

VWFS INSURANCE SERVICES INC. PRIVACY POLICY

At VWFS Insurance Services Inc. (“we”, “us” or “our”), your privacy is important to us. This privacy policy (the “Policy”) explains VWFS Insurance Services Inc. privacy practices as well as the choices you can make about the way we collect, use and disclose your personal information.

Definitions of “personal information” may vary from one jurisdiction to another but generally, “personal information” means any information about an identifiable individual. Personal information may, for example, include direct or indirect identifiers such as a person’s name or driver’s license number, as well as information that, when used in combination with other available information, allows a person to be identified. Your rights in relation to your personal information may also vary depending on where you live. Personal information does not include any business contact information that is solely used to communicate with you in relation to your employment, business or profession, such as your name, position name or title, work address, work telephone number, work fax number or work e-mail address. Personal Information also does not include aggregated and anonymized data because it cannot be used to identify you.

To make this Policy easy to find, we make it available on our website at [audi.ca/insurance and vw.ca/insurance]

If you are unsure if or how this Policy applies to you or have questions about this Policy, or our personal information handling practices, please contact our Privacy Officer at: [Scott Mitchell, General Counsel, VW Credit, Canada Inc. Legal, 500-1340 Pickering Pkwy Pickering, ON L1V 0C4]

In Summary

What personal information we collect and how: the personal information we may collect about you and how we obtain it varies depending on the nature of our relationship with you and how you interact with us. For example, we may collect information when you visit our website, attend special events, complete our customer surveys, when you request and/or receive any products or services from us or if you communicate with us through one of our customer care representatives (or any AI chatbot tool) or contact us by email, telephone or through social media. We may also obtain personal information about you indirectly through our dealers, our affiliates (e.g., Volkswagen Canada, Volkswagen Financial Services) and others who provide information to us.

Generally, the personal information we may collect falls into the following categories, not all of which may apply to you: (i) contact information such as your name, address, telephone number, and e-mail address; (ii) financing and payment information (including billing and authorization information); (iii) vehicle information, including lessors or lienholders; (iii) information concerning vehicle use and driving history; (iv) information relating to your prior insurance history, including prior claims information; and (v) information relating to individual preferences of our products and services.

Why we collect personal information and how we use it: Our reasons for collecting your personal information and how we use it will vary depending on the nature of our relationship with you but generally, we only use and share personal information for the purposes for which it was collected, unless we are legally allowed to use it for another purpose. For example, we may collect and use your personal information to provide you insurance quotes and premium estimates, manage our relationship with you, to communicate with you, to obtain your feedback, to improve our products and their safety features on an ongoing basis, to conduct research and marketing activities, and to defend our legal rights and comply with the law.

How we share personal information: We share your personal information with our underwriting, [Co-operators Group Insurance Inc.] in order to assess, quote and offer you auto and property insurance. We may also share personal information to ecommerce service providers, technical support service providers, customer relationship management (CRM) software service providers, research and analytics service providers, and data storage and processing service providers that are assisting us in fulfilling the purposes for which we collected the personal information. We may also share your personal information with our parent, affiliates, and subsidiaries for the purposes described in this Policy. We may also disclose your personal information to a third party in the event of a significant business transaction involving VW Insurance, such as a merger or reorganization of our business.

For more details about the personal information we collect, how we collect it, and how we use and share it, please read the sections below.

Your Consent Is Important

When it is required, it is important to us that we have your consent to collect, use or disclose your personal information. Depending on the sensitivity of the personal information and on the applicable legal requirements, your consent may be implied or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enter into an agreement with us, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to the performance of that agreement and for any other purposes identified to you at the relevant time, unless express consent is required.

If you choose to provide personal information to us, we assume that you consent to the collection, use and disclosure of that personal information as outlined in this Privacy Policy.

If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will advise you of that purpose before such use or disclosure, unless we are permitted by law to proceed without

obtaining your consent. Privacy laws in Canada provide for certain exceptions where personal information can be used or shared without consent.

Please be advised that we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required to do so by applicable law or regulatory requirements. These circumstances include, for example, personal information which is subject to solicitor-client privilege, where collection or use is clearly in the interests of the individual and consent cannot be obtained in a timely way, to investigate a breach of an agreement or a contravention of a law, to act in response to an emergency that threatens the life, health or security of an individual, for debt collection, or to comply with a subpoena, warrant or court order.

If you wish to withdraw your consent to our collection, use or disclosure of your personal information, please contact us using the contact information at the end of this Policy. In some cases, withdrawal of your consent may mean that we will no longer be able to provide certain products or services.

