

Data Protection Information of Volkswagen Versicherung AG

With this Data Protection Information we want to inform you about the processing of your personal data by Volkswagen Versicherung AG and about your rights resulting from the statutory data protection provisions.

I. Person responsible for the processing of your personal data and contact details

Your trading partner has issued a vehicle warranty to you and has insured the risk resulting from this warranty with us, the insurer Volkswagen Versicherung AG¹. Volkswagen Versicherung AG (data controller, hereinafter named “we” or “us”) is therefore responsible for the processing of your personal data. In case you have any questions regarding the processing of your personal data please contact us by sending a letter or e-mail to the following address:

Volkswagen Versicherung AG

Contact data:

SEAT Warranty

PO Box 869

Warrington, WA4 6LD

E-Mail:

dataprotectionrights.VW-Versicherung-AG@vwfs.com

You can contact our **data protection officer** via post by sending a letter to the postal address named above adding the supplement – Data Protection Officer – or by sending an e-mail to: dpo.VW-Versicherung-AG@vwfs.com.

II. Purposes and legal basis of the data processing

1. Legal bases for data processing

We process your personal data taking into account the General Data Protection Regulation (EU) 2016/679 (hereinafter named “GDPR”), the German Federal Data Protection Act as well as any further relevant statutory provisions.

We process your personal data

- insofar as it is necessary for pre-contractual and contractual purposes, based on Art. 6 paragraph 1 sentence 1 letter b) GDPR (e.g. for the issuing of the warranty certificate), or
- insofar as it is necessary for the compliance with a legal obligation, based on Art. 6 paragraph 1 sentence 1 letter c) GDPR (e.g. to ensure the completeness and correctness of tax data according to the commercial law and tax law), or
- insofar as it is necessary for the purposes of legitimate interests of us or third parties, based on Art. 6 paragraph 1 sentence 1 letter f) GDPR (e.g. to protect our assets against criminal offences or to optimize our offered products), or
- insofar as it is covered by your voluntary given consent, based on Art. 6 paragraph 1 sentence 1 letter a) GDPR.

2. Purposes of data processing

We process your personal data for the following purposes:

- for the assessment of the risk that is to be insured and for the issuing of the warranty certificate, based on the legal bases given in section II.1.a or II.1.b,

- for the performance of the contractual relationship between your trading partner and us, based on the legal basis given in section II.1.a. Data processing is particularly necessary for the assessment whether an insured event has occurred,
- for the creation of insurance-specific statistics and for the development of new insurance tariffs/products, based on the legal basis given in section II.1.c. Data processing is particularly necessary for business management monitoring as well as for pricing and for optimising our products and the products of VW Financial Services Group,
- to comply with statutory regulations, e.g. supervisory provisions or retention duties resulting from commercial and tax law, based on the legal basis given in section II.1.b,
- to advertise our own insurance products (direct marketing) and therefore to send you offers tailored to you in a prompt and reliable manner, based on the legal bases given in section II.1.c or II.1.d,
- to prevent and to detect criminal offences and fraud and therefore to protect our assets, based on the legal bases given in section II.1.c; we especially can use data analysis to identify hints, that could indicate fraud (e.g. in connection with the claims management process),
- for the establishment, exercise or defence in case of legal proceedings or other disputes/complaints (especially insofar this is necessary in case of lawsuits), based on the legal bases given in section II.1.a, II.1.b or II.1.c,
- for the maintenance and implementation of IT systems and services (test data management), based on the legal basis given in section II.1.c. Data processing is in particularly necessary to ensure the security, operability and reliability of new and existing IT systems and services and to protect them against disruptions and unlawful interference. The data processing is also necessary in order to guarantee a permanently high quality and uniformity of the provided services in connection with our insurance products and to constantly optimise the provided services.

The data of all of your warranties whose risks are insured by Volkswagen Versicherung AG and of all contracts being in place with Volkswagen Versicherung AG may be used for a consideration of our overall customer relationship, i.e. for decisions based on goodwill, based on the legal bases given in section II.1.a or II.1.c. In regards of our legitimate interests, data processing might especially be necessary in order to consider the whole customer relationship when making relevant contractual decisions.

