PRIVACY POLICY FOR THE PROVISION OF VIN-RELATED VEHICLE IMAGES DATA BY VOLKSWAGEN GROUP INFO SERVICES AG FOR THE VOLKSWAGEN PASSENGER VEHICLES, VOLKSWAGEN COMMERCIAL VEHICLES, AUDI, SEAT AND CUPRA BRANDS (VEHICLE IMAGES)

This privacy policy informs you about the processing of your personal data by Volkswagen Group Info Services AG.

Volkswagen Group Info Services AG is the central interface to mobility data of several brands of the Volkswagen Group. The provision of VIN-related vehicle images data to a B2B Customer as the current owner/holder of the vehicle, or software provider on behalf of a B2B Customer, is carried out centrally by us.

A. Controller according to GDPR

The entity responsible for processing your personal data is Volkswagen Group Info Services AG. You can contact us at the following address:

Volkswagen Group Info Services AG

Berliner Ring 2

38440 Wolfsburg

Germany

gis-support@cariad.technology

Commercial register number HRB 207876 (Braunschweig Local Court)

Website: https://drivesomethinggreater.com/

B. Data Protection Officer and Data Protection Representative

Our data protection officer is available to you as a contact for all data protection-related concerns. Please direct your inquiries to:

Data Protection Officer of Volkswagen Group Info Services AG

Berliner Ring 2

38440 Wolfsburg

Germany

gis-privacy@cariad.technology

Volkswagen Group Info Services AG has appointed a Data Protection Representative in the United Kingdom. Details of our representative and contact details are as follows:

Data Protection Representative of Volkswagen Group Info Services AG
Volkswagen Group United Kingdom Limited
Yeomans Drive
Blakelands
Milton Keynes, MK14 5AN
United Kingdom
Email: ukrepresentative@vwg.co.uk

C. Purpose of the data processing

Volkswagen Group Info Services AG provides certain VIN-related vehicle images data on vehicles of the Volkswagen Passenger Cars, Volkswagen Commercial Vehicles, Audi, Seat, and CUPRA brands to the specific B2B Customer who is currently the owner/holder of this vehicle, or to a software provider on behalf of the B2B Customer. This data is provided for the purpose of fleet management, remarketing as well as the associated process improvement and increase in efficiency in fleet and sales operations, including the necessary prior product testing.

Volkswagen Group Info Services AG receives the VIN-related vehicle images data from the brands of the Volkswagen Group and then makes this data technically available as a central interface to mobility data of several brands of the Volkswagen Group to the specific B2B Customer who is the current owner/holder of this vehicle, or software provider on behalf of such a B2B Customer as owner/holder of this vehicle.

D. Data categories

Volkswagen Group Info Services AG receives the following personal data from Volkswagen AG (Berliner Ring 2, 38440 Wolfsburg), Audi AG (Auto-Union-Str. 1, 85057 Ingolstadt)and SEAT CUPRA, S. A. U. (Autovía A-2, km 585, 08760 Martorell) and forwards them to the B2B Customer as the current owner/holder of a specific vehicle, provider on behalf of a fleet operator as owner/holder of this vehicle:

- VIN,
- Vehicle images data (e.g., type, url, view).

Volkswagen Group Info Services AG receives the following personal data from your contractual partner

- Name and address in the case of individual entrepreneur (as B2B Customer) or in the event that the company name under commercial law (Section 17 HGB) or the specific company identifier is also personal data within the meaning of the GDPR (e.g. name of the entrepreneur is also his or her company name), and
- Contract number/documentation for a B2B Customer's contract with its chosen software provider to ensure that only VIN-based Volkswagen vehicle images data with a valid contract is provided by Volkswagen Group Info Service.

E. Legal basis

The processing of personal data by Volkswagen Group Info Services AG is based on the necessity for the fulfillment of the contract concluded with the B2B Customer (Art. 6 para. 1 lit. b GDPR) and the legitimate interest pursuant to Art. 6 para. 1 lit. f DSGVO. Volkswagen Group Info Services AG is the central interface for the provision of mobility data of several brands of the Volkswagen Group. It has the legitimate interest to process the data transmitted by the Volkswagen Group brands to Volkswagen Group Info Services AG for the provision of vehicle images master data to authorized B2B Customers, or software providers on behalf of a B2B Customer for the purpose of a more efficient management of fleet vehicles, remarketing and to provide these data centrally via its Data Hub (https://drivesomethinggreater.com/).

