

# Volkswagen ID Privacy Policy

This Privacy Policy contains important information on your rights in conjunction with the processing of your personal data and the legal grounds on which basis the processing of the personal data we collect in the context of use of the Volkswagen ID, or which you provide to us, takes place. We do not intend to collect data from children.

Please note that we – as a German company – are bound by German law including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) ('GDPR'), including when we process personal data concerning people whose permanent residence is outside of Germany. The information required in accordance with German law and the GDPR regarding the processing of your personal data can be found in Part I of this Privacy Policy. We may also be bound by national laws from other countries to a certain degree. If you have your permanent residence in a country named in Part II of this Privacy Policy, you will find more information therein.

## A. Controller

Thank you for using the Volkswagen ID user account ("Volkswagen ID"). The responsible office for the Volkswagen ID is Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany, [vw@volkswagen.de](mailto:vw@volkswagen.de), entered in the register of companies at Braunschweig District Court under no. HRB 100484 ("Volkswagen AG" or "we", "us" or "our").

Please find below information on how your personal data is collected, processed and used in conjunction with use of the Volkswagen ID.

## B. Processing of your personal data

### I. Processing of log data on the website

If you only visit the [Volkswagen ID landing page](#) without registering or logging in, we process the following log data concerning you:

- Your IP address
- The operating system you use
- Your web browser and the screen resolution you are using
- Date and time of your visit

Volkswagen AG processes this data on the basis of the legitimate interest (Article 6, paragraph 1, letter f GDPR) of Volkswagen AG in properly displaying the website to you. The log data is stored for a month and then erased.

### II. Cookies

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 the website easier to use (known as convenience cookies) and some cookies are used to create a pseudonymised usage profile (known as tracking cookies). The use of functional cookies is required to allow you to visit this website. Data is processed on the basis of contract fulfilment (providing the "Volkswagen ID" service, Article 6, paragraph 1, letter b GDPR). More information on our cookies is available in the [Cookie Policy](#).

### **III. Registration, use and management of Volkswagen ID**

If you register for a Volkswagen ID, you can log into numerous services, apps and websites from Volkswagen AG and third parties and manage your data at any time in the [Volkswagen ID user account](#). The purposes and nature of processing and the legal basis thereof are described in detail below.

#### **1. Registering for a Volkswagen ID**

To create a Volkswagen ID, you need to register with an email address and password. To determine which legal texts apply to you, you must also select a country preselected based on your IP address and a region. To verify your registration for the Volkswagen ID, we use what is known as the "double opt-in" procedure. We will send you an email at the email address provided requesting confirmation. Data is processed on the basis of contract fulfilment (providing the "Volkswagen ID" service, Article 6, paragraph 1, letter b GDPR). In the Volkswagen ID, you can also voluntarily give further personal data in addition to the obligatory email address and password fields. Volkswagen AG saves the data entered in the Volkswagen ID user account:

- Name
- Salutation and title
- Date of birth
- Address
- Telephone numbers
- Preferred language
- Profile picture

If you do not provide this additional information or you supply inaccurate information, it may not be possible for you to use other digital services in conjunction with your Volkswagen ID, if the information is required to use another such digital service. However, your ability to set up a Volkswagen ID will not be affected.

This data is saved in the Volkswagen ID on the basis of contract fulfilment (providing the "Volkswagen ID" service, Article 6, paragraph 1, letter b GDPR).

#### **2. Using the Volkswagen ID to log into services, apps and websites**

- You may use your Volkswagen ID to log into various services, apps and websites, which may be provided by us or also by third parties. To log in with your Volkswagen ID, you must log in using the email address you set during registration and your password. For some services, you can also log in with your Volkswagen ID by scanning a code displayed during the login process using your device.

If you use a Volkswagen AG app with a code scanner, you can scan the code with your device's code scanner. This also allows you to use the app login data you have already entered to log in on another device (e.g. vehicle). After scanning, you must confirm that you are also using the login

details to log in on another device (e.g. vehicle). You will be logged in on the additional device (e.g. vehicle) automatically.

If you are not using a Volkswagen AG app with a code scanner, you can scan the code using your device's camera and complete the login process in your browser. Following login, you must confirm that you are also using the login details to log in on an additional device (e.g. vehicle). You will be logged in on the additional device (e.g. vehicle) automatically.

The first time you log into a service, app or website you will be asked to grant the service, app or website access to the data required for the provisions of services from the Volkswagen ID. If you grant access, Volkswagen AG transfers the data from your Volkswagen ID to the provider of the service, app or website in question.

If Volkswagen AG provides services, apps or websites free of charge and you thereby do not enter into an ongoing commitment, the access of the service, app or website to personal data in your Volkswagen ID is based on consent (Article 6, paragraph 1, letter a GDPR), once you have given your consent to the service accessing this data.

If Volkswagen AG provides services, apps or websites on an ongoing basis in exchange for payment of remuneration and you thereby enter into an ongoing commitment, the access of the service, app or website to personal data in your Volkswagen ID is based on a contract (Article 6, paragraph 1, letter b GDPR), after you have authorised the service to access this data.

