

## Privacy Policy

For business partners and employees of business partners of Volkswagen AG

The following discloses how your personal data, as a business partner or employee of a business partner, is processed by Volkswagen AG as the sole responsible party for data protection (controller) or by Volkswagen AG and its Group companies as joint responsible parties (joint controller) for data protection.

This data privacy statement does not cover the processing of your data outside the data processing activities described below, in particular by Group companies belonging to the Volkswagen Group as the sole controller. In this respect, only those particular privacy policies made available to you for these data processing activities by Volkswagen AG or Group companies shall apply.

### 1. Who is responsible for data processing and whom may I contact?

#### a. Controller

For the processing of your personal data,

Volkswagen AG  
Berliner Ring 2, 38440 Wolfsburg, Germany  
Amtsgericht Braunschweig (Brunswick District Court) - HRB 100484

is responsible for data protection either as the sole responsible party or together with the Group companies within the meaning of Article 4 No. 7 of the EU General Data Protection Regulation (Regulation (EU) 2016/679 – “GDPR”).

See Clause 3 below for information about whether Volkswagen AG is the sole controller or Volkswagen AG and the Group companies are joint controllers.

Volkswagen AG and the Group companies have concluded joint controllership agreements within the meaning of Article 26 GDPR with regard to their joint responsibility. We shall make available the principal content of these agreements on request. Please use the following contact options for this purpose.

#### b. Contact options for data subjects

##### Information

For information about the processing of your personal data within the meaning of Article 15 GDPR, please use one of the forms below.

[Provision of information form for suppliers](#)

[Provision of information form for partner company employees](#)

If you are in a contractual relationship with Volkswagen AG or a Group company in your capacity as a business partner, please use the “Provision of information form for suppliers”. If you are employed by a company that is in a contractual relationship with Volkswagen AG or a Group company in its capacity as a business partner, please use the “Provision of information form for partner company employees”. After completing the form, please send it to us by clicking “Send”.

##### Other requests

For the assertion of all other rights as a data subject or other requests, please use one of the following contact options:

Information team for business partners and business partner employees

Service hours  
Monday to Friday from 8:00 to 18:00 (CET)

Contact  
Tel.: +49 5361 - 9 - 46290  
datenschutz@VWGroupSupply.com

**c. Data protection officer**

You can contact the Volkswagen AG data protection officer as follows:

Volkswagen AG Data Protection Officer  
Berliner Ring 2, 38440 Wolfsburg, Germany  
datenschutz@volkswagen.de

**2. What data do we process and what sources does the data come from?**

We process personal data that we obtain from you with your permission or that we collect about you in a permissible manner as part of our business relationship with you as a business partner or as an employee of a business partner and as part of your interaction with us. This includes, in particular, the use of IT systems (including websites and platforms) and communication media, contact with employees or customer support, information that we obtain from your supervisors and colleagues, registration for newsletters, participation in training and further education courses, participation in events, and the receipt of non-cash benefits.

Relevant personal data includes the following:

**Professional contact and (employment-related) organisational data** (e.g. surname, first name, title, academic degree, gender, address, date and place of birth (for identification purposes, in particular for requesting user rights for IT systems), nationality (in order to take specific national legislation into account), name of the company that you work for along with the department and occupation, professional email address, phone number, address),

**Private contact details** (e.g. address, email address, phone number),

**Information about private/professional situation & characteristics** (e.g. professional title, duties, roles, qualifications, training and further education details, data privacy declarations such as declarations of consent for the processing of personal data, language skills, activity-based assessments),

**Photos** (e.g. plant ID card, portrait photo published on the basis of consent obtained separately),

**Health record** (e.g. accidents on the plant premises),

**IT usage data** (e.g. user ID, roles and rights, (system) authorisations, login times, computer name, IP address, user-specific settings, change documentation, log data pertaining to the use of the One.Konzern business platform (anonymous cookie ID, operating system, web browser, screen resolution, date and time of visit, websites accessed, referer URL), etc.),

**Data from permitted surveillance equipment** (e.g. video monitoring systems, data from IT security programmes (including log files with IP addresses, MAC addresses, admission checks), data to access the plant premises or specific secure areas),

**Vehicle data** (model, brand, registration number),

**Information about received work equipment and allocation plans** (e.g. mobile phones, smartphones, tablets, laptops, assigned locker, access authorisation),

**Other** We may also process other personal data from you that you provide as part of our interaction with you, e.g.

ID card data, data pertaining to the use of IT systems or as part of your interaction with our employees, or data that we collect about you in a permissible manner from publicly available sources (e.g. commercial register, credit rating agencies (such as Schufa in Germany), the media, publications).

