

Privacy Notice "SpeakUp® whistleblowing and reporting platform"

I. Scope of the privacy notice

In this privacy notice, we are informing you about the automated, electronic processing of your personal data by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Deutschland / Germany ("we", or "VW") when you visit the SpeakUp® whistleblowing and reporting platform (online reporting channel, app, voice intake) developed by People Intouch B.V..

Within SpeakUp®, you can leave an (anonymous) hint and start a safe and secure conversation with the Whistleblowing System of Volkswagen. This serves to receive and process hints about potential regulatory violations of employees or of suppliers of the Volkswagen Group in a safe and confidential way.

II. Who is the controller for the processing?

The controller for the processing of your personal data is:

Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany.

Tax identification number / Registration number: DE 115235681

Registered in the commercial register of the Braunschweig District Court under the number HRB 100484 ("Volkswagen AG"). Chairman of the Board: Oliver Blume.

In certain cases, reports are processed together with the respective group company (subsidiary) in order to ensure the independence of the audit, e.g. in the case of specific violations of the rules. For this purpose, personal data is also shared as part of joint data processing. A corresponding data protection agreement has been concluded for this purpose (Joint Data Processing Agreement). The provisions of the Joint Data Processing Agreement can be provided on request.

III. Who can I contact?

If you wish to assert your data protection rights, please use the contact options at

<https://datenschutz.volkswagen.de/?lang=en-gb>

There, you will find further information regarding how you can assert your data protection rights. You may also send your request

- via mail: Volkswagen AG, Privacy Team, Berliner Ring 2, 38440 Wolfsburg, Germany
- via e-mail: privacy@volkswagen.de
- via telephone: 00800-8932836724889 (00800-VWDATENSCHUTZ)

We take data subject rights very seriously and will respond to any request that you might have as soon as possible. If you have any general questions about this privacy notice or the processing of your personal data by Volkswagen AG, please use the following contact option:

io@volkswagen.de

IV. Contact details of the data protection officer

For matters concerning data protection, you can also consult our **company data protection officer**, using your own language:

Volkswagen Aktiengesellschaft

Mail Box 011/80910, 38436 Wolfsburg

E-Mail: datapriva@volkswagen.de

Dr. Oliver Draf

00800-8932836724889 (00800-VWDATENSCHUTZ)

V. Which rights do I have?

All the below named rights concerning the personal data and the processing thereof may be subject to limitations, according to the applicable EU and/ or national laws. Depending on your jurisdiction, as the data subject, you may be entitled to the following data protection rights. **Please note:** Your data protection rights under the local laws of the country where you are located at the relevant time may differ from the rights described below. Please see Annex 1 for additional, country-specific information, in particular on rights that you might have under local laws. Such rights apply, to the extent the legal requirements are met, in addition to your rights provided under the GDPR.

For more information about rights you may have in connection with our processing of your personal data, please click here:

<https://datenschutz.volkswagen.de/?lang=en-gb>

- 1. Right to be informed**
- 2. Right to access**
- 3. Rectification**
- 4. Erasure**
- 5. Restriction of processing**
- 6. Data portability**
- 7. Objection**
- 8. Withdrawal of consent**
- 9. Complaint**

In addition, you have the right to lodge a complaint with a data protection supervisory authority if you believe that the processing of your personal data is unlawful. The right to lodge a complaint is without prejudice to any other administrative or judicial remedy. The address of the data protection supervisory authority responsible for VOLKSWAGEN is:

Der Landesbeauftragte für den Datenschutz Niedersachsen
Prinzenstraße 5
30159 Hannover
Deutschland / Germany

However, you can also lodge a complaint with any other data protection supervisory authority competent for you within or outside the EU, in particular with the one in the Member state of your habitual residence, place of work or place of the alleged infringement. Please find hereinafter 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.

See Appendix 1 "Additional rights of data subjects and further country-specific information" for contact details of national supervisory authorities and further country-specific information.

