

Privacy Policy for the Group Retail Portal ("GRP") – version 5.1

A. Data Controller

We are pleased that you are visiting a website of Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany, noreplygroupretailportal@volkswagen.de, registered in the Commercial Register of the Municipal Court Braunschweig (Braunschweig District Court) under No. HRB 100484 ("Volkswagen AG"). In the following, we would like to inform you about the processing of your personal data by Volkswagen AG in connection with your visit of the website.

In addition, usage data will be analyzed when you are using GRP to ensure information security under the joint responsibility of Volkswagen AG, AUDI AG, Seat S.A. and Škoda AUTO a.s. Further information on this topic is provided in the Privacy Policy Information Security in Aftersales Systems, which you can access here <https://datenschutz.volkswagen.de/download/get-document-content/en-GB/information-security-aftersales>.

B. Processing of your personal data

I. Processing of log files

We process log files from registered users ("Users") of the "GRP", which may contain the following personal data:

1. your IP address,
2. your User ID
3. your context ID
4. your personal information before and after changing this information,
5. reasons for requests, changes or cancellations of roles and rights, as well as
6. the time and date of each activity on the GRP.

The processing of this personal data of users of the GRP for the purpose of availability (error analysis), verification of user and data accesses, control and traceability of technical administrative accesses as well as for security relevance is carried out in accordance with Article 6 paragraph 1 letter f GDPR based on our legitimate interest to ensure the security and integrity of the GRP. Depending on its purpose, this log data will be deleted no later than twelve months after the end of the respective calendar year, unless there are legal obligations that require a longer storage period.

Log files are not processed for visits to our website without registration/login.

II. Registration on the "GRP" including master data management

The GRP is a cloud- and web-based application which provides registered users ("User") access to applications of the Volkswagen Group. When registering, Volkswagen AG will collect the following personal data from you: **First name, last name, Volkswagen User-ID and business e-mail-address** ("master data"). In the event that your initial registration as a User is not carried out by yourself, but by an administrator, your mobile phone number will also be collected for the purpose of two-factor authentication and to be able to send an SMS with an initial password.

Once your registration has been confirmed, you can log in to the GRP by entering your e-mail address or user ID and your self-defined password. Registered employees of the Volkswagen Group can alternatively log in with their PKI card.

The aforementioned registration data must be provided by you for the use of the GRP in accordance with section 2.3 of the Terms of Use. Without the provision and processing of this data, proper registration on and subsequent use of the GRP is not possible.

The processing of this personal data for the purposes of registration on the GRP (including storage and management of your master data) is carried out in accordance with Article 6 paragraph 1 letter b GDPR (necessary processing for the performance of the user relationship with the user). In the case of Users who are employees of Volkswagen AG, the processing of this personal data for the purposes of registration on GRP (including storage and administration of master data) is carried out in accordance with § 26 paragraph 1 of the Federal Data Protection Act (BDSG; for the purpose of performing the employment relationship).

III. Use of the GRP and user (rights) management by the respective working context

After successful registration and login to the GRP, you can work within your assigned "Working Context" according to your assigned roles (e. g. sales person, workshop manager, mechanic) and use context- and role-specific applications. The Working Context usually corresponds to your employer, e.g. the operator of a car dealership or workshop, an importer, a Volkswagen brand company or Volkswagen AG.

The concrete assignment of roles and rights to users (user (rights) management), is carried out by the local administrator ("Local Admin") at the level of the respective Working Context. To enable this context-specific user (rights) management, Volkswagen AG transfers your user profile within the GRP to the data protection responsibility of the respective working context.

This transfer is carried out in order to enable the proper use of the GRP on the basis of Article 6 paragraph 1 letter b GDPR (necessary processing for the performance of the user relationship with the user). In the case of Users who are employees of Volkswagen AG, this transfer takes place in accordance with § 26 paragraph 1 BDSG for the purpose of performing the employment relationship.

When you are assigned a role and as soon as you access connected applications over the GRP, your abovementioned personal data will be encrypted and transferred to the respective providers of these applications for the purpose of authentication and authorization. These providers may be Volkswagen AG, brand companies and/or other third parties. Your respective working context is also responsible for the transfer of your personal data under data protection law.

IV. Transfer of contact details of GRP administrators

For Users with administrative rights on the GRP (administrators), it also applies that their stored contact details (first name, last name, business e-mail address and context ID) can be passed on to administrators at higher administrative levels (e.g. wholesale, OEM or group administrators) within the Volkswagen sales network – if necessary – for the following purposes:

- rollout of new versions or functions of GRP

- elimination of technical problems
- governance and maintenance of the GRP
- communication of relevant information (e.g. announcements of changes, new functionalities or planned service interruptions).

This transfer or processing of personal data is carried out on the basis of Article 6 paragraph 1 letter b GDPR (necessary processing for the performance of the user relationship with the user). In the case of administrators who are employees of Volkswagen AG, this transfer or processing is carried out in accordance with Article 26 paragraph 1 BDSG for the purpose of performing the employment relationship.

V. Contacting of application owners

The responsible contact persons for the applications integrated in the GRP (application owners) are contacted by e-mail for the purpose of communicating relevant information (e.g. announcing changes, new functionalities or planned service interruptions). In this context, the professional contact data (first name, last name and business e-mail address) of the application owners are processed.

These information e-mails are sent to the application owners pursuant to Article 6 paragraph 1 letter f GDPR on the basis of our legitimate interest to ensure the full provision of the applications integrated in the GRP.

VI. Consent Management

If and to the extent your use of an application we make available to you on the GRP requires your approval, e.g., of the terms of use or consent to the processing of your data, Volkswagen AG will manage such approval via a consent management functionality. For the purpose of collecting, managing, and documenting your approval, we will process your master data, your Working Context, your role, and if and at what time you provided your approval.

