DATA PROTECTION DECLARATION FOR THE PROVISION OF VIN-RELATED FOD DATA BY VOLKSWAGEN GROUP INFO SERVICES AG FOR THE BRANDS VOLKSWAGEN PASSENGER CARS, VOLKSWAGEN COMMERCIAL VEHICLES, AUDI, SKODA (FUNCTIONS ON DEMAND DATA [RETAIL & IMPORTER])

This privacy policy informs you about the processing of personal data by Volkswagen Group Info Services AG to here stated purposes.

Volkswagen Group Info Services AG is the central interface for mobility data of several brands of the Volkswagen Group. The provision of the VIN-related FOD data to a specific car retailer or importer as the current owner/holder of the vehicle or to an online sales platform on behalf of a car retailer or importer as the current owner/holder of the vehicle is carried out centrally via us.

**A. Controller according to GDPR**

The entity responsible for processing your personal data is Volkswagen Group Info Services AG (see point D.). You can contact us at the following address:

Volkswagen Group Info Services AG

Berliner Ring 2

38440 Wolfsburg

Germany

volkswagen.group.data.business@cariad.technology

Commercial register number HRB 207876 (Braunschweig Local Court)

Website: https://drivesomethinggreater.com/

**B. Data Protection Officer**

Our data protection officer is available to you as a contact for all data protection-related concerns. Please direct your enquiries to:

Data Protection Officer of Volkswagen Group Info Services AG

Berliner Ring 2

38440 Wolfsburg

Germany

gis-privacy@cariad.technology

**C. Purpose of the processing**

Volkswagen Group Info Services AG provides certain VIN-related FOD data on vehicles of the Volkswagen Passenger Cars, Volkswagen Commercial Vehicles, Audi and Skoda brands to the specific car retailer or importer who is currently the owner/holder of this vehicle, or directly to an online sales platform on behalf of a car retailer or importer who is currently the owner/holder of the vehicle. This data is provided for the purpose of improving the accuracy of the valuation and marketing of Volkswagen Group vehicles, as well as the associated process improvement and efficiency increase in trading operations, including the necessary prior product testing.

Volkswagen Group Info Services AG receives the VIN-related FOD data from the brands of the Volkswagen Group and then makes this data technically available as a central interface to

mobility data of several brands of the Volkswagen Group to the specific car retailer or importer who is the current owner/holder of this vehicle, or to an online sales platform on behalf of the respective car retailer or importer as the current owner/holder of the vehicle.

**D. Data categories**

Volkswagen Group Info Services AG receives the following personal data from Volkswagen AG (Berliner Ring 2, 38440 Wolfsburg), Audi AG (Auto-Union-Str. 1, 85057 Ingolstadt), and ŠKODA AUTO a.s. (tř. Václava Klementa 869, 293 01, Mladá Boleslav) and forwards it to the car retailer or importer as the current owner/holder of a specific vehicle or online sales platform on behalf of the respective car retailer or importer:

- VIN,
- FOD data (e.g. function ID, status ID, activation date, expiry date, etc.),
- Name and address in the case of a sole proprietor (as a car retailer or importer) or in the event that the company name under commercial law (Section 17 HGB) or the specific company identifier is also a personal data within the meaning of the GDPR (e.g. company name of the entrepreneur is also their company name), and
- Contract number/documentation for the contract concluded between the car retailer or importer as current owner/holder of the vehicle and their selected online sales platform to ensure that only VIN-based Volkswagen FOD data with a valid contract can be provided directly to an online sales platform by Volkswagen Group Info Services.

**E. Legal bases**

The processing of personal data by Volkswagen Group Info Services AG is based on the legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR. Volkswagen Group Info Services AG is the central interface for the provision of mobility data from several brands of the Volkswagen Group and has a legitimate interest to process the data transmitted by the Volkswagen Group brands to Volkswagen Group Info Services AG for the provision of VIN-related FOD data to authorized car retailers or importers or sales platforms on behalf of the car retailer or importer for the purpose of improving the precision of residual value estimates and marketing Volkswagen Group vehicles and to provide these data centrally via our Data Hub (https://drivesomethinggreater.com/).

In the case of a contractual relationship with a car retailer or importer as a sole proprietor and data subjects to which the personal data pertain, the legal basis is the necessity for the fulfilment of the contract concluded with the car retailer or importer as a data subject (Art. 6 para. 1 lit. b GDPR).