10. Information on your right to object

a) Right to object on grounds relating to your particular situation

You have the right to object to the processing of your personal data on grounds relating to your particular situation. The prerequisite for this is that the data processing takes place in the public interest or on the basis of legitimate interests. This also applies for any profiling. Insofar as we base the processing of your personal data on legitimate interests, we generally assume that compelling legitimate grounds can be demonstrated, but we will, of course, examine each individual case. In the event of an objection, we will no longer process your personal data, unless

- we can demonstrate compelling legitimate grounds for the processing of such data which override your interests, rights and freedoms or
- your personal data are used for the establishment, exercise or defence of legal claims or
- there are grounds permitting the processing of your personal data, notwithstanding your objection, under applicable local laws, provided that such processing is not restricted under the GDPR.

b) Exercise of the right to object

The objection can be exercised in any form and should preferably be addressed to the contact details listed in section III.

VI. Which data do we process for which purposes and which legal bases apply?

When leaving a report via SpeakUp®, you can decide to share your identity with Volkswagen AG or remain anonymous. If you share personal details in your report, these will be processed when handling your report. We process your personal data which we receive from you within the scope of submission and processing of hints via the Volkswagen Whistleblowing System in accordance with the provisions of the General Data Protection Regulation ("GDPR") and the German Federal Data Protection Act (*Bundesdatenschutzgesetz*, "BDSG") and other local law. The processing also includes a machine (AI-assisted) translation of your report. **Please note:** If the applicable local law of the country where you are located at the relevant time foresees additional requirements regarding the legal bases, we will comply with such additional requirements and will inform you accordingly.

The personal data could include to the maximum extend:

- **Job-related contact and (work) organisation data** (e.g. Surname, given name, sex, address, email address, phone number, mobile phone number, (Group) company, area, department, cost centre, personnel number, responsibilities, functions, presence (yes/no), etc.)
- **IT usage data** (e.g. UserID, roles, permissions, log-in times, computer name, IP address, GID, Legic no., etc.)
- **Special category: Photo of the employee** (e.g. Portrait photo voluntarily published by the employee (intranet telephone directory, internal social media platform, etc.)
- **Private contact and identification data** (e.g. Surname, given name, sex, address, email address, phone number, mobile phone number, date / place of birth, identification numbers, nationality, etc.)
- **Contract data** (e.g. Purchased products, (financial) services, date of purchase agreement, purchase price, extras, warranties, etc.)
- **Vehicle usage data with VIN / number plate Guarantee, warranty, product liability, safe vehicle operation** (e.g. Data generated during vehicle use which is linked to the VIN / number plate and which is of importance in connection with workshop repairs, guarantees, warranties, product liability or the availability of what is required for the safe operation of the vehicle.)
- **Vehicle usage data with VIN / number plate Comfort settings, multimedia, navigation** (e.g. Data generated during vehicle use that are linked to the VIN / number plate and that relate to comfort settings, such as seat adjustment, preferred radio stations, climate settings, navigation data, email / SMS contact information, etc.)
- **Vehicle usage data with VIN / number plate Assistance systems, driving behaviour etc.** (e.g. Data generated during vehicle use that are linked to the VIN / number plate and that relate to the driving behaviour or the use of assistance systems and their specific operational data, etc.)
- **Position data** (e.g. GPS, wireless positioning / tracking, movement profile, WLAN hotspot tracking / positioning, etc.)
- **Data regarding personal / professional circumstances and characteristics** (e.g. Data concerning spouse or children, marital status, portrait photo, volunteer work, job title, career, length of service, tasks, activities, log-file analyses, joining and leaving dates, qualifications, assessments / evaluations, etc.)
- **Payment and time management data** (e.g. Pay scale group, payroll accounting, special payments, garnishment, daily attendance times, reasons for absence, etc.)
- **Creditworthiness and other financial data, bank details** (e.g. Payment behaviour, balance sheets, credit bureau data, credit score values, financial circumstances, bank account details, credit card number, etc.)
- **Special categories of personal data** (e.g. Special categories of personal data pursuant to Article 9(1) GDPR: racial and ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation)
- **Criminal offences / regulatory offences** (e.g. Data relating to (suspected) criminal acts and other special requirements under Article 10 GDPR)

Following on from the above, we process your personal data on the basis of the following legal bases for the following purposes:

