

VOLKSWAGEN GROUP

Volkswagen AG: Data Privacy Statement

Responsible: Group Digital Risks and Privacy (K-ID)
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"All the data that Volkswagen AG collects and processes is a valuable asset. This applies, for example, to customer data and data from cooperation with suppliers and our employees worldwide. A trusting and legally compliant approach is therefore important to us at Volkswagen. It is of great importance, especially towards our current and future employees, customers, and partner companies, to fulfil this responsibility and, in particular, to ensure the protection of personal data," says Dr. Manfred Döss, Group Board Member for Integrity and Legal Affairs.

1) Preamble:

The global protection and responsible handling of personal data of customers, employees and other persons associated with the Volkswagen Group is a key objective of the Group and is in line with its Code of Conduct. The focus is on the responsible handling of personal data of customers, employees and other persons associated with the Volkswagen AG.

Therefore, aligning the digital transformation with technical, strategic and entrepreneurial goals is an essential part of Volkswagen AG. In this context, the global requirements for the handling of data through the regulation of data and digital markets are taken into account.

Compliance with global data protection regulations, in particular the data protection General Regulation and the Federal Data Protection Act, is of particular importance in this regard. A data protection culture has been established at Volkswagen AG that makes employees to be sustainably aware of the relevance of data protection.

At Volkswagen AG, we protect the personal data of our employees as well as our customers, suppliers and other data subjects. Personal data is collected, processed, used and stored exclusively in accordance with the legal requirements. All components of data processing are secured in such a way as to ensure the confidentiality, integrity, availability, provability and resilience of the processing of personal data. This prevents unauthorized internal and external use.

These key data protection principles are binding for the Volkswagen Group in the applicable Group Policy: Data Privacy in the Volkswagen Group. The aim (and purpose) is to achieve and maintain an adequate level of data protection in the

Volkswagen Group in accordance with the Volkswagen Group Principles and the Group Data Protection Policy.

The Volkswagen AG Data Privacy Statement serves as a summary of all the essential principles that we stand for at Volkswagen AG.

2) Data Protection Principles:

2.1 Legal basis:

Personal data will only be processed if and to the extent that there legal basis for the respective processing operation. In the context of the processing of personal data pursuant to Art. 6 (1) (a) GDPR, the processing is only carried out with the consent of the data subject who has been informed in advance.

2.2 Purpose of data processing:

Personal data may only be collected and processed for specified, explicit, and legitimate purposes.

2.3 Accuracy:

The stored personal data will be processed, correctly and completely and updated if necessary.

2.4 Data minimization:

Only a minimum amount of personal data is stored and only the personal data that is necessary for the respective fulfilment of the defined purpose.

2.5 Storage:

Personal data will not be stored for longer than is necessary for the purposes of their processing, in compliance with further statutory retention periods.

2.6 Rights of data subjects:

Data subjects are given the opportunity to exercise their rights as data subjects (e.g. the right to information, rectification, deletion) via the [data protection portal](#), among other things.

2.7 Data Security:

We are committed to implementing technical and organizational measures against unauthorized or unlawful processing of personal data and against accidental loss, destruction or damage to personal data.

For all data subjects, Volkswagen AG provides specific data protection declarations for the various processing activities. For Example: [Privacy Policy | Volkswagen Germany](#).

3) Legally binding within Volkswagen AG:

Compliance by the Group companies with the relevant legal, regulatory, and operational data protection provisions is ensured by the Group Policy 2 on Data Protection and other internal works agreements and organizational guidelines. The Group Policy on Data Protection is binding for all majority companies in the Volkswagen Group worldwide.

The Executive Board or management of the respective Group company is legally responsible for compliance with all data privacy regulations and for the implementation of this Group policy. The companies implement the requirements independently and are responsible for compliance with the applicable data protection requirements. This Group Policy applies to all collection, processing and other use of personal data of natural persons, in particular employees, customers, suppliers, contractual partners and other third parties.

Due to the worldwide validity, changes are permitted where locally applicable law, regulatory requirements or specifics of the respective company make this mandatory. Deviations from the Group policy must be agreed with the policy holder. Insofar as data privacy regulations apply to individual Group companies that either contain mandatory deviations from this Policy or go beyond the principles regulated here for the benefit of the data subjects or contain additional requirements for the processing of personal data, these shall remain unaffected by this Group Policy.

4) Data Protection Management System:

It is the responsibility of the data protection function to set data protection standards in close coordination with Group IT. At Volkswagen AG, the data protection management organizations also support the departments in meeting data protection requirements.

In addition to establishing a sustainable data protection organization, we have also developed and implemented a consistent data protection management system (DSMS) with the aim of achieving the necessary process security.

The principle of "checks and balances" established in the Group with the distribution of different roles and rights in the context of processing data protection relevant processes is also an indispensable prerequisite for a reflective and responsible implementation of high level tasks

A central element of our data protection management is the process for reporting data breaches (Articles 33, 34 GDPR). This serves to detect possible data breaches at an early stage and to be able to process them efficiently. If necessary, appropriate and harm-reducing countermeasures will be initiated and a report will be made to the responsible supervisory authority and the affected parties will be notified.

A data breach hotline is available around the clock (24/7) to report potential data breaches. It is also possible to contact us via other channels, for example by e-mail to the data-breach@volkswagen.de mailbox or by telephone via the local helpdesk within Volkswagen AG. In addition, anonymous reports of potential data protection breaches can also be submitted via our central whistleblowing system.

We also have established a process to ensure compliance with the rights of data subjects. Data subjects can assert their rights at any time and about a variety of in- put channels e.g. the [data protection portal](#).

5) Privacy Awareness:

To strengthen data protection awareness, we conduct a mandatory web-based data protection training for all executives as well as all members of the Executive Board of Volkswagen AG and the brand members of the Board of Management of Volkswagen AG. For their part, managers have an obligation to sensitize their respective employees to data protection related issues.

Furthermore, a wide range of target-group-specific training courses are available, e.g. training courses for prospective managers, training courses for trainees/trainees as well as joint events with IT security.

Information and communication activities such as awareness raising campaigns, newsletters or podcasts expand the data protection awareness offer and support employees in complying with legal and company data protection requirements. Information on the subject of data protection is available on our Volkswagen intranet.

6) Privacy and Technology:

Volkswagen AG's objective is to use technology to benefit people. To that end, we have developed many features designed to improve vehicle safety and comfort. In addition, Volkswagen AG supports the mission of "Vision Zero", a multinational road traffic safety campaign that strives to eliminate fatalities and serious injuries related to road traffic. Volkswagen AG takes its responsibility to the general public seriously and continues to use available technology and data to further improve the overall safety and comfort of our vehicles

We strive to make our collection and use of this vehicle data transparent to our Customers and other road users and to inform them about their data privacy choices. The privacy policy in the relevant market describes our companies' data privacy practices with respect to this data. Together with our customers, we hope to contribute to "Vision Zero" in an informed and positive way that promotes our mission to benefit society through technology.

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Dr. Manfred Döss
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of Volkswagen AG for Business Unit "Integrity & Legal"



Dr. Oliver Draf
Data Protection Officer of Volkswagen AG