### **3. Managing the Volkswagen ID**

You may edit your data at any time in the [Volkswagen ID user account](#). To do this, you must log in with the email address you set during registration and your password.

You may also withdraw authorisation to access your personal data for individual or all services you have logged into with your Volkswagen ID. If Volkswagen AG provides services on an ongoing basis in exchange for payment of remuneration, the withdrawal of authorisation of data access may be made conditional upon the contract for the provision of services being terminated first. For services provided by third parties, this limitation does not exist, as there is a direct contractual relationship between you and the relevant third party. Withdrawal of authorisation of data access shall only have effect for the future. The relevant service provider is notified of the withdrawal of consent to the automatic link between the Volkswagen ID and the associated services provided by this service provider. However, it may occur that data which was already transmitted before withdrawal of consent is still processed by the relevant service provider if this is required to provide you with the associated services. You can find information on this in the Privacy Policy for the relevant service you use. You will find an overview of the services you have logged into with your Volkswagen ID in your [Volkswagen ID user account](#). You can also manage your authorisations there.

You have the option (with the exception of your email address and password) to also erase all or individual items of personal data from the Volkswagen ID, without erasing the entire Volkswagen ID. However, this does not affect the processing of personal data for the purposes of a service if you have granted it authorisation for access and personal data has therefore already been transferred to the service provider. The processing of your data in conjunction with the specific service is governed by the Privacy Policy for the service in question.

You also have the option to erase the Volkswagen ID as a whole in the "Account settings" menu option. If you do this, we shall erase your personal data, if and insofar as we are not obliged to save the data for other reasons (particularly for commercial or fiscal reasons). In that event, the data will be erased as soon as these grounds cease to exist. If the data is still required to settle claims arising from contracts with us, it shall not be erased until these claims have been settled.

## **IV. Dialogue Centre (customer services)**

Through the Customer Interaction Center (CIC), you have the option to consult us with queries regarding apps, services and websites from Volkswagen AG (e.g. by post, email, contact form or telephone). In this context, Volkswagen AG processes the personal data required to process your query and for the purposes of customer care (e.g. name, email address, address, telephone number, country and language). We also send you an email in conjunction with your issue in which we ask you for your express consent to the collection and processing of your personal data. More information on data protection when using the CIC can be found in the CIC Privacy Policy.

If the Customer Interaction Center (CIC) cannot resolve a query directly, it shall consult the Volkswagen ID team for processing and resolution purposes. The Volkswagen ID team processes the necessary personal data to handle your query.

## **V. Processing for the purposes of contractual COMMUNICATIONS**

Providing we identify that we can write to you for contractual reasons. We use the data from the Volkswagen ID and the associated services to inform you, for instance, of expiring licences) (Article 6, paragraph 1, letter b GDPR)

The data processed for this purpose includes the following:

- private contact and identification data (e.g. surname, first name, email address, telephone number)
- personal details (such as preferred partners)
- transaction data (e.g. parking sessions completed)
- vehicle data (e.g. built-in navigation system in stored vehicles)
- vehicle usage data (e.g. logbook, fill levels)
- contract data (e.g. ongoing contracts with associated services)
- IT usage data (e.g. last logins to services, use of functions)
- campaign data (e.g. time and content of recent campaign delivery)

All of the abovementioned data is also used for further analyses for the purposes of ensuring and monitoring data quality (e.g. identification of missing or corrupted data). The legal basis for this data processing is the legitimate interest in contractual communication in order to ensure flawless communication (Article 6, paragraph 1, letter f GDPR).

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

\*This section does not apply to people permanently resident in Germany

If you wish to receive advertising personally tailored to you from Volkswagen AG, you must consent to the processing of your data for this purpose (Article 6, paragraph 1, letter a GDPR). If you give your consent, Volkswagen AG processes personal data from the Volkswagen ID user account and associated services. The following data is processed once you have given your consent:

- private contact and identification data (e.g. surname, first name, email address, telephone number)
- personal details (such as preferred partners)
- transaction data (e.g. parking sessions completed)
- vehicle data (e.g. built-in navigation system in stored vehicles)
- vehicle usage data (e.g. logbook, fill levels)
- contract data (e.g. ongoing contracts with associated services)

- IT usage data (e.g. last logins to services, use of functions)
- Campaign data (e.g. time and content of recent campaign delivery)

All of the abovementioned data is also used for further analyses for the purposes of ensuring and monitoring data quality (e.g. identification of missing or corrupted data). The legal basis for this data processing is the legitimate interest in contractual communication in order to ensure flawless communication (Article 6, paragraph 1, letter f GDPR).

For individuals who are permanently resident in Germany, Volkswagen AG also processes location data (e.g. GPS data).

