Privacy Policy for Sales, Services and Marketing Measures

In the following, we are providing you with information on the processing of your personal data by us and your rights and remedies in accordance with the data protection regulations.

Version: September 2026

A. Who is responsible for data processing?

Volkswagen AG
Berliner Ring 2, 38440 Wolfsburg, Germany
kundenbetreuung@volkswagen.de

entered in the register of companies at Braunschweig District Court under HRB 100484 ("Volkswagen AG")

B. Collection, processing and use of your data

I. What data do we process and what sources does it come from?

We process data that we generally receive from you. Relevant personal data is generally:

- **Private contact details and basic data**
  - Name, address, email, telephone number
  - Identification data: date/location of birth, sex/gender
- **Job-related organisation data**
  - Contact details (job-related): name, address, email, telephone number, company
  - Allocation within the work organisation: division, department, employee number, responsibilities
- **Data on personal circumstances and preferences**
  - Personal preferences: preferred brands, models
- **IT usage data**
  - User and login data: user name, roles, authorisations
  - Logging data: technical logs, login times
  - Software and hardware data: IP address, MAC address
- **Basic vehicle data and vehicle identification**
  - Vehicle identification data: VIN, vehicle registration number, production number
  - Basic vehicle data: e.g. model, engine output, exterior colour
- **Data on vehicle history and workshop visits**
  - Vehicle health and operation: engine speed, speed, driver messages
  - Data for processing of guarantee and service: contract and request data
  - Event memory data: counter readings, event and readiness codes
- **Vehicle usage data (vehicle usage and operating data)**
  - Vehicle interior sensors: fatigue and alcohol warnings, seat occupancy
  - Environment and driving sensor system: pedestrian detection, parking aid
  - Online vehicle data: vehicle health and operating data
  - Online transmitted event memory data: counter readings, event and readiness codes
  - V2X data: driving data for communication with other road users
  - Accident data: collision force, direction of travel

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  - Smartphone integration: data transfer between vehicle and smartphone
  - Infotainment and navigation usage data: online traffic information, navigation
  - Convenience settings: mirror settings, seat heating
  - Location data: positioning data including time stamp
- **Transactions/contract data**
  - Contract metadata: purchased products, sales contract, guarantees
  - Power of attorney and representation: legal representation rules, power of attorney (Prokura)
- **Financial data**
  - Credit history data: solvency assessments, credit scores
  - Financial circumstances and details of ownership: financial statements, credit data, debts
  - Payment data and bank information: account details, credit card number
- **Particularly sensitive personal data (Article 9 GDPR)**
  - Data concerning health

In addition, we process data that we have received from authorities by permissible means (e.g. due to statutory authorisation, for the execution of orders, for the fulfilment of contracts or based on your consent) to the extent that this is required to meet statutory or official obligations.

Furthermore, we process data that we have collected by permissible means from publicly accessible sources (such as registers of companies or associations, company records, credit agencies including Schufa, the press, publications or the internet) and other sources (such as local authorities, other persons authorised by you or public authorities), and that we are permitted to process.

II. Is it mandatory to make data available?

You are only required to provide data that is required for the initiation, justification, performance or termination of a business relationship or if we are legally required to collect such data. Without this data, we will generally have to reject the conclusion of a contract or the execution of an order or may not be able to perform an existing contract or service.

If we ask you for your consent for the processing of your personal data, this consent is always voluntary. However, if you do not give your consent, we may not be able to provide a specific service if the respective service cannot be provided without this data.

III. For what purposes and based on which legal basis do we process your data?

1. General information on the legal bases of data processing

Volkswagen processes personal data exclusively for specified and legitimate purposes and only to the extent that a legal basis for this exists in accordance with data protection regulations. Which legal basis is applicable in a specific case is determined by the particular purpose and specific processing context.

Processing based on consent takes place for clearly defined purposes about which the data subject was informed in advance; consent can be withdrawn at any time with effect for the future without affecting the legality of the processing that has taken place up to this point (Article 6(1)(a) GDPR).

In addition, Volkswagen processes personal data to the extent that this is necessary for the initiation, performance or processing of contractual relationships or to take steps prior to entering into a contract (Article 6(1)(b) GDPR) or to fulfil statutory obligations, such as those arising from requirements under commercial, tax or regulatory law (Article 6(1)(c) GDPR).

