

Volkswagen ID Personal Information Protection Policy

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Volkswagen Group Import Co., Ltd (hereafter "VGIC" or "We") is a nation-wide sales company which covers the brand of Volkswagen import vehicles (including passenger car and light commercial vehicle) and registered in the People's Republic of China. The registered domicile of VGIC is Room 316, Kaili Building, No.188 Tianbao Road, Tianjin Free Trade Pilot Zone (Tianjin Port Free Trade Zone), China.

Volkswagen ID business function is provided by the VGIC. You can register for Volkswagen services through using a Volkswagen ID user account (currently, only My Volkswagen service is available in Chinese mainland). For details, please refer to the "Terms of Use". This Volkswagen ID Personal Information Protection Policy (hereafter "**Statement**") applies to VGIC, VGIC affiliates, and VGIC authorized entities regarding the collection, use, storage, sharing, transfer and otherwise processing of our customer's(hereinafter "**You**") personal information when providing services.

Personal Information under this Statement refers to various information related to identified or identifiable natural persons recorded electronically or by other means, excluding anonymized information. The VGIC affiliates refer to Volkswagen AG and its direct and indirect subsidiaries (including Volkswagen (China) Investment Co., Ltd.), and, VGIC authorized entities refer to authorized dealerships and service providers who process information on our behalf, such as call center service provider, connectivity service provider and marketing service provider. Your agreement to the following Statement should precede your registration on and use of Volkswagen ID services (hereinafter "**Service**").

If you have any questions or concerns about this statement, or would like to deliver your complain about our potential violations of relevant laws and regulations, please call our customer service hotline 400-188-0888 or email address data-protection@volkswagen.com.cn to contact us.

This Statement provides you with the following information:

- 1.How do we collect and use your personal information:
- 2.How do we use Cookies
- 3.How do we store your personal information
- 4.How do we entrust to process, share, transfer, and publicly disclose your personal information
- 5.How do we protect your personal information
- 6.Your rights
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Responsible processing of your personal information is part of VGIC's social and legal responsibilities. We are fully aware of the importance of personal information to you and will try our best to protect the security and reliability of your personal information. This statement is to ensure that your personal information can be fully protected under the "Personal Information Protection Law", "Cybersecurity Law" and other applicable laws and regulations. We will protect

your personal information in accordance with the principles of fairness and lawfulness, clear usage, appropriate proportions, openness and transparency, opt-in consent, and security as required by applicable laws, regulations and internal policies. We will take appropriate technical and organizational security measures to protect your personal information from accidental or illegal destruction, accidental loss, alteration, unauthorized disclosure or access.

1.How do we collect and use your personal information**

We collect your personal information strictly in accordance with relevant laws and regulations. For the purpose of this Statement, Sensitive Personal Information refers to the personal information that is likely to result in damage to the personal dignity of any natural person or damage to his or her personal or property safety once disclosed or illegally used, including such information as biometric identification, religious belief, specific identity, medical health, financial account and whereabouts and tracks, as well as the personal information of minors under the age of 14; vehicle whereabouts, audio, video, images and other information involved in the process of car design, production, sales, use, and operation and maintenance.

For the purposes described below, we will collect the following personal information. We will only collect your personal information in accordance with relevant laws and regulations. If you refuse to provide us with the above personal information, you will not be able to enjoy the corresponding services.

- Registration for the Volkswagen ID user account:** To register a Volkswagen ID user account, you must fill in your email address and set the account password. Volkswagen ID registration uses the registration process of double verification. At the same time, you must confirm and accept the Terms of Use. We will send an email to your email address requesting you to verify. You can also choose to enter other personal information, such as name, address, or contact information (such as telephone number, etc.) to fill in the user account details in advance.

- Register for new services with a Volkswagen ID user account: Using a Volkswagen ID user account allows you to register for multiple Volkswagen services (such as My Volkswagen service). Therefore, when you register for a new service, you can directly use the data you entered during the initial registration without registering again. After completing the service registration, these services will be directly linked to your Volkswagen ID user account. If you want to add other Volkswagen services to your Volkswagen ID user account, you must authorize us to use the personal information stored in the Volkswagen ID user account, including your email address. Generally, personal information is provided to a service only when it is essential to the service. If you do not agree with the authorization, you can choose to create a separate Volkswagen ID user account to log in to the selected service.