This data is processed for the following purposes:

Surveys and personally tailored advertising such as information, offers, discounts on new and existing products from Volkswagen AG (e.g. We services, vehicles and vehicle-related products), products from Volkswagen Group Charging GmbH (e.g. the Elli charging card) and products from national subsidiaries of Volkswagen Financial Services AG (e.g. leasing) and information on and invitations to service and loyalty programmes, delivery of customer magazines, customer and product events (e.g. test drives, product launches, product demonstrations), trade fairs and events. Volkswagen AG will contact you for these purposes using the contact details available via message (email, SMS, in-app notification, push notification) and by telephone. For individuals who are permanently resident in Belgium and Poland, Volkswagen AG will contact you via your selected channels.

In order to improve its advertising, Volkswagen AG pseudonymises and segments the personal data stored in your Volkswagen ID user account and associated services. If you have consented to advertising (Article 6, paragraph 1, letter a GDPR), Volkswagen AG uses the results of segmentation and makes a direct personal link with the data mentioned above. For more information on the pseudonymisation and segmentation of your data, please see the section "Segmentation for the purposes of advertising optimisation" in the Privacy Policy for the service you are using. You can find services you use and which are linked to the Volkswagen ID user account at any time in the [Volkswagen ID Portal](#) under the menu option "Connected apps".

To tailor advertising to you personally, Volkswagen AG processes data regarding your usage behaviour in the context of advertising delivery (e.g. opening emails and links within emails). Volkswagen AG uses this information to work out which topics are of more interest to you. This is used as a basis to ensure you receive advertising better suited to your needs in future (e.g. if you click on links/advertising in a particular section of an email, you will receive more emails on this topic).

For stored vehicles, Volkswagen AG processes the vehicle identification number and adds further equipment data for your vehicle to the above (raw) data and forms segments. The purpose of segments is to identify and analyse your individual interests and needs and contact you accordingly.

The processing of your data described takes place on the basis of consent granted by you (Article 6, paragraph 1, letter a GDPR) to personalised advertising by Volkswagen AG.

You may of course withdraw your consent to advertising (Article 6, paragraph 1, letter a GDPR) with respect to Volkswagen AG at any time, without giving reasons, with immediate effect for the future, e.g. by sending an email to [info-datenschutz@volkswagen.de](mailto:info-datenschutz@volkswagen.de), via the withdrawal link contained in the messages, via the contact details stated in the site notice or in the Volkswagen ID

user account. If you withdraw your consent, Volkswagen AG will no longer process your personal data for advertising purposes. However, said withdrawal does not affect the lawfulness of data processing prior to withdrawal.

Volkswagen AG will no longer process your personal data for advertising purposes if you have not been contacted for advertising purposes for three years. Volkswagen AG erases your data after five 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.

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

\*This section only applies to people permanently resident in Germany

If you wish to receive advertising personally tailored to you from Volkswagen AG, you must consent to the processing of your data for this purpose (Art. 6 Abs. 1 lit. a DSGVO). If you give your consent, Volkswagen AG processes personal data from the Volkswagen ID user account and associated services. The following data is processed once you have given your consent:

- private contact and identification data (e.g. surname, first name, email address, telephone number)
- personal details (such as preferred partners)
- transaction data (e.g. parking sessions completed)
- vehicle data (e.g. built-in navigation system in stored vehicles)
- vehicle usage data (e.g. logbook, fill levels)
- contract data (e.g. ongoing contracts with associated services)
- IT usage data (e.g. last logins to services, use of functions)
- campaign data (e.g. time and content of recent campaign delivery)

All of the abovementioned data is also used for further analyses for the purposes of ensuring and monitoring data quality (e.g. identification of missing or corrupted data). The legal basis for this data processing is the legitimate interest in contractual communication in order to ensure flawless communication (Article 6, paragraph 1, letter f GDPR).

For individuals who are permanently resident in Germany, Volkswagen AG also processes location data (e.g. GPS data).

This data is processed for the following purposes:

Surveys and personally tailored advertising such as information, offers, discounts on new and existing products from Volkswagen AG (e.g. We services, vehicles and vehicle-related products), products from Volkswagen Group Charging GmbH (e.g. the Elli charging card) and products from national subsidiaries of Volkswagen Financial Services AG (e.g. leasing) and information on and invitations to service and loyalty programmes, delivery of customer magazines, customer and product events (e.g. test drives, product launches, product demonstrations), trade fairs and events.

Volkswagen AG will contact you for these purposes using the contact details available via message (email, SMS, in-app notification, push notification) and by telephone. For individuals who are permanently resident in Belgium and Poland, Volkswagen AG will contact you via your selected channels.

To tailor advertising to you personally, Volkswagen AG processes data regarding your usage behaviour in the context of advertising delivery (e.g. opening emails and links within emails). Volkswagen AG uses this information to work out which topics are of more interest to you. This is used as a basis to ensure you receive advertising better suited to your needs in future (e.g. if you

click on links/advertising in a particular section of an email, you will receive more emails on this topic).

