen dealership is outside the EU or in a 'third country' as defined by the GDPR, corresponding EU standard contractual clauses for transferring personal data to these Volkswagen dealerships have been concluded to ensure sufficient protection of your personal data.

Customer care currently involves the processing of your personal data by the following companies:

- Concentrix Holding Germany GmbH
- Volkswagen Digital Solutions, Unipessoal Lda.

The personal data processed in the context of the invitation and the conduct of evaluations for the purposes of business management is stored in a web services cloud operated by Amazon Web Services EMEA SARL. We cannot preclude the possibility that the information will be accessed by Amazon Web Services, Inc. with headquarters in the USA. Corresponding EU standard contractual clauses have been concluded for the transmission of personal data to processors in third countries (as an adequate guarantee for data processing in non-European countries) in order to provide sufficient protection for your personal data.

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

You can access the EU standard contractual clauses used at the URL <https://eur-lex.europa.eu/legal-content/de/TXT/?uri=CELEX%3A32021D0914>.

The personal data processed for contractual purposes and contact via email and as part of Customer Care is processed in a cloud operated by Salesforce.com EMEA Limited.

We cannot preclude the possibility that the information will be accessed by Salesforce.com Inc. with headquarters in the USA. Corresponding EU standard contractual clauses have been concluded for the transmission of personal data to processors in third countries (as an adequate guarantee for data processing in non-European countries) in order to provide sufficient protection for your personal data. You can access the EU standard contractual clauses used at the URL <https://eur-lex.europa.eu/legal-content/de/TXT/?uri=CELEX%3A32021D0914>.

## **VIII. Processing for the purposes of advertising from Volkswagen AG**

### **Processing of data in country of use Germany**

Volkswagen AG constantly strives to provide you with information that is as personally tailored to you as possible in order to improve advertising for the marketing of its products and services. This requires sound analysis of your use of our products and services. If you have granted us your consent to this, Volkswagen AG processes data from the Volkswagen ID user account and 'Pre-Delivery Enrollment' accordingly. Details on this data processing (e.g. which data is processed in precisely which way) can be found in the Volkswagen ID Privacy Policy at <https://vwid.vwgroup.io/data-privacy>.

### **Processing of data outside country of use Germany**

If you wish to receive [additional] marketing information on our products and services or be interviewed in the context of market research [and feedback], you may grant us your consent to the use of your data stored in the context of the Volkswagen ID you have set up and associated services for this purpose (Article 6, paragraph 1, letter a GDPR).

You may revoke this consent at any time with effect for the future in your Volkswagen ID portal. More information on data processing in the context of data processing for marketing and market research using the Volkswagen ID can be found in the Volkswagen ID Privacy Policy at <https://vwid.vwgroup.io/data-privacy>.

## **IX. Additional information for Bosnia and Herzegovina**

In deviation from the legal bases described in the sections above, the legal basis for the processing of personal data in accordance with the law of Bosnia and Herzegovina is data subjects' consent. The consent of data subjects is granted through the use of the 'Pre-Delivery Enrollment' service, once they have confirmed that they have read and accepted the Privacy Policy.

## **X. Creating assessments for business management purposes**

Volkswagen AG constantly strives to improve business process workflows in the context of business management. Sound evaluation of the use of the 'Pre-Delivery Enrollment' service is required to achieve this objective.

The following personal data is processed for the purposes of collecting usage statistics in 'Pre-Delivery Enrollment'

- Pseudonymous identification data (pseudonymous user recognition based on Volkswagen ID)
- Vehicle usage data (e.g. vehicle identification number, commission number)
- IT usage data (e.g. time of invitation, invitation status, order information)

The purposes and nature of processing and the legal basis thereof are described in detail below.

For the purposes of conducting evaluations for the purposes of business management, Volkswagen AG conducts analyses of order data by model, sales channel, order status, analyses of requested versions and equipment and reporting on business economic indicators using an identification number. Your personal data is pseudonymised as part of processing.

Pseudonymisation involves the removal of all direct personal identifiers (e.g. name, email, telephone number, vehicle identification number). Indirectly traceable identifiers (pseudonyms) are retained. Data is only analysed in Volkswagen AG's analytics systems once this pseudonymisation has taken place. The direct personal link is not restored at any time. The results of the analytics (particularly metrics and figures) are completely anonymous. For further processing (e.g. calculating segments, metrics and statistics), the data is anonymised in advance. 'Pre-Delivery Enrollment' also regularly generates usage statistics in aggregated and pseudonymised form, such as the number of invitations performed at the Volkswagen dealership and invitation status.

Your data is processed as described based on Volkswagen AG's legitimate interest in conducting evaluations for the purposes of business management and service improvement (Article 6, paragraph 1, letter f GDPR).

