

## **PRIVACY POLICY FOR THE PROVISION OF CHARGING DATA BY VOLKSWAGEN GROUP INFO**

### **SERVICES AG FOR THE BRAND VOLKSWAGEN PASSENGER CARS,VOLKSWAGEN COMMERCIAL**

#### **VEHICLES, AUDI, ŠKODA, SEAT, AND CUPRA (CHARGING CONTROL)**

This privacy policy informs you about the processing of your personal data by Volkswagen Group Info Services AG.

Volkswagen Group Info Services AG is the central interface to mobility data of several brands of the Volkswagen Group. We provide your mobility data centrally to the service provider you have selected.

#### **A. Controller according to GDPR**

The entity responsible for processing your personal data is Volkswagen Group Info Services AG. You can reach us at the following address:

**Volkswagen Group Info Services AG**

**Berliner Ring 2**

**38440 WOLFSBURG GERMANY**

[gis-support@cariad.technology](mailto:gis-support@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 data protection-related concerns. Please direct your inquiries to:

**Data Protection Officer of Volkswagen Group Info Services AG**

**Berliner Ring 2**

**38440 WOLFSBURG GERMANY**

[gis-privacy@cariad.technology](mailto:gis-privacy@cariad.technology)

#### **C. Purpose of data processing**

The Volkswagen Group Info Services AG provides charging data for your vehicle from the brands Volkswagen Passenger Cars, Volkswagen Commercial Vehicles, Audi, Škoda, SEAT, and CUPRA to a service provider selected by you.

This data provision enables you to successfully use digital services agreed upon with your service provider to optimize your energy consumption and charging costs. Volkswagen Group Info Services AG makes basic vehicle charging data (e.g., state of charge, target state of charge) available to the service provider you have commissioned, along with the ability to transmit charging commands to schedule and optimize the charging process. This serves the management and optimization of vehicle fleets and the management and control of the vehicle status. Additionally, the product allows the service provider to perform an initial check to determine whether the data subject meets all requirements for using the service.

**The data processing is carried out for the following purposes:**

##### **1. Optimization of charging behavior and energy consumption**

The goal is to intelligently manage the charging process of electric vehicles to use energy

efficiently, reduce costs, and support grid stability. Relevant vehicle data is processed and charging commands are transmitted for this purpose.

- Provision of charging information (e.g., state of charge, target state of charge)
- Control and scheduling of charging processes
- Optimization of energy consumption and charging costs

## 2. Access check and usage authorization

Before using the service, it is verified whether the data subject meets all technical and legal requirements. This verification is carried out by the service provider.

- Initial check of usage authorization
- Validation of technical requirements for charging optimization

## D. Data categories

Volkswagen Group Info Services AG receives the following categories of personal data from Volkswagen AG (Berliner Ring 2, 38440 Wolfsburg), Audi (Auto-Union-Str. 1, 85057 Ingolstadt), ŠKODA AUTO a.s. (tř. Václava Klementa 869, 293 01, Mladá Boleslav), and SEAT CUPRA, S.A.U. (Autovía A-2, km 585, 08760 Martorell), and forwards them to the service provider with whom you have entered into a contract:

- Charging profile
- Charging power
- Charging status
- Charging & departure timer
- Mileage
- Vehicle Identification Number (VIN)

Volkswagen Group Info Services AG receives the contract number/documentation for the contract concluded between the service provider and you from the service provider with whom you have concluded a contract, in order to ensure that the above-mentioned data is only provided by Volkswagen Group Info Services AG if there is a valid contract between the service provider and you.

## E. Legal basis

The processing of personal data by Volkswagen Group Info Services AG is based on legitimate interest (Art. 6(1)(f) GDPR) and the necessity for the performance of the contract (Art. 6(1)(b) GDPR) concluded between you, as the registered primary user of the vehicle, and the service provider you have selected for the use of digital services aimed at optimizing your energy consumption and charging costs.

Volkswagen Group Info Services AG serves as the central interface for the provision of mobility data from various brands within the Volkswagen Group and has a legitimate interest in making the data

transmitted by these brands available to authorized service providers via our Data Hub (<https://drivesomethinggreater.com/>).

In cases where other users operate the vehicle under the primary user account, identification by us is generally not possible. Should we become aware of such usage in any conceivable way, the processing of personal data of these additional vehicle users will also be based on the legitimate interest of Volkswagen Group Info Services AG (Art. 6(1)(f) GDPR).

#### **F. Data recipient**

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

- the service provider you selected;
- data processor on behalf of the service provider you selected;
- data processor on behalf of Volkswagen Group Info Services AG.

#### **G. Data source**

**We have received your data from the following sources:**

- Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg
- Audi, Auto-Union-Str. 1, 85057 Ingolstadt
- ŠKODA AUTO a.s., tř. Václava Klementa 869, 293 01, Mladá Boleslav
- SEAT CUPRA, S.A.U., Autovía A-2, km 585, 08760 Martorell
- As well as from the service provider with whom you have entered into a contract.

#### **H. Storage duration**

Generally, your personal data will not be stored by Volkswagen Group Info Services AG. The Volkswagen Group Info Services AG - as a central interface for mobility data of several brands of the Volkswagen Group - provides your data from the respective brand to the respective service provider selected by you in the declaration of consent. Therefore, the data is merely transferred through without being stored by us.

For commercial accounting (German HGB), tax compliance (German AO) and data protection accountability (Art. 5 para. 2 GDPR) reasons, Volkswagen Group Info Services AG only archives in a revision-proof manner that the data of the "Charging Data" product (see point D.) for a specific VIN was provided to a data recipient without storing the provided charging data (see point D.) itself.

The contract number/documentation and the Vehicle Identification Number (VIN) will be stored for a maximum period of 4 years after the termination of the contract with the data subject.

#### **I. Your rights**

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

For more information on how to exercise your rights, please visit: <https://drivesomethinggreater.com/legal-notice/privacy-notice/data-hub>

#### **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 which data has been disclosed as 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 data 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 data but does not store the transmitted data itself (see point H.).

#### **Right to erasure**

You have the right to demand the deletion of your data if the conditions specified in Art. 17 GDPR are met. 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. In addition, if we process your data based on your consent and you revoke this consent, you can demand its deletion. 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 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, if 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 brands of the Volkswagen Group, only transmits data but does not store the transmitted data itself (see point H.).

#### **Right to data portability**

If the data processing is based on consent or the performance of a contract, and if it is also carried out using automated processing, you have the right to receive 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 transmit that data to another controller without hindrance 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 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 the data processing is based on your consent, you have the right to revoke your consent at any time free of charge with effect for the future by email to:

gis-support@cariad.technology

#### **Notice according to Article 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 and that we are not obligated to obtain or process additional information in order to identify data subjects in accordance with Article 11 GDPR.

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 providing personal data according to GDPR data subject rights.

Automated individual decisions

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

#### **Right of appeal**

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 Hanover,  
[poststelle@lfd.niedersachsen.de](mailto:poststelle@lfd.niedersachsen.de)**

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