### 3. For what purposes do we process your data and on what legal basis?

We always process your personal data for a specific purpose and only insofar as this is necessary in order to fulfil this purpose.

#### a. General information

Personal data may generally be processed based on the following legal grounds:

- You have provided your consent (Article 6(1)(1)(a) GDPR);
- Processing is necessary for the performance of a contract where you are the contracting party, or in order to take steps at the request of you prior to entering into a contract (Article 6(1)(1)(b) General Data Protection Regulation (GDPR));
- Processing is necessary for compliance with a legal obligation to which we are subject (Article 6(1)(1)(c) GDPR);
- Processing is necessary in order to protect your vital interests or to protect those of another natural person (Article 6(1)(1)(d) GDPR);
- Processing is necessary for the performance of a task that is carried out in the public interest or in the exercise of official authority vested in us (Article 6(1)(1)(e) GDPR);
- Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data (Article 6(1)(1)(f) GDPR).

If, in individual cases, we process special categories of personal data, this may be done contrary to the statements above and generally based on the principles below:

- You have given your explicit consent (Article 9(2)(a) GDPR);
- Processing is necessary to protect your vital interests or those of another natural person and you are physically or legally incapable of giving consent (Article 9(2)(c) GDPR);
- Processing relates to personal data that you have manifestly made public (Article 9(2)(e) GDPR);
- Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity (Article 9(2)(f) GDPR);
- Processing is required for the purpose of health care in order to assess your capacity to work, for medical diagnosis purposes, for provision or treatment in the health care or social sector, or for the management of systems and services in the health care and social sector, or due to a contract that you have concluded with a member of a health care profession, and this data is subject to a corresponding obligation to secrecy by medical personal or other persons, or is processed under their responsibility (§ 22(1)(1)(b) German Federal Data Protection Act (BDSG)).

Special categories of personal data includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of 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.

The following outlines provide a more specific definition of the legal grounds on which – and the purpose for which –

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the personal data stated under Clause 2 may be processed. The data processing activities stipulated under letter b are carried out by Volkswagen AG as the sole controller. The data processing activities stipulated under letter c are carried out by Volkswagen AG and other Group companies as joint controllers.

## b. Data processing by Volkswagen AG as controller

| Purpose  | Examples  | Legal basis   | Legitimate interest when weighing interests  |
|--|---|---|--|
| Establishing contact for the preparation, execution and termination of a business relationship between Volkswagen AG and the business partner for whom you work or, if applicable, with yourself outside the processes stated under letter c | General communication<br>Processing of orders and acquisitions based on contacts (e.g. nomination agreement, framework agreement, order)<br>Enquiries pertaining to current orders (change requests, changes in capacity, etc.)<br>Appointment scheduling, event/participant management<br>Billing between Volkswagen AG and the business partner, billing of performance periods and/or billing of expenses or costs<br>Contact person for the business relationship, business units, departments, projects, cooperation between the business partners<br>Cooperation as part of the business relationship, projects | Contract initiation and execution (if you are working in your own name), weighing of interests                          | Collaboration with business partners, practicable process design within the business relationship by making contact persons available; controlling and billing of contractual services |
| Execution and processing of Volkswagen AG procurement processes and internal processes for the execution of the business relationship outside the processes stated under letter c  | Processing of orders and acquisitions based on contacts (e.g. nomination agreement, framework agreement, order)<br>Monitoring and reporting<br>Administration<br>Fulfilment of fiscal control and reporting obligations, data archiving<br>Accounting, debt collection  | Fulfilment of legal requirements, execution of contract (if you are working in your own name) and weighing of interests | Design of processes within the business relationship, fulfilment of legal and official guidelines  |