Volkswagen AG erases your pseudonymised data after three years or in accordance with legal requirements, for instance, once the purpose for which it was collected becomes invalid and if erasure is not contrary to any other retention obligations.

## **XI. Privacy Policies for data processing in the context of using mobile online services**

### **VW Connect, We Connect (ID. family)**

Belgique | België (Belgium):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/be/fr/dataprivacy/latest/html> (fr) /

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/be/nl/dataprivacy/latest/html> (nl)

Bosna i Hercegovina (Bosnia and Herzegovina):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/ba/bs/dataprivacy/latest/html> (bs) /

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/ba/hr/dataprivacy/latest/html> (hr) /

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/ba/sr/dataprivacy/latest/html> (sr)

България (Bulgaria):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/bg/bg/dataprivacy/latest/html> (bg)

Cyprus:

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/cy/en/dataprivacy/latest/html> (en)

Danmark (Denmark):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/dk/da/dataprivacy/latest/html> (da)

Deutschland (Germany):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/de/de/dataprivacy/latest/html> (de)

Eesti / Эстония (Estonia):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/ee/et/dataprivacy/latest/html> (et) /

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/ee/ru/dataprivacy/latest/html> (ru)

Ελλάδα (Greece):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/gr/el/dataprivacy/latest/html> (el)

España - Península y Baleares (Spain - Peninsula and Balearic Islands):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/es/es/dataprivacy/latest/html> (es)

España - Islas Canarias, Ceuta y Melilla (Spain - Canary Islands, Ceuta and Melilla):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/ic/es/dataprivacy/latest/html> (es)

France:

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/fr/fr/dataprivacy/latest/html> (fr)

Hrvatska (Croatia):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/hr/hr/dataprivacy/latest/html> (hr)

Ísland (Iceland):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/is/is/dataprivacy/latest/html> (is)

Ireland:

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/ie/en/dataprivacy/latest/html> (en)

Italia (Italy):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/it/it/dataprivacy/latest/html> (it)

Japan:

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/jp/ja/dataprivacy/latest/html> (jp)

Latvija / Латвия (Latvia):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/lv/lv/dataprivacy/latest/html> (lv) /

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/lv/ru/dataprivacy/latest/html> (ru)

Lietuva / Литва (Lithuania):

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/lt/lt/dataprivacy/latest/html> (lt) /

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/lt/ru/dataprivacy/latest/html> (ru)

Luxemburg / Luxembourg:

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/lu/fr/dataprivacy/latest/html> (fr) /

<https://consent.vwgroup.io/consent/v1/texts/WeConnect/lu/de/dataprivacy/latest/html> (de)  
Magyarország (Hungary):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/hu/hu/dataprivacy/latest/html> (hu)  
Македонија / Maqedoni (Macedonia):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/mk/mk/dataprivacy/latest/html> (mk) /  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/mk/sq/dataprivacy/latest/html> (sq)  
Malta:  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/mt/en/dataprivacy/latest/html> (en)  
Nederland (Netherlands):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/nl/nl/dataprivacy/latest/html> (nl)  
Norge (Norway):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/no/nb/dataprivacy/latest/html> (nb)  
Österreich (Austria):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/at/de/dataprivacy/latest/html> (de)  
Polska (Poland):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/pl/pl/dataprivacy/latest/html> (pl)  
Portugal:  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/pt/pt/dataprivacy/latest/html> (pt)  
România (Romania):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/ro/ro/dataprivacy/latest/html> (ro)  
Schweiz / Svizzera / Suisse (Switzerland):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/ch/de/dataprivacy/latest/html> (de) /  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/ch/fr/dataprivacy/latest/html> (fr) /  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/ch/it/dataprivacy/latest/html> (it)  
Србија (Serbia):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/rs/sr/dataprivacy/latest/html> (sr)  
Shqipëri (Albania):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/al/sq/dataprivacy/latest/html> (sq)  
Slovenija (Slovenia):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/si/sl/dataprivacy/latest/html> (sl)  
Slovenská republika (Slovakia):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/sk/sk/dataprivacy/latest/html> (sk)  
Suomi (Finland):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/fi/fi/dataprivacy/latest/html> (fi)  
Sverige (Sweden):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/SE/sv/dataprivacy/latest/html> (sv)  
Україна (Ukraine):  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/ua/uk/dataprivacy/latest/html> (uk)  
United Kingdom:  
<https://consent.vwgroup.io/consent/v1/texts/WeConnect/gb/en/dataprivacy/latest/html> (en)

