Data protection information

As part of the use of this website, your personal data will be processed by the respective controller and stored for the duration required for meeting the defined purposes and statutory obligations. In the following, we inform you about what types of personal data are involved, how they will be processed and what your corresponding rights are with respect to the General Data Protection Regulation (EU) 2016/679 (GDPR).

1. General information on data processing when using the website

When you visit our website, we process your data, which we collect as part of the use of the website or which you provide to us (hereinafter: "Your Data"). To provide our website and services, your data will be processed with processors and other service providers (e.g. in the sectors: logistics, telecommunications, receivables management, marketing, printing). In addition, the controller exchanges your data with the companies in the Volkswagen Financial Services Group (e.g. companies from the banking, leasing, insurance, mobility and fuel / service cards sectors - hereinafter referred to as "VW Financial Services Group"). The processing and exchange of Your Data takes solely to the extent that

- this is necessary for the fulfillment of the contract with you or for the implementation of pre-contractual measures that take place in response to your mediation (Art. 6 para. 1 s. 1 lit. b GDPR);
- this is necessary for compliance with a legal obligation (Art. 6 para. 1 s. 1 lit. c GDPR).
 Data processing is particularly necessary to fulfill our legal obligation in the area of data security;
- this is necessary for the purposes of the Controller's legitimate interest or those of a third party (Art. 6 para. 1 s.1 lit.f GDPR). Data processing is particularly necessary to ensure the availability and functionality of our website and to be able to provide you with our portals and services;
- this is covered by your voluntarily given consent (Art. 6 para. 1 s. 1 lit. a GDPR).

2. Third-country transmission

The Controller also can use processors and other contractors (e.g. in the sectors: information and communicationtechnology) based outside the European Economic Area (EEA). The transfer of your data takes places in compliance with the specific requirements of Art. 44 – 49 GDPR, the appropriate level of protection being provided either by an adequacy decision of the European Commission in accordance with Art. 45 GDPR or concluded EU standard contractual clauses pursuant to Art. 46 para. 2 lit. c and d DSGVO. The EU standard contractual clauses can be accessed and viewed on the European Commission's website, or requested and copied directly from the respective Controller.

3. General storage periods

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

- If the customer informs himself about our products/services, but not initiated a contract, your personal data will be erased 6 months after the last contact between you and the Controller.
- Your personal data relevant for a brokered contract, in particular data relevant under tax law, will be deleted after expiration of the statutory retention periods, but no later than 10 years after the end of the contract. In exceptional cases, the general

duration of storage of your personal data can be up to 30 years, to the extent that this is necessary for the establishment, exercise or defence of legal claims.

This Data Protection Information draws attention to differing erasure periods for individual data categories, where appropriate, at the end of the category in question.

4. Use of a contact form

You have the option of contacting the respective controller via a web form, in which the controller processes the data you have entered (e.g. personal details, contact details, email address) in order to be able to process your request. The processing for this purpose takes place as far

- this is necessary for the fulfillment of the contract with you or for the implementation of pre-contractual measures that take place in response to your mediation (Art. 6 para. 1 s. 1 lit. b GDPR);
- this is necessary to safeguard our legitimate interests or those of a third party (Art. 6 para. 1 s.1 lit.f GDPR). Data processing is particularly necessary in order to process your request;
- this is covered by your voluntarily given consent (Art. 6 para. 1 s. 1 lit. a GDPR).

5. Marketing measures

The Controller processes your data for the purpose of direct marketing, in so far as the Controller is entitled to do so, and forwards your data to the Data Processor and service provider in this context (e.g. a company in these industries: (online) marketing, printing, logistics and marketing and market and opinion research), to the extent that

- this is necessary for the purposes of the Controller's legitimate interests or those of a third party (Art. 6 Para. 1 S. 1 lit. f GDPR). The data processing is necessary in particular in order to provide you with customised offers in a timely and reliable manner;
- this is covered by your voluntarily given consent (Art. 6 Para. 1 S. 1 lit. a GDPR).

6. Cookies

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

Information is stored in the cookie, which results in connection with the specific device used. However, this does not mean that we are immediately aware of your identity.

Most browsers accept cookies automatically. However, you can configure your browser so that no cookies are stored on your computer or that a message always appears before a new cookie is created. However, the complete deactivation of cookies can mean that you cannot use all functions of our website.

1. Session-Cookies:

Cookies are used to statistically record the use of our offer and to make it more user-friendly and effective for you. For example, we use so-called session cookies to recognize that you have already visited individual pages on our website.

The data stored in it (e.g. session ID, time of page access) will be automatically deleted after your visit. Some cookies, however, remain stored on your end device until you delete them or until the period of validity defined for the cookie expires.

Processing for the above-mentioned purposes takes place insofar as this is necessary to safeguard our legitimate interests or those of a third party (Art. 6 para. 1 s. 1 lit. f GDPR). Data processing is particularly necessary for the optimization of our website and services.

