

Privacy policy of the "audi.es" website of Volkswagen Group España Distribución, S.A.U.

At Volkswagen Group España Distribución, we want you to know what we do with your personal data. Therefore, we only use your information for those purposes that you will find specified in this privacy policy, complying at all times with all the principles and criteria established in the data protection regulations.

This Privacy Policy details how we use your personal information as a user of this website, as well as other uses that we may carry out as those responsible for the brand of our customers in the Spanish market.

Who is responsible for the processing of your personal data?

Identity of the responsible party: Volkswagen Group España Distribución S.A.U. (hereinafter, "VGED"). VGED is the representative in Spain of AUDI AG, with registered office located at Ettinger Straße 70, 85057 Ingolstadt, Germany, and the manufacturer of Audi brand vehicles.

Postal address of the responsible party: Avinguda del Parc Logístic, 12-20. 08040 Barcelona, Spain.

Contact telephone number: +34 932 61 72 00

Contact email: atencioncliente@audi.es

VGED has a Data Protection Delegate through which you can contact at delegadoprotecciondatos@volkswagengroup.es

What is the purpose for which we process your personal data?

In compliance with the provisions of Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation or GDPR, hereinafter), as well as the Organic Law 3/2018 on the Protection of Personal Data and guarantee of digital rights, we inform you that at VGED we process the personal data you provide us with in a lawful and transparent manner for the following purposes:

1. Respond to your questions, queries and / or requests when you contact us through any channel such as, for example, the forms on the website www.audi.es, any form enabled for you to contact us, instant messaging (for example, through the WhatsApp application) or through our customer service managing the request. By way of example, but not limited to: processing your appointment for the selected dealer or authorized service, providing you with information, answering your calls, etc.

2. Send you surveys to know your opinion in relation to the products and/or services contracted related to Audi, as well as to learn about your experience and assessment in relation to them and the quality of service offered by our network. You may receive these notifications by any means, for example, via email or instant messaging through the WhatsApp application.

3. We keep your data anonymous, and from that moment we will not be able to link them to your identity, in order to create statistical and/or analytical reports that allow us to draw conclusions related to the use of our products and/or services, as well as to establish improvements in our activity. Also, from the information extracted with your interaction with our brand we will elaborate predictive patterns that will help us to better know the users of our brands.

4. Send you informative notifications that may be of interest to you as a consumer of our products and/or services. You may receive these messages by any means, i.e., electronically, by telephone, instant messaging or postal mail. By way of example, but not limited to, from VGED we will carry out:

- **Vehicle manufacturing status:** VGED will send you information about the different stages of vehicle manufacturing so that you know at what point the vehicle is and thus know more precisely when you will be able to take possession of it.

- **Technical and/or safety campaigns:** we will contact you to provide you with important information that affects the safety of your vehicle or manufacturing problems that may become known after the purchase of the vehicle.

- **Communication of the maintenance plan defined by the brand:** VGED will provide you with recommendations regarding the maintenance plan in order to ensure your safety, maintain the warranty and/or improve the vehicle's performance.

- **Communication of warranty termination:** VGED will inform you when your vehicle will no longer be covered by the warranty provided by the vehicle owner.

5. If you have given your consent, we will periodically send you information about discounts, news, upcoming releases, invitations to events and/or special promotions on our products and/or services, as well as congratulate you on special dates such as your birthday or local holidays, among others. You may receive these notifications by any means, i.e., electronically, by telephone, instant messaging or mail.

6. If you have given your consent, we will create a profile of you as a user with all the information we have about you resulting from your relationship with us such as the type of products and / or services purchased, as well as any interaction with our brand, for example, when you have told us what your hobbies are or through the monitoring of your activity and your behavior habits on the websites and communication channels of VGED. For this purpose, we will use both the information you have provided us directly and the information that may be provided to us by third parties such as AUDI AG, by the

dealer or authorized services where you have purchased your vehicle, as well as by Volkswagen Bank GmbH Branch in Spain or Volkswagen Renting S.A.U. as long as you have consented to them providing us with this information. With this information we will be able to send you commercial communication about our products and services that we believe will be of more interest to you than generic ones, since the commercial notifications you receive will be more tailored to your circumstances and habits. In the event that you consent, you will not receive generic commercial communications but rather those that are as personalized as possible. Under no circumstances will automated decisions with significant legal effects be generated from the processing.