In order to improve its advertising, Volkswagen AG pseudonymises and segments the personal data stored in your Volkswagen ID user account and associated services. If you have consented to advertising (Article 6, paragraph 1, letter a GDPR), Volkswagen AG uses the results of segmentation and makes a direct personal link with the data mentioned above. For more information on the pseudonymisation and segmentation of your data, please see the section "Segmentation for the purposes of advertising optimisation" in the Privacy Policy for the service you are using. You can find services you use and which are linked to the Volkswagen ID user account at any time in the [Volkswagen ID Portal](#) under the menu option "Connected apps".

You also have the option to combine your usage data generated in the digital services with your data in the Volkswagen ID. This is done for the purposes of personalising digital services and advertising (e.g. personalised advertising campaigns). This processing only takes place if you have given us your consent (Article 6, paragraph 1, letter a GDPR).

Details on collecting usage data in the digital services can be found in the Privacy Policy for the relevant service. You may of course withdraw your consent to advertising (Article 6, paragraph 1, letter a GDPR) with respect to Volkswagen AG at any time, without giving reasons, with immediate effect for the future, e.g. by sending an email to [info-datenschutz@volkswagen.de](mailto:info-datenschutz@volkswagen.de), via the withdrawal link contained in the messages, via the contact details stated in the site notice or in the Volkswagen ID user account. If you withdraw your consent, Volkswagen AG will no longer process your personal data for advertising purposes. However, said withdrawal does not affect the lawfulness of data processing prior to withdrawal.

Volkswagen AG will no longer process your personal data for advertising purposes if you have not been contacted for advertising purposes for three years. Volkswagen AG erases your data after five 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.

## **VIII. Data processing in the context of personalised advertising and communications by Volkswagen AG**

\*This section applies irrespective of the permanent residence for individuals who grant their consent from 31/10/2024

If you wish to stay up to date and obtain information that is personally relevant for you from Volkswagen on current products and services from the world of Volkswagen via your contact options, you can consent to personalised advertising/communications from Volkswagen AG (Article 6, article 1, letter a GDPR). For this purpose, Volkswagen AG processes your data from use of the world of Volkswagen, creates an individual customer profile and personalises advertising /communications for you:

- The world of Volkswagen comprises all products and services from Volkswagen AG and companies associated with it (e.g. Volkswagen Financial Services AG, Volkswagen Group Charging GmbH (Elli)) and your dealerships and authorised workshops.
- Your data includes all data from products and services that you use with your central Volkswagen ID user account (Volkswagen ID) or are associated with it, as well as data relating to and from vehicles you have ordered or purchased. This includes, but is not limited to, all your
  - o Contact details (e.g. name, address, contact options),
  - o Contract data (e.g. related leasing or charging plan agreements),
  - o Vehicle master data (e.g. production and equipment data),
  - o Vehicle usage data (e.g. driving and usage behaviour as well as use of functions for all your

stored vehicles (e.g. infotainment system, software and function updates, driver assist systems, sensor data),

o Vehicle data (e.g. GPS positioning data, saved routes, visited locations),

o Online use and usage behaviour (e.g. use of our apps or mailings and clicking behaviour, campaign data, saved vehicle configurations, preferred partners, website use).

In processing your data, Volkswagen AG generates a personal customer profile about you. In this context, your data can be combined with socioeconomic data (e.g. education and training, career, social class) and publicly available information (e.g. weather data) and segmented and statistically evaluated in order to assess and improve the success of marketing and campaigns. Volkswagen AG also uses artificial intelligence (AI) for this purpose. In this context, AI refers to the use of suitable advanced technologies that enable us to efficiently analyse and make use of customer interactions and data. AI systems can process large quantities of data, recognise our customers' patterns of behaviour and probabilities, and, on the basis of these analyses, for instance, give you personalised recommendations.

-Personalised advertising/communication for you includes, in particular, information and offers relating to new and existing products including accessories, services, including notifications about new technical developments, Connect services, (connection) offers relating to leasing and financing options and insurance products, charging and mobility services products as well as maintenance and service packages, road tests, competitions, surveys, invitations to service and loyalty schemes and events from the world of Volkswagen (e.g. Volkswagen AG, Volkswagen Financial Services AG, Volkswagen Group Charging GmbH (Elli)). Volkswagen AG may use your contact options to contact you for this purpose (e.g. by phone, email, SMS, push notification (in-app/in-car)). If national regulations require an explicit selection of contact options, Volkswagen AG shall contact you via the channels selected by you.

All of the abovementioned data is also used for further analyses for the purposes of ensuring and monitoring data quality (e.g. identification of missing or corrupted data). The legal basis for this data processing is the legitimate interest in contractual communication in order to ensure flawless communication (Article 6, paragraph 1, letter f GDPR).

On the basis of a legitimate interest (Article 6, paragraph 1, clause 1, letter f GDPR), Volkswagen AG may also anonymise your data to develop machine pattern recognition methods. These methods help us better understand things like decision-making patterns and thus the interests of our customers. The anonymised data is not traceable and data from the pattern recognition methods is not assigned to the data of your Volkswagen ID at any time. The patterns created in this way help us send you recommendations and personalised marketing if you have granted us corresponding consent (Article 6, paragraph 1, clause 1, letter a GDPR).

