



# Privacy Policy “Data Processing in the Context of Research, Development, and Test Drives”

## A. Controller

This privacy policy is to inform you about the processing of your personal data and about your rights as a data subject in the context of drives for research, development, and testing purposes, which are carried out by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany, registered in the commercial register of the Braunschweig Local Court under No. HRB 100484 ("Volkswagen AG").

## B. Collection, processing, and use of your personal data

### 1. Basic principles

Research, development, enhancement, testing, and validation of vehicles, functions, and systems as well as other services require the use of test vehicles under real environmental and traffic conditions and in dynamic driving situations.

These test drives are carried out with specially marked Volkswagen AG test vehicles on public roads as well as on private factory, test, and other sites. During these drives, data recordings are made using sensors, measuring equipment, and video measurement technology.

Your personal data is processed in connection with the creation and evaluation of data recordings – including the collection, processing, and storage of video recordings and still images – from the vehicle environment.

Potentially, this data processing may affect individuals who are present in the vicinity of one of the marked vehicles during the research, development, or test drives.

The recognition of relevant situations and the subsequent training of the systems and functions is an important part of their ongoing development.

The knowledge gained helps to improve the convenience and user experience as well as product, vehicle, and road safety in order to prevent future traffic accidents.

In the context of research, development and testing processes or downstream processing, persons, vehicles, and other objects are only considered as "objects" in the context of traffic situations and the surroundings, e.g., "pedestrians on the right-hand side of the road."

Volkswagen AG will not identify individuals in the data sets at any time.

### 2. Affected data categories and purposes for processing

The following personal data is also collected and processed – depending on the use case – for the purposes of research, development, enhancement, testing, and validation of vehicles, functions, and systems as well as other services (e.g., as part of test drives and usability tests as well as test subject studies):

- Still images and video recordings of other road users (vehicles and persons)
- License plates and lettering on vehicles



- Lettering on stores and street signs and other information in the immediate vicinity of the test vehicles that is recorded using interior and exterior sensors (e.g., video and image data)

### 3. Recipients

Within Volkswagen AG, only those individuals who require your data for the purposes listed above in section B.2 have access to your personal data.

If Volkswagen AG shares the aforementioned personal data with service providers and/or other third parties (e.g., cooperation partners), this is done in compliance with the applicable data protection legislation. For service providers, this is done based on corresponding agreements regarding processing by a processor.

Service providers (so-called processors) that are used by Volkswagen AG and receive personal data include:

- Companies of the Volkswagen Group that render services (e.g., development services) for Volkswagen AG
- Development service providers outside the Volkswagen Group
- Suppliers of safety-relevant advanced driver assistance system (ADAS) components
- Hosting service providers
- IT service providers

These companies are each involved in product development and the evaluation of tests. Further information on the recipients of data from actual drives will be provided by Volkswagen AG upon request.

Please use the contact information listed below for this purpose.

Volkswagen AG may also forward your personal data to recipients based outside the EU/European Economic Area (EEA) for specific purposes. Please be aware that not all third countries have a level of data protection that is recognized as commensurate by the European Commission, i.e., the level of data protection is not comparable to that in the EU.

To ensure an adequate level of protection for your personal data, Volkswagen AG enters into EU standard contractual clauses with these recipients if there is no adequacy decision for the respective third country by the European Commission or if the data forwarding is not permitted under any other law.

If required based on the applicable data protection laws, additional protective measures (e.g., encryption and additional contractual arrangements) are taken so as to ensure an adequate level of protection for your personal data.

The EU standard contractual clauses used are available in the European languages at [Standard contractual clauses for controllers and processors in the EU/EEA | European Commission \(europa.eu\)](https://european-commission.europa.eu/standard-contractual-clauses-for-controllers-and-processors-in-the-eu-eea).

### 4. Legal basis for data processing

Your personal data are only collected, processed, and transmitted for specific purposes, and only if the pertinent legal basis for this exists.

The above described purposes have the following legal basis:

The processing of your personal data is carried out on the basis of a weighing of interests.

Volkswagen AG has a legitimate interest in the processing of your personal data for the purposes of research, development, enhancement, testing, and validation of vehicles, functions, and systems as well as other services in order to increase road safety on public roads and to enhance the user experience.



Information on your rights, including your right to object to the processing of your personal data, can be found in section C of this privacy policy.

## 5. Duration of processing and erasure of personal data

Your personal data is processed exclusively in secure databases.

Unless specific legal reasons exist to the contrary, your personal data is only stored for as long as required for processing purposes. Your personal data will then be deleted or anonymized.

Your personal data may need to be stored for a longer period of time for quality assurance and troubleshooting purposes. In each case, your personal data will be deleted as soon as the purpose for which we collected and processed the personal data no longer applies.

## C. Your rights

You can assert the following rights with respect to Volkswagen AG at any time, free of charge. The corresponding contact details for asserting your rights can be found in section D.

Further information on exercising your rights as a data subject:

This is a "processing activity which does not require identification". Apart from the video and image data collected, no other identifying features of the data subject are processed.

The exercise and fulfillment of the rights of data subjects therefore—depending on the individual case—will often require further information from the data subject, in particular information on the place and time at which they may be affected by the data processing (i.e., information on when and where you were specifically in the vicinity of a marked vehicle). This additional information may be required in order to determine whether a particular individual is affected by the data processing and in order to be able to actually fulfill the rights mentioned below.

**Right of access:** You have the right to receive from us information regarding the processing of your personal data.

**Right to rectification:** You have the right to request immediate correction of incorrect or incomplete details of your personal data that we have stored.

**Right to deletion:** You have the right to request deletion of your personal data. Accordingly, for example, you can request deletion of your personal data if this data is no longer required for the purposes for which it was collected. You can also request deletion if we process your personal data on the basis of your consent and you withdraw this consent.

**Right to restriction of processing:** You have the right to request a restriction of the processing of your personal data. This may be the case, for example, if you contest the accuracy of your personal data. In such cases, you can request that processing be restricted for the duration of the review concerning the accuracy of the personal data.



**Right to object:** You have the right to object to the processing of your personal data in the following cases:

- If the processing is for direct marketing purposes (including profiling for direct marketing purposes).
- If the processing (including profiling) has one of the following legal bases:
  - The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.
  - Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party. In the case of such objection, we ask that you share with us your reasons for objecting to data processing. If you object, we will no longer process your data unless we can verify compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the establishment, exercise, or defense of legal claims.

**Right to lodge a complaint:** You also have the right to lodge a complaint with a supervisory authority (e.g., Data Protection Authority for the state of Lower Saxony) regarding our processing of your personal data.

## D. Contacts

### Contacts for asserting your rights

The contacts for asserting your rights and further information can be found at the following website:  
<https://datenschutz.volkswagen.de>.

### Data protection officer

Our data protection officer is available as your contact for matters relating to data protection:

Data protection officer of Volkswagen AG  
Berliner Ring 2  
38440 Wolfsburg  
GERMANY  
[dataprivacy@volkswagen.de](mailto:dataprivacy@volkswagen.de)

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