2. Analysis-Cookies:

We use tracking measures on our website to ensure the needs-based design and continuous optimization of our website and to statistically record its use. We also use the data for the optimal display of advertising content. The processing takes place insofar as this includes your voluntarily given consent (Art. 6 Para. 1 S. 1 lit. a GDPR) or to safeguard our legitimate interests or those of a third party (Art. 6 Para. 1 S. 1 lit.. f GDPR).

a) Adobe Analytics

We use Adobe Analytics on our website, a web analysis service of 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 is transferred to an Adobe server in Ireland and stored there. This information may also be transferred to third parties if this is required by law or if third parties process this data on behalf. Under no circumstances will your IP address be merged with other Adobe data. The IP addresses are anonymized so that an assignment is not possible (IP masking).

You can allow the collection of the data generated by the cookie and relating to your use of the website (including your IP address) and the processing of this data by Adobe by consenting to the collection by Adobe Analytics (opt-in cookie). You can revoke your once given consent at any time with effect for the future. An opt-out cookie will then be set, which prevents the future collection of your data when visiting this website. The opt-out cookie is only valid in this browser and only for our website and is stored on your device. The following link provides an explanation of how you can deactivate data collection on your computer or mobile device: 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

On our website we use Google Ads Remarketing from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter "Google") to place advertisements.

With the remarketing function, we can present individualized advertisements to users of our website on other websites within the Google advertising network (eg "Google Search" or YouTube). For this purpose, the interaction of users on our website is analyzed, e.g. which offers the user was interested in, in order to be able to show users targeted advertising on other pages even after visiting our website.

For this purpose, Google saves the cookie on your device. If necessary, your IP address will 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 behavior is carried out for the purpose of gaining additional information about the visitors to our website in order to also target individual advertising on third party websites enable.

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

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

- By setting your browser software accordingly.
- By deactivating cookies or device recognition in the Google advertising settings under the following link: http://www.google.com/settings/ads.
- By installing the plug-in provided by Google under the following link: https://www.google.com/settings/ads/plugin.
- By calling up the deactivation page of the Network Advertising Initiative
 (https://optout.networkadvertising.org/?c=1) or managing the use of the device IDs via the device settings.

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

Any further data processing will only take place if you have agreed with Google that your web and app browser history will be linked to your Google account by Google and that information from your Google account will be used to personalize advertisements. In this case, if you are logged in to Google while visiting our 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 <u>here</u> and <u>here</u>.

7. Affected rights

You have the right:

- pursuant to Art. 15 GDPR to request information from the Controller regarding personal data undergoing processing by the Controller
- pursuant to Art. 16 GDPR to obtain rectification without undue delay of inaccurate personal data or have your personal data stored by the Controller completed;
- pursuant to Art. 17 GDPR to obtain from the Controller the erasure of your personal data, provided the legal requirements are met;
- pursuant to Art. 18 GDPR to obtain from the Controller restriction of processing your personal data, provided the legal requirements are met;
- pursuant to Art. 20 GDPR to receive the personal data concerning you which you have provided to the Controller, in a structured, commonly used and machine-readable format or to obtain transmission of those data to another Controller;
- pursuant to Art. 7 para. 3 GDPR to withdraw your consent from the Controller at any time;
- pursuant to Art. 77 GDPR to lodge a complaint with a supervisory authority. As a rule, you can contact the supervisory authority for your habitual residence, place of work or our registered offices.

Should you wish to exercise your rights as a data subject, simply send an email to: betroffenenrechte.GWC@vwfs.com. Any further contact to the data protection officer: dsb.GWC@vwfs.com.

Right of objection

Pursuant to Art. 21 GDPR you have the right to object at any time to processing of personal data concerning you, on grounds relating to your personal situation or where the objection is directed against general direct marketing or direct marketing customised for you. In the latter case you have a general right to object which we will implement without you having to invoke a particular personal situation.

The Controller

Correspondence address of the Controller and Data Protection Officer: **Volkswagen Financial Services AG**Gifhorner Straße 57
38112 Braunschweig

If you want to exercise your right of objection, simply send an email to widerspruch.GWC@vwfs.com.

8. Data security

All of the data personally submitted by you through our website will be encrypted with the commonly used and secure TLS Standard (Transport Layer Security). TLS is a secure and proven standard which is also used, for instance, in online banking. You can recognise a secure TLS connection, for instance by the letter'sappended to http (i.e. https://..) in the address bar of your browser or by the padlock icon in the lower area of your browser.

We also use suitable technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.

9. Updates and changes of this data protection information

This information about data privacy protection is currently valid and has the version April 2021.

By further developing our website and offerings through the site or due to changing statutory and regulatory requirements, it might be necessary to amend this Data Privacy Statement. The currently valid Data Privacy Statement can be viewed on our website and printed at any time.