

## Data protection for retail and business customers.

### Data protection information.

When you use this website, your personal data is processed by the relevant controller and stored for the length of time which is necessary in order to fulfil the established purposes and legal obligations. The text below provides information as to which data this is, how it is processed, and what rights you have in relation to it, especially in relation to the General Data Protection Regulation (EU) 2016/679 (GDPR).

#### I. Data processing by Volkswagen Bank GmbH, Volkswagen Leasing GmbH and Volkswagen Versicherungsdienst GmbH

Depending on which product you seek information about on this website and which service you use, the data processing below will be carried out by Volkswagen Bank GmbH, Volkswagen Leasing GmbH and Volkswagen Versicherungsdienst GmbH.

##### **1. General information on data processing when you use the website**

When you visit our website, we process your data which we collect during your use of the website, or which you provide us with while using it (hereinafter: 'Your Data'). In order to provide our website and services, we exchange Your Data with processors and other contractors (e.g., from the following industries: logistics, telecommunications, receivables management, marketing, printing). We also exchange Your Data with the companies within Volkswagen Financial Services Group (e.g., companies from the industries: banking, leasing, insurance, mobility and fuel/service cards, hereinafter referred to simply as: 'VW Financial Services Group'). Your data will be processed and exchanged where this

- is necessary in order to fulfil the contract with you or to carry out pre-contractual measures at your request (Article 6(1)(1)(b) GDPR);
- is necessary in order to fulfil a legal obligation (Article 6(1)(1)(c) GDPR). Data processing is especially necessary in order to fulfil our legal obligation in the area of data security;
- is necessary in order to safeguard our legitimate interests, or those of a third party (Article 6(1)(1)(f) GDPR). Data processing is especially necessary in order to ensure the provision and functionality of our website, and to be able to provide you with our portals and services;
- this is covered by your freely given consent (Article 6(1)(1)(a) GDPR).

## **2. Transfer to third countries**

The controller may also make use of processors and other contractors (e.g., from the industries: information and communications technology) with their registered offices outside the European Economic Area (EEA) within the framework of this business relationship. Your data will be transferred in accordance with the particular requirements of Articles 44–49 GDPR, whereby the appropriate level of protection is ensured either by an adequacy decision of the European Commission according to Article 45 GDPR, or the conclusion of EU standard contractual clauses according to Article 46(2)(c) and (d) GDPR. You can access and view the EU standard contractual clauses on the European Commission website, or request them directly from the controller and receive a copy.

## **3. General retention periods**

The general duration Your Data is stored for depends on the possible conclusion of a contract via our website, and on when the contract ends.

- Should you seek information on our products and services, but not have initiated a contract, your personal data will be erased six months after the last contact between you and us.
- Your personal data which is relevant for a contract, especially data relevant under tax law, will be erased after the statutory retention period has elapsed, 10 years at the latest after the contract ends. The general storage period for your personal data may last up to 30 years, if this is necessary for bringing, contesting or defending against a legal action.

This data protection information will refer to any different periods before erasure for individual categories of data at the end of the category in question.

## **4. Use of a contact form**

You have the option to contact us using a web form, whereby we will process the data you enter (e.g., personal details, contact details, email address), in order to process your request. Processing will occur for this purpose where this

- is necessary in order to fulfil the contract with you or to carry out pre-contractual measures at your request (Article 6(1)(1)(b) GDPR);
- is necessary in order to safeguard our legitimate interests, or those of a third party (Article 6(1)(1)(f) GDPR). Data processing is especially necessary in order to be able to process your issue;
- this is covered by your freely given consent (Article 6(1)(1)(a) GDPR).

## **5. Use of a login area**

When you create and use a password-protected user account, we will process the data you provide (e.g., personal details, contact details and contractual details) in order to allow you to access our portals, as well as their functions and services. Processing will occur for this purpose where this

- is necessary in order to fulfil a contract with you, or to carry out pre-contractual measures at your request (Article 6(1)(1)(b) GDPR);
- is necessary in order to safeguard our legitimate interests, or those of a third party (Article 6(1)(1)(f) GDPR). Data processing is especially necessary in order to be able to provide our portals and their services;
- this is covered by your freely given consent (Article 6(1)(1)(a) GDPR).

The duration Your Data is stored for depends on your user account. Your data will be erased if you delete your user account. Otherwise, the 'General Storage Periods' shall apply.