In addition, we may carry out profiling in the sense of Art. 4 no. 4 GDPR based on the legal bases given in section II.1.c or II.1.d. Data processing is particularly necessary in order to better evaluate your interests, e.g. in insurance products, and to avoid unwanted or inappropriate offers.

In the list of purposes of data processing above, we have referenced to the most likely corresponding legal bases for the data processing.

Further purposes of data processing may result from section IV. Should we wish to process data for a purpose that differs significantly from the purposes given in this document, we will inform you in advance within the scope of the statutory data protection provisions.

III. Sources und categories of the personal data

1. Sources of data

¹ Legal seat of Volkswagen Versicherung AG: Gifhorner Strasse 57, 38112 Brunswick, Germany

The main source of data processing is generally the data provision by you in connection with the issuing of the warranty, the warranty management, the claims management and the termination of the warranty.

Data marked as mandatory in the warranty certificate are either required by law or required for the issuing of the warranty certificate. The lack of provision of the requested data can have legal or economic disadvantages for you. Especially, the issuing of the warranty certificate or the performance of the warranty is not possible without processing your personal data. Other voluntarily provided data, e.g. your telephone number, might be helpful to ease for example the communication during the contract term.

We also may process personal data from other sources, especially from:

- service providers, dealerships and garages responsible for you, or
- companies of Volkswagen Financial Services Group, Volkswagen Group and vehicle importers acting for Volkswagen Group, or
- the former warrantee in case of a vehicle purchase, or
- other third parties and sources (e.g. service providers, car appraisers, business databases), or
- publicly accessible sources (e.g. commercial registers).

2. Categories of data

We generally process the following categories of data:

- Identification, authentication, contact data (e.g. your name, address and other contact details),
- other master data and contract data (e.g. vehicle data),
- claims data,
- data required to prevent fraud or in connection with legal proceedings,
- documentation data (e.g. about providing information to you),
- data required for tax authorities and other public bodies.

IV. Recipients of the personal data

Within our company, those branches and departments that need your data to fulfil the purposes given under section II.2 will have access to it. In addition, we might transmit your data to the following recipients and categories of recipients:

Dealerships and garages:

We exchange your data with your trading partner which can be the dealership, where you have bought your car or the garage, in which you/ have your car repaired, based on the legal bases given in section II.1.a, II.1.c or II.1.d. The data processing is particularly necessary to be able to let repairs being carried out by the respective dealership/garage.

Volkswagen Financial Services Group, Volkswagen Group and vehicle importers acting for Volkswagen Group:

In addition to that, we may exchange your data with the companies in the Volkswagen Financial Services Group ("VWFS group", e.g. companies in the sectors leasing, banking, insurance, mobility and fuel/service cards), based on the legal bases given in section II.1.a, II.1.b, II.1.c or II.1.d. Especially, specialised companies or divisions of VWFS group may provide services centrally for the companies affiliated in the VWFS group, which can involve data processing. These, for example, can include the central contract- and claims management, customer support, collection and test data management. If a warranty was issued to you by your trading partner we might exchange your data with the manufacturer or the importer of your vehicle within the Volkswagen group or with a Volkswagen group-external importer of your vehicle, in case the importer is acting for Volkswagen group, especially based on the legal bases given in section II.1.c or II.1.d. In particular, data processing might be required in order to fulfil internal group administration and billing purposes (possibly also with regard

to the dealership/garage), as well as to optimize the offered products taking care on your interests.

External service providers:

To fulfil our contractually agreed and statutory duties we may use external service providers or processors in the United Kingdom and abroad, especially based on the legal bases given in section II.1.a, II.1.c or II.1.d.

Please find below information on our contractors, service providers and other recipients who carry out data processing as the principal object of the contract with us and with whom we do not only have a temporary business relationship:

- Opteven Assurances S.A, insurance company, France (general insurance services).