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|--|---|---|--|
| Preparation and management of access rights to the plant premises, facilities, buildings, security of the Volkswagen AG plant premises | <p>Preparation of plant ID cards and access rights</p> <p>Identification of visitors and access rights</p> <p>Visitor management, issue of visitor passes</p> <p>Issue of entrance and/or parking access permit for vehicles visiting the plant</p> <p>Video monitoring for plant premises</p>  | Execution of contract (if you are working in your own name), weighing of interests  | Protection of our business and trade secrets, protection of our property rights, management of access rights to our buildings and premises                               |
| IT administration outside the processes stated under letter c  | <p>User management (allocation of access rights, IT support, system access, authorisation management)</p> <p>Verification of changes to information in applications</p> <p>to clearly identify the user for the secure use of applications</p> <p>Identification of errors and guarantee of system security, including exposure and tracking of unauthorised access attempts and access to our web server</p> | Weighing of interests and execution of contract (if you are working in your own name), fulfilment of our legal requirements for data protection | Guarantee of security and integrity of processes when using our systems, rectification of errors and exposure and tracking of unauthorised access and/or access attempts |
| Project organisation and management  | <p>Collaboration on projects</p> <p>Exchange with other business partners on projects</p>   | Execution of contract (if you are working in your own name), weighing of interests  | Cooperation with business partner  |
| Taxes  | <p>Identification and reporting of monetary benefits from benefits in kind</p> <p>Legal documentation regarding recipients of hospitality and gifts</p>   | Fulfilment of our legal requirement with regard to taxes  |  |
| Catering   | <p>Cashless payment</p> <p>Claim for card balance on plant ID cards</p>   | Fulfilment of contract (hospitality agreement and/or payment function of plant ID card)   |  |



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| Health protection  | Medical care in the event of work-related and commuting accidents and/or accidents that occur on the plant premises  | Consent, health care, medical diagnostics, protection of vital interests, § 22(1)(1)(b) BDSG |  |
|  | Medical care (acute medicine, medical emergency, work-related accident, occupational health examinations and preventative care, outpatient clinics, medical advice, functional diagnostics, medical history, laboratory analysis)                                    |  |  |
| Audit  | Audits and special checks  | Weighing of interests  | Monitoring of compliance with contractual and legal obligations of Volkswagen AG, of the business partner and of the employees |
|  | Internal investigations  |  |  |
| Protection and defence of our rights and disclosure as part of official/legal measures   | Exercise and assertion of rights and claims  | Fulfilment of legal requirements   | Assertion and defence of our rights and fulfilment of legal and official regulations   |
|  | Disclosure as part of official/legal measures for the purpose of collecting evidence, prosecution and the assertion of civil law claims<br><br>Fulfil the rights of data subjects according to the GDPR, providing the data processing is in our sole responsibility | Weighing of interests  |  |
| Preventing, combating and investigating of financing for terrorism and offences that are detrimental to assets, comparison with European and international anti-terror lists | Comparison with anti-terror lists  | Fulfilment of legal requirements, weighing of interests                                      | Fulfilment of legal and official regulations   |
|  |  |  |  |
| Retention and archiving  | Archiving based on fiscal and commercial retention obligations   | Fulfilment of legal requirements, weighing of interests                                      | Fulfilment of legal and official regulations, internal guidelines and industry standards                                       |

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| Prevention of fraud and money laundering  |  | Fulfilment of legal and official regulations |   |
| Statistical evaluations for corporate management, cost recording and controlling                | Reporting on economic indicators   | Weighing of interests                        | Evaluations for management of our business processes and cost controlling                       |
| Conducting surveys and campaigns  | Conducting surveys, marketing campaigns, market analyses, prize draws, competitions and related activities   | Weighing of interests, consent               |   |
| Trial, development, further development of our products, quality assurance, product enhancement | Processing of data pertaining to the use of a trial/test vehicle (e.g. driving and operating behaviour, position and movement data, video and audio data) when employed as a trial/test driver for product development and/or quality assurance and during acceptance road tests | Research<br>Weighing of interests<br>Consent | Trial, development, further development of our products, quality assurance, product enhancement |

c. Data processing as part of the joint controllership of Volkswagen AG and Group companies belonging to the Volkswagen Group