You can find services you use and which are linked to the Volkswagen ID user account at any time in the Volkswagen ID Portal under the menu option "Connected apps". Please note that apps and applications whose permissions you cannot revoke are not displayed.

Your consent is voluntary. You can simply update it at any time or withdraw it with immediate effect for the future without providing a reason (e.g. by clicking on a withdrawal link in every personalised marketing message, in my Volkswagen ID user account or by sending an email to [info-datenschutz@volkswagen.de](mailto:info-datenschutz@volkswagen.de)). Volkswagen AG will then stop processing your data for the purposes of personalised marketing/communication.

Volkswagen AG will no longer process your personal data for advertising purposes if you have not been contacted for advertising purposes for three years. Volkswagen AG erases your data after five 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.



## **IX Processing for the purposes of advertising by the national sales company (importer) responsible for your country\***

\*This section does not apply to people permanently resident in Germany

If you wish to receive advertising personally tailored to you from the national sales company (importer) responsible for your country, you must consent to the processing of your data for this purpose (Article 6, paragraph 1, letter a GDPR). If you give your consent, Volkswagen AG processes personal data from the Volkswagen ID user account and associated services. The following data is processed once you have given your consent:

- private contact and identification data (e.g. surname, first name, email address, telephone number)
- personal details (such as preferred partners)
- transaction data (e.g. parking sessions completed)
- vehicle data (e.g. built-in navigation system in stored vehicles)
- vehicle usage data (e.g. logbook, fill levels)
- contract data (e.g. ongoing contracts with associated services)
- IT usage data (e.g. last logins to services, use of functions)
- campaign data (e.g. time and content of recent campaign delivery)

All of the abovementioned data is also used for further analyses for the purposes of ensuring and monitoring data quality (e.g. identification of missing or corrupted data). The legal basis for this data processing is the legitimate interest in contractual communication in order to ensure flawless communication (Article 6, paragraph 1, letter f GDPR).

This data is processed for the following purposes:

Surveys and personally tailored advertising such as information, offers, discounts on new and existing products from the national sales company (importer) responsible for your country (e.g. vehicles and vehicle-related products), the products from Volkswagen Group Charging GmbH (e.g. the Elli charging card) and products from national subsidiaries of Volkswagen Financial Services AG (e.g. leasing) and information on and invitations to service and loyalty programmes, delivery of customer magazines, customer and product events (e.g. road tests, product launches, product demonstrations), trade fairs and events.

In order to improve its advertising, Volkswagen AG pseudonymises and segments the personal data stored in your Volkswagen ID user account and associated services. If you have consented to advertising (Article 6, paragraph 1, letter a GDPR), Volkswagen AG uses the results of segmentation and makes a direct personal link with the data mentioned above. For more information on the pseudonymisation and segmentation of your data, please see the section "Segmentation for the purposes of advertising optimisation" in the Privacy Policy for the service you are using. You can find services you use and which are linked to the Volkswagen ID user account at any time in the [Volkswagen ID user account](#) under the menu option "Connected apps".

For the purposes of approaches by the national sales company (importer) responsible for your country, Volkswagen AG transfers relevant data (e.g. contact details) and results of relevant segmentation to the national sales company (importer) responsible for your country. The national sales company (importer) responsible for your country processes this data and results of segmentation at its own responsibility. The national sales company (importer) responsible for your country will contact you using the contact details available via message (email, SMS, in-app notification, push notification) and by telephone. For individuals who are permanently resident in Belgium, the UK, Ireland and Poland, the national sales company which is responsible for your

country will contact you via your selected channels. You can view the national sales company (importer) responsible for your country at the following link: <https://connect.volkswagen-we.com/connectivity.html>.

To tailor advertising to you personally, Volkswagen AG and the national sales company (importer) responsible for your country process data regarding your usage behaviour in the context of advertising delivery (e.g. opening emails and links within emails). Volkswagen AG processes this data to ensure that segmentation is highly relevant. The national sales company (importer) responsible for your country processes this data to ensure content is highly relevant. This is used as a basis to ensure you receive advertising better suited to your needs in future (e.g. if you click on links/advertising in a particular section of an email, you will receive more emails on this topic). You may of course withdraw your consent to advertising (Article 6, paragraph 1, letter a GDPR) with respect to the national sales company (importer) responsible for your country at any time, without giving reasons, with immediate effect for the future, e.g. by sending an email to the email address in the consent declaration, via the withdrawal link contained in the messages or by contacting Volkswagen AG, e.g. by email to [info-datenschutz@volkswagen.de](mailto:info-datenschutz@volkswagen.de), via the contact details stated in the site notice or in the [Volkswagen ID user account](#). If you withdraw your consent, Volkswagen AG and the national sales company (importer) responsible for your country will no longer process your personal data for advertising purposes. However, said withdrawal does not affect the lawfulness of data processing prior to withdrawal.