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In strictly limited exceptional cases, processing may be necessary to protect vital interests (Article 6(1)(d) GDPR).

Furthermore, Volkswagen processes personal data to the extent that this is necessary for the purposes of its own legitimate interests or the interests of third parties and no overriding legitimate interests of the data subject oppose this (Article 6(1)(f) GDPR). The legitimate interests relevant in each case are named in the overview table below.

If special categories of personal data are processed, this takes place exclusively under the additional prerequisites of Article 9(2) GDPR and therefore only in exceptional cases strictly limited by law.

2. Data processing

Purpose	Processing examples	Legal bases under the GDPR
Customer care, customer service, mobility services and customer communication	Identification of existing customer contacts for the consistent processing of customer requests and the avoidance of multiple processing operations. Processing of customer requests, in particular in relation to service, vehicle or mobility topics. Provision and coordination of assistance or mobility services, in particular in exceptional situations. Performance of customer-related information, service or communication measures to improve the user experience. Invitation to/organisation of customer events. Provision of information on digital products and vehicle functions to process customer requests and to advise and assist customers.	Article 6(1)(a) GDPR Article 6(1)(b) GDPR Article 6(1)(f) GDPR Processing serves to correctly allocate customer contacts and avoid multiple processing operations, to efficiently process customer requests and to ensure consistent, high-quality customer service across all sales, service and mobility processes. This includes, in particular, the correct allocation of operations, the verifiability of processing statuses, the coordination of assistance and mobility services and the continuous improvement of service-related processes.
Performance of consent-based marketing, information and customer retention measures	Sending of newsletters and similar electronic marketing communications. Performance of customer-related information, service or communication measures to improve the user experience.	Article 6(1)(a) GDPR

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	Invitation to and organisation and holding of customer events. Management of granted declarations of consent and processing of unsubscribe actions and withdrawals of consent.	
Warranty, guarantee and goodwill	Review and processing of performance requests during the use phase, including the assessment of technical anomalies. Decision regarding gestures of goodwill, in particular in cases of unusual or unforeseeable damage. Support for the technical assessment of repair, service or condition information to enable entitlements to be categorised correctly.	Article 6(1)(b) GDPR Article 6(1)(f) GDPR Processing serves the correct, consistent and economically viable review and processing of warranty, guarantee and goodwill requests. It enables the technical assessment of circumstances, the review of eligibility requirements, the avoidance of unauthorised claims and assurance of consistent decision-making standards across the Group in the context of product and manufacturing responsibility.
Product monitoring in the context of product liability, quality assurance and field campaigns	Examination of technical features to clarify possible causes of faults or develop remedies. Performance of technical field campaigns to maintain or restore vehicle functionality and safety. Monitoring and assessment of vehicle behaviour and service results to identify the main areas of technical faults and enhance product quality. Inclusion of average consumption values to assess efficiency parameters in the context of quality assurance. Establishment of facts, communication with authorities and technical implementation of recall and field campaigns, including the	Article 6(1)(c) GDPR Article 6(1)(f) GDPR Volkswagen AG processes personal data to exercise its responsibility for the product as the manufacturer over the entire lifecycle of the vehicles. This includes, in particular, the monitoring of products in the field, the evaluation of technical anomalies, the analysis of possible causes of faults as well as the documentary verifiability of the respective vehicle health and the derivation, performance and tracking of field campaigns and remedies, including recall campaigns and service actions. Processing serves the early detection and assessment of safety- and quality-related circumstances, the assurance of

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	management of software, function and control unit updates. Management, performance and tracking of field and recall campaigns, including notification of customers and documentation. Documentation and archiving of the vehicle-specific build status	quality and function standards by the manufacturer and the limitation of risks in relation to liability, safety and reputation. In this respect, the processing of personal data may also be necessary to identify affected vehicles, inform customers and meet official information and cooperation obligations in relation to product safety measures and field campaigns.
Product monitoring and analysis for the purposes of product improvement, product development and market research	Evaluation of voluntary customer feedback regarding vehicle behaviour and the use of vehicle functions. Analysis of customer feedback regarding vehicle functions, software behaviour and service experience. Merging customer feedback provided voluntarily with vehicle-related information for in-depth product monitoring. Assessment of individual customer comments on product or function anomalies.	Article 6(1)(a) GDPR
Performing contracts in special situations	Performance of special contract models in relation to specific vehicle programmes or buyer groups (such as adapted vehicles) Performance of individual contract, ordering or change processes requiring special agreements. Review and implementation of services or benefits arising from special funding or custom arrangements.	Article 6(1)(b) GDPR Article 6(1)(a) in conjunction with Article 9(2)(a) GDPR (consent)
Production planning and logistics	Review of the technical feasibility of a selected vehicle configuration.	Article 6(1)(b) GDPR Article 6(1)(f) GDPR