Personal Information We Collect

We collect and maintain different types of personal information concerning the individuals with whom we interact. For example, we may collect:

- your contact information, such as your name, mailing address, telephone number, e-mail address, date of birth, and driver's license;
- information used to verify your identity;
- your payment information, including your credit card number, CVV code and expiry date;
- your financial and credit information as disclosed to us by VW Credit Canada, Inc. ("Volkswagen Financial Services"), when you have provided your consent;
- information which enables us to provide you with the products or services that you seek, including any information you provide to us when you request a quote for insurance;
- information about your use of certain services that we may provide to you, or that may be provided through your insurance policy;
- information about your vehicle, including: (i) your vehicle's make, model, and model year; (ii) vehicle identification number (VIN); (iii) license plate number; (iv) whether it was a new or used, lease or purchase, and/or a trade-in; (v) date of purchase or lease; (vi) the term of your lease or financing and other loan-related information; (vii) service information (e.g. service history, recalls, warranty and repair data, mileage, diagnostic data about the performance or status of vehicle

modules and systems); and (viii) applicable third party service providers (e.g. cellular provider, satellite radio provider, etc.);

- information about your insurance and driving records, including: (i) insurance you currently carry relating to the products and services you seek from us; (ii) insurance claims history; (iii) accident history; (iv) your driving records and history; (v) any other information provided by your Motor Vehicle Report; and (vi) all of the foregoing information of the additional insureds relating to your request for our products and services;
- where applicable, information gathered by your vehicle and how you interact with it. For example, your vehicle may contain an event data recorder ("EDR"), which can collect and store information about your vehicle and its occupants immediately before and during a collision or near collision event (including how various systems in your vehicle were operating (such as your accelerator and brakes), as well as the speed of your vehicle), diagnostic information, and information about the deployment of the airbags.
- information about your assets, debts, investments and expenses
- credit information (including credit score and other information contained in your credit file) obtained from credit reporting agencies
- information that you submit to us or any of our service providers (including photographs, videos, questions or prompts) through or in connection with contests, sweepstakes, social media, contact forms, or your use of human or AI-enabled chat features on our website or app, through written or verbal communications with any of our representatives or AI chatbot tools, or through any other means; and
- spoken data (and any personal information included therein) when using voice command features or when you speak to a customer care representative or use an AI chatbot tool.
- technical and usage information when you use our website, such as your internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website; and
- marketing and communications information, such as your preferences for receiving our newsletter.

We also collect, use, and share aggregated and anonymized data for any purpose. Aggregated and anonymized data is not considered personal information because it cannot be used to identify you.

How We Collect Personal Information

We may collect your personal information from you when, for example:

- you visit our website;
- you use our products and services (e.g. warranties, extended service plans, or roadside assistance);
- you interact with our customer relations representatives or an AI chatbot tool;
- you attend special events organized by us;
- you complete customer surveys;
- you participate in a contests, sweepstakes or social media;

Affiliates. We may collect personal information from our affiliates and subsidiaries, such as Volkswagen Financial Services, so that we may: (i) process your information on their behalf; and (ii) where we have consent to, send you marketing information about our vehicles, products or services, events and promotional or loyalty offers (including finance or lease offers).

From other Third Parties. We may also obtain your personal information from third parties who help us operate our business. For example, we use ecommerce and online commercial platforms and service providers to operate our insurance quoting platform online through which we may obtain any information you submit through the platform when seeking an insurance quote or premium estimate. Also, we may conduct joint marketing activities with third parties (such as contests, sweepstakes or social media) through which we may obtain your name and address and other information about you. We may also use third parties to help us conduct surveys or fulfill our customer service operations (including to facilitate AI chatbot tools you may interact with) and thus obtain information about you from them. Lastly, we may use third parties to help us manage, process, store and/or understand the information we have about you and others (e.g., Customer Relationship Management solutions). When we engage such other third parties to provide services for us, we contractually bind them to certain terms to ensure that they only collect, use and disclose your personal information per our instructions and for purposes disclosed to you either in this Policy or at the time your information is collected. In some cases, those other third parties will collect information from you on our behalf and may wish to use your personal information for their own purposes, in which case they are responsible for telling you about those other purposes before they collect your personal information. You should therefore make sure to read their privacy policies so that you understand how both we and they may use and disclose your personal information. Any questions concerning their privacy policies and procedures (including

opting out of marketing communications) should be addressed directly to such third parties.