Purpose	Legal Basis	Legitimate Interest for Balancing of Interests	Data category
Detection of violations of the law while safe-guarding the rights of data subjects and whistleblowers	Initiation, performance or termination of an employment relationship/employment contract (6 1 b)	-	Job-related contact and (work) organisation data
	Special legal regulation not covered by the GDPR (Whistleblower Protection Act, Art. 6 1 (c))	-	<ul style="list-style-type: none"> IT usage data Special category: Photo of the employee Private contact and identification data Contract data Vehicle usage data with VIN / number plate
	Balancing of interests (6 1 f) (not applicable for Special categories of personal data and data of criminal offences / regulatory offences	The processing of hints aims to support the legitimate interests of Volkswagen AG and its employees in relation to crimes or serious regulatory violations.	<ul style="list-style-type: none"> Guarantee, warranty, product liability, safe vehicle operation Vehicle usage data with VIN / number plate Comfort settings, multimedia, navigation
	Other provisions of the GDPR	-	<ul style="list-style-type: none"> Vehicle usage data with VIN / number plate Assistance systems, driving behaviour etc. Position data Data regarding personal / professional circumstances and characteristics Payment and time management data Creditworthiness and other financial data, bank details Special categories of personal data Criminal offences / regulatory offences

Please note: If the applicable local law of the country where you are located at the relevant time foresees additional requirements regarding the legal bases, we will comply with such additional requirements and will inform you accordingly.

VII. Who receives my data?

Within VOLKSWAGEN, those entities receive your data that are needed to fulfil our contractual and statutory obligations and to safeguard our legitimate interests. Our service providers (so-called processors) that we utilise and engage may also receive data for these purposes. We will generally share your personal data with third parties only if this is necessary for the performance of the contract, if we or the third party have a legitimate interest in the disclosure, or if you have given your consent, subject to applicable local laws. In addition, data may be shared with third parties (including investigative or security authorities) to the extent we should be required to do so by law or by enforceable regulatory or judicial orders.

Please note that all data will be processed within the European Union.

1. Processors

Service providers which are used and act on behalf of VOLKSWAGEN and that do not process data for any of their own purposes (so called "processors") may receive data for the purposes mentioned above. We utilise processors of the following categories for the provision of specific services, who support us in the execution of our business processes. Specifically, this includes:

Category of Processor	Name of Processor	Processing purpose
Technical Supplier	People Intouch B.V. Olympisch Stadion 6 1076 DE Amsterdam Netherlands	People Intouch provides the intake channels (Voice intake, Web intake, App) through which Whistleblower reports are submitted to Volkswagen Group.

2. Third parties

We do not disclose your personal data to other recipients or categories of recipients who are acting as controllers.

3. Is data transmitted to a third country?

We do not transfer your data to third countries (countries that are neither members of the European Union nor of the European Economic Area) or to international organisations. **Please note:** Under the applicable local laws of the jurisdiction you are located at, a transfer to a third country might be defined as a transfer outside of the territory or country where you are located at the relevant time.

VIII. How long will my data be stored?

We store your data as long as necessary for the provision of our services to you or do so if we have a legitimate interest in the continued storage.

We will store your data for the duration of the relevant statutory storage obligations (generally up to 3 years). In addition, the storage period in case of potential violations against supply chain due diligence act is up to 7 years.

In addition, we are subject to various retention and documentation obligations, which result, *inter alia*, from the German Commercial Code (*Handelsgesetzbuch*, "HGB") and the German Tax Code (*Abgabenordnung*, "AO"). The periods specified therein for retention and documentation are up to ten years. Finally, the storage period is also assessed according to the statutory limitation periods, which can be up to thirty

years, for example, according to Sections 195 et seqq. of the German Civil Code (*Bürgerliches Gesetzbuch, "BGB"*), with the regular period of limitation being three years.

Under certain circumstances, your data may also need to be retained for a longer period of time, such as when a so-called legal hold or litigation hold (i.e. a prohibition of data deletion for the duration of the proceedings) is ordered in connection with administrative or judicial proceedings.

We may also be subject to retention and documentation obligations in line with the local legislation of your country.