- Sales and after-sales service: For the purpose of sales, pre-sales and after-sales service, we will collect customer email address (required), password (required), dealer information(optional), VIN number (optional), name (optional), address (optional), telephone number (optional). You may save your personal information via connected digital services in the Volkswagen ID user account and use this data in other connected digital services. You can manage the personal information and the services associated with the user account on the Volkswagen ID portal <https://vgic.idk.vwautocloud.cn/>. The personal information displayed in the Volkswagen ID portal relates exclusively to the personal information entered by you during use of the portal. Subject to Chinese laws and regulations, your personal information will be saved in the Volkswagen ID for as long as the Volkswagen ID user account is open. This is done on the basis of the contract fulfilment for the Volkswagen ID. Your personal information is always forwarded to and/or saved by the connected digital services on the basis of your voluntary consent. Based on a balancing of interests, your personal information will be maintained in your Volkswagen ID user account after individual digital services have been unlinked. The aim of the digital services is to inspire you in a unique manner to take advantage of their available services. The benefits to you

when using many of the digital services connected with the Volkswagen ID is significantly increased because the personal information is generally maintained in the Volkswagen user account, thus strengthening the customer relationship as a result of the ease of use. With your consent, we may collect your personal information through the following channels: User interaction interfaces, such as VW Car-Net II App and Volkswagen ID portal.

2.How do we use Cookies

For the proper function of relevant websites, we may store a small piece of data named Cookie on our Customer or potential Customer's computer or mobile device. For detailed Cookie policy, please refer to <https://vgic.idk.vwautocloud.cn/cookie-policy>. With the Cookie, we may be able to collect our Customer's personal information. The types of personal information collected will be limited to the types described under this Statement, and will only be used for purposes described under this Statement. By using our mobile device applications and website, our Customer or potential Customer consents to the use and storage of Cookies on his/her computers or mobile device.

3.How do we store your personal information**

We treat your personal information very seriously. Your personal information is stored in databases which are housed in facilities using strict physical security measures and IT security measures with limited authorized access only. Personal information collected by us will be kept in our database only to the extent necessary to achieve the purpose.

Your personal information will be stored in the databases provided qualified third party located within city of Zhangjiakou, Hebei Province, Chinese mainland.

We generally store your personal information for no longer than the minimum period in order to fulfil the abovementioned purposes or mandatorily required by law. After such period, we will permanently delete or anonymize your personal information. If laws and regulations have other mandatory provisions, we will comply with them in accordance with the mandatory provisions.

4.How do we entrust to process, share, transfer, and publicly disclose your personal information

4.1 How do we entrust to process your personal information**

To realize the following purposes, we engage the following VGIC affiliates and VGIC authorized entities to process your personal information:

To provide the maintenance service, we engage VGIC affiliate CARIAD (China) Co., Ltd.to do the operation; to provide the technical support under special circumstance , VGIC affiliates CARIAD SE located in German will remotely access to your personal information. And for the details, please read the Notification and Consent Letter for Volkswagen ID Cross-border Transfer of Personal information.

VGIC affiliates and VGIC authorized entities are required to strictly follow this Statement, and take necessary measures to ensure confidentiality and security of our customers' personal information. VGIC will not and does not allow third parties to share, transfer, or disclose our customers' personal information for unauthorized purposes.

4.2 How do we share your personal information

In principle, we will not share your personal information with any company, organization or individual other than our company, except in the following circumstances:

Obtain your explicit authorization or consent;

Must be provided in accordance with applicable laws and regulations, legal procedures or mandatory government requirements or judicial rulings;

Under the premise of taking effective measures to protect your personal information security (including but not limited to signing relevant confidentiality agreements, etc.), share with VGIC affiliates and VGIC authorized entities:

For the purpose of providing sales services, we will share your name, address, email address, telephone number and vehicle VIN number with VGIC authorized dealers. For the specific dealer's information, please find them in your sales contract. If you have any question on this part, please contact us through the contact information under this Statement.