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	Comparison and allocation of ordering information for production planning. Preparation of quotation, purchase order, invoicing in direct sales. Management and tracking of production progress up until delivery. Logistics and delivery, including the processing of replacement part orders.	Processing serves the economic, technically reliable planning and management of production and logistics processes that have been agreed across the Group.
Analysis, management and statistics	Analysis of sales- and service-related information to improve corporate management and market supervision. Preparation of statistical assessments and forecasts to support strategic decisions. Evaluation of structural developments in the dealer and service network to optimise cooperation. Provision of analytical foundations to assess the efficiency and performance of the dealer or service network. Analysis and evaluation of brokered contract and service cases to review the quality, correctness and regularity of brokering services as well as to identify atypical patterns, anomalies or deviations, in particular to protect against unauthorised access, prevent misuse and fraud and avoid unauthorised warranty or guarantee claims. Evaluations regarding the consistent and misuse-free application of special or funding conditions as well	Article 6(1)(f) GDPR Processing serves the business management and analysis and enhancement of sales, service and market processes. It enables Volkswagen AG to analyse structural developments within market and sales networks as well as brokered contract and service cases, establish management and comparative KPIs and ensure the quality, correctness and regularity of brokering services. As part of this analysis, aggregated and structured operation data is evaluated to identify atypical patterns, anomalies or deviations. This is used in particular to protect against unauthorised access and prevent misuse and fraud as well as for the early detection and avoidance of unauthorised warranty or guarantee claims. The processing takes place primarily at aggregated or pseudonymised level and is restricted to the data required for this. Due to the described purpose limitation, data minimisation, access restrictions and the

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	as to support internal review and inspection measures.	technical and organisational measures used, the legitimate interests of Volkswagen AG in ensuring correct management, risk mitigation and misuse prevention outweigh the interests of the data subjects.
Forwarding of data to third parties via vehicle-related system interfaces	Processing of vehicle financing, leases and insurance, in particular for the purposes of preparing a quotation, performing a contract and ongoing contract management by engaged financial service and insurance providers. Performance of damage, residual value and vehicle assessments – for example, for the purposes of claim settlement, determining residual value or assessment in case of contract termination or vehicle recycling. Facilitation of fleet management solutions, including the management, use and billing of vehicles by authorised commercial fleet operators or fleet service providers. Provision of vehicle-related information on the use of supplementary vehicle functions or services provided by external providers or cooperation partners.	Article 6(1)(b) GDPR Article 6(1)(f) GDPR Processing serves the legitimate interest of Volkswagen AG to use vehicle-related information in a targeted manner to offer reliable, integrated and functional services in relation to the vehicle. For this purpose, it is necessary to forward specific vehicle-related data in a structured and controlled manner to carefully selected external partners to the extent that this is required for the proper implementation of these services. Volkswagen AG hereby ensures that the use of vehicle-related information is consistently managed and clearly delimited.
Fulfilment of statutory requirements/processing on the basis of legal regulations	Performance of legally prescribed inspection, documentation and reporting obligations with respect to relevant authorities on an individual basis, including inspections under tax and customs law. Processing and transfer of personal data to meet statutory requirements in relation to emissions,	Article 6(1)(c) GDPR Article 9(2)(g) GDPR (legal obligation)