Why We Collect Your Personal Information and How We Use It

VW Insurance collects personal information (as well as Vehicle Data) to enable us to develop, manage and maintain our operations and business, including for example:

- to assess your requested insurance coverage, provide you with our auto and property insurance quotes and premium estimates, and offer and issue an insurance policy to you;
- to establish, maintain and manage our relationship with you so that we may provide you with the products, information or services that have been requested (including, for example, to respond to your questions or requests for insurance and other products, information or services), and to enable you to register, subscribe and/or use various services provided by Volkswagen or third parties);
- to be able to review the products and services that we provide to you so that we may:
 - understand your requirements for our products and services;
 - understand your preferences and needs; and
 - work to improve our products and services;
- to send you marketing materials about our insurance, vehicles, products or services, events and promotional or loyalty offers;
- to conduct market research;
- to build and maintain a customer profile of you to be used for any of the above purposes;
- to protect us against error, fraud, theft, and damage to our goods and property;
- to enable us to comply with applicable laws or regulatory process;
- to generate anonymized and aggregated information
- to respond to questions, requests, or prompts you share with us as part of your use of an AI chatbot tool;
- to enable us or our service providers to operate, develop, monitor, improve, or train AI models that you use (e.g., where you use an AI chatbot tool) or for another

business purpose related to the offering of a chatbot tool, such as to reproduce, modify, create derivative works, publicly perform, or publicly display personal information in the chatbot tool, as necessary to enable the chatbot service, including after de-identifying and aggregating your personal information for these purposes;

- for any other purposes described in this Policy; and
- any other reasonable purpose to which you consent at or before the time we collect your applicable personal information.

How We Share Personal Information

For the purposes outlined in this Policy, we may share your personal information with:

- Our underwriters, [Co-operators General Insurance Company];
- Volkswagen Canada Inc.
- Volkswagen Financial Services Inc.;
- our affiliates, including Audi Canada Inc., Volkswagen Group of America, Inc. (“Volkswagen America”) and Volkswagen Aktiengesellschaft (“Volkswagen AG”);
- third party service providers, including our suppliers, contractors, professional advisors, and affiliates that perform services for us (e.g. (i) our online ecommerce platform service provider; (ii) data hosting, network and other information technology services, including AI chatbot services, (iii) customer service, (iv) marketing services, (v) payment processing, and (vi) legal, accounting and other professional services); and
- appropriate authorities to protect our rights, your safety or the safety of others, to investigate fraud, or to respond to a law enforcement request.

Additionally, we may use and disclose your information when we believe such use or disclosure is permitted, necessary or appropriate: (i) under applicable law, including laws outside your country of residence; (ii) to comply with legal process; (iii) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (iv) to enforce the terms of the agreements for our products and services; (v) to protect our rights, operations or property; (vi) to allow us to pursue available remedies or limit the damages that we may sustain.

Finally, your personal information may be disclosed or transferred to another party during the course of (i) the grant of a security interest in VW Insurance’s assets, or (ii) completion of the sale of all or a part of VW Insurance through (for example, an asset or share sale, or some other form of business combination, merger or joint venture); provided, however,

that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in accordance with this Privacy Policy.

International or Interprovincial Transfers of Personal Information

We may transfer your personal information to a jurisdiction other than the one in which it was collected in order to fulfil the purpose outlined in this Privacy Policy or for other processing and storage purposes permitted by law. When your personal information is outside of its jurisdiction of origin, it is subject to the laws of the country or province in which it is located, which may have different data protection laws than those in force in its originating jurisdiction. Those laws may make it possible for your information to be accessed by law enforcement and national security authorities in that other jurisdiction. For example, we could be obliged to respond to a subpoena or other mechanism that would give law enforcement officials in that other jurisdiction access to your personal information.

Collection of Personal Information from Minors

We do not seek to obtain, nor do we wish to receive, personal information directly from minors; however, we cannot always determine the age of individuals with whom we interact (e.g. individuals who access and use our websites). If a minor (as defined by applicable law) provides us with his or her personal information without parental or guardian consent, we encourage the parent or guardian to contact us.

De-Identified and Anonymized Information

To the extent allowed under applicable laws, us and our service providers may de-identify or anonymize your personal information, and use and disclose such de-identified or anonymized information for any purpose (including to develop, manage, and maintain our business) without further notice to you.

Our Use of Commercial Electronic Messages

VW Insurance will only send you commercial electronic messages if we have your implied consent or express consent to do so. For example, we may send email, text or other electronic messages to you: (i) if you have an existing vehicle warranty, purchase a service directly from us, or have some other form of existing business relationship with us; or (ii) if you have asked for or otherwise expressly agreed to receive such electronic messages from us, such as by signing up for our newsletter or by agreeing to receive

marketing communications from VW Insurance in the context of one of your interactions with a dealer.

You can withdraw your consent or request to stop receiving such messages at any time either by using the unsubscribe mechanism within the body of any such message or by contacting our Privacy Officer at vwfsprivacy@vwcredit.com. We will endeavour to respond to your opt-out request promptly, but we ask that you please allow us a reasonable time to process your request. Please note that if you opt-out from receiving marketing-related emails, we may still need to send you communications about your use of our products or services, or other matters.