| Purpose  | Examples  | Legal basis   | Legitimate interest when balancing interests   |
|--|---|---|--|
| Establishing contact for the preparation, execution and termination of a business relationship between Volkswagen AG or a Group company and the business partner for whom you work or, if applicable, with yourself within the context of the procurement processes developed across the Group | <p>General communication</p> <p>Processing of orders and acquisitions based on contacts (e.g. framework agreement, order)</p> <p>Enquiries pertaining to current orders (change requests, changes in capacity, etc.)</p>  | Contract initiation and execution (if you are working in your own name), weighing of interests  | Collaboration with business partners, practicable process design within the business relationship by making contact persons available; controlling and billing of contractual services |
| Execution and processing of Volkswagen AG procurement processes and internal processes for the execution of the business relationship within the context of the procurement processes developed across the Group   | <p>Processing of orders and acquisitions based on contacts (e.g. framework agreement, order)</p> <p>Monitoring and reporting</p> <p>Administration</p> <p>Fulfilment of control and reporting obligations, data archiving</p> <p>Accounting, debt collection</p>  | Fulfilment of legal requirements, execution of contract (if you are working in your own name) and weighing of interests                         | Design of processes within the business relationship and creation of Group-wide synergies, fulfilment of legal and official guidelines   |
| IT administration outside the context of the procurement processes developed across the Group  | <p>User management (allocation of access rights, IT support, system access, authorisation management)</p> <p>Verification of changes to information in applications</p> <p>to clearly identify the user for the secure use of applications</p> <p>Identification of errors and guarantee of system security, including exposure and tracking of unauthorised access attempts and access to our web server</p> | Weighing of interests and execution of contract (if you are working in your own name), fulfilment of our legal requirements for data protection | Guarantee of security and integrity of processes when using our systems, rectification of errors and exposure and tracking of unauthorised access and/or access attempts               |

The list of participating Group companies is available to view and download here:

[List of Group companies](#)



#### 4. Is it mandatory to make personal data available?

As part of the business relationship and/or our interaction with you, you only have to make available the personal data required for the interaction or that we are legally required to collect. If you have to make personal data available to us due to a legal or contractual obligation, we will make you aware of this fact when collecting the data, with reference to the obligation in question. If you do not provide us with the relevant data, certain services may not be able to be provided.

#### 5. Who will receive my data?

Within Volkswagen AG and the Group companies, your data is provided to those bodies that require it as part of your employment (e.g. Sales in Germany, IT).

Furthermore, service providers (also known as processors) contracted by us and that operate on our behalf may receive this data for these purposes. These providers include:

- Group companies belonging to the Volkswagen Group that provide services (e.g. IT services)
- Printing service providers
- Media providers and shipping providers
- Archiving service providers
- Hosting service providers
- IT service providers (e.g. support, maintenance)
- Development service providers that operate on our behalf
- Event providers
- Logistics/warehouse enterprises
- Consulting service providers

Where necessary, we may also disclose your personal data to the following categories of recipients that are acting as controllers for the purposes described above:

- Other Group companies as part of the data processing activities described under Clause 3 within the context of joint controllership as well as customers, other business partners (e.g. development partners, consulting service providers, lawyers, tax advisers, auditors) and Group company subcontractors through whom you interact with us as part of your professional duties or business operations
- Universities
- Insurance companies
- Authorities within their sphere of responsibility (e.g. tax office, police, public prosecutor's office, social insurance bodies)
- Courts of law
- Other third parties providing you instruct us to disclose your data or provide your consent.

#### 6. Is data transferred to third countries?

As a rule, we do not transfer your data to third countries (i.e. countries that are not a member of the European Union or of the European Economic Area).

As part of the data processing activities described under Clause 3 within the context of the joint controllership of Volkswagen AG and other Group companies, we also transfer your data within the Group to recipients outside the European Union and the European Economic Area. In certain cases, too, our processors will process personal data in countries outside the European Union or the European Economic Area.

In any case, data is only transferred to third countries if a sufficient level of data protection level is assured by the third country in accordance with the European Commission's adequacy resolution, or if suitable guarantees (e.g. data protection contracts using the European Commission's standard data protection clauses) can be provided to protect your personal data to an appropriate level. Within the context of the agreements between Volkswagen AG

and the Group companies regarding joint controllership within the meaning of Article 26 GDPR, a suitable, standardised level of data protection is guaranteed through the application of the European Commission's standard data protection clauses. The agreements with processors regularly provide for the conclusion of the European Commission's standard data protection clauses, which guarantee a suitable level of data protection. A copy of these guarantees will be provided on request. Please use the contact information listed above for this purpose.

## 7. How long will my data be stored?

We will save your personal data for as long as it is required to fulfil the purpose for which we recorded it. This means we regularly save your data at any rate for the duration of our business relationship with you or with the business partner whom you work for and/or for the duration of your interaction with us.

In addition, we are subject to various retention and documentation obligations pursuant to, inter alia, the German Commercial Code (HGB) and the German Fiscal Code (AO). The retention or documentation periods specified therein are up to ten years. Regardless of the purpose for which we have collected your data, we store your data for as long as it takes to fulfil these retention and documentation obligations. Finally, the duration of storage is also determined based on the statutory periods of limitation, which may, for example, be up to 30 years according to §§ 195 ff. of the German Civil Code (BGB), with the regular statute of limitation being three years.