Volkswagen AG will no longer process your personal data for advertising purposes if you have not been contacted for advertising purposes for three years. Volkswagen AG erases your data after five 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.

## **X. Data processing in the context of personalised advertising and communications of the sales company (importer) responsible for your country**

\*This section applies irrespective of the permanent residence for individuals who grant their consent from 31/10/2024

If you wish to stay up to date and obtain information that is personally relevant for you from the importer on current products and services from the world of Volkswagen via your contact options, you can consent to personalised advertising/communications from the importer (Article 6, article 1, letter a GDPR).

By granting consent, you authorise the importer to process your data from use of the world of Volkswagen, generate an individual customer profile and personalise advertising for you. For this purpose, Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, analyses, segments and transmits your data mentioned above under VIII. Data processing in the context of personalised advertising and communications by Volkswagen AG and a customer profile generated by Volkswagen AG to the importer, which may process and combine this information with its personal data from you as a controller in its own right. Furthermore, the importer can make part of your data (such as the opening of emails and links contained therein) available to Volkswagen AG again in order to continuously improve the personalisation of advertising on its own responsibility.

More information on data processing by the importer, your rights and withdrawal options (e.g. via the Volkswagen user account (Volkswagen ID), withdrawal link in every personalised advertising message) can be found in the Privacy Policy of the importer responsible for you.

XI. Data from associated services from VOLKSWAGEN LEASING GMBH or EURO LEASING GMBH for the purposes of advertising\* \*This section only applies to people permanently resident in Germany

On the basis of your consent (Article 6, paragraph 1, letter a GDPR), Volkswagen AG obtains your stored personal data (e.g. concluded leasing agreements and contract status) from associated services of Volkswagen Leasing GmbH (e.g. the VW FS customer portal) which is combined with your Volkswagen ID user account for the purposes of improving products and advertising. We use this information to generate personalised advertising based on your current existing contract(s).

The following data is transmitted and processed once you have given your consent:

- private contact and identification data (e.g. surname, first name, email address, telephone number)
- personal details (such as preferred partners)
- vehicle usage data (e.g. logbook, fill levels)
- contract data (e.g. ongoing contracts with associated services)
- IT usage data (e.g. VW ID, login information)

You may of course withdraw your consent with respect to Volkswagen AG at any time, without giving reasons, with immediate effect for the future, e.g. by sending an email to [info-datenschutz@volkswagen.de](mailto:info-datenschutz@volkswagen.de), via the contact details stated in the site notice and in the Volkswagen ID user account.

Volkswagen AG deletes your data after 49 months or in accordance with legal requirements, for instance, once the purpose for which it was collected becomes invalid and if deletion is not contrary to any other retention obligations.

## **XII. General information on the analysis of data from Volkswagen ID\***

\*This section does not apply to people permanently resident in Argentina, India and Ukraine

Volkswagen AG is constantly striving to develop new products and services, improve the products and services it provides and optimise advertising for the purposes of marketing said products and services. Sound evaluation of the use of current products and services (analytics) is required for this purpose. Accordingly, Volkswagen AG processes data from the Volkswagen ID user account and associated services, such as

- pseudonymous identification data (e.g. a randomly generated pseudonymous user ID)
- user account data (such as preferred partners)
- transaction data (e.g. completed appointment scheduling)
- vehicle usage data (e.g. logbook, fill levels)
- contract data (e.g. vehicle equipment, ongoing contracts with associated services)
- IT usage data (e.g. last logins to services, use of functions)
- location data (e.g. truncated GPS data)

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

### **1. Analysis for the purposes of developing and improving products**

Volkswagen AG processes data from Volkswagen ID user account for the purposes of developing new products and services (by estimating adoption rates for new products, for example) and improving existing ones (such as by evaluating adoption rates for existing products). For stored vehicles, Volkswagen AG processes the vehicle identification number and adds further equipment data for your vehicle to the above data. 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. Processing of pseudonymous data is required as there are interactions between the Volkswagen ID user account and the relevant services. In these circumstances, the use of the pseudonym is absolutely essential in establishing a connection between the data underpinning the analysis from the Volkswagen ID user account and from the associated services.

Your data is processed as described on the basis of the legitimate interest of Volkswagen AG in offering you new and improved products and services (Article 6, paragraph 1, letter f GDPR). Volkswagen AG erases your pseudonymised data after five 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. For more information on the pseudonymisation and analysis of your data, please see the section "Analysis for the purposes of developing and improving products" in the Privacy Policy for the relevant service you are using. You can find services you use and which are linked to the Volkswagen ID user account at any time in the [Volkswagen ID user account](#) under the menu option "Connected apps".

## **2. Processing for the purposes of analysing sales activities**

Volkswagen AG is also constantly striving to optimise sales activity workflows and business processes, reduce associated costs and create bases for decision-making for sales policy-related activities.