## **6. Registration for newsletter and email notifications**

On our website, we offer you the option to subscribe to newsletters and email notifications. If you have consented, the companies in Volkswagen Financial Services Group will use your email address to send you information regarding banking, leasing, insurance and mobility services (e.g., letting, traffic and energy-related services).

You can unsubscribe from the newsletter and from email notifications at any time, e.g., using a link at the end of each newsletter. Your email address will be erased after you revoke your consent to be sent the newsletter and email notifications, where

- You have not consented to storage beyond this point (Article 6(1)(1)(a) GDPR) or
- storage is not necessary in order to fulfil a contract with you (Article 6(1)(1)(b) GDPR).

## **7. Use of an online application process**

If you wish to purchase a product on our website via the online application process, the data you enter (e.g., personal details, contact details, vehicle details) will be temporarily stored after each submission, in order to prevent misuse of the application processes, to ensure the security of our IT systems, and to be able to help you further in the event of disruption. Processing shall occur for the above purposes where this

- is necessary in order to fulfil the contract with you or to carry out pre-contractual measures at your request (Article 6(1)(1)(b) GDPR);
- is necessary in order to safeguard our legitimate interests, or those of a third party (Article 6(1)(1)(f) GDPR). Data processing is particularly necessary in order to be able to process your issue, and to ensure that our systems function properly;
- this is covered by your freely given consent (Article 6(1)(1)(a) GDPR).

The duration for which Your Data will be stored depends on whether you purchase a product. Should you use an online application process but not purchase a product, Your Data will be erased after six months. Otherwise, the 'General Storage Periods' shall apply.

## **8. Use of chat functions**

Depending on availability, we will add chat functions to our website. If you use these, we will in this context process data regarding your use of the chat functions (usage and connection data such as duration of the chat, time of request, browser type). We will also process content exchanged via the chat. Your data will be processed for the purposes of customer advice, and for fault analysis, quality assurance and performance analysis where this

- is necessary in order to fulfil a contract with you, or to carry out pre-contractual measures at your request (Article 6(1)(1)(b) GDPR);
- is necessary in order to fulfil a legal obligation (Article 6(1)(1)(c) GDPR). Data processing is especially necessary in order to fulfil our legal obligations in the area of data security;
- is necessary in order to safeguard our legitimate interests, or those of a third party (Article 6(1)(1)(f) GDPR). Data processing is especially necessary in order to ensure system security, and long-term quality of customer advice.

The data which we process in connection with the chat function will be erased after a year at the latest.

## **9. Google reCAPTCHA**

On our website, we use Google reCAPTCHA, provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter: 'Google') to check and prevent interactions with our sites by automated requests, for example by 'bots'.

This service allows Google to determine from which website a request is sent to us, and from which IP address you use the reCAPTCHA input box. Along with your IP address, Google captures other information where possible, which is necessary in order to offer and guarantee this service. The processing occurs where this is necessary in order to safeguard our legitimate interests, or those of a third party (Article 6(1)(1)(f) GDPR). Data processing is especially necessary in order to secure our website and to prevent undesired automatic requests in the form of spam or similar.

You can find further information on Google's handling of your user data here.

## **10. YouTube**

Our website uses components (videos) from YouTube, LLC 901 Cherry Ave., 94066 San Bruno, USA (hereinafter: 'YouTube'), a Google company. In order to send the video to your browser and to be able to play the video, it is necessary for us to send your IP address to YouTube. The processing occurs where this is necessary in order to safeguard our legitimate interests, or

those of a third party (Article 6(1)(1)(f) GDPR). The processing is particularly necessary in order to design our online offering in an attractive and interesting way.

We use the option provided by YouTube of an 'expanded data protection mode'.

When you call up a page which has a video embedded in it, a connection to the YouTube servers is established, and the content displayed by means of a notification to your browser on the web page. According to details provided by YouTube, in 'expanded data protection mode', Your Data (especially regarding which of our web pages you have visited and device-specific information including your IP address) will only be transferred to YouTube servers in the USA if you view the video. By clicking on the video, you consent to this transfer of data. If you are logged onto YouTube at the same time, this information will be associated with your YouTube account. You can prevent this by logging out of YouTube before you visit our website.

Google complies with the data protection regulations of the 'US Privacy Shield', and is registered with the 'US Privacy Shield' programme of the US Department of Commerce.