For the purpose of providing call center services, we will share your email address, telephone number and vehicle VIN number with Shanghai PATEO Network Technology Service Co., Ltd.(for ECall) and Sino Assistance Co., Ltd.(for BCall).

VGIC affiliates and VGIC authorized entities are required to strictly follow this Statement, and take necessary measures to ensure confidentiality and security of our customers' personal information. VGIC will not and does not allow third parties to share, transfer, or disclose our customers' personal information for unauthorized purposes.

4.3 How do we transfer your personal information

We will not transfer your personal information to any company, organization or individual, except in the following circumstances:

After obtaining your explicit consent, we will transfer your personal information to other parties; In case of merger, division, dissolution, acquisition or bankruptcy, if it involves the transfer of personal information, we will inform you of the name and contact information of the recipient of the personal information. We will require new companies and organizations that hold your personal information to continue to be bound by this Statement, otherwise we will require that company and organization to regain your authorization and consent.

4.4 How do we publicly disclose your personal information

We will only publicly disclose your personal information under the following circumstances:

After obtaining your explicit consent;

We may publicly disclose your personal information in the case of laws, legal procedures, litigation or mandatory requirements of government authorities.

5.How do we protect your personal information**

We use technical and organizational security measures which are in line with widely recognized industry standard in order to protect the personal information under our control against accidental or intentional manipulation, loss, destruction and against access by unauthorized persons. The security measures are updated as necessary to meet our business needs, changes in technology, and regulatory requirements, *i.e.* Access Control, System Hardening, Network Vulnerability Scan and Management, Awareness Training, Logging and Security Event Management, Transmission and Storage Encryption.

In case of personal information security incident, we will follow internal designed emergency plan to investigate and take all necessary measures to eliminate the potential risks and inform you in accordance with applicable laws and regulations. At the same time, we will also proactively report the processing of personal information security incidents in accordance with the requirements of the regulatory authorities.

6.Your rights**

In accordance with the relevant laws, regulations, and standards of the People's Republic of China, we guarantee that you can exercise the following rights with respect to your personal information:

6.1. Access to your personal information**

Unless restricted by laws and regulations, you have the right to access your personal information. You can view the personal information in the Volkswagen ID user account under the "Personal Information" and "Contacts" menu items of the Volkswagen ID user account.

6.2. Correct your personal information**

When you find that the information processed is incorrect, you have the right to correct your

information. You can edit the personal information in the "Volkswagen ID" user account under the "Personal Information" and "Contacts" menu items of the "Volkswagen ID" user account.

6.3. Delete your personal information**

You can delete the personal information in the "Volkswagen ID" user account under the "Personal Information" and "Contacts" menu items of the "Volkswagen ID" user account. In addition, you can also get in touch with us through the contact information specified in this Statement. In the following circumstances, you can request us to delete personal information:

- a) If our processing of personal information violates laws, administrative regulations or agreements with you;
- b) If you no longer use our products or services, or de-register your account;
- c) If our processing purpose has been achieved, cannot be achieved or no longer necessary to achieve;
- d) If we no longer provide you with products or services, or the storage period has expired;
- e) If you withdraw your consent.

When you delete your personal information from our service, due to technical reasons, we may not be able to delete the corresponding information in the backup system immediately, but we will ensure that the corresponding information in the backup system will not be used for daily business or other purposes again, and ensure that the information is deleted in time when the backup is updated. Please understand and acknowledge that according to the laws and regulations, if the storage period specified by laws and administrative regulations has not expired**, ** or it is technically difficult to delete personal information, we will stop the processing activities except the storage and taking necessary security measures.

6.4. Withdraw your authorization and consent**

When we agree to process your personal information based on your authorization, you have the right to withdraw authorization. When a service depends on your authorization to realize or operate normally, if you withdraw relevant authorization, we cannot continue to provide you with the corresponding service or some functions of the service will be affected. If you want to withdraw your authorization and consent, you can get in touch with us through the contact information set out in this Statement. After you withdraw relevant authorization, we will no longer process the corresponding personal information. However, your decision to withdraw the authorization will not affect the previous processing of personal information based on your authorization.