### **Car-Net, VW Connect, We Connect (other vehicles)**

Belgique | België (Belgium):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/be/fr/dataprivacy/latest/html> (fr) /  
<https://consent.vwgroup.io/consent/v1/texts/carnet/be/nl/dataprivacy/latest/html> (nl)  
Bosna i Hercegovina (Bosnia and Herzegovina):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/ba/bs/dataprivacy/latest/html> (bs) /  
<https://consent.vwgroup.io/consent/v1/texts/carnet/ba/hr/dataprivacy/latest/html> (hr) /  
<https://consent.vwgroup.io/consent/v1/texts/carnet/ba/sr/dataprivacy/latest/html> (sr)  
България (Bulgaria):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/bg/bg/dataprivacy/latest/html> (bg)  
Cyprus:  
<https://consent.vwgroup.io/consent/v1/texts/carnet/cy/en/dataprivacy/latest/html> (en)  
Danmark (Denmark):



<https://consent.vwgroup.io/consent/v1/texts/carnet/dk/da/dataprivacy/latest/html> (da)  
Deutschland (Germany):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/de/de/dataprivacy/latest/html> (de)  
Eesti / Эстония (Estonia):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/ee/et/dataprivacy/latest/html> (et) /  
<https://consent.vwgroup.io/consent/v1/texts/carnet/ee/ru/dataprivacy/latest/html> (ru)  
Ελλάδα (Greece):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/gr/el/dataprivacy/latest/html> (el)  
España - Península y Baleares (Spain - Peninsula and Balearic Islands):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/es/es/dataprivacy/latest/html> (es)  
España - Islas Canarias, Ceuta y Melilla (Spain - Canary Islands, Ceuta and Melilla):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/ic/es/dataprivacy/latest/html> (es)  
France:  
<https://consent.vwgroup.io/consent/v1/texts/carnet/fr/fr/dataprivacy/latest/html> (fr)  
Hrvatska (Croatia):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/hr/hr/dataprivacy/latest/html> (hr)  
Ísland (Iceland):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/is/is/dataprivacy/latest/html> (is)  
Ireland:  
<https://consent.vwgroup.io/consent/v1/texts/carnet/ie/en/dataprivacy/latest/html> (en)  
Italia (Italy):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/it/it/dataprivacy/latest/html> (it)  
Japan:  
<https://consent.vwgroup.io/consent/v1/texts/carnet/jp/ja/dataprivacy/latest/html> (jp)  
Latvija / Латвия (Latvia):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/lv/lv/dataprivacy/latest/html> (lv) /  
<https://consent.vwgroup.io/consent/v1/texts/carnet/lv/ru/dataprivacy/latest/html> (ru)  
Lietuva / Литва (Lithuania):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/lt/lt/dataprivacy/latest/html> (lt) /  
<https://consent.vwgroup.io/consent/v1/texts/carnet/lt/ru/dataprivacy/latest/html> (ru)  
Luxemburg / Luxembourg:  
<https://consent.vwgroup.io/consent/v1/texts/carnet/lu/fr/dataprivacy/latest/html> (fr) /  
<https://consent.vwgroup.io/consent/v1/texts/carnet/lu/de/dataprivacy/latest/html> (de)  
Magyarország (Hungary):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/hu/hu/dataprivacy/latest/html> (hu)  
Македонија / Maqedoni (Macedonia):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/mk/mk/dataprivacy/latest/html> (mk) /  
<https://consent.vwgroup.io/consent/v1/texts/carnet/mk/sq/dataprivacy/latest/html> (sq)  
Malta:  
<https://consent.vwgroup.io/consent/v1/texts/carnet/mt/en/dataprivacy/latest/html> (en)  
Nederland (Netherlands):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/nl/nl/dataprivacy/latest/html> (nl)  
Norge (Norway):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/no/nb/dataprivacy/latest/html> (nb)  
Österreich (Austria):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/at/de/dataprivacy/latest/html> (de)  
Polska (Poland):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/pl/pl/dataprivacy/latest/html> (pl)  
Portugal:  
<https://consent.vwgroup.io/consent/v1/texts/carnet/pt/pt/dataprivacy/latest/html> (pt)  
România (Romania):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/ro/ro/dataprivacy/latest/html> (ro)  
Schweiz / Svizzera / Suisse (Switzerland):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/ch/de/dataprivacy/latest/html> (de) /

