

The English translation serves only for information purposes. The German version is solely binding.

Website Data Protection Information

In the course of using this website, personal data relating to you will be processed by the respective controller and stored for the period of time required to fulfil the specified purposes and legal obligations. In the following, you will be informed about what data is involved, how it is processed and what rights you have in this regard, especially with regard to the General Data Protection Regulation (EU) 2016/679 (GDPR). Data that are marked as mandatory are either required by law or contract or are necessary for the conclusion of the contract. Failure to provide the requested data may have legal or economic disadvantages for you. For example, you may not be able to continue your application process.

1. General information on data processing when using the website

When you visit this website, the respective controller processes your data that it collects in the course of using the website or that you provide to it in the process (hereinafter: "your data"). In order to provide the website and services of the controller, your data is shared with processors and other contractors (e.g. from the industries: Logistics, Telecommunications, Receivables Management, Marketing, Printing, Market and Opinion Research). In addition, the data controller exchanges your data in each case with the companies of the Volkswagen Financial Services Group (e.g. companies from the sectors: Banking, Leasing, Insurance, Mobility and Fuel/Service Cards - hereinafter: "VW Financial Services Group"). There is also an exchange with public authorities, publicly accessible sources and, where applicable, with insurers, credit institutions, payment service providers and cooperation partners. The processing and exchange of your data takes place in particular insofar as

- this is necessary for the performance of a contract that you have concluded or for the implementation of pre-contractual measures that take place at your request (Art. 6 para. 1 sentence 1 (b) GDPR). In particular, data processing is necessary to ensure the completeness and accuracy of the data as well as its digitisation and, if necessary, to perform the contract or its initiation;
- this is necessary for the fulfilment of a legal obligation (Art. 6 para. 1 sentence 1 (c) GDPR). In particular, the data processing is necessary for the fulfilment of the legal obligation of the controller in the area of data security;
- this is necessary to protect the legitimate interests of the controller or those of a third party (Art. 6 para. 1 sentence 1 (f) GDPR). In particular, data processing is necessary to ensure the provision and functionality of the website and to be able to provide you with the portals and services, to ensure and optimise informed decisions by the parties involved, also in your interest, and to ensure a permanently high quality and uniformity of customer advice by the person responsible and the VW Financial Services Group. In addition, data processing is necessary to protect the assets of the controller, the VW Financial Services Group or its customers and to fulfil internal group administration and accounting purposes. Furthermore, the data processing is necessary to analyse and evaluate the interests and preferences of the customers and to create general evaluations for internal purposes (e.g. for business monitoring and optimisation of the products);
- this is covered by your voluntarily given consent (Art. 6 para. 1 sentence 1 (a) GDPR).
- this is covered by your voluntarily given consent (Art. 9 para. 2 (a) GDPR) or another legal basis (Art. 9 para. 2 (b) to (j) GDPR), if your data also contains special categories of personal data pursuant to Art. 9 para. 1 GDPR (e.g. health data).

2. Third country transfer

The controller may also transfer your data to a country outside the European Economic Area (EEA). This transfer takes place in compliance with the special requirements of Art. 44 - 49 GDPR, whereby the adequate level of protection is guaranteed in particular either by an adequacy decision of the European Commission pursuant to Art. 45 GDPR, concluded EU standard contractual clauses pursuant

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to Art. 46 para. 2 (c) and (d) GDPR or binding internal data protection regulations pursuant to Art. 47 GDPR. You may access and view the EU standard contractual clauses on the website of the European Commission or ask the controller directly and receive a copy.

3. General storage periods

The general duration of the storage of your data depends on a possible conclusion of a contract via the website and on the termination of the contract.

If you have enquired about products/services of the controller but have not initiated a contract, your data will be stored for a maximum of 6 months after the last contact between you and the controller.

Otherwise, the storage period begins at the end of the calendar year of the last event within the scope of this business relationship and the following periods apply:

- If a contract has been initiated but not concluded, your data will be stored for a maximum of 3 years.
- Your personal data relevant to a contract, in particular data relevant under tax law, will be deleted after expiry of the statutory retention periods, at the latest 10 years after termination of the contract. The general storage period of your personal data may exceptionally be up to 30 years, insofar as this is necessary for the assertion, exercise or defence of legal claims.

You will be informed of different storage periods for individual data categories within this data protection information at the end of the respective section. The storage periods may be extended in exceptional cases if further storage is legally permissible (e.g. for the protection of assets or to safeguard and, if necessary, enforce the rights of the data controller) or necessary (e.g. retention period for advertising consent or in the context of tax audits).