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	consumption and homologation requirements. The legally required processing of vehicle or usage data to fulfil periodic monitoring or reporting requirements with respect to authorities or bodies specified by law. Checking anti-terror lists. Archiving based on retention obligations under tax and commercial law. Prevention of fraud and money laundering. Processing of data subject requests in accordance with the GDPR. Processing of messages regarding potential violations of the protection of personal data.	
Protection and defence of our rights or disclosure within the scope of official/judicial measures	Exercise and assertion of rights and claims Disclosure within the scope of official/judicial measures for the purposes of obtaining evidence, criminal prosecution and enforcement of civil claims Disclosure within the scope of official/judicial measures in connection with securities trading	Article 6(1)(c) GDPR Article 9(2)(f) GDPR Article 6(1)(f) GDPR Assertion and defence of our rights and compliance with statutory and official requirements
Compliance checks, statistical evaluations and controlling	Performance of internal compliance and inspection measures to ensure observance of legal, regulatory and internal requirements. Preparation of aggregated statistical evaluations and KPIs for managing, monitoring and enhancing internal business and support processes. Analysis of economic and organisational special situations in	Article 6(1)(c) GDPR Article 6(1)(f) GDPR Processing serves to ensure compliance with legal and internal requirements as well as the management, monitoring and enhancement of internal business and support processes.

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	the context of risk management and the derivation of appropriate management and safeguarding measures.	It enables the performance of internal compliance and inspection measures, the preparation of aggregated statistical evaluations and KPIs and the management of economic or organisational risks.

3. Data processing with joint controllers

Individual processing activities take place with joint controllers comprising Volkswagen AG, Audi AG, Seat S.A. and Škoda AUTO a.s. in accordance with Article 26 GDPR. Data subject rights can be asserted against any joint controller – the central contact point is Volkswagen AG (Section VII.).

Purpose	Examples	Legal bases under the GDPR
Information security	Detection of security-related anomalies in IT systems of the sales and service network. Analysis and rectification of malfunctions to ensure stable system operation. Protection of customer and vehicle data against unauthorised access. Assurance of the integrity and availability of the IT systems being used. Assistance with security-related operations with respect to authorities or courts.	• Article 6(1)(c) GDPR • Article 6(1)(f) GDPR • To ensure information and system security, it is necessary to process security-related operation and system information in order to detect anomalies, analyse them and initiate appropriate countermeasures. Processing serves to protect the IT infrastructure being used and the customer and vehicle data processed within it, and is restricted to this purpose. •

IV. Who receives your data?

Within Volkswagen AG, only the areas that require your data for the purposes listed above have access to this data.

A transfer to a third party only takes place if this is required for the purposes listed above and a legal basis exists or if you have previously given your consent. If Volkswagen AG has commissioned service providers for the processing of data or to provide associated services, the transfer is generally based on an order processing agreement in accordance with Article 28 GDPR or professional obligations exist that ensure a sufficient data protection level.

The following categories of recipients can receive data:

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- **Service providers/suppliers**
  - Vehicle/component manufacturers/suppliers
  - Hosting service providers
  - Technical support service providers
  - Call centres
  - Banks/financial service providers
  - Telecommunications companies
  - Shipping companies
  - Transport service providers
  - Consulting companies/service providers
  - Technical development service providers
  - Customer retention partners
  - Vehicle-related service providers
  - Identification service providers
  - Event service providers/agencies
  - Marketing companies/partners
  - Market research companies
  - Supply and disposal companies
  - Quality assurance service providers
- **Insurance**
  - Vehicle insurance
  - Company insurance
- **Authorities**
  - Supervisory authorities
  - Road traffic authorities
  - Police/investigative authorities/courts
  - EU/EEA supervisory authorities
  - Non-EU supervisory authorities
- **Elected officials for law, business and finance**
  - Audit firms/tax advisers
  - External auditors
  - Lawyers/notaries
  - Technical testers
- **Trade partners**
  - Retail
  - Importer
- **Group companies**
  - Group company belonging to its own brand parent company
  - VW Group companies, no own brand parent company

V. Will your data be transferred to a third country or international organisation?

Your data is generally processed within the EEA (European Economic Area) to which the GDPR applies without limitation.
As a global company, exceptional cases may require the storage and processing of data outside of the EU. In specific cases, data may also be passed on to authorities and courts in third countries.
Please note that not all third countries have a data protection level that is recognised as suitable by the

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European Commission. Unless an adequacy decision from the European Commission exists, Volkswagen AG will only transfer your data to third countries if this is permissible in accordance with Article 44 – 49 GDPR. Insofar that Volkswagen AG relies on adequate guarantees for the third country transfer in accordance with Article 46(2) GDPR (e.g. standard contractual clauses or binding corporate rules), Volkswagen AG will, if this is required to maintain adequate protection of your data, take additional technical and/or organisational measures. The agreements with processors regularly provide for the conclusion of standard contractual clauses of the European Commission to ensure an adequate level of data protection. You can obtain a copy of the specific applicable or agreed regulations for the assurance of the adequate level of data protection from us. Please use the information in Section B.VII for this purpose.