To achieve this aim, Volkswagen AG processes the following data from the Volkswagen ID in order to obtain information on sales activities:

-Private contact and identification data (e.g. title, street address, postcode)

On the basis of this data, Volkswagen AG conducts in-depth analyses and generates reports and forecasts regarding incoming orders, sales and inventories. Volkswagen AG uses these reports as a medium- and long-term planning tool for better management of client structure.

Your personal data collected by Volkswagen AG and by third parties is processed by Volkswagen AG for the above purposes. The relevant third parties (e.g. Volkswagen dealerships, Volkswagen Financial Services AG) transfers your data to Volkswagen AG accordingly. For stored vehicles, Volkswagen AG processes the vehicle identification number and adds further equipment data for your vehicle to the above data. 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 and processed in Volkswagen AG's analysis systems once this pseudonymisation has taken place. The outcome of the analysis is anonymous.

For more information on the above processing, please note the Privacy Policy for the relevant third party. Your data is processed as described based on Volkswagen AG's legitimate interest in conducting analyses of sales activities (Article 6, paragraph 1, letter f GDPR).

Volkswagen AG erases your data after 10 years at the latest 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.

## **XIII. COMPLIANCE WITH LEGAL AND REGULATORY REQUIREMENTS**

For direct sales and the provision of digital services, we will process your personal data (first name, surname, address, country) for the purposes of preventing fraud and money laundering, for the prevention, combating and investigation of the financing of terrorism and asset endangering crimes as well as to check against European and international anti-terrorism lists, where this is legally permitted. The requirements for Volkswagen AG result in particular from legal obligations

(such as the money laundering act or the European embargo and terrorism regulations). Volkswagen AG may have a legitimate interest in the compliance and observance of requirements imposed by public and other competent governmental authorities - inside or outside your country of residence - so as not to expose Volkswagen AG and its representatives to criminal or civil sanctions.

The legal basis for the processing of your personal data for the purposes set out above is, in the case of legal obligations, Article 6, paragraph 1, letter c GDPR or, in the case of a legitimate interest, Article 6, paragraph 1, letter f GDPR.

For reasons of our legal and taxation obligations to retain data, we generally retain the personal data you provide for seven years after fulfilling the contract, but – if legally required – we will retain your personal data for up to 30 years after collecting the data to comply with our legal obligations.

#### **XIV. Recipients of your personal data and transfer to third countries**

If you use your Volkswagen ID to log into a service which is not provided by us, but by a third party, including, in some cases, providers of associated services that are not directly provided by us, these third parties shall only be transferred the personal data from your Volkswagen ID to whose transfer you gave your consent when you first logged into this service.

We commission service providers to facilitate use of Volkswagen ID and associated 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.

For the purposes of processing your personal data in the context of use of the Volkswagen ID, Volkswagen AG uses CARIAD SE, with headquarters in Germany, as a processor. CARIAD SE processes your data in a cloud that is operated by Microsoft Ireland Operations Ltd. in the European Union. It is not possible to rule out Microsoft Corporation or subsidiaries with headquarters in a state outside of the EU/EEA having access to the personal data, so CARIAD SE and Volkswagen AG have concluded corresponding EU standard contractual clauses (a contractual arrangement approved by the European Commission according personal data the same protection in the context of processing in non-EU countries as in the EU). CARIAD SE processes your personal data exclusively on our behalf and in accordance with our instructions as part of a contract data processing agreement.

The processing of your personal data (e.g. for the purposes of advertising optimisation and improving products) may also take place in an Amazon Web Services cloud operated by Amazon Web Services EMEA SARL ("Amazon") in the European Union. It is not possible to rule out Amazon Web Services, Inc. with headquarters in the US, having access to the personal data, so corresponding EU standard contractual clauses (a contractual arrangement approved by the European Commission according personal data the same protection in the context of processing in non-EU countries as in the EU) have been concluded. Amazon processes your personal data exclusively on our behalf and in accordance with our instructions as part of a contract data processing agreement. For the purposes of ensuring smooth operation and enhancement, Volkswagen AG also uses CARIAD SE, with headquarters in Germany, as a processor. For individuals permanently resident in Germany, Volkswagen AG uses Volkswagen Deutschland GmbH & Co. KG, with headquarters in Germany, as a processor.

In the context of the Customer Interaction Center (Customer Care) and communication, your personal data is processed in a cloud operated by Salesforce.com EMEA Limited ("Salesforce") in the European Union. It is not possible to rule out Salesforce.com, Inc., with headquarters in the US,

having access to the data, so corresponding EU standard contractual clauses (a contractual arrangement approved by the European Commission according personal data the same protection in the context of processing in non-EU countries as in the EU) have been concluded. The data processed is also protected by BCR (Binding Corporate Rules) of Salesforce. Salesforce processes your data exclusively on our behalf and in accordance with our instructions as part of a contract data processing agreement.

The processing of your personal data in the context of contractual communications is partly carried out via Škoda Auto a.s. (Address: tř. Václava Klementa 869, Mladá Boleslav II, 293 01 Mladá Boleslav). Škoda Auto a.s. processes your personal data exclusively on our behalf and in accordance with our instructions as part of a contract data processing agreement.

