



Privacy Policy – Multifunctional ID-CARD

A. Controller

This privacy policy informs you about the collection, processing, and use of your personal data by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, vw@volkswagen.de, registered in the commercial register of the Braunschweig District Court under HRB 100484 ("Volkswagen AG") in connection with the Multifunctional ID-CARD.

B. Collection, Processing, and Use of Your Personal Data

I. Application and Issuance of Multifunctional ID-CARDS

For the application and issuance of personalized ID-CARDS for Volkswagen, Group, and partner company employees by the Card Service Center of Volkswagen AG, it is necessary to process personal data. This applies to new orders, renewals, and replacements for defective, lost, or stolen ID-CARDS.

The Multifunctional ID-CARD enables clear identification of employees and ensures authorized access to Volkswagen AG premises.

The following personal data is processed for this purpose:

- Professional work and organizational data: Name, first name, title, address, email address, phone number, company, location, department, cost center, personnel number/F-number, hiring date, responsibility/function
- Private contact and master data: Name, first name, title, email address, phone number, date/place of birth, birth name
- Photo
- Legic number

Processing takes place exclusively in Volkswagen AG systems: my.Serve, SAP Fremit, Zubesy, VCD, and IDCARD-Print. Data is not shared. After a retention period of max. 3 years from the event (last use), the data is deleted.

II. Use of the PKI Function

If the ID-CARD is equipped with a corresponding chip, it includes the "Public Key Infrastructure (PKI)" function. The Volkswagen PKI card is used to implement various IT security solutions using digital certificates. This includes logging into IT systems and enabling encryption and signing of emails and files.

In addition to the data described in section I, the following personal data is processed by Volkswagen AG's Group Information Security when using the PKI card:

- IT usage data: User and login data (e.g., UserID), logging data, software and hardware data (e.g., IP address)

Certificates of Volkswagen AG employees containing name, GID, certificate number, email address, and public key are published on the intranet and internet (<https://certdist.volkswagen.de>) to enable encrypted communication with external parties. Publication can be disabled in the VCD system under "Edit person entry."

Processing for these purposes takes place exclusively in Volkswagen PKI systems. Data is retained as long as needed to open encrypted files, which may include company-relevant documents subject to indefinite (legal) retention periods.

III. Entry Permits

The Multifunctional ID-CARD may also serve, especially for Volkswagen employees, to indicate authorization to enter Volkswagen AG factory premises with a personally assigned company vehicle via a red bar marking.

For this purpose, the following additional personal data is processed:

- Professional work and organizational data: Employee group
- Vehicle group

IV. Additional Functions

Information on data processing related to additional functions of the Multifunctional ID-CARD, such as cashless top-up and fuel card, is provided separately.

V. Legal Basis

Data processing is necessary for the execution of the employment relationship or to fulfill the employment contract pursuant to § 26 (1) BDSG; Art. 6 (1)(b) GDPR or is based on an overriding legitimate interest pursuant to Art. 6 (1)(f) GDPR. Volkswagen AG's legitimate interests in data processing include ensuring security measures and the clear identification and authentication of Volkswagen, Group, and partner company employees.

C. Your Rights

You may exercise the following rights at any time free of charge with Volkswagen AG. Further information on how to exercise your rights can be found in Section D.

Right of access: You have the right to obtain information from us about the processing of your personal data.

Right to rectification: You have the right to request the correction of inaccurate or incomplete personal data concerning you.

Right to erasure: You have the right to request the deletion of your data under the conditions specified in Article 17 GDPR. For example, you may request deletion if the data is no longer necessary for the purposes for which it was collected. You may also request deletion if we process your data based on your consent and you withdraw that consent.

Right to restriction of processing: You have the right to request the restriction of processing of your data if the conditions of Article 18 GDPR are met. This is the case, for example, if you dispute the accuracy of your data. You may then request restriction of processing for the duration of the verification.

Right to object: If the processing is based on an overriding legitimate interest or your data is used for direct marketing purposes, you have the right to object to the processing of your data. In the event of an objection, we ask you to state your reasons for objecting to the data processing. You also have the right to object to the processing of your data for direct marketing purposes. This also applies to profiling, insofar as it is related to direct marketing.

Right to data portability: If the data processing is based on consent or the performance of a contract and is carried out using automated means, you have the right to receive your data in a structured, commonly used, and machine-readable format and to transmit it to another data controller.

Right to withdraw consent: If the data processing is based on your consent, you have the right to withdraw your consent at any time with effect for the future, free of charge.

Right to lodge a complaint: You also have the right to lodge a complaint with a supervisory authority (e.g., the State Commissioner for Data Protection of Lower Saxony) regarding our processing of your data.

D. Your Contact Person

Contact person for exercising your rights

You can find the contact person for exercising your rights and further information at the following website: <https://datenschutz.volkswagen.de>

Data Protection Officer

Our Data Protection Officer is available to you as a contact person for data protection-related concerns:

Data Protection Officer of Volkswagen AG

Berliner Ring 2, 38440 Wolfsburg

dataprivacy@volkswagen.de

Status: April 2025