IX. Is there an obligation for me to provide data?

In the context of the Whistleblowing System, you need to provide only the personal data you want. You can provide your hint anonymously. SpeakUp® is designed in such a way that you are in complete control of what you will report and when. The more information you can provide, the better we will be able to fully investigate the potential misconduct.

X. What practices and procedures are implemented to secure my data?

We have implemented and maintain at all times encompassing technical and organisational measures (**TOMs**) to protect your data in accordance with the high standards of the GDPR and the standards required under other applicable local laws of the jurisdiction you may be located at. This includes, but is not limited to, pseudonymisation and encryption, measures to ensure the ongoing confidentiality, integrity and availability of your data (including the ability to restore data in case of an incident). We are regularly reviewing our TOMs and apply enhancements where needed to keep your data safe and to comply with applicable laws. We have put in place appropriate procedures to deal with any personal data breach (i.e. a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed) and will notify you as the data subject and relevant supervisory authority when we are legally required to do so.

XI. Updates of this privacy notice

We might update this privacy notice from time to time by making available updates to this privacy notice on our website.

Version: 02.09.2024

Annex 1 – Additional data subject rights and further country-specific information

Argentina

You have the right to

- access;
- rectification;
- erasure;
- file a complaint regarding the processing of your personal data to THE PUBLIC INFORMATION ACCESS AGENCY, which, depending on the facts of the individual case, in its capacity as the Control Entity of Law No. 25,326, has the power to attend complaints and claims filed by those whose rights are affected due to breaches with applicable regulations on personal data protection.

Australia

You have the right to

- access;
- rectification;
- lodge a complaint with both VOLKSWAGEN and the Office of the Australian Information Commissioner ("OAIC") or any other dispute recognition scheme recognised by the OAIC which can be found on the OAIC website www.oaic.gov.au.

If you are concerned with the way we have handled your personal data, you may lodge a privacy complaint with the Office of the Australian Information Commissioner ("OAIC"). However, it is a requirement of the OAIC that prior to lodging a complaint, you have raised your complaint with us. If you are not satisfied with our response or we fail to provide a response within 30 days of receipt, you can lodge a complaint with the OAIC. The contact details for the OAIC are set out below:

Phone	1300 363 992
Fax	(02) 9284 9666
Website	https://www.oaic.gov.au/
Post	GPO Box 5288, Sydney NSW 2001

Brazil

You have the right to

- to be informed about the collection and use of your personal data, by us, in a readily accessible manner, and in plain and clear language. You also have the right to be informed about any public or private entity with whom your data has eventually been shared. We are implementing your right to be informed, also through this notice, the content of which may be updated from time to time.
- information access;
- obtain a copy when the legal basis for processing is consent or performance of a contract;

- erasure when consent is the legal basis for processing: please note that exceptions to this right might apply, namely, when the data is needed for (i) compliance with legal obligations; (ii) study by a research organization; (iii) transfer to third parties; (iv) use solely by the controller, as long as the data is anonymized;
- rectification;
- object to the processing (e.g. if the data is being unlawfully processed);
- data portability;
- withdraw consent at any time;
- anonymize, block or delete unnecessary or excessive personal data or data processed in non-compliance with data protection law;
- review decisions made solely on the basis of automated processing;
- lodge a complaint before ANPD (Autoridade Nacional de Proteção de Dados) against the data controller;
- be informed of the possibility of not providing consent and the consequences thereof;
- be informed about the public and private entities with whom the data has been shared.

Colombia

Data Subject's Rights

Pursuant to the provisions of art. 8 of Law 1581 of 2012, you have the right to

- know, update and rectify your Personal Data from the Controller or the Processor. This right can be exercised, among other, regarding partial data as well as in respect to data that is incomplete or fractioned, that induces error, or those whose Processing is expressly forbidden or has not been authorized;
- request evidence of the authorization granted to the Controller unless when it is expressly excepted as a requirement for the Processing, pursuant to the provisions of article 10 of law 1581 of 2012;
- be informed by the Controller or the Processor upon request, in respect to the use that has been made of your Personal Data;
- file to the Superintendence of Industry and Commerce complaints for infractions to the provisions of Law 1581 of 2012 as amended, added to or supplemented from time to time;
- revoke the authorization and/or to request the deletion of the specific data, provided that there is no legal or contractual obligation that imposes on you the duty to remain in the database;
- have access, free of charge, to your Personal Data that has been the subject of Processing, at least once per calendar month and whenever there are substantial amendments to the Processing policies.