For the purposes of ensuring smooth operation and enhancement, Volkswagen AG also uses CARIAD SE, with headquarters in Germany, as a processor. For individuals permanently resident in Germany, Volkswagen AG uses Volkswagen Deutschland GmbH & Co. KG, with headquarters in Germany, as a processor. Personal data is only disclosed to the national sales company (importer) responsible for your country if you consent to the processing of your data for this purpose. In principle, your personal data is only transferred from Volkswagen AG to the national sales company (importer) responsible for your country in encrypted form. If the national sales company (importer) responsible for your country is in a country outside the European Union and the European Economic Area, we transfer your data to what are known as "third countries" under the GDPR. There may therefore be a lower level of protection for your personal data. To protect your data, Volkswagen AG and the national sales company (importer) have concluded EU standard agreements. You can view the national sales company (importer) responsible for your country at the following link: <https://connect.volkswagen-we.com/connectivity.html>

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

## **XV. DATA RETENTION**

As a rule, we shall only retain your personal data for as long as is reasonably necessary to fulfil the purposes for which we collected it, including the fulfilment of legal, official, fiscal, accounting or reporting requirements. In the event of a complaint, or if we reasonably assume 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.

To determine the appropriate retention period for personal data, we take into account the quantity, nature and sensitivity of personal data, the potential risk of harm due to unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, and whether we may achieve these purposes by other means, and the applicable statutory, official, fiscal or accounting requirements. Specific information regarding data storage in conjunction with the specific individual purposes of data processing may be found in the relevant sections above.

## **C. 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 in section D.

**Right of access to personal data:** You have the right to receive information from us regarding whether personal data concerning you is processed or not, and – if this is the case – to learn which personal data concerning you is being processed and to which third parties within and outside the EU your data (including contact data) is being passed on. You are also entitled to obtain a copy of

the personal data concerning you that is processed by us (Article 15 GDPR).

**Right to rectification:** You have the right to request that we rectify any of your personal data that is incorrect or incomplete (Article 16 GDPR).

**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. 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 or if you dispute the completeness of the personal data, and for a duration that enables the controller to review the completeness of the personal data. 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 IN THE FOLLOWING CASES: -IF THE PROCESSING IS FOR DIRECT MARKETING PURPOSES (INCLUDING PROFILING FOR DIRECT MARKETING PURPOSES).**

**-AN OBJECTION SHALL BE PERMISSIBLE IF THE PROCESSING (INCLUDING PROFILING) TAKES PLACE BASED ON THE FOLLOWING LEGAL BASES:**

**o THE PROCESSING IS NECESSARY FOR THE PERFORMANCE OF A TASK CARRIED OUT IN THE PUBLIC INTEREST OR IN THE EXERCISE OF OFFICIAL AUTHORITY VESTED IN US (ARTICLE 6, PARAGRAPH 1, LETTER E GDPR). THE PROCESSING IS NECESSARY TO SAFEGUARD THE LEGITIMATE INTERESTS OF US OR OF A THIRD PARTY (ARTICLE 6, PARAGRAPH 1, LETTER F GDPR) AND WE ARE UNABLE TO DEMONSTRATE COMPELLING REASONS FOR PROCESSING WORTHY OF PROTECTION WHICH OUTWEIGH YOUR INTERESTS, RIGHTS AND FREEDOMS OR THE PROCESSING TAKES PLACE FOR THE PURPOSES OF ASSERTING, EXERCISING OR DEFENDING LEGAL CLAIMS. IN THE EVENT OF OBJECTION, WE REQUEST THAT YOU INFORM US OF YOUR REASONS FOR OBJECTING TO DATA PROCESSING. YOU ALSO HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA FOR THE PURPOSES OF DIRECT MARKETING. THIS ALSO APPLIES TO PROFILING WHERE THIS IS CONNECTED TO DIRECT MARKETING.**

**Right to data portability:** If data processing is based on consent or contract fulfilment and is also undertaken while using automated processing, you have the right to receive your data in a structured, commonly used and machine-readable format and to transmit it to another data processor. In addition, you have the right to request that the personal data be forwarded directly from us to another controller.

**Right to withdraw consent:** Insofar as the data processing is undertaken based upon consent, you have the right to withdraw your consent to data processing, 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. This may be the data protection authority in your country of residence, for

instance. A list of all data protection authorities in the European Union and the European Economic Area can be found here: [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en)

**The right not to be subjected to a decision based on automated processing:** You have the right not to be subjected to a decision based on automated processing (a decision that is based on automated processing of your personal data and affects your vital interests), unless certain limited circumstances apply.

## **D. Your points of contact**

Points of contact for the exercise of your rights

For information on your points for contact for the 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: Datenschutzbeauftragter der Volkswagen AG [Volkswagen AG Data Protection Officer]

Berliner Ring 2, 38440 Wolfsburg, Germany

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

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