Please note that the consent you have given through MyAudi to Audi AG does not affect any of the authorizations given to VGED for these two purposes. For more information about the processing carried out by MyAudi, you can consult the privacy policy at myaudi.com.

7. Provide you with the digital services that your vehicle can offer you for having a connected vehicle. VGED is the service provider of some of the features offered by the vehicle.

8. Offer you services that are included with the purchase of the vehicle or for the acquisition of another product or service offered by the brand such as, for example, roadside assistance service. VGED will make the necessary arrangements so that you can enjoy this service while your vehicle is under warranty or you have extended this service or you have purchased a product or service where the provision of such service is included.

9. Process, manage and guarantee the delivery of the product contracted online through the website, which includes informing you of the status of the same, as well as issuing the corresponding invoice.

What type of personal data do we process?

For the purposes previously indicated, we may process the following categories of personal data:

- Identifying and contact data, by way of example, but not limited to: name, last name, telephone number, date of birth, postal address or email address.
- Data on social circumstances, hobbies, preferences, personal characteristics and other data of interest, if any, in the form you fill out.
- Commercial information data and data about your preferences: For example, but not limited to: the type of vehicle and/or vehicles you are interested in, type of engine, color, vehicle interior, optional equipment or accessories, vehicle configuration data.
- Data necessary to comply with legal and/or contractual obligations.

- Management and payment data, in those cases in which a commercial transaction is made directly with VGED.
- Data related to the sale and maintenance of your vehicle, including, but not limited to, the date of purchase and delivery of the vehicle, the steps taken by workshop and expenses incurred in each step, as well as the repair history of your vehicle.
- Information about your vehicle, including but not limited to: VIN number, license plate number, order number, workshop steps, warranty information.
- Data related to a road accident or breakdown such as, but not limited to: location data (GPS data), area of impact, severity of impact, date of accident, time of accident, cause, warning lights, diagnostic trouble codes, etc.

How long will we keep your personal data?

Your personal data will be processed for as long as they are necessary to fulfill the purpose for which they were collected and, for those purposes to which you have consented, until you revoke your consent. As soon as the purpose is terminated, your personal data will be blocked, in general, for a period of 3 years. Once this period has elapsed, they will be permanently deleted. In those cases in which legal liabilities may arise from the product sold or services offered, they may be kept for a period of 5 or 10 years (depending on applicable law).

What is the legal basis for the processing of your personal data?

The legal basis for the processing of your personal data can be either the consent you expressly give to VGED, the fulfillment of the service subscription contract (a test drive, among others), the legitimate interest of VGED as the controller or of a third party.

For those purposes described in points 1 to 4 of the purposes section, the basis that legitimizes the processing of your data is the legitimate interest of VGED as data controller (art.6.1 f) of the GDPR). Specifically, we understand that there are the following interests for processing personal data:

1. To answer, as well as to manage, your questions, queries and/or requests: due to the interest shown by you in contacting us, we must process your personal data in order to answer your requests correctly. We understand that, in no case, shall your interests as a data subject be harmed since we are responding to a request initiated by you.
2. Send you surveys: VGED as representative of the brand of the vehicle purchased in Spain, ensures the quality of the product distributed to dealers and to offer the customer quality service and as consistent as possible in order to maintain a single brand image and quality standards that's the same for all dealers and official services. After carrying out the corresponding analysis, VGED has considered that your interests as the affected party are not harmed, since through the surveys you will be able to report your experience with the brand, which may benefit the attention received in the future.

3. Anonymize data for statistical and analytical purposes: The legitimate interest of VGED is to control our activity as an entity, as well as to monitor the growth of our business, study the behavior and development of users and customers who interact with our brand, as well as the use they make of our products and / or services in order to design new ones and improve existing ones.

