

DATA PROTECTION DECLARATION FOR THE PROVISION OF VIN-RELATED VEHICLE MASTER DATA BY VOLKSWAGEN GROUP INFO SERVICES AG FOR THE BRANDS VOLKSWAGEN PASSENGER CARS, VOLKSWAGEN COMMERCIAL VEHICLES, AUDI, SKODA, SEAT/CUPRA (VIN SPECIFICATION FOR REPAIR & MAINTENANCE)

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 VIN-related vehicle master data on the vehicle you are the holder or owner of, for the purpose of correct damage assessment and for support with repair and maintenance requirements is carried out centrally via us. This data can be provided either directly to the workshop or damage assessor selected by you as the vehicle holder/owner or via a software provider as data intermediary that retrieves this data from Volkswagen Group Info Services AG on behalf of the workshop, insurance company or damage assessor selected by you.

**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](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 enquiries 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](mailto:ukrepresentative@vwg.co.uk)

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

Volkswagen Group Info Services AG provides certain VIN-related vehicle master data on vehicles of the Volkswagen Passenger Cars, Volkswagen Commercial Vehicles, Audi, Seat/Cupra and Skoda brands to a workshop, insurance company or damage assessor selected by you as the vehicle owner/holder for the purpose of correct damage assessment, and for support with repair and maintenance requirements

It is possible that the workshop, insurance company or damage assessor selected by you has commissioned a software provider to retrieve and process the data required for the correct damage assessment, and for support with repair and maintenance requirements from Volkswagen Group Info Services AG as the central interface to mobility data of several brands of the Volkswagen Group.

Volkswagen Group Info Services AG receives the VIN-related vehicle master data from the brands of the Volkswagen Group and then makes these data technically available as a central interface to mobility data of several brands of the Volkswagen Group either directly to the workshop, or damage assessor selected by you, or to a software provider on behalf of the workshop, insurance company or damage assessor that act as processors under data protection law.

### **E. 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), 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 it to the above mentioned recipients:

- VIN,
- Vehicle master data (e.g., model year, model number, transmission type, fuel type, etc.);

Volkswagen Group Info Services AG receives the following personal data from your contractual partner

- Contract number/documentation for the contract concluded between you and the workshop, insurance company or damage assessor selected by you as the vehicle holder/owner of the vehicle, to ensure that only VIN-based Volkswagen FOD data with a valid contract is provided to workshops, insurance companies or damage assessors by Volkswagen Group Info Services for the purpose of correct damage assessment, and for support with repair and maintenance requirements

## **F. Legal bases**

The legal bases for the processing of personal data within the scope of this product by Volkswagen Group Info Services AG are:

The necessary performance of the contract concluded by you (Art. 6 para 1 lit. B GDPR) for a damage assessment, and for support with repair and maintenance requirements for your vehicle with the workshop, insurance company or damage assessor selected by you as the vehicle holder / owner of the vehicle; as well as the legitimate interest of Volkswagen Group Info Services AG (Art. 6 para. 1 lit. f 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 a legitimate interest in providing the data transmitted by the brands of the Volkswagen Group to Volkswagen Group Info Services AG for the purpose of correct damage assessment and for support with repair and maintenance requirements of Volkswagen Group vehicles 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:

- workshops, insurance companies and/or damage assessors (separate data controller);
- data processors of the respective workshop, insurance company or damage assessor selected by you as the vehicle owner; (e.g. software providers); and
- data processors of Volkswagen Group Info Services AG.

## **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 this data technically available as a central interface to mobility data of several brands of the Volkswagen Group from the respective brand for the purpose of correct damage assessment, and for support with repair and maintenance requirements to a workshop, insurance company or damage assessor selected by you as the

vehicle owner/holder. The data may be provided via a software provider that collects this data from Volkswagen Group Info Services AG on behalf of the workshop, insurance company or damage assessor selected by you, which operates as a processor under data protection law. At Volkswagen Group Info Services AG, the data is simply forwarded without being stored.

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 "VIN Specification for Repair & Maintenance" (see point D.) was provided to a recipient for a specific VIN on the basis of a specific contract (contract number/documentation) – without storing the extracted vehicle master data (see point D.) 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 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](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 the 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](mailto:poststelle@lf.niedersachsen.de).