You can find further information regarding data protection in connection with YouTube in Google's privacy policy.

## **11. Cookies**

We use cookies on our website. Cookies are small text files which your browser creates automatically, and which are placed on your end device when you visit our site. Cookies do not damage your end device, and do not contain any viruses, trojans or other malware.

The cookie stores information generated in connection with the specific end device used. This does not, however, give us direct access to your identity.

Most browsers accept cookies automatically. You can configure your browser in such a way that no cookies are stored on your computer, or that a notification appears before a new cookie is created. Deactivating cookies completely may mean that you are unable to use all the functions on our website.

### **1. Session cookies:**

Cookies serve to statistically record the use of our offering, and to design it in a way that is more user-friendly and effective for you. We use so-called cookies to recognise that you have already visited individual pages on our website.

The data stored in these cookies (e.g., session ID, time of your visit to a page) will be automatically erased at the end of your visit. Some cookies, by contrast, remain stored on your end device until you delete them, or the cookie's defined period of validity expires.

Processing for the above purposes occurs where this is necessary in order to safeguard our legitimate interests, or those of a third party (Article 6(1)(1)(f) GDPR). Data processing is especially necessary in order to optimise our website and services.

## **2. Analysis cookies:**

Our website uses tracking measures in order to ensure that our website is designed according to user needs, and is optimised on an ongoing basis, and to statistically evaluate use of the website. The processing occurs where this is necessary in order to safeguard our legitimate interests, or those of a third party (Article 6(1)(1)(f) GDPR). The processing is especially necessary for the needs-based design and ongoing optimisation of our website and services. We also use the data to ensure that advertising content is presented in an optimal way. You can object to the use of analysis cookies, and the associated analysis services. Please find categories of data processed and options for objecting in the description of the corresponding analysis cookies below.

### **a) Adobe Analytics**

Our website uses Adobe Analytics, a web analysis service from Adobe Systems Software Ireland Limited, 4-6 Riverwalk, Citywest Business Campus, Dublin 24, Ireland (hereinafter: 'Adobe'). In this context, pseudonymous user profiles are created and cookies used.

The information generated by the cookie regarding your use of our website is usually transferred to an Adobe server in Ireland and stored there. This information may also be passed on to third parties where this is mandated by law, or where third parties process this data on Adobe's behalf. Under no circumstances will Adobe associate your IP address with other Adobe data. IP addresses are anonymised, such that it is no longer possible to trace them (IP masking).

You can prevent the collection of data regarding your use of the website collected by the cookie (including your IP address), as well as the processing of this data by Adobe, by objecting to collection of data by Adobe Analytics. An opt-out cookie is installed that prevents the future collection of your information when you visit this website. The opt-out cookies only apply in this browser and only for our website, and will be stored on your device. If you delete your cookies in your browser, you will have to install the opt-out cookie again. Under the following link, you can find an explanation of how you can deactivate data collection on your computer or your mobile end device: <https://www.adobe.com/de/privacy/opt-out.html>.

Further information on data protection in connection with Adobe Analytics can be found here.

### **b) Google Ads (formerly Adwords)**

Our website uses the web analysis service Google Ads (formerly Adwords) from Google, in order to display online adverts. We do not process any of your personal data in connection with this. You can find information regarding any data processing carried out automatically by Google here.

### **c) Adobe Target**

Our website uses Adobe Target, a web analysis service from Adobe Systems Software Ireland Limited, 4-6 Riverwalk, Citywest Business Campus, Dublin 24, Ireland (hereinafter: 'Adobe'). Pseudonymised user profiles are created and cookies used in this context in order to facilitate tests of our website, and to be able to present you with appropriate content when you visit our website again.

The information generated by the cookie regarding your use of our website is usually transferred to an Adobe server in London, England and stored there. This information may also be passed on to third parties where this is mandated by law, or where third parties process this data on Adobe's behalf. Under no circumstances will Adobe associate your IP address with other Adobe data.

You can prevent data regarding your use of the website from being collected by the cookie by objecting to Adobe Target collecting Your Data at the link below. An opt-out cookie will be installed, which will prevent the pixels from loading, and the transfer of personal data by cookies. The opt-out cookies only apply in this browser and only for our website, and will be stored on your device. If you delete your cookies in your browser, you will have to install the opt-out cookie again.

Further information on data protection in connection with Adobe Target can be found [here](#).