VI. How long will your data be stored?

Personal data is only stored for as long as this is necessary for the relevant purposes of the processing. If these purposes do not apply, the data is erased or anonymised provided no statutory retention obligations or obligations to provide evidence or documentation oppose this.

To the extent that personal data is processed to fulfil retention obligations under commercial, tax or regulatory law, the data is stored for the legally prescribed periods, which can generally be up to 15 years.

If processing takes place in the context of sales, service, warranty, guarantee, goodwill, product liability or similar operation- or vehicle-related processes, personal data is stored for the duration of the respective business or contractual relationship. The data may be stored beyond the end of the contractual relationship to the extent that this is necessary for the purposes of correct processing, verifiability or to fulfil statutory obligations to provide evidence and documentation. In these cases, the storage period can be up to 15 years.

Irrespective of whether the respective purpose of the processing ceases to apply, personal data can be stored for longer if and for as long as this is necessary for the assertion, exercise or defence of legal claims.

If processing is based on consent, storage takes place for the duration of the purpose limitation of the consent and – subject to statutory retention obligations – for no longer than the point at which consent is withdrawn.

In justified specific cases, storage beyond this can be envisaged if this is necessary to fulfil the respective purpose of the processing. This may be the case with respect to media- or vehicle-related content in particular; such storage periods can extend beyond 15 years and are defined based on purpose.

VII. Data protection officer and data subject rights

If you have general questions pertaining to this Privacy Policy or the processing of your data by Volkswagen AG, you can contact our **Data Protection Officer**, Oliver Draf:

- Post: Volkswagen AG, Data Protection Officer, Berliner Ring 2, 38440 Wolfsburg, Germany
- Email: dataprivacy@volkswagen.de
- Telephone: 00800-8932836724889 (00800-VWDATENSCHUTZ)

What are your rights?

You have the following rights toward us under the respective legal prerequisites:

- Right of access (Article 15 GDPR)

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- Right to rectification (Article 16 GDPR)
- Right to erasure or "right to be forgotten" (Article 17 GDPR)
- Right to restriction of processing (Article 18 GDPR)
- Right to data portability (Article 20 GDPR).

You also have the right to contact a data protection supervisory authority at any time in accordance with Article 77 GDPR if you feel that the processing of data concerning you violates an applicable law. The address of the data protection supervisory authority responsible for VOLKSWAGEN is:

The Data Protection Officer for the State of Lower Saxony
Prinzenstraße 5
30159 Hannover
Deutschland / Germany

However, you can also lodge a complaint with any other competent data protection supervisory authority within or outside the EU, particularly to the supervisory authority in the member state of your regular residence, your workplace or the place of the presumed infringement. Below is a link where you can find all contact details of the national authorities in all member states: https://edpb.europa.eu/about-edpb/board/members_en.

Right to object

You have the right to object to the processing of your data

- if processing takes place for direct marketing purposes (including profiling for direct marketing purposes) or
- if processing (including profiling) is necessary for the protection of our legitimate interests and those of a third party (Article 6(1)(f) GDPR). If you do raise any objection of this kind, we kindly request that you inform us of the reasons why you are objecting to data processing. If you object, we will no longer process your data unless we can prove compelling reasons for processing that outweigh your interests, rights and freedoms, or the processing serves the assertion, exercise or defence of legal claims.

Please direct your objection and, if necessary, its justification, to Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany, by email to **privacy@volkswagen.de** or via our Privacy Portal **https://datenschutz.volkswagen.de/**.

Data subject rights

If you want to assert your data subject rights, please feel free to use our Privacy Portal https://datenschutz.volkswagen.de/

You can also send your request via the following contact options

- Post: Volkswagen AG, Privacy Team, Berliner Ring 2, 38440 Wolfsburg, Germany
- Email: privacy@volkswagen.de
- Telephone: 00800-8932836724889 (00800-VWDATENSCHUTZ)

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