4. Use of a contact form

You have the possibility of contacting the controller via a web form, in which the controller processes the data you have entered in order to be able to process your request. The processing for this purpose takes place insofar as

- this is necessary for the performance of the contract you have concluded or for the implementation of pre-contractual measures that take place at your request (Art. 6 para. 1 sentence 1 (b) GDPR). In particular, data processing is necessary to ensure the completeness and accuracy of the data as well as its digitisation and to perform the contract;
- this is necessary to protect the legitimate interests of the person responsible or those of a third party (Art. 6 para. 1 sentence 1 (f) GDPR). In particular, the data processing is necessary to be able to process your request;
- this is covered by your voluntarily given consent (Art. 6 para. 1 sentence 1 (a) GDPR);
- this is covered by your voluntarily given consent (Art. 9 para. 2 (a) GDPR) or another legal basis (Art. 9 para. 2 (b) to (j) GDPR), if your data also contains special categories of personal data pursuant to Art. 9 para. 1 GDPR (e.g. health data).

5. Customer profiles

The controller creates your individual customer profile on the basis of your data and other data relevant to advertising and assigns this to specific customer segments. The controller uses these results for the target group-specific control of the type, content and frequency of advertising measures. In particular, this may result in you receiving or not receiving certain advertising in contrast to other customers. This happens insofar as

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- this is necessary to protect the legitimate interests of the controller or those of a third party (Art. 6 para. 1 sentence 1 (f) GDPR). In particular, data processing is necessary to better tailor offers to you based on simple evaluations of usage data and obvious preferences and to avoid unwanted or inappropriate offers (limited evaluations);
- this is covered by your voluntarily given consent (Art. 6 para. 1 sentence 1 (a) GDPR) (extensive evaluations).

6. Individual advertising measures

On this website, the data controller processes your data for direct advertising, both for its own offers and for offers from the VW Financial Services Group, your trading partner and the manufacturer, importer or sales company of your vehicle or from other authorised third parties (e.g. companies from the sectors: Banking, Leasing, Insurance and Mobility), and exchanges your data with the aforementioned recipients for this purpose. In addition, the data controller uses online marketing services to display interest-based advertising content to certain target groups when they use online services. For this purpose, the controller transmits your data (e.g. e-mail address) in encrypted form (hash value) to the online marketing services. These match the hash value of the transmitted data with the hash values of their own user data for identification. This happens in each case insofar as

- this is necessary to protect the legitimate interests of the controller or a third party (Art. 6 para. 1 sentence 1 (f) GDPR). In particular, data processing is necessary in order to be able to send you offers tailored to you in a timely and reliable manner and to display online advertising tailored to you;
- this is covered by your voluntarily given consent (Art. 6 para. 1 sentence 1 (a) GDPR).

An exchange with other recipients only takes place insofar as this is covered by your voluntarily given consent (Art. 6 para. 1 sentence 1 (a) GDPR).

7. Cookies

The controller uses cookies on the website. These are small files that your browser automatically creates and that are stored on your device when you visit the website. Cookies do not cause any damage to your device and do not contain any viruses, Trojans or other malware.

Information is stored in the cookie that arises in each case in connection with the specific device used. This does not mean, however, that the controller will gain direct knowledge of your identity.

Most browsers accept cookies automatically. However, you can configure your browser so that no cookies are stored on your computer or a notice always appears before a new cookie is created. However, the complete deactivation of cookies may have the result that you cannot use all the functions of the website. Cookies are used to statistically record the use of the offer and to make it more user-friendly and effective for you. For example, the controller uses so-called session cookies to recognise that you have already visited individual pages of the website.

The data stored in them (e.g. session ID, time of page view) are automatically deleted at the end of your visit. Some cookies, on the other hand, remain stored on your device until you delete them or the validity period defined for the cookie expires.

Furthermore, the controller uses tracking measures on this website in order to ensure a needs-based design and ongoing optimisation of the website as well as to statistically record its use. In addition, the controller, as well as other companies of the Volkswagen Financial Services Group, e.g. Euro Leasing GmbH, use the data for the optimal layout of advertising content.

The use of cookies takes place insofar as

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- this is absolutely necessary for technical reasons or for the functionality or optimisation of the website or the service you have requested (§ 25 para. 2 no. 2 German Telecommunications Telemedia Data Protection Act).
- this is covered by your voluntarily given consent (§ 25 para. 1 German Telecommunications Telemedia Data Protection Act; Art. 6 para. 1 sentence 1 (a) GDPR);
- this is covered by your voluntarily given consent (§ 25 para. 1 German Telecommunications Telemedia Data Protection Act; Art. 9 para. 2 (a) GDPR) if your data also contains special categories of personal data according to Art. 9 para. 1 GDPR (e.g. health data).

You can revoke your consent once given at any time with effect for the future, either via the Cookie Consent Tool and/or via the link to the third-party provider listed at the end of each individual analysis cookie. In both cases, an opt-out cookie will be set that prevents the future collection of your data when visiting this website. If you revoke the processing of your data via the Cookie Consent Tool, this will only apply in this browser and only for the website of the controller and will be stored on your device.

a. Adobe Analytics

The controller uses Adobe Analytics on the website, a web analytics service provided by Adobe Systems Software Ireland Limited, 4-6 Riverwalk, Citywest Business Campus, Dublin 24, Ireland (hereinafter: "Adobe"). In this context, pseudonymised usage profiles are created and cookies are used.

