

## **PRIVACY POLICY FOR THE PROVISION OF VIN-RELATED RECALL-CAMPAIGN DATA BY VOLKSWAGEN GROUP INFO SERVICES AG FOR THE VOLKSWAGEN PASSENGER VEHICLES, VOLKSWAGEN COMMERCIAL VEHICLES, AUDI, SKODA, SEAT AND CUPRA BRANDS (VIN RECALL FOR FLEET)**

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. The provision of VIN-related recall-campaign data to a specific fleet operator as the current owner/holder of the vehicle, or fleet management software provider on behalf of a fleet operator is carried out centrally by us.

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

The entity responsible for processing your personal data is Volkswagen Group Info Services AG. 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](mailto: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 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. Data Protection Representative**

Volkswagen Group Info Services AG has appointed a Data Protection Representative in the United Kingdom. Details of our representative and contact details are as follows:

Data Protection Representative of Volkswagen Group Info Services AG  
Volkswagen Group United Kingdom Limited  
Yeomans Drive  
Blakelands  
Milton Keynes, MK14 5AN  
United Kingdom  
Email: ukrepresentative@vwg.co.uk

### **D. Purpose of the data processing**

Volkswagen Group Info Services AG provides certain VIN-related recall-campaign data on vehicles of the Volkswagen Passenger Cars, Volkswagen Commercial Vehicles, Audi, Skoda, Seat, and CUPRA brands to the specific fleet operator who is currently the owner/holder of this vehicle, or to a fleet management software provider on behalf of the fleet operator. This data is provided for the purpose of the assurance of recall-free vehicle remarketing and efficient and thoroughly secure fleet management with the maintenance of high qualitative standards.

Volkswagen Group Info Services AG receives the VIN-related recall-campaign 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 fleet operator who is the current owner/holder of this vehicle, or fleet management software provider on behalf of such a fleet operator as owner/holder of this vehicle.

### **E. Data categories**

Personal data only exists in the case of a fleet operator as a data subject within the meaning of the GDPR. This is the case for sole proprietor, or in the event that the company name under commercial law (Section 17 HGB) or the specific company identifier is also personal data within the meaning of the GDPR (e.g. the name of the entrepreneur is also their company name).

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), 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 fleet operator as the current owner/holder of a specific vehicle, or fleet management software provider on behalf of a fleet operator as owner/holder of this vehicle:

1. VIN;
2. Recall- campaign data (e.g., campaign ID, start of campaign, campaign type, etc.);
3. Name and address of the fleet operator;

4. In case a fleet management software provider is integrated: Contract number/documentation for the contract concluded between the fleet operator and their fleet management software provider, to ensure that VIN-based Volkswagen Group recall data is provided directly to a fleet management software provider by Volkswagen Group Info Services AG only if a valid contract exists between the fleet operator and the fleet management software provider.

## **F. Legal basis**

The processing of personal data by Volkswagen Group Info Services AG is based on the legitimate interest (Art. 6 para. 1 lit. f GDPR) and, in the case of a contract between Volkswagen Group Info Services AG or a fleet management software provider with a fleet operator as a data subject, on the basis of the necessity for the performance of this contract (Art. 6 para. 1 lit. b GDPR).

Volkswagen Group Info Services AG is the central interface for the provision of mobility data of several brands of the Volkswagen Group and has the legitimate interest to process the data transmitted by the Volkswagen Group brands to Volkswagen Group Info Services AG for the provision of VIN-related recall-campaign data to authorized fleet operators, or fleet software provider on behalf of a fleet operator for the purpose of the assurance of recall-free vehicle remarketing and efficient and thoroughly secure fleet management with the maintenance of high qualitative standards of fleet vehicles and to provide these data centrally via our Data Hub (<https://drivesomethinggreater.com/>).

## **G. Data recipients**

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

- fleet operator in possession/holding of the respective vehicle (data controller);
- data processor on behalf of the respective fleet operator (e.g. fleet software provider); and
- data 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.

## **H. 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,
- SEAT CUPRA, S.A.U., Autovía A-2, km 585, 08760 Martorell.

## **I. Storage period**

Generally, your personal data will not be stored by Volkswagen Group Info Services AG. The Volkswagen Group Info Services AG makes your data technically available as a central interface to mobility data of several brands of the Volkswagen Group from the respective brand to the specific

fleet operator as the current owner/holder of the vehicle, or fleet software provider on behalf of a fleet operator. 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 data of the product 'VIN Recall for Fleet' (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 specific transferred data as content itself.

## **J. 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 has 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, 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 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](mailto: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 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 Hannover,

[poststelle@lf.niedersachsen.de](mailto:poststelle@lf.niedersachsen.de)

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