F. Data recipients

Your data will be provided to the following data recipients for the purpose defined above:

- B2B Customers in possession/holding of the respective vehicle (separate data controllers);

- data processors on behalf of the respective B2B Customer (e.g. software providers); and
- data processors of Volkswagen Group Info Services AG.

G. Data source

We receive your data from:

- Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany,
- AUDI AG, Auto-Union-Str. 1, 85057 Ingolstadt,
- SEAT CUPRA, S.A.U., Autovía A-2, km 585, 08760 Martorell.

H. Storage period

Generally, your personal data will not be stored by Volkswagen Group Info Services AG. The Volkswagen Group Info Services AG makes your data technically available as a central interface to mobility data of several brands of the Volkswagen Group from the respective brand to the specific B2B Customer as the current owner/holder of the vehicle, or software provider on behalf of a B2B Customer such as e.g., a vehicle dealer or fleet operator, which operates as a processor under data protection law. At Volkswagen Group Info Services AG, the data is simply forwarded without being stored.

For commercial accounting (German HGB), tax compliance (German AO) and data protection accountability (Art. 5 para. 2 GDPR) reasons, Volkswagen Group Info Services AG only archives in a revision-proof manner that data of the product 'Vehicle Images' (see point D.) was provided to a specific recipient for a specific VIN on the basis of a specific contract (contract number/documentation), without storing the specific transferred vehicle images data (see point D.) itself.

I. Your rights

You may assert your rights against Volkswagen Group Info Services AG free of charge at any time.

For more information on how to exercise your rights, please visit: https://drivesomethinggreater.com/legal-notice/privacy-notice/data-hub.

Right of access

You have the right to access, i.e., to request confirmation from us as to whether and - if so - which personal data concerning you are being processed and to whom such data has been disclosed as a data recipient. In addition, you generally have the right to receive a copy of your personal data processed by us. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits the data technically but does not store the transmitted data itself (see point H.).

Right to rectification

You have the right to demand that we correct any personal data relating to you that is incorrect or incomplete. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits the data but does not store the transmitted data itself (see point H.).

Right of erasure

You have the right to demand the deletion of your data if the conditions set out in Art. 17 GDPR apply. According to this, you can, for example, demand the deletion of your data if it is no longer necessary for the purposes for which it was collected. You can also request deletion if we process your data on the basis of your consent and you revoke this consent. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits the data but does not store the transmitted data itself (see point H.).

Right to restriction of processing

You have the right to request the restriction of the processing of your data if the conditions of Art. 18 GDPR are met. This is the case, for example, if you dispute the accuracy of your data. You can then request the restriction of processing for the duration of the verification of the accuracy of the personal data. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several Volkswagen Group brands, only transmits the data but does not store the transmitted data itself (point H.).

Right to data portability

If the data processing is based on consent or the performance of a contract, and if it also involves the use of automated processing, you have the right to obtain your data in a structured, common and machine-readable format and to have it transferred to another controller. In addition, you have the right to have the personal data transferred directly from us to another controller. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits the data but does not store the transmitted data itself (see point H.).

Right of objection

If we process your data on the basis of legitimate interests, you have the right to object to the processing of your data at any time on grounds relating to your particular situation. If your objection relates to data processing for direct marketing purposes, you have a general right to object, which we will implement without giving reasons.

Right of withdrawal

If data processing is based on consent, you have the right to revoke your consent at any time free of charge with effect for the future by sending an email to gis-support@cariad.technology.

Notice in accordance with Art. 11 GDPR

We would like to point out that in many cases we, as Volkswagen Group Info Services AG, are not able to identify the additional vehicle users of a vehicle or the main vehicle users and that we are not obliged under Art. 11 GDPR to obtain or process additional information in order to identify data subjects.

If you assert rights against us, we must verify your status as a data subject according to GDPR and may ask you for further information if necessary. This also serves to ensure that we may not violate the rights of third parties when releasing personal data, according to GDPR data subject rights.

Automated individual decisions

There is no automated decision-making according to Art. 22 GDPR.

Right of appeal

You also have the right to complain to a supervisory authority about the processing of your data by us. The competent supervisory authority for Volkswagen Group Info Services AG is:

The State Commissioner for Data Protection of Lower Saxony,

Prinzenstraße 5,

30159 Hannover,

poststelle@lf.niedersachsen.de

Status November 2025