4. Informative notifications such as end of warranty, vehicle manufacturing status, maintenance plan, among others: VGED, as the importer and representative of the brand of the vehicle purchased in the national territory, has updated information of interest for the proper functioning of the vehicle, as well as information that will allow you to keep your vehicle in the conditions recommended by the manufacturer of the vehicle. In this regard, in the case of communications of the state of manufacture, VGED has the delivery dates of the vehicles, since it has direct information from the factories. In this case, we understand that you as a customer have an interest in knowing the actual delivery date, as well as having information about possible delays, both in delivery and in its manufacture, or having updated information on how to maintain your vehicle to keep it in optimal condition for its use and safety. Likewise, we consider that in no case shall your interests as the affected party be harmed, since we will be providing you with information of interest related to the purchase of your vehicle, since you will know when you will be able to enjoy it or with the correct maintenance of it, which will allow you to keep your vehicle in the desired condition for its correct use. In addition, we understand that as a customer you have the reasonable expectation of being contacted directly by VGED as the country representative of the vehicle manufacturer.

In relation to the communication of the expiration of the warranty of the purchased product, as it depends exclusively on VGED, we understand that there is an interest to communicate to customers the end of the warranty period. It will provide more of a guarantee to customers to be aware of the moment when their legal warranty expires and, in the event that they have contracted it, other insurance products come into effect, such as the extension of warranty.

To inform you that, in the event that you do not want VGED to contact you for the purposes previously indicated, you can send your request at any time to atencioncliente@audi.es informing us that you do not want VGED to use your personal data for the corresponding purpose. On the other hand, if you would like to obtain more information about the weighting and analysis carried out by VGED in relation to the assessment of the existence of legitimate interest, you can send your request to delegadoprotecciondatos@volkswagengroup.es.

In relation to the purposes indicated in paragraphs 5 and 6, the lawfulness of the same is the consent (art. 6.1 a) GDPR) expressly given by you. We remind you that you may revoke this consent at any time without affecting the withdrawal to the processing carried out before it.

With regard to the purposes indicated in paragraphs 7, 8 and 9, the legal basis that legitimizes the processing of your data is the fulfillment of a contract or the provision of

a service to which you are a party (art. 6.1 b) GDPR). The processing of your data is necessary for the compliance of the same.

To which recipients will your personal data be communicated?

VGED may communicate your personal data to Audi AG, as both companies provide essential services for the proper functioning of VGED as a representative in Spain. We may also communicate your identifying and contact details to the manufacturer of your vehicle in order for them to carry out surveys related to the vehicle you have purchased.

On the other hand, in those cases where you have selected a dealer or you express a preference for a dealer, we will send them your personal data in order to process your request or application. For example, if you have expressly consented, we will communicate your personal information along with the technical information of the breakdown or accident so that they can follow up on it and provide, if necessary, the corresponding service.

We may also communicate to the dealerships, in an anonymized manner, the results of the profiling when performed with the sole purpose of ensuring that your vehicle is always in an optimal state.

Finally, we would like to inform you that VGED may give access to your personal data to third parties to whom it has entrusted the provision of services such as roadside assistance, technical and computer support, as well as communicate your data to third parties for the fulfillment of legal obligations. In the event that they are considered service providers, these third parties will act on behalf of VGED following our instructions and never for their own purposes.

We also inform you that VGED contracts part of its virtual infrastructure with Salesforce.com, Inc, an entity registered at The Landmark, 1 Market Street, San Francisco CA 94105, United States, so that your personal data may be transferred internationally. VGED has signed appropriate standard contractual clauses approved by the European Commission to ensure that your personal data is sufficiently protected in accordance data protection regulations.

What are your rights when you provide us with your personal data?

As a data subject, you have the right to obtain confirmation as to whether we are processing your personal data, as well as to access your personal data, to request the rectification of your personal data if it is inaccurate, to the portability of your data provided as long as the conditions foreseen by the data protection regulations are met, and to the deletion of your data when, among other reasons, it is no longer necessary for the purposes for which it was collected. Also, in certain circumstances you may object to the processing of your personal data, as well as request the limitation of the processing of your personal data.

In addition, in those cases that are treated on the basis of the consent given, you can withdraw it at any time, without affecting the legality of the processing based on the consent prior to its withdrawal.

To inform you that you can exercise these rights by sending an email to **atencioncliente@audi.es**, and clearly indicating the right you want to exercise and, if necessary, we may require additional information to prove your identity.

Regarding the exercise of your right to withdraw your consent to receive commercial communications relating to Function on demand, you may exercise this right through your myAudi subscription at <https://my.audi.com/>.

Lastly, we inform you that you can contact the Spanish Data Protection Agency (www.aepd.es) to file any claim you consider appropriate arising from the processing of your personal data.

How did we obtain your information?

