

VOLKSWAGEN

GROUP SERVICES

Privacy policy according to Article 13, 14 General Data Protection Regulation ("GDPR")

For business partners and employees of business partners of Volkswagen Group Services GmbH

Volkswagen Group Services GmbH (hereinafter referred to as "**we**" or "**VWGS**") is the controller of the personal data of our suppliers, service providers, other business partners and of the personal data of their employees and representatives (all together hereinafter referred to as "**business partners**" or "**you**").

This privacy policy shall be addressed to you if

- you are a business partner of VWGS as a natural person (e.g. , as a consultant or entrepreneur);
- you are an employee or representative of one of our business partner and you have a relationship with us on behalf of that business partner (e.g. if you work on our projects or represent the business partner);
- you are an employee or agent of any person, company, corporation or other organization with whom we are in contract negotiations or otherwise in the process of establishing a business relationship.

A. Contact details of the controller

Volkswagen Group Services GmbH
Major Hirst Street 11
38442 Wolfsburg
info@volkswagen-groupservices.com

B. Contact details of the data protection officer of the controller

Our data protection officer is available as a contact for all data protection-related concerns as well as for exercising your rights. Please address your submissions to:

Data Protection Officer of Volkswagen Group Services GmbH
Volkswagen AG (K-SD)
Mailbox 011/80910
38436 Wolfsburg
Tel. +49 5361 924333
Fax: +49 5361 95790617
E-Mail: konzerndatenschutz@volkswagen.de

C. Data categories

In the course of our cooperation with you, we process categories of data as follows:

- Personal data
- Work related communication and organizational data (work address, telephone number and e-mail address)
- Certificates related to the service
- If applicable, IT usage data insofar as work is performed in VWGS systems.

D. Purposes and legal basis of the processing of your personal data

- As a legal basis for the processing, we rely on Art. 6 (1) letter b) GDPR, if the processing of your personal data is necessary for the performance of a contract or for the implementation of pre-contractual measures.
- We rely on Art. 6 (1) letter f) GDPR as the legal basis for processing if the processing is based on legitimate interests (e.g. cooperation with our business partners and their employees; data processing with affiliated companies for administrative purposes; data submission to authorities for inspections and inquiries, data processing to ensure IT security or assertion of legal claims).
- In addition, we may also rely on Art. 6 (1) letter c) GDPR as a legal basis under certain circumstances if the data processing is necessary for the fulfillment of legal obligations (e.g. performance of notification, disclosure and reporting obligations).
- As a legal basis, we rely on Art. 6 (1) letter a) GDPR, if the data subject has given us their consent to the intended processing of their personal data.

E. Data source

If we have not collected your personal data directly from you, we may have received your personal data from one of our business partners for whom you

work as an employee. In this case, we assume that the required information pursuant to Article 13 GDPR will also be provided to you there.

F. Recipients/disclosure of your personal data

- Service providers of VWGS such as IT service providers, payment service providers and other order processors;
- Specialist consultants (e.g. auditors, lawyers, tax consultants, auditors);
- Authorities;
- Contractual partners of VWGS as far as the transfer is necessary for the fulfillment of legal or contractual obligations;
- Group companies within the Volkswagen Group

We have concluded a commissioned data processing contract with each of our processors and agreed on appropriate guarantees for the protection of personal data. The processors have appropriate technical and organizational measures in place to protect your personal data and are regularly monitored by us.

G. Data transfer to a third country

As a rule, we do not transfer your personal data to third countries (countries that are neither members of the European Union nor the European Economic Area). In individual cases, however, our processors process personal data in countries outside the European Union or the European Economic Area. We select these service providers carefully and review them regularly. In these cases, a data transfer only takes place if the further requirements for such a transfer according to the GDPR are met (for example, the signing of EU standard contractual clauses with the service provider(s) according to Art. 46 (2) c) GDPR).

H. Duration of the data storage

We store your personal data as long as this is necessary for the purpose for which we have collected your data and, in addition, as long as we are legally obliged to do so. This means that we regularly store your data in any case for the duration of our business relationship with you or the business partner for whom you work or your interaction with us (e.g. for contract processing). Legal retention obligations arise for us, for example, from the German Fiscal Code for tax reasons (§ 147 AO) and the German Commercial Code for accounting purposes (§ 257 HGB) and can be up to fifteen years. If the data is no longer required for the fulfillment of contractual or legal obligations, the data are deleted in accordance with our deletion concept. Finally, the storage period is also assessed according to the statutory limitation periods, which can be up to 30 years, for example,

according to §§ 195 et seq. of the German Civil Code (BGB), with the regular limitation period being three years.

I. Your rights

You have the right to information (Art. 15 GDPR), correction (Art. 16 GDPR), deletion (Art. 17 GDPR), restriction of processing (Art. 18 GDPR) and the right to data portability (Art. 20 GDPR).

Insofar as the processing of your personal data is based on your consent, you can revoke this consent at any time without giving reasons to Volkswagen Group Services GmbH, Major-Hirst-Straße 11, 38442 Wolfsburg, Germany, in writing or also by e-mail to info@volkswagen-groupservices.com, with effect for the future. Your revocation will not affect the lawfulness of the processing of your data carried out on the basis of the consent until the revocation.

Finally, you have the right to lodge a complaint with a data protection supervisory authority if you consider that the processing of personal data concerning you infringes the GDPR. This right is without prejudice to any other administrative or judicial remedy.

J. Provision

In contractual relationships, we collect your personal data only for the purposes described above, i.e. as far as this is necessary, e.g. for the proper execution of the contract. You are not obliged to provide personal data. However, if you do not provide personal data, the contract cannot be performed.

If you give us consent, we will use your personal data solely for the purpose covered by the consent; this purpose is described in detail in the consent text. The consent is voluntary and you decide freely whether you want to give it or not.

If the processing of your personal data is carried out due to legal requirements, a duty to provide results from these legal requirements. In order to comply with these legal requirements, we need the personal data from you with the required information. If you do not provide us with the necessary data, we will not be able to establish or continue the desired business relationship with you.

If the processing of your personal data is based on legitimate interests of us, a duty to provide may arise due to general assistance obligations. In any case, before processing your personal data, we will weigh whether the processing is necessary and whether your interests in not processing outweigh. You have the

Seite 5

right to object to processing based on Art. 6 (1) letter f) GDPR in accordance with Art. 21 GDPR.