## **II. Additional data processing at Volkswagen Bank GmbH**

**The following data processing occurs when you search for information on a Volkswagen Bank GmbH product, or use one of its services:**

### **a) Adform**

Our website uses the web analysis service of Adform A/S, Wildersgade 10B, 1408 Copenhagen, Denmark (hereinafter: 'Adform'). This collects the online identification numbers (online IDs), such as cookie IDs, IP address, device IDs, advertising ID/IDFA (e.g., on Android or Apple smartphones) of your end device, in order to recognise your end device, the internet browser you use and/or the app you use if you visit again. No unique user data, such as name or address, is stored here. All the IDs we use only allow us to recognise your end device, your internet browser or the app you are using. Adform uses this data to provide us with various statistics. In this way we are able to establish whether internet users who have seen our ads then visit our website, and which products they are interested in. The statistics do not generate a connection to individual online IDs.

We can also recognise users of our website if they visit again, and adapt the content of future advertising contact to their interests (e.g., products and information viewed), as well as recognising which ads or mediators made users aware of us. Analysing

advertising contacts, the content viewed on our website and the targeted delivery of ads based on your interests help us to show you ads related to your interests.

Should you not wish Adform to collect Your Data, you can find an explanation at the following link as to how you can deactivate data collection on your computer, or your mobile end device: <https://site.adform.com/privacy-center/platform-privacy/opt-out/>.

## **b) AWIN**

Within the framework of particular sales campaigns, our website uses the web analysis service provided by AWIN AG, Eichhornstraße 3, Berlin (hereinafter: 'AWIN'), which collects data for analysis and marketing purposes, and in so doing helps us to improve our marketing strategy and our website. AWIN uses the data collected in order to link advertising contact and click on ads on pages managed by AWIN with resulting us of our website. This allows us to establish whether internet users who have seen our ads in the AWIN network visit our website, and which products and content they are interested in. This helps us to adapt the content of our ads to customers' interests. Pseudonymous online identification numbers (Online IDs) such as cookie IDs, IP address, device IDs, advertising IDs/IDFA (e.g., on Android or Apple smartphones) are used to collect data. No unique user information, such as name or address, is stored here. All the IDs we use only allow us to recognise your end user device or your internet browser.

Should you not wish AWIN to collect Your Data, you can find an explanation at the following link of how to deactivate data collection on your computer or your mobile end device: <https://www.awin.com/de/rechtliches/cookieoptout>.

## **c) Consentric technology**

Our website uses Consentric technology from Deutsche Post AG to determine statistical characteristic values for cross-media use. One of our partners assigns a Deutsche Post Direkt GmbH 'microcell' to your stored shipping or billing address (6.6 households on average), and this key figure is stored in encrypted form with another service provider. The legal basis for this use of your address is Article 6(1)(1)(f) GDPR. In addition to this, cookies will be stored on the PC or other device you are using, with your consent. IP addresses will not be stored in the procedure, and will be immediately anonymised.

With the help of the cookie, it is possible to recognise that you are visiting a website participating in the measurement programme. This information is then aggregated on the basis of the aforementioned Deutsche Post Direkt GmbH microcell, and is can thus no longer be traced back to your person. The objective is to first statistically evaluate physical advertising on a website. Specifically, the point is to determine how many people who have received a catalogue (or other advertising medium) then searched out the website of the company in question. At no time are individual users identified by name. Your identity remains protected. Access to a website or another advertising medium is stored by Deutsche Post Direkt GmbH as a characteristic of a microcell. This characteristic may be used by Deutsche Post Direkt GmbH within the framework of the



address services it otherwise offers in order to select target group elements on a microcell level, and use them for dialogue marketing campaigns.

You can object to data protection within the framework of the described procedure at the following link: <https://pixel.consentric.de/optout>.

Please note: Using the cookies placed with you is the only way to recognise that you do not wish to be recorded in future. If you delete all cookies, these cookies will also be deleted. In this case, you will need to object again to participating in the procedure.

This procedure was developed in line with data protection, and has received the privacy seal of ADCERT Privacy Audit GmbH for being particularly data protection-compliant ([www.adcert.eu](http://www.adcert.eu)).