**F. Data recipients**

Your data will be disclosed to the following data recipients for the purpose defined above:

- Car retailer or importer in rightful possession or ownership of the respective vehicle (controller);
- Processors of the respective car retailer or importer (e.g. online sales platform); and
- Processors of Volkswagen Group Info Services AG.

Further recipients or categories of recipients of personal data of Volkswagen Group Info Services AG are regularly listed with an updated privacy policy.

**G. Data source**

We receive your data from:

- Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany
- AUDI AG, Auto-Union-Str. 1, 85057 Ingolstadt,
- ŠKODA AUTO a.s., tř. Václava Klementa 869, 293 01, Mladá Boleslav.

**H. Storage period**

Generally, your personal data will not be stored by Volkswagen Group Info Services AG. The Volkswagen Group Info Services AG makes this data technically available as a central interface to mobility data of several brands of the Volkswagen Group from the respective brand to the specific car retailer or importer as the current owner/holder of the vehicle, or to an online sales platform on behalf of the respective car retailer or importer who is the current owner/holder of the vehicle. Therefore, the data is merely transferred without being stored by us.

For commercial accounting (German HGB), tax compliance (German AO), and data protection accountability (Art. 5 para. 2 DSGVO) reasons, Volkswagen Group Info Services AG only archives, in a revision-proof manner, that the data of the product "Functions on Demand Data [Retail & Importer] " (see point D.) was provided to a specific recipient for a specific VIN on the basis of a specific contract (contract number/documentation) – without storing the extracted FOD data (see point D.) itself.

**I. Your rights**

You may assert your rights against Volkswagen Group Info Services AG at any time and free of charge.

Further information on exercising your rights can be found on the website https://privacy.drivesomethinggreater.com.

**Right of access**

You have the right to access, i.e., to request confirmation from us as to whether and - if so - which personal data concerning you are being processed and to whom such data have been disclosed as a data recipient. In addition, you generally have the right to receive a copy of your personal data processed by us. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits the data technically but does not store the transmitted data itself (see point H.).

**Right to rectification**

You have the right to demand that we correct any personal data relating to you that is incorrect or incomplete. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits the data but does not store the transmitted data itself (see point H.).

**Right of erasure**

You have the right to demand the deletion of your data if the conditions set out in Art. 17 GDPR apply. According to this, you can, for example, demand the deletion of your data if it is no longer necessary for the purposes for which it was collected. You can also request deletion if we process your data on the basis of your consent and you revoke this consent. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits the data but does not store the transmitted data itself (see point H.).

**Right to restriction of processing**

You have the right to request the restriction of the processing of your data if the conditions of Art. 18 GDPR are met. This is the case, for example, in case you dispute the accuracy of your data. You can then request the restriction of processing for the duration of the verification of the accuracy of the personal data. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several Volkswagen Group brands, only transmits the data but does not store the transmitted data itself (point H.).

**Right to data portability**

If the data processing is based on consent or the performance of a contract, and if it also involves the use of automated processing, you have the right to obtain your data in a structured, common and machine-readable format and to have it transferred to another controller. In addition, you have the right to have the personal data transferred directly from us to another controller. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits the data but does not store the transmitted data itself (see point H.).

**Right of objection**

If we process your data on the basis of legitimate interests, you have the right to object to the processing of your data at any time on grounds relating to your particular situation. If your objection relates to data processing for direct marketing purposes, you have a general right to object, which we will implement without giving reasons.

**Right of withdrawal**

If data processing is based on consent, you have the right to revoke your consent at any time free of charge with effect for the future by sending an email to volkswagen.group.data.business@cariad.technology.

**Notice in accordance with Art. 11 GDPR**

We would like to point out that in many cases we, as Volkswagen Group Info Services AG, are not able to identify the additional vehicle users of a vehicle or the main vehicle users and that we are not obliged under Art. 11 GDPR to obtain or process additional information in order to identify data subjects.

If you assert rights against us, we must verify your status as a data subject according to GDPR and may ask you for further information if necessary. This also serves to ensure that we may not violate the rights of third parties when releasing personal data, according to GDPR data subject rights.

**Automated individual decisions**

There is no automated decision-making according to Art. 22 GDPR.

**Right to lodge a complaint with a supervisory authority**

You also have the right to complain to a supervisory authority about the processing of your data by us. The competent supervisory authority for Volkswagen Group Info Services AG is:

The State Commissioner for Data Protection of Lower Saxony,

Prinzenstraße 5,

30159 Hannover,

poststelle@lf.niedersachsen.de.

Status January 2025