



# Privacy Policy for the Volkswagen Service “We Experience”

## A. Controller

In this Privacy Statement, we inform you about the processing of your personal data by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, [weexperience-support@volkswagen.de](mailto:weexperience-support@volkswagen.de), entered in the register of companies at Brunswick District Court under the register No. HRB 100484 (“Volkswagen AG”) when using the mobile service “We Experience”.

## B. We Experience service

The We Experience Service is a service, which is embedded in the We Connect Go app. A separate login is not required for the We Experience service. Thanks to the We Experience service you receive special recommendations from our trade partners. You can deactivate and re-activate the We Experience service in the We Connect Go settings at any time. When the We Experience service is deactivated, no personal data whatsoever are collected, processed or used.

## C. Collecting, processing and using your personal data

The processing of your personal data is necessary to send you personalised recommendations tailored to your needs as part of the We Experience service. The processing of this data is carried out by us on the basis of your consent (Article 6 (1) (a) of the GDPR) and always in accordance with the applicable data protection provisions.

### I. To provide the service we collect the following data

- 1. Volkswagen ID:** To take advantage of the We Experience service, you have to log in to the We Connect Go app with your Volkswagen ID. This requires you to enter your email address. The We Experience service is given your Volkswagen ID as a uniquely identifiable identification number to create a pseudonymised We Experience profile for you and to send you customised recommendations on the basis of that profile. Usage data collected in relation to the We Experience service is not merged via your Volkswagen ID and is therefore also not transferred to other Volkswagen applications.
- 2. E-mail:** Your e-mail address is required to inform you in the event of a prolonged non-use of our services about the deletion of your personal data and any recommendations that may have been sent to you.
- 3. Salutation:** In order that We Experience can send you relevant recommendations, it requires the use of your salutation. We use the salutation to draw conclusions about your gender so you can receive certain categories of offers, such as personal hygiene products, based on gender.
- 4. Country and language:** We need the language stored in your We Connect Go app as well as the country stored to show you recommendations in the correct language.

5. **Telephone type:** For a correct display of the contents in device-specific size and resolution we need your telephone type (e.g. Huawei P20 or iPhone X).
6. **Vehicle data:** To send you relevant recommendations related to your Volkswagen, we need the last four digits of your vehicle identification number (VIN). The VIN is needed to make a distinction where you connect several vehicles to your We Connect Go app. Moreover, we collect your fuel tank level and your AdBlue level to ensure you are sent relevant recommendations.
7. **Positioning data and journey details:** In order to send you relevant recommendations in the vicinity as well as along your preferred routes, we need your positioning data and journey details. This includes your current position, the distance covered (kilometres driven) and the duration of your journey, as well as your geo-position at the beginning and end of a journey. Furthermore, we collect the time at the beginning and end of your journey. Positioning data will only be transmitted if you have activated the relevant function in your smartphone and for the app.
8. **We Connect Go Challenges:** In We Connect Go you can complete challenges and collect points in the process. E.g. the challenge "rpm king" for which you must complete 5 journeys of >10 km each with an engine speed of <2,000 rpm and can collect 800 points in the process. The challenges can be found in the menu of your We Connect Go app. We rate the challenges you have completed so we can send you recommendations based on your driving style.
9. **Evaluation of the recommendation:** We Experience allows you to give purchase recommendations shown to you a positive or negative rating. Based on this evaluation, we determine which recommendations or recommendation categories you are particularly fond of and send you similar recommendations more frequently.
10. **User behaviour:** Depending on how you interact with a featured recommendation, i.e. whether you have received a recommendation, click or close the recommendation, view the coupon code, etc., we draw conclusions about your interest in our recommendations. Based on this user behaviour, we determine which recommendations or recommendation categories you especially like and therefore send similar recommendations more frequently.

## II. Evaluation of personal data (profiling)

To optimise your experience using We Experience and continually improve the recommendations, we interpret personal characteristics about you from your personal data so as to show you concrete offers.

### 1. Interpretation of personal data (profiling)

To further personalise your recommendations, we extract the following information from the data described in section I.