If we collect your consent to the processing of personal data, we document such consent to comply with statutory obligations (Article 6 paragraph 1 letter c GDPR in connection with Art. 7 paragraph 1 GDPR).

If we collect your approval to the terms of use, we process your data for the performance of a contract (Art. 6 paragraph 1 letter b GDPR, in case of employees, in connection with Sec. 26 BDSG).

We will store your data for 5 years.

VII. Deactivation of your user account and deletion of your data

By deactivating your user account on the GRP, you lose access to all functions of the GRP and subsequent applications. We delete your personal data in the following cases if further processing is not required to comply with statutory retention periods:

- 14 days after deactivation of your user account;
- 2 days after registration, if your user account has not been verified by then;
- 14 days after registration, if you have not been assigned a Working Context by then;

- Without delay after withdrawal of your last Working Context
- If you have not logged in on the GRP for more than 365 days

Your mobile number processed as part of the initial registration through an administrator will be deleted immediately after this authentication is performed.

VIII. Hosting of the GRP and commissioning of data processors

The GRP is hosted on behalf of Volkswagen AG by *Amazon Web Services (AWS)* in Germany and Ireland (cloud-based). The data processing of Volkswagen AG mentioned in this privacy policy are carried out exclusively by Volkswagen AG or by the service providers *Amazon Web Services Inc, Capgemini Deutschland GmbH, Hyand Group GmbH, Volkswagen Group Services GmbH, Infosys Technologies Limited, KPMG AG Wirtschaftsprüfungsgesellschaft, KPMG Rechtsanwaltsgesellschaft mbH, Porsche Informatik GmbH, Sogeti Deutschland GmbH, Trask solutions a.s., Volkswagen Gebrauchtfahrzeughandels und Service GmbH, re:think Innovations GmbH* commissioned by Volkswagen AG. The necessary data protection agreements and, where required, standard contractual clauses and other necessary measures have been concluded with these service providers or data processors. The EU standard contractual clauses used can be accessed via the URL <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087>.

C. Use of cookies

Volkswagen AG uses various cookies on its websites. Cookies are small files containing configuration information that are stored on your end device. Cookies can basically be divided into three categories. There are cookies which are essential for the functionality of the website (so-called functional cookies), cookies which increase the level of comfort when visiting a website by e.g. saving your language settings (so-called comfort cookies) and cookies which are used to create a pseudonymized user account (so-called tracking cookies).

On the GRP, only functional cookies are used. While you are active on the website, a so-called session cookie (functional cookie) is temporarily stored in the memory of your end device, which contains a session ID (e.g. session cookie to ensure single sign-on). Session cookies are deleted when you log out or lose their validity as soon as your session has automatically expired. The legal basis for the use of these functional cookies and the collection of your data through them is § 25 paragraph 2 no. 2 TTDSG, as the storage is absolutely necessary due to the registration barrier in order to provide a telemedia service expressly requested by the end user. The collection and further processing of your personal data collected through the functional cookies is based on Art. 6 paragraph 1 b DSGVO ("performance of contract").

Apart from functional cookies, no other cookies (in particular comfort and tracking cookies) are used on the GRP.

Further information on our cookies can be found in the GRP cookie policy, which can be accessed in the footer section of the GRP.

D. Your Rights

You may assert your rights below against Volkswagen AG at any time and free of charge. For further information concerning the exercise of your rights, please see below Section E "Your Contacts".

Right of Access by the Data Subject: You shall have the right to receive information from us regarding the processing of your personal data.

Right to Rectification: You shall have the right to demand that we correct your personal data which are incorrect and/or incomplete.

Right to Erasure: You shall have the right, to ask for your data to be deleted if the requirements specified in Article 17 GDPR are met. According to Article 17 GDPR you can, for example, demand the deletion of your data if they are no longer necessary for the purposes for which they were collected. Furthermore, you may demand deletion if we process your data on the basis of your consent and you withdraw this consent.

Right to Restriction of Processing: You have the right to demand the restriction of the processing of your data if the requirements specified in article 18 of the GDPR are met. This is the case if you for example dispute the correctness of your data. For the duration of the verification of the correctness of the data, you may demand the restriction of the processing.

Right to Object: Insofar as the processing is based upon an overriding interest or your data are used for the purposes of direct advertising, you have the right to object to the processing of your data. An objection shall be permissible if the processing either is carried out in the public interest or in the exercising of official authority or owing to a justified interest of Volkswagen AG or of a third party. In the event that you object, we request that you state your reasons to us regarding why you are objecting to the data processing. In addition, you have the right to object to the data processing for the purposes of direct advertising. This shall also be valid for profiling insofar as this is undertaken in conjunction with the direct advertising.

Right to Data Portability: Insofar as the data processing is undertaken based upon a consent or a fulfilment of a contractual agreement and this is also undertaken while using an automated processing system, you have the right to receive your data in a structured, commonplace and machine-readable format and to transfer these data to another data processing service provider.

Right of Revocation: Insofar as the data processing is undertaken based upon a consent, you have the right to withdraw your consent for the data processing, with effectiveness for the future at any time and free of charge.

Right to Lodge a Complain: You also have the right to complain to a government supervisory authority (e.g. to the State Data Protection Officer for Lower Saxony, Germany) regarding our processing of your data.

E. Your Contacts

Contact Person for Exercise of Your Rights

You will find the contact persons for exercising your rights and further information on the following Volkswagen AG website: <https://datenschutz.volkswagen.de>.

Data Protection Officer

Our Data Protection Officer shall support you as your contact person on all data protection-related matters:

Data Protection Officer of Volkswagen AG

Berliner Ring 2, 38440 Wolfsburg

datenschutz@volkswagen.de

As off: December 2025