Procedures you have to follow to exercise your personal data rights

- A. Complaints: You may file complaints regarding the Personal Data kept in VOLKSWAGEN's databases, according to the following rules:
 - The complaint will be analyzed to verify your identification. If the complaint is made by a person other than you and the capacity of such person is not accredited according to the laws in force, the complaint will be rejected.

- All the complaints will be resolved in a maximum term of ten (10) business days as from the date in which the same are received. If it is not possible to answer the complaint within said term, you will be informed, expressing the reasons for the delay and informing a date in which the enquiry will be answered, which cannot exceed, in any case, five (5) business days after the expiration of the original term.
- B. Requests: If you consider that the data contained in VOLKSWAGEN's databases must be subject to corrections, updates or deletion, or when they notice the alleged breach of any of the duties, you may file a request according to the following rules:
- The requests will be analyzed to verify your identification. If the request is made by a person other than you and the representation thereof is not accredited according to the regulations in force, the request will be rejected.
 - The request must contain the following information: (i) your identification; (ii) contact data (physical and/or electronic address and contact phone numbers); (iii) the documents that accredit your identity, or your representation; (iv) The clear and precise description of the Personal Data regarding which you seek to exercise any of the rights; (v) The description of the facts that lead to the request; (vi) The documents that they intend to enforce; (vii) signature and identification number.
 - If the request is incomplete, VOLKSWAGEN shall make a requirement to you, within a term of five (5) days after the receipt of the request, to remedy the defects. If two (2) months lapse from the date of the requirement and you have not given the information required, it shall be construed that you have desisted the request.
 - If the area that receives the request is not competent to answer it, it shall pass it to the relevant area or person within a term of two (2) business days and will inform this situation to the interested party.
 - Once the complete request has been received, a note saying "request being processed" shall be included in the database with the reason thereof, in a term of no more than two (2) business days. Said note must be left in place until the moment in which the claim is decided.
 - The maximum term to answer the request will be fifteen (15) business days as from the day after the date in which it is received. When it is not possible to answer the request within that term, the reasons of the delay shall be informed to the interested party together with the date in which the request will be answered, which under no circumstances can exceed eight (8) business days after the expiration of the first term.
 - You have the right, at all times, to request the deletion of your Personal Data. The deletion implies the total or partial removal of the Personal Data from the Data Bases, according to your request. The deletion right is not absolute and VOLKSWAGEN may refuse the exercise thereof in the following events: (i) If you have a legal or contractual duty to remain in the Database or if the Controller has a legal or contractual obligation that means that it has to keep the Personal Data; (ii) The deletion of the Personal Data would thwart judicial or administrative activities related to fiscal obligations, the investigation and persecution of crimes or the update of administrative sanctions; (iii) The Personal Data is necessary to protect your interests protected by the laws, to perform an action pursuant to the public interest, or to comply with an obligation legally acquired by you or by the Controller.

Authorization: As from the enactment of this notice, at the time of the collection of Personal Data, VOLKSWAGEN shall request the prior authorization from you and you shall be duly informed about the

specific purposes of the Processing for which such consent has been obtained, excepting in the case of any one of the exceptions provided in article 10 of Law 1581 of 2012 for such purposes.

VOLKSWAGEN may transmit and/or transfer your Personal Data to third parties located in Colombia or abroad, as long as VOLKSWAGEN has the prior and express authorization of you of the Personal Data.

Retention period: The information provided by you shall only be used for the purposes herein established. Once the need for the Processing of the Personal Data has ceased, the same shall be deleted from VOLKSWAGEN's databases.

Hong Kong

In addition to your rights set out in Sec. V, you may withdraw your consent to the use of your personal data.