- **Known/unknown area:** Insight that you are familiar with area x, not area y.
- **Typical route:** Insight that you always choose a particular route from A to B which allows us to send you an intuitive recommendation.
- **Typical fuel tank level:** Insight as to when you generally refuel.
- **Commuter:** Insight that you drive along a particular route at a particular time so we can identify you as a commuter and provide intuitive recommendations.
- **Frequency of journeys:** Insight as to how often you normally drive so we can adapt the frequency of the offer dispatch to the frequency of journeys made. In other words, frequent drivers tend to be contacted more frequently.

## 2. Examples

Profiling is the automated creation of profiles based on personal data. In other words, we use your personal information and the information we collect about you to make predictions about the future. In the following we list examples illustrating how we implement profiling in We Experience:

### Example 1

We analyse that many men are interested in a car wash on Saturday morning between 10 and 12 o'clock in the Berlin Mitte district. Given this insight, we interpret that even men in other districts of Berlin might be interested in a car wash between 10 and 12 o'clock on Saturday morning. That's why we make recommendations in such cases.

Data used: salutation, time, geodata and user behaviour

### Example 2

We analyse that, for example, "frequent drivers" drive to the filling station when the fuel tank is almost empty, and "occasional drivers" when fuel tank is already  $\frac{3}{4}$  full. Based on this insight, we interpret that the filling behaviour differs depending on the driving frequency and fuel tank level. Thus, for example, customers who are classified as frequent drivers will later be provided with a fuel tank recommendation.

Data used: geodata, user behaviour, fuel tank level, driving frequency

## III. Transferring your data to us

If the following conditions arise, your data will be transferred to us so we can create personalised offers:

1. You switch off your vehicle (when the We Connect Go app is connected with the DataPlug): The last four digits of your VIN, the route (in km) and duration, the positioning data at the start and end of your journey, the fuel tank and AdBlue level as well as your We Connect Go Challenges.
2. You connect to a Wi-Fi network: information about the routes last driven by you.
3. You open the We Connect Go app: the last four digits of your VIN (when the We Connect Go app is connected with the DataPlug) as well as your current position.

## IV. Customer Care

1. You can contact our Customer Care service by email or telephone. This is processed by our contracted data processors.
2. If you contact Customer Care, the information and data you provide (including personal data) is recorded in an electronic case file so that your matter can be dealt with.
  - a. The legal basis for the processing of your data by Volkswagen AG is to fulfil a contract to which you are party or to take steps at your request prior to entering into a contract (Article 6, paragraph 1, letter b, GDPR).

We store your data only for as long as necessary for the respective purposes for which we process your data. If your data is required and processed for multiple purposes, as soon as the last specific purpose has been fulfilled your data is automatically deleted or stored in anonymised form, which prevents the data from being associated directly with you.

Volkswagen AG has drawn up an internal deletion concept to ensure that all of your data is deleted in accordance with the principle of data minimisation. The fundamental principles that this deletion concept stipulates for deletion of your personal data are:

The data is used in Customer Care. Our customers have high expectations regarding the quality of our products and services, and with good reason. For us to live up to this standard and to offer you the best possible service, we store the data collected from you for six months to ten years after the relevant intended use, unless you wish this data to be deleted and there are no contractual or legal retention obligations conflicting with this deletion request.

- b. If you contact Customer Care by telephone, you will be asked for at least the following data: surname, first name, email address, telephone number, country and language. If you contact Customer Care by email, at least the following data is collected: email address, country and language.

We will ask for further information depending on the matter in question. This information includes: data regarding your smartphone (model, manufacturer, operating system and version of the operating system), data regarding the app (version, version number, country, set language), data regarding your vehicle (VIN) and information about your case (What is the problem? What led to the problem? What is the effect of the problem? Can the problem be reproduced or did it only occur once? When did the problem first occur (specific point/period of time)? When does the problem occur (date/time)? Location: Where does the problem occur? Affected trading partner/offer).