#### **d) Multichannel tracking with the web analysis service intelliAd**

This website uses the web analysis service intelliAd, developed by diva-e Products GmbH, Sendlinger Str. 7, 80331 Munich. For needs-based design and to optimise this website, we process anonymised user data and store it in aggregated form. When we use intelliAd tracking, cookies are stored locally. You have the right to object to the processing of your usage data. To do this, use the intelliAd opt-out function.

### **III. Data subjects' rights, contact details, data security and validity of data protection information**

#### **12. Rights of data subjects**

You have the right:

- under Article 15 GDPR to demand information on your personal data processed by the controller;
- under Article 16 GDPR to request the immediate rectification of incorrect data, or completion of your personal data stored by the controller;
- under Article 17 GDPR to demand the erasure of your personal data stored by the controller, insofar as the statutory requirements have been met;
- under Article 18 GDPR, to demand that the processing of your personal data be restricted, provided that the statutory requirements have been met;
- under Article 20 GDPR, to receive the personal data that you have provided to the controller in a structured, commonly used and machine-readable format, or to request that this data be transferred to another controller;
- under Article 7(3) GDPR, to revoke the consent you have given to the controller at any time;
- under Article 77 GDPR to raise an objection with a supervisory authority. To do this, you can generally contact the supervisory authority for your usual place of residence or work, or for our registered office.

You can contact the data protection officer at [dsb.fsag\[at\]vwfs.com](mailto:dsb.fsag@vwfs.com).

Depending on which product you have sought information regarding on this website or which service you have used, you can find the contact details of the relevant controller below.

### **Right to object**

**You have the right to raise an objection to the processing of your personal data in accordance with Article 21 GDPR, insofar as there are reasons for this arising from your particular situation, or the objection is against general advertising, or advertising tailored to you. In the latter case, you have a general right of objection, which shall be implemented by us without stating a particular situation.**

#### **Controller, Volkswagen Bank GmbH:**

Postal address of the controller and the data protection officer:

**Volkswagen Bank GmbH,**  
Gifhorner Str. 57,  
38112 Braunschweig.

If you wish to exercise your right to object by contacting Volkswagen Bank GmbH, an email to [widerspruch\[at\]volkswagenbank.de](mailto:widerspruch@volkswagenbank.de) will be sufficient.

If you wish to exercise your rights as a data subject by contacting Volkswagen Bank, an email to [betroffenenrechte\[at\]volkswagenbank.de](mailto:betroffenenrechte@volkswagenbank.de) will be sufficient.

#### **Controller, Volkswagen Leasing GmbH:**

Postal address of the controller and the data protection officer:

**Volkswagen Leasing GmbH,**  
Gifhorner Str. 57,  
38112 Braunschweig.

If you wish to exercise your right to object by contacting Volkswagen Leasing GmbH, an email to [widerspruch\[at\]volkswagenleasing.de](mailto:widerspruch@volkswagenleasing.de) will be sufficient.

If you wish to exercise your rights as a data subject by contacting Volkswagen Leasing GmbH, an email to [betroffenenrechte\[at\]volkswagenleasing.de](mailto:betroffenenrechte@volkswagenleasing.de) will be sufficient.

#### **Controller, Volkswagen Versicherungsdienst GmbH:**

Postal address of the controller and the data protection officer:

**Volkswagen Versicherungsdienst GmbH,**  
Gifhorner Str. 57,  
38112 Braunschweig.

If you wish to exercise your right to object by contacting Volkswagen Versicherungsdienst GmbH, an email to widerspruch[at]vvd.de will be sufficient.

If you wish to exercise your rights as a data subject by contacting Volkswagen Versicherungsdienst GmbH, an email to betroffenenrechte[at]vvd.de will be sufficient.

### **13. Data security**

All data personally transferred by you will be transferred in encrypted form according to the generally usual and secure standard TLS (Transport Layer Security). TLS is a secure and tested standard, which is also used, for example, in online banking. You can recognise a secure TLS connection by, among other things, the s appended to http (to make https://) in your browser's address bar, or the lock symbol in the lower area of your browser.

We also use appropriate technical and organisational security measures in order to protect Your Data from accidental or intentional manipulation, partial or complete loss, destruction or against unauthorised access. Our security measures are continuously improved in line with technological developments.

### **14. Validity and amending of this data protection information**

This data protection information is currently valid, as at August 2019.

The further development of our website and offerings, or changes to legal or official requirements, may make it necessary to update this data protection information. You can access and print up-to-date data protection information on the website at any time.