Our Use of Cookies and Similar Technologies

For details on how we and our partners use cookies, please see our [Cookie Policy](#), which forms part of this Policy.

How To Control Your Cookie Preferences

There are a variety of ways in which you can control the information collected by cookies and similar technologies when you use our websites or apps. For example, you can control the cookies used by modifying the settings in your browser or on your device that allow you to change the setting of all or some cookies. Through those settings, you should also be able to delete cookies that have already been placed on your devices. For information and instructions on how to change your cookie settings on different browsers and mobile devices, see [here](#).

Please note that if you use your browser or device settings to block all cookies, you may not be able to access all or parts of our websites, apps, or services.

Our Use of Third Party Advertising Services and Their Use of Behavioral Tracking

We may use technology to serve advertisements on our own websites and within its content as that content is served across the Internet. In addition, we may use third party ad networks, publishers and other entities to serve advertisements (including via Facebook) and third party analytics vendors to evaluate and provide us with information about the use of our websites and the viewing of our content on our and other platforms.

Ad network providers, data providers, publishers and other media-related companies, and/or analytics service providers may set and access their own cookies, pixel tags and similar technologies on your device's web browser and they may otherwise collect or have access to information about you. We and they may target advertisements for products and services in which you might be interested based on your visits to both the VW

Insurance websites and other websites. We and they may use a variety of companies to serve advertisements.

You can control the information we collect about you for these purposes through cookies and similar technologies. Please see the “How To Control Your Cookie Preferences” section above for more information on how to change your cookie settings.

Our Commitment to the Security of Personal Information

We maintain appropriate physical, organizational, contractual and technological measures and follow generally accepted industry standards to preserve and safeguard the confidentiality and integrity of your personal information against accidental or unauthorized access, use, disclosure, alteration, destruction or accidental loss.

Despite these measures, we can't guarantee that our safeguards will always be effective. For example, hardware or software failure, and other events such as a ransomware attack may compromise the security of your personal information. In such cases, we will act promptly to mitigate the risks and to inform you where there is a real risk of significant harm, or as otherwise required by law.

If you have reason to believe that your interaction with us is no longer secure or if you feel that the security of any information that you provided to us or that is under our control has been compromised, please advise our Privacy Officer using the contact information set out below.

Retention

We will retain your personal information for as long as necessary to fulfil each of the purposes for which it was collected, or as otherwise permitted or required by law. When this retention period expires, your personal information will either be anonymized or destroyed. If you would like more information on how long we retain your personal information, please contact our Privacy Officer using the contact information set out below.

Your Rights

Your rights relative to your personal information may vary depending on where you live. When contacting us to change or withdraw your consent or when requesting access to or correction of your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as

to search for and provide you with the personal information that we hold about you. We may charge you a reasonable fee to provide you with a copy of your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact our Privacy Officer.

You can exercise all of the rights listed below by submitting a request in writing to our Privacy Officer using the contact information set out below.

Withdrawing Your Consent. You have the right to change or withdraw your consent to the further communication or use of your personal information at any time, subject to reasonable notice and to certain limitations such as legal or contractual obligations. Please note that in some cases, the withdrawal of consent may render us unable to continue to provide you with products or services where the collection, use or disclosure of your personal information is necessary to provide the product or service.

Accessing Your Personal Information. You have the right to request to view and/or obtain a copy of your personal information. Please note that your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, your personal information may have been destroyed, erased or made anonymous.

Correcting Your Personal Information. You have the right to request that any incomplete or inaccurate personal information we hold about you be corrected, subject to certain limitations. That said, it is important that the information contained in our records is both accurate and current so if your personal information happens to change during the course of our relationship, please keep us informed of such changes.

How to Contact Us

All complaints or requests for information should be made to our Privacy Officer at:

VWFS Insurance Services Inc.

500-1340 Pickering Pkwy Pickering, ON L1V 0C4

Attention: Privacy Officer

E-mail: vwfsprivacy@vwcredit.com

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact our Privacy Officer using the contact information set out above. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may also contact the Office of the Privacy Commissioner of Canada or the

applicable provincial privacy commissioner. For more information, please go to <https://www.priv.gc.ca/en/>

Interpretation of This Policy

Any interpretation associated with this Policy will be made by our Privacy Officer. This Policy includes examples but is not intended to be restricted in its application to such examples; therefore where the word "including" is used, it shall mean "including without limitation".

This Policy does not create or confer upon any individual any rights, or impose upon VW Insurance any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Policy and Canada's federal and provincial privacy laws, as applicable, this Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

Changes to this Policy

We may make changes to this Policy from time to time. Accordingly, we encourage you to refer back to it on a regular basis. The most current version of the Policy will always be posted on [audi.ca/insurance vw.ca/insurance].

This Privacy Policy is effective as of February 2025.