Under certain circumstances, your data has to be retained for a longer period, e.g. if, in conjunction with official or legal proceedings, a legal hold or litigation hold (i.e. a ban on deleting the data for the duration of the proceedings) is put in place.

## 8. What rights do I have?

As the data subject, you are entitled to the following data protection rights within the scope of legal provisions:

- |                                   |  |
|-----------------------------------|--|
| <b>Information:</b>               | You are entitled to request information about the data stored about you and the scope of the data processing performed and the dissemination of this data, and to receive a copy of the personal data stored about you.  |
| <b>Rectification:</b>             | You are entitled to request the rectification of any personal data stored about you that is incorrect and to have any incomplete data completed.   |
| <b>Erase:</b>                     | <p>You are entitled to request the erasure of personal data stored about you, subject to legal requirements.</p> <p>This is especially the case if</p> <ul style="list-style-type: none"><li>– Your personal data is no longer necessary in relation to the purposes for which it was collected;</li><li>– you have withdrawn your consent which was the sole legal basis for processing your personal data;</li><li>– you – if the processing of your personal data was based on legal grounds pertaining to a weighing of interests – have objected to processing due to personal reasons and we are not able to demonstrate that there are overriding legitimate grounds for the processing;</li><li>– your personal data was processed unlawfully; or</li><li>– your personal data has to be deleted in order to conform to legal requirements.</li></ul> <p>If we have disclosed your data to third parties, we will inform them about the erasure of the data providing this is legally required.</p> <p>Please be aware that your right to erasure is subject to restrictions. For example, we cannot and may not delete any data that we must continue to retain due to legal retention periods. Furthermore, data that we require for the establishment, exercise and defence of legal claims is regularly excluded from your right to erasure.</p> |
| <b>Restriction of processing:</b> | Under certain conditions, you are entitled to request that processing activities are restricted (i.e. the flagging of stored personal data with the aim of restricting its processing in the future). These conditions are:  |

- The accuracy of the personal data is contested by you and we have to check the accuracy of the personal data
- Processing is unlawful, but you oppose the erasure of the personal data and instead request the restriction of their use
- We no longer require your personal data for processing purposes, but you require the data to establish, exercise or defend legal claims
- You have - if the processing of your personal data was based on legal grounds pertaining to a weighing of interests - filed an objection against the processing of the data and it is not yet clear whether our legitimate reasons supersede your objection

In the event of a processing restriction, the data will be flagged accordingly and – apart from being stored – will only be processed with your consent or in order to establish, exercise or defend legal claims or to protect the rights of another natural or legal person or for reasons of substantial public interest of the EU or an EU member state.

**Data portability:**

If we process your personal data that you have provided us on the basis of your consent or an agreement with you and carry out the processing via automated means, you are entitled to receive the data in a structured, commonly used and machine-readable format and to transmit this data to another controller without any attempt by us to prevent this. In addition, you have the right to have the personal data transmitted directly by us to another controller, providing this is technically feasible and does not adversely affect the rights or freedoms of other persons.

**Withdrawal of consent:**

If you have provided your consent to the processing of your personal data, you can withdraw it at any time. Please note that a revocation only applies to the future. Processing that was conducted prior to the withdrawal of consent is unaffected.

**Lodge a complaint:**

Furthermore, you have a right of lodge a complaint with a data protection supervisory authority if you consider that your personal data is not being processed lawfully. The right of appeal is without prejudice to any other administrative or judicial remedy. The address for the data protection supervisory body responsible for Volkswagen AG is:

**The State Officer for Data Protection in Lower Saxony**

Prinzenstrasse 5  
30159 Hannover

## Information regarding your right to object

### 1. Right to objection for personal reasons

You are entitled to object to the processing of your personal data for reasons relating to your particular situation. This is provided that the data processing activities are performed in the public interest or on the basis of a weighing of interests. This also applies for profiling.

In the event of an objection, we will no longer process your personal data. That is unless

- we can demonstrate a compelling legitimate need to process this data that supersedes your interests, rights and freedoms, or
- your personal data is required for the establishment, exercise or defence of legal claims.

Insofar as we base the processing of your personal data on the weighing of interests, we assume that we can demonstrate a compelling legitimate reason which, despite your objection, will permit us to process the data; however, this will of course be checked on a case-by-case basis.

### 2. Exercising a right to object

An objection may be made informally; the contact details stated in this data privacy notice should be used if possible.