The information generated by the cookie about your use of our website will be transmitted to and stored by Adobe on servers in the United Kingdom. This information may also be transferred to third parties if this is required by law or if third parties process this data on our behalf. Under no circumstances will your IP address be merged with other Adobe data. The IP addresses are anonymised so that an allocation is not possible (IP masking).

If you log in to the website with access data, the controller combines the information collected via Adobe Analytics about your use of our website with other data relating to you that the controller has stored in its customer systems in order to be able to serve you optimised advertising content tailored to your needs, which is also in the legitimate interests of the controller.

You can allow the collection of the data generated by the cookie and related to your use of the website (incl. your IP address) as well as the processing of this data by Adobe by consenting to the collection by Adobe Analytics (opt-in cookie). You can revoke your consent once given at any time under the following link: <https://www.adobe.com/de/privacy/opt-out.html>

Further information on data protection in connection with Adobe Analytics can be found [here](#).

b. Google Ads Remarketing

The controller uses Google Ads Remarketing by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter "Google") on the website to serve advertisements.

With the remarketing function, the controller can present individualised advertisements to the users of the website on other websites within the Google advertising network (e.g. "Google Search" or YouTube). For this purpose, the interaction of the users on our website is analysed, e.g. which offers the user was interested in, in order to be able to display targeted advertising to the users on other sites even after they have visited our website.

For this purpose, Google stores the cookie on your device. Your IP address may be transmitted to Google. The processing of your personal data (IP address) associated with the use of Google Remarketing as well as the analysis and documentation of your usage behaviour is carried out for the purpose of gaining additional information about the visitors to our website in order to enable an individualised advertising approach, also on third-party websites.

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According to Google, all data used for tracking (in particular cookies) are deleted after 540 days at the latest.

You can allow the collection of data generated by the cookie and related to your use of the website (including your IP address) as well as the processing of this data by Google by consenting to the collection by Google Ads Remarketing (opt-in cookie). You can revoke your consent once given in various ways:

- By adjusting your browser software accordingly.
- By deactivating cookies or device recognition in Google's advertising settings at the following link: <http://www.google.com/settings/ads>).
- By installing the plug-in provided by Google at the following link: <https://www.google.com/settings/ads/plugin>.
- By accessing the Network Advertising Initiative deactivation page (<https://optout.networkadvertising.org/?c=1>) or managing the use of device identifiers via the device settings.

Please note that you may have to repeat the above steps after deleting an opt-out cookie on your terminal device.

Additional data processing will only take place if you have consented to Google linking your web and app browsing history to your Google account and using information from your Google account to personalise ads. In this case, if you are logged into Google while visiting the website, Google will use your data to create and define target group lists for cross-device remarketing.

Further information on data processing by Google can be found [here](#) and [here](#).

8. Data subjects' rights

You have the right:

- to request access to and information about your personal data processed by the controller in accordance with Art. 15 GDPR;
- demand the rectification of inaccurate or incomplete personal data stored by the controller without delay in accordance with Art. 16 GDPR;
- to request the erasure of your personal data stored by the controller in accordance with Art. 17 GDPR, provided that the legal requirements are met;
- to request the restriction of the processing of your personal data in accordance with Art. 18 GDPR, provided that the legal requirements are met;
- in accordance with Art. 20 GDPR to receive your personal data that you have provided to the controller in a structured, common and machine-readable format or to request the transfer to another controller;
- revoke your consent at any time in accordance with Art. 7 para. 3 GDPR;
- complain to a supervisory authority in accordance with Art. 77 GDPR. As a rule, you can contact the supervisory authority of your usual place of residence or our company headquarters.

Right of objection

You have the right to object to the processing of your personal data in accordance with Art. 21 GDPR, insofar as there are grounds for doing so that arise from your particular situation or the

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objection is directed against general direct marketing or direct marketing tailored to you. In the latter case, you have a general right to object, which we fulfil regardless of your particular situation.

Controller: Vehicle Trading International (VTI) GmbH:

Postal address of the data controller and the data protection officer:

Vehicle Trading International (VTI) GmbH

Gifhorner Street 57

38112 Brunswick

Germany

If you wish to exercise your right to object or your data protection rights, simply send an e-mail to [betroffenenrechte.GWC\[at\]vwfs.com](mailto:betroffenenrechte.GWC@vwfs.com). Further contact with the data protection officer: [dsb.GWC\[at\]vwfs.com](mailto:dsb.GWC@vwfs.com)

9. Current version and amendments of this data protection information

This data protection information is currently valid and has the status April 2022.

Due to the further development of the website and offers on it or due to changed legal or official requirements, it may become necessary to update this data protection information. You can access and print out the current data protection information on the website at any time.