India

You have the right to

- access (i.e., the right to be informed if and to which extent we process your data);
- rectification (i.e., the right to have corrected false or incorrect data);
- withdraw consent;
- nominate (this right allows individuals to choose another person who can act on their behalf and exercise their rights under the DPD Act in case they are unable to do so themselves due to death or incapacity);
- contact the Grievance Officer. The Data Protection Officer is the Grievance Officer for VOLKSWAGEN AG. For the contact details please see Sec. III.

You can assert your rights at any time by usind the contact details set out in Sec. III.

Israel

You have the right, subject to Protection of Privacy Law, 5741-1981 and the regulations enacted therefrom, to

- be informed if you are under a legal duty to provide the data, the purpose of collection, and details of any third party that will receive the data and for what purpose;
- access;
- rectification: request correction of the inaccurate or missing data or request deletion or destruction of the data;
- object to the processing (e.g. if the data is being unlawfully processed).

Japan

You have the right to

- request information on purpose of use;
- request information on security control measures;
- request access;
- request correction, addition or deletion;
- request discontinuance of use or erasure; and
- request explanations on data processing.

You also have the right to lodge a complaint with the Japanese authority, PPC as below:

Personal Information Protection Commission, Government of Japan (PPC),
Kasumigaseki Common Gate West Tower 32nd Floor, 3-2-1, Kasumigaseki, Chiyoda-ku, Tokyo, 100-0013, Japan
TEL: +81-3-6457-9680

Malaysia

You have the right to

- request access to your personal data;
- request correction of your personal data;
- prevent processing likely to cause damage or distress; and
- prevent processing for purposes of direct marketing.

Upon exercising your rights stated above in written form addressed to the contact details listed in section III, if you are dissatisfied with our response or we fail to provide a response within 21 days of receipt, you have the right to submit an application to the Personal Data Commissioner to require us to comply with your request. The application to the Personal Data Commissioner can be made to the following address:

Commissioner of Personal Data Protection, 6 th Floor, KKMM Complex Lot 4G9, Persiaran Perdana, Presint 4 Federal Government Administrative Centre 62100 Putrajaya.

In the event of any inconsistencies between the English version and the Bahasa Malaysia version of this privacy notice, the English version shall prevail.

Mexico

You have the right to:

- access;
- rectify;
- cancel;
- oppose;
- file data protection measures with the Federal Institute for Access to Information and Data Protection;
- request a reconsideration of a decision made via automated decision making in case you are of the opinion that the data processed in this context is (partly) incomplete or incorrect.

Please note the processing for the purposes set out above in Sec. VI includes the sensitive data you may provide us with in your hint. Sensitive data is defined as "*the personal data that affects the most intimate sphere of its holder, or whose improper use may give rise to discrimination or entail serious risk for the holder. In particular, sensitive data are considered those that may reveal aspects such as racial or ethnic origin, present and future state of health, genetic information, religious, philosophical and moral beliefs, union membership, political opinions, sexual preference.*".

New Zealand

You have the right to

- know what personal data is held;
- request for personal data held and access the personal data;
- rectification;
- a response to your request within 20 working days, if you make a request for access to or rectification of your personal information. In limited circumstances, VOLKSWAGEN may extend this 20 working day time limit, but we must tell you the period of the extension and the reasons for the extension.
- lodge a complaint with both VOLKSWAGEN and the Privacy Commissioner. However, it is a requirement that before you can complain to the Privacy Commissioner you must first raise your complaint with VOLKSWAGEN. If you are not satisfied with VOLKSWAGEN's response or you do not receive a response, you can lodge a complaint to the Privacy Commissioner. In general, you should wait at least 30 working days for a response before contacting the Privacy Commissioner to lodge a complaint.

North Macedonia

You have the right to also contact the authorized representative for Volkswagen AG in the Republic of North Macedonia in case of any query related to the processing of your data and your data subject rights:

Porsche Macedonia DOOEL, Skopje
 Blvd. Bosnia and Herzegovina 4
 1000 Skopje
 North Macedonia
 Email: dataprivacy@volkswagen.de

Serbia

You have the right to be informed about appropriate safeguards in case of a data transfer to countries or international organisations outside Serbia that do not provide an adequate level of data protection recognised by a Serbian Government Decision. All EU / EEA Member states provide an adequate level of data protection recognised by a Serbian Government Decision.