In some cases, your personal data may have been obtained through the dealership or official service that you have visited or have processed the purchase of your vehicle. VGED may process your identification and contact data and those related to the product you are interested in or have purchased in order to respond as the representative in Spain of the manufacturer of your vehicle to send you surveys or invite you to participate in quality programs.

Also, if you have given your consent, we may receive your data from Volkswagen Bank GmbH Branch in Spain, Volkswagen Renting, S.A.U., Volkswagen Insurance Services Correduría de Seguros, S.L. or its parent company. Specifically, we will receive your identification and contact data and information related to the contracted product that we may process for commercial purposes.

For those digital services that require the subscription of an ID account as a single sign-on system, such as connected vehicles and/or other services provided by Audi AG as the manufacturer of your vehicle or VGED, we may receive information about your account, profile or vehicle directly from the owner of the ID account, i.e. Audi AG.

Lastly, we would like to remind you that if you provide us with data relating to another individual, you must inform him or her of the contents of this privacy policy in advance.

Changes to the privacy policy

The privacy policy may be modified in accordance with the applicable regulations, as well as with the various processing operations carried out by VGED.

Zeotap Analysis Tool

General information

On our website we use the Zeotap tool from the company Zeotap GmbH, c/o WeWork Stresemannstr. 123, 10963 Berlin, Germany. Zeotap uses a pixel to systematically record and evaluate user interactions on our website. In this regard, the following data will be collected:

- Unique user ID assigned to the browser (Zeotap ID);
- The user's clicking behavior on the website;
- The subpages accessed by the user;
- Browser type, URL, screen resolution;
- Timestamp and;
- Vehicle model that the user configures on the website.

Zeotap will collect information about your usage behavior on its own behalf and through its partners or data providers, provided that you have given your consent to Zeotap or its partners on the respective website. The categories of data collected by Zeotap on its own behalf can be found in Zeotap's data protection notice (https://zeotap.com/privacy_policy). Zeotap assigns the collected information to user groups (segments) with your consent.

Information regarding co-responsibility between VGED and Zeotap (Art. 26 GDPR)

VGED cooperates with Zeotap and therefore they are considered co-responsible for data processing as they have jointly determined both the purposes and the means of processing personal data (Art. 26 GDPR).

The collection and subsequent processing of data of users who visit this website is the sole responsibility of VGED. VGED will collect this information through the use of the Zeotap pixel. The co-responsibility is limited exclusively to the merging that Zeotap performs with the data of third parties such as its partners. This merging of information will only be used by VGED for retargeting purposes allowing VGED to optimize its marketing campaigns. These campaigns will always be configured according to the permissions obtained by VGED.

a. Co-responsibility agreement

VGED and Zeotap have entered into a co-responsibility agreement, in which VGED and Zeotap have defined the fulfillment of their respective obligations to comply with the General Data Protection Regulation.

You can exercise your rights with respect to VGED through the address atencioncliente@audi.es, and with respect to Zeotap by following the instructions provided here, as well as complying with the duty of information detailed in this policy.

Purpose and legal basis of processing

The processing of your personal data with the help of Zeotap helps us to understand what interests you and to personalize our online offers and provide you with content tailored to your interests. It is also used to limit the number of times an advertisement appears, as well as to measure and monitor the effectiveness of advertising campaigns. The Zeotap pixel records whether or not you have visited a website and what content you have used. This is done on the basis of a unique identification of your browser and your Internet device (via a Zeotap identifier). This information may be passed on to third parties, e.g. advertisers, so that you can be shown relevant advertising content on other websites.

The legal basis for such processing of personal data is your express consent in accordance with Art. 6.1 a) of the General Data Protection Regulation. This consent may be withdrawn at any time by modifying the installation settings of cookies and/or similar technologies. You may also contact Zeotap directly (ePrivacy GmbH, represented by Prof. Dr. Christoph Bauer, Große Bleichen 21, 20354 Hamburg, Germany or <https://privacyportal-de.onetrust.com/webform/bdcc4a2f-2458-4e17-96c3-cf88f7115dfc/2c5e70e5-643a-4c1e-b9c2-1e71584d04ad>).

Retention period

The data stored by Zeotap will be deleted as soon as you withdraw your consent or the data is no longer required for our aforementioned purposes. This is the case after 90 days.