- c. If you leave a public comment or a review for We Experience on social media (e. g. app stores, YouTube, Facebook, Instagram), we may respond to this as part of our customer service. We process this data for internal analysis to improve our We Experience service and our customer service. Please note that it is not possible to trace your personal data as it is not mandatory to provide it on social media.
- d. The personal data processed for the contractual purpose of responding to Customer Care support requests is processed in a cloud operated by Salesforce.com EMEA Limited. This data is encrypted using a standardised procedure and is hosted in Europe and in the USA by Salesforce. We cannot preclude the possibility that the data hosted in Europe will be accessed from the USA through Salesforce.com Inc., having headquarters in the USA. To safeguard the data processing, a corresponding EU standard agreement (appropriate guarantee on data processing in non-European countries) has been concluded. The data hosted in Europe is also protected through the conclusion of Binding Corporate Rules (appropriate guarantee on data processing in non-European countries). You have the right to be informed of the agreed guarantees in the course of the disclosure.

## **V. Sharing of data**

Hosting in the context of data processing is performed by our data processor IBM Deutschland GmbH. Data may be transferred to a third country using support services and is based on the conclusion of EU standard contractual clauses.

Personal data will not be passed on to trade partners.

If you use a recommendation that involves redeeming loyalty points as part of a loyalty programme and you are using a customer or loyalty card, the provider of this loyalty programme can identify you as a result of this card use. By redeeming the voucher code and using the customer/loyalty card, the provider of the loyalty programme can connect you to the We Experience Service.

## VI. Storing and deleting your personal data

Your personal data will be stored in our backend, which is hosted by IBM Deutschland GmbH. Your personal data will be automatically deleted if you have not used We Experience for more than a year. In this case, we will inform you in due course via e-mail that we are going to delete your data. You then have the opportunity to prevent your data from being deleted.

Furthermore, we will delete your data if any of the following conditions arise:

- You withdraw your consent for We Experience in the We Connect Go settings.
- You instruct us to delete your data (e.g. via the Volkswagen ID at <https://vwid.vwgroup.io/>).
- You reject the We Connect Go Terms of Use.
- You delete your Volkswagen ID.

## VII. Receiving messages (push notification)

We Experience can provide push notifications (push technology or server push describes a type of communication in which data is provided even when the app in question is running in the background) to keep you informed, for example, when new recommendations exist. You can configure this service via the We Connect Go settings and activate or deactivate the notifications for We Experience. Volkswagen has to store a push token from your mobile device for messages to be delivered.

## VIII. Your rights

You may exercise the following rights vis-a-vis Volkswagen AG at any time without cost. You can obtain further information about exercising your rights at the following website: <https://datenschutz.volkswagen.de>.

**Right to information:** You have the right to obtain information from us about how we process your personal data.

**Right to rectification:** You have the right to obtain from us the rectification of any inaccurate or incomplete personal data concerning yourself.

**Right of deletion:** you have the right to request the deletion of your data, provided the preconditions stated in Art. 17 GDPR have been met. For example, you may ask us to delete your data provided they are no longer necessary for the purposes for which they were collected. You may also request deletion if we process your data based on your consent and you revoke that consent.

**Right to restriction of processing:** You have the right to demand restriction of the processing of your data if the conditions set out in Article 18 GDPR are met. This is the case, for example, if you dispute the accuracy of your data. You can then demand a restriction of the processing for the period it takes to verify the accuracy of the data.

**Right of data transferability:** You have the right to receive your data in a structured, commonly used and machine-readable format and transfer this data to another data processor, provided that data processing is based on consent or contract fulfilment and that automated processing methods are used.

**Right to withdraw consent:** Where data processing is based on consent, you have the right to withdraw your consent to data processing, with future effect, free of charge at any time.

**Right to lodge a complaint:** You also have the right to lodge a complaint about our processing of your data with a supervisory authority (such as the Data Protection Commissioner for the Federal State of Lower Saxony [Die Landesbeauftragte für den Datenschutz Niedersachsen]).

## **IX. Your contact partner: Data Protection Officer**

If you have any data protection concerns, please contact our data protection officer. Please address your submissions to:

Volkswagen AG Data Protection Officer

Berliner Ring 2, 38440 Wolfsburg, Germany

[datenschutz@volkswagen.de](mailto:datenschutz@volkswagen.de)

As at: December 2019