Singapore

You have statutory rights as provided under Singapore's Personal Data Protection Act 2012, including the rights to

- request access to your personal data;
- request correction of your personal data; and
- withdraw consent to the collection, use or disclosure of your personal data (where applicable), subject to any grounds for the collection, use or disclosure without your consent that are required or authorised under the Personal Data Protection Act 2012 or any other written law of Singapore.

South Africa

You have the right to

- not have your personal data processed for the purposes of direct marketing by unsolicited electronic communication;
- initiate civil proceedings;
- be informed if your personal information has been compromised;
- be informed, free of charge and before the information is included in a directory, should you be a subscriber to a printed or electronic directory;
- lodge a complaint to the Information Regulator of South Africa by completing this form (<https://inforegulator.org.za/wp-content/uploads/2020/07/FORM-5-COMPLAINT-REGARD-ING-INTERFERENCE-WITH-THE-PROTECTION-OF-AN-ADJUDICATOR.pdf>) and sending it to POPIAComplaints@inforegulator.org.za.

For further information about your South African data privacy rights, please click here (<https://inforegulator.org.za/>) which will take you to the website of the Information Regulator.

South Korea

You (and your legal representative) have statutory rights under the Korean Personal Information Protection Act, in particular the right to

- access;
- rectification / erasure;
- suspension of processing; and
- withdrawal of consent.

You (or your legal representative) can exercise such rights by contacting us or our data protection officer using the contact details set out in Section III.

Certain personal data may be retained for compliance with local laws and regulations for certain periods, such as the following:

- All transaction records and relevant documentary evidence as prescribed by applicable tax laws: 5 years (as required under the Framework Act on National Taxes and the Corporate Tax Act)
- Records of logins: 3 months (as required under the Protection of Communications Secrets Act)
- Records on labels and advertisements: 6 months (as required under the Act on Consumer Protection in Electronic Commerce)
- Records on revocation of contracts or cancellation of orders/purchases, payments, provision of products and services: 5 years (as required under the Act on Consumer Protection in Electronic Commerce)
- Records on handling of customer complaints or disputes: 3 years (as required under the Act on Consumer Protection in Electronic Commerce)

The process and method for destroying personal data are set forth below.

- Process of destruction: We select the relevant personal data to be destroyed and destroy it with the approval of our Data Protection Officer.
- Method of destruction: We destroy personal data recorded and stored in the form of electronic files by using a technical method (e.g., low level format) to ensure that the records cannot be reproduced, while personal data recorded and stored in the form of paper documents shall be shredded or incinerated

If it is necessary to retain personal data for a period longer than the legal retention periods described herein, to the extent required by the laws of the applicable country, we shall obtain the data subject's consent for such longer retention of personal data.

Taiwan

You have the right to

- make an inquiry of and to review your personal data;
- request a copy of your personal data;
- supplement or correct your personal data;
- demand the cessation of the collection, processing or use of your personal data; and
- erase your personal data.

Thailand

Please note that your right to obtain a copy of the personal data is subject to law or pursuant to a court order, and must not adversely affect the rights and freedoms of others.

Turkey

You have statutory rights under Art. 11 of the Turkish Data Protection Law, in particular the right to

- request reporting of the operations carried out which are rectification of the incomplete or inaccurate data, if any and the erasure or destruction of your personal data to third parties to whom your personal data have been transferred;
- claim compensation for the damage arising from the unlawful processing of your personal data;
- object to the occurrence of a result against yourself by analyzing the data processed solely through automated systems,
- lodge a complaint with the Turkish Data Protection Authority (Kişisel Verileri Koruma Kurumu) Nasuh Akar Mahallesi 1407. Sok. No:4, 06520 Çankaya/Ankara/Turkey.

The objection can be exercised in the forms stated in Article 5/1 of the Commuinque On The Principles and Procedures for the Request To Data Controller.

You have the right to also contact the Data controllers representative in case of any query related to the processing of your data and your data subject rights:

Hergüner Bilgen Üçer Attorney Partnership

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