<https://consent.vwgroup.io/consent/v1/texts/carnet/ch/fr/dataprivacy/latest/html> (fr) /  
<https://consent.vwgroup.io/consent/v1/texts/carnet/ch/it/dataprivacy/latest/html> (it)  
Србија (Serbia):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/rs/sr/dataprivacy/latest/html> (sr)  
Shqipëri (Albania):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/al/sq/dataprivacy/latest/html> (sq)  
Slovenija (Slovenia):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/si/sl/dataprivacy/latest/html> (sl)  
Slovenská republika (Slovakia):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/sk/sk/dataprivacy/latest/html> (sk)  
Suomi (Finland):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/fi/fi/dataprivacy/latest/html> (fi)  
Sverige (Sweden):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/se/sv/dataprivacy/latest/html> (sv)  
Україна (Ukraine):  
<https://consent.vwgroup.io/consent/v1/texts/carnet/ua/uk/dataprivacy/latest/html> (uk)  
United Kingdom:  
<https://consent.vwgroup.io/consent/v1/texts/carnet/gb/en/dataprivacy/latest/html> (en)

## **XII. 'We Charge' charging service**

If you wish, you can be assisted with the conclusion of an optional We Charge charging contract. You will be taken to the We Charge website to do this. For this purpose, we pass on your country, language, the brand of your vehicle and/or your Volkswagen dealership, and your preferred charging plan from the invitation. Conclusion of a contract with We Charge does not take place via PDE.

The legal basis for the processing of your data by Volkswagen AG is the fulfilment of a contract to which you are party or the taking of measures at your request prior to conclusion of a contract (Article 6, paragraph 1, letter b GDPR).

More information on data processing in the context of use of We Charge from Elli can be found in the Privacy Policies in Chapter XIII.

## **XIII. Privacy Policies on data processing in the context of using services from VW Group Charging GmbH ('Elli')**

<https://www.elli.eco/en/privacy-policy> (en)

The Privacy Policy is also available in other languages.

## **C. Use of cookies and tracking tools**

### **General information**

Volkswagen AG uses various cookies on its websites. Cookies are small files containing configuration information which are stored on your device. Cookies can essentially be divided into three categories. Some cookies are essential for website functionality (known as functional cookies), some cookies make a website easier to use and save settings such as your language preferences (known as convenience cookies) and some cookies are used to create a pseudonymised usage profile (known as tracking cookies).

Only functional cookies are used by 'Pre-Delivery Enrollment'.

The functional cookies need to be processed to allow you to visit the website (see Article 6, paragraph 1, letter b GDPR). More information on our cookies is available in the Cookie guidelines.

## D. Your rights

You may assert the following rights vis-à-vis Volkswagen AG at any time free of charge. Additional information on exercising your rights can be found under Section E.

**Right to information:** You have the right to receive information from us (Article 15 GDPR) regarding the processing of your personal data.

**Right to rectification:** You have the right to request rectification (Article 16 GDPR) from us of any personal data concerning you 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 request 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. In addition, you may request erasure if we process your data on the basis of your consent and you withdraw 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 then request the restriction of processing of the data while the accuracy of the data is being verified.

**Right to object:** Insofar as the processing is based on an overriding legitimate interest, you have the right to object to the processing of your data. An objection is permissible if the processing either is carried out in the public interest or owing to a legitimate interest of Volkswagen AG or of a third party. If you object, we ask you to inform us of the reasons why you are objecting to data processing.

**Besides this, you also have the right to object to data processing for the purpose of direct marketing. This also applies to profiling where this is connected to direct marketing.**

**Right to data portability:** Provided that the data processing is based on consent or on the fulfilment of a contract and that it is also carried out using automated processing, you have the right to receive your data in a structured, commonly used and machine-readable format and to forward it to another data processor.

**Right to withdraw consent:** Insofar as the data processing is undertaken based upon consent, you have the right to withdraw your consent, with effect for the future 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 the State of Lower Saxony) regarding our processing of your data.

## E. Your points of contact

### Points of contact for the exercise your rights

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

### 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

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

**For the following countries, we are obliged to state their specific data protection officers:**

**Data protection officer in Albania**

Porsche Albania Sh.p.k Autostrada Tirane-Durres

Km. 3, Tirane,1051

**Data protection officer in Bosnia and Herzegovina**

Porsche BH d.o.o.

Sarajevo, BIH-71000 Sarajevo | Bulevar Meše Selimovića br 16

**Representative for the data controller responsible for data processing in Montenegro**

Porsche Leasing d.o.o.

Josipa Broza Tita 67, 81000 Podgorica, Montenegro

**Representative for the data controller responsible for data processing in Serbia**

PORSCHE SCG DOO BEOGRAD

Zrenjaninski put 11, 11210 Beograd

**Representative for the data controller responsible for data processing in the United Kingdom**

Volkswagen Group United Kingdom Limited

Yeomans Drive

Blakelands

Milton Keynes, MK14 5AN

United Kingdom

Version dated: February 2025; Version 2.10