6.5. De-register your account**

You can de-register the entire user account through the "Account Settings" menu on the Volkswagen ID [website](#). Under special circumstances, the de-registration of your Volkswagen ID account may affect your continued use of other services associated with the Volkswagen ID account. If the services you use through your Volkswagen ID account have not expired, such services may also affect your de-registration of Volkswagen ID account. For details, please refer to Chapter 5 "Managing Volkswagen ID" of "Volkswagen ID Terms of Use". You can delete all personal information, unless VGIC is obliged to store data in accordance with legal requirements or VGIC has other legal basis to continue to store the data. In this case, once the corresponding legal basis expires, the data will be deleted immediately, unless otherwise stipulated by laws and regulations. Services that require a Volkswagen ID user account can only be used after creating a new user account. If you do not log in with a Volkswagen ID within five years, your user account will be completely deleted.

6.6. Obtain a copy of your personal information and portability**

You have the right to obtain a copy of your personal information. You can get in touch with us through the contact information specified in this Statement. Under the conditions stipulated by

laws and regulations, if technically feasible, you can also request us to transfer your personal information to other subjects you designate.

6.7. Right to Interpretation**

You have the right to request us to explain the rules for processing personal information. You can get in touch with us through the contact information specified in this Statement.

6.8 Responding to your above request**

You have the right to exercise your above-mentioned rights through online and offline contact channels. You can request to exercise the above rights through our call center with hotline 400-188-0888 .

To ensure safety, you may need to prove your identity by providing a written request, or in other ways. We may ask you to verify your identity before processing your request.

We will reply within fifteen working days. If you are still unsatisfied with the response, you can call 400-188-0888 to file a complaint, or submit a customer complaint to the competent authority. If you have any questions, we will try our best to provide you with relevant department information based on the corresponding case.

For your reasonable request, we do not charge fees in principle, but for repeated requests that exceed reasonable limits, we will charge a fee for the costs depending on the specific case. We may reject requests that are unreasonably repeated, need to be resolved by taking too many technical means (for example, need to develop new systems or fundamentally change existing practices), bring risks to the legitimate rights and interests of others, or are very impractical (for example, involving information stored on backup tapes).

In the following circumstances, we will not be able to respond to your request:

- a) Related to our performance of obligations under laws and regulations;
- b) Directly related to national security and national defense security;
- c) Directly related to public safety, public health, and major public interests;
- d) Directly related to criminal investigation, prosecution, trial and execution of judgments;
- e) We have sufficient evidence to show that you have subjective malice or abuse of rights;
- f) In order to protect your or other individuals' life, property and other major legal rights, but it is difficult to obtain your own consent;
- g) Responding to your request will cause serious damage to the legitimate rights and interests of you or other individuals or organizations;
- h) Involving trade secrets.

7.How do we handle children's personal information

We will not knowingly solicit or collect personal information of children under the age of 14 without obtaining parental consent in accordance with applicable laws. If we discover that we have accidentally collected information about children under the age of 14, we will delete these children's information from our records as soon as possible. Unless for the purpose of providing products or services related to the family or children, we will not knowingly use children's personal information for any purpose.

8.How to transfer your personal information globally

Please refer to the Notification and Consent Letter for Volkswagen ID Cross-border Transfer of Personal information.

9.How to update this Statement**

This Statement will be updated from time to time. When issuing the update, we will also modify the update date at the top of this Statement. Update release address: <https://vgic.idk.vwautocloud>.

[cn/data-privacy](#) . If there are important updates, we will inform the customer through a pop-up window when the customer logs in. We encourage our customers to read this statement from time to time to understand how we protect their personal information.

10.How to contact us**

If you have any questions or concerns about this Statement, or want to complain about our possible violations of relevant laws and regulations, please call customer service hotline 400-188-0888 or email address data-protection@volkswagen.com.cn to contact us for user rights affairs. All such questions and concerns will be reviewed and replied where appropriate as soon as possible. If you is unsatisfied with the received reply, you may file your complaint to the competent authorities. Upon receiving your questions about the information related to the competent authorities, we will endeavor to provide you with information about relevant authorities which may be applicable to your particular case.

Volkswagen Group Import Co., Ltd.