Please find below the possible further categories of contractors, service providers and further recipients of personal data who do not carry out data processing as the principal object of the contract with us or are only mandated once or not permanently:

Categories of recipients	Main object of the cooperation / assignment
General insurance service providers	Insurance Services, especially in the field of customer service and claims management
Legal counsels and lawyers	Legal consulting, litigation, debt collection
Tax consultants, tax service providers, accountants, auditors	Tax consulting and tax services, Creating of annual financial statements, auditing
Management Consultants	Process consulting, support in the further development of the company, development of concepts
Disposal companies	Destruction of paper documents and data carriers
Claims management service providers and appraisers	Claims settlement and management, preparation of valuations and appraisals
Logistics companies	Transport of documents and papers
Roadside assistance providers or roadside assistance insurers	Provision of assistance services in the event of damage agreed upon with our clients
Marketing agencies	Carrying out of marketing campaigns
IT service providers, software and hardware manufacturers	Support and (remote) maintenance of systems / applications, IT error analysis and consulting, execution of change requests, security checks, maintenance and servicing of hardware and software
Translation agencies	Translations of documents

Reinsurers:

We insure risks assumed by us with special insurance companies (hereinafter named "reinsurers"), especially based on the legal bases given in section II.1.a or II.1.c. For this, it may be necessary to submit your contract data and possibly claims data to a reinsurer, so that this reinsurer can evaluate the risk or the claims event.

Other recipients:

We may transmit your personal data to other recipients, especially based on the legal bases given in section II.1.b, II.1.c or II.1.d. These can, for example, be public bodies, e.g.

for the fulfilment of our legal notification duties (i.e. fiscal authorities, data protection authorities and financial supervisory authorities).

V. Personal data transmission to third countries outside the European Economic Area

In connection with this business relationship, we may also make use of contract processors and other contractors (e.g. from the information and communications technology sectors) based outside the European Economic Area (EEA). In this case, your data will be transmitted in compliance with the special requirements of Art. 44 - 49 GDPR, whereby the appropriate level of protection will be guaranteed either by an adequacy decision of the European Commission pursuant to Art. 45 GDPR or by concluded EU standard contract clauses pursuant to Art. 46 paragraph 2 letter c and d GDPR. The aforementioned EU standard contract clauses can be accessed and viewed on the website of the European Commission or requested directly from us as a copy.

VI. Duration of the personal data storage

We store your personal data from the time of collection. We will delete your personal data as soon as your warranty has expired and under the condition that we don't need your personal data anymore for the purposes given under section II.2. In this regard, we will also store your personal data as long as and insofar as we are legally obliged to do so. Corresponding legal duties of proof and retention arise, inter alia, from the UK tax law and from the French tax law and commercial law. According to these statutory provisions, the maximum storage periods will end 10 years after the end of the year in which your warranty has expired. It may also happen that we have to store your personal data for the time in which it is required for the establishment, exercise or defence in case of legal claims. The respective storage period will generally end 6 years after the moment a court ruling has become final and non-revisable.

VII. Your rights in relation to the personal data processing

You have the right to demand information about your personal data processed by us (Art. 15 GDPR). In particular, you can demand information about the purposes of the processing, the categories of the personal data, the categories of recipients to whom the personal data have been or will be disclosed and the planned storage period. Furthermore you have the right of information about the source of your data in so far as the data was not collected from you, and – if applicable - about the existence of automated decision-making including profiling and meaningful information about the details thereof.

You have the right to withdraw a given consent to personal data processing (Art. 7 section 3 GDPR). As a consequence, we won't continue the processing of data, which is based exclusively on this consent, for the future.

In addition, you have the right to demand rectification of inaccurate data (Art. 16 GDPR) and under certain circumstances you have the right to data erasure (Art. 17 GDPR), the right to the restriction of data processing (Art. 18 GDPR) and the right to data portability in so far it is technically possible (Art. 20 GDPR).

Right to object (Art. 21 GDPR)

You have the right to object, at any time, to the processing of personal data regarding generalised or personalised direct marketing.

If we process your data to pursue legitimate interests, you can object to processing, in so far there are reasons that arise from your personal specific situation.

Please note that an objection will only have effect for the future. If a processing took place before the objection, it won't be affected by the objection.

If you wish to exercise any of the rights given above, please contact us via our contact data given in section I.

Furthermore you have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR), e.g. with the data protection authority locally responsible for your habitual place of residence.