

PRIVACY POLICY FOR THE PROVISION OF CHARGING DATA BY VOLKSWAGEN GROUP INFO

SERVICES AG FOR THE BRAND VOLKSWAGEN PASSENGER CARS, VOLKSWAGEN COMMERCIAL

VEHICLES, AUDI, ŠKODA, SEAT, AND CUPRA (STATE OF HEALTH/SOH)

This privacy policy informs you about the processing of your personal data by Volkswagen Group Info Services AG. Volkswagen Group Info Services AG is the central interface to mobility data of several brands of the Volkswagen Group. We provide your mobility data centrally to the service provider you have selected.

A. Controller according to GDPR

The entity responsible for processing your personal data is Volkswagen Group Info Services AG. You can contact us at the following address:

Volkswagen Group Info Services AG
Berliner Ring 2
38440 WOLFSBURG
GERMANY
gis-support@cariad.technology

Commercial Register Number HRB 207876 (Braunschweig Local Court)

Website: <https://drivesomethinggreater.com>

B. Data Protection Officer and Data Protection Representative

Our data protection officer is available to you as a contact for data protection-related concerns. Please direct your inquiries to:

Data Protection Officer of Volkswagen Group Info Services AG
Berliner Ring 2
38440 WOLFSBURG GERMANY
gis-privacy@cariad.technology

Volkswagen Group Info Services AG has appointed a Data Protection Representative in the United Kingdom. Details of our representative and contact details are as follows:

Data Protection Representative of Volkswagen Group Info Services AG
Volkswagen Group United Kingdom Limited
Yeomans Drive
Blakelands
Milton Keynes, MK14 5AN
United Kingdom
ukrepresentative@vvg.co.uk

C. Purpose of data processing

The Volkswagen Group Info Services AG provides the SoH (State of Health) data for your vehicle battery from the brands Volkswagen Passenger Cars, Volkswagen Commercial Vehicles, Audi, Škoda,

SEAT, and CUPRA to a service provider selected by you. This data provision enables the service provider to offer you digital services based on battery health analysis – for example, to evaluate battery performance, optimize vehicle usage, or support decisions related to maintenance, warranty, or resale.

Volkswagen Group Info Services AG transmits basic information on the health of the high-voltage battery to enable a well-founded assessment of battery life and efficiency. This particularly supports the management and optimization of vehicle fleets and the transparent communication of vehicle status to third parties. Additionally, the product allows the service provider to conduct an initial check to determine whether the data subject meets all the requirements for using the respective service.

The data processing is carried out for the following purposes:

1. Battery Health Assessment and Optimization

The aim is to transparently display the health status of the high-voltage battery in the electric vehicle and evaluate it based on data. This enables a well-founded assessment of battery performance, supports the optimization of vehicle utilization, and can contribute to reducing maintenance and operating costs.

- Provision of SoH status in %
- Analysis of battery health data to optimize vehicle fleets and individual usage patterns
- Support with maintenance, warranty, and resale
- (Predictive) management of service, repair, and wear and tear
- Management and customization of vehicle warranties
- Estimation of residual value and forecast development
- Marketing of used, new, and damaged vehicles
- Recycling and dismantling of damaged vehicles

2. Vehicle Status Monitoring and Management

The aim is to continuously record the general condition of the vehicle and manage relevant processes. This supports compliance with legal requirements as well as remarketing and claims management.

- Vehicle accident and damage management
- Claims reporting to support remarketing processes
- Monitoring vehicle emissions and legal requirements
- Risk analysis and underwriting

3. Access verification and authorization to use

Before using the service, it is verified whether the data subject meets all technical and legal requirements. This verification is carried out by the service provider.

- Initial verification of authorization to use
- Validation of technical requirements for using SoH-based services

D. Data categories

Volkswagen Group Info Services AG receives the following categories of personal data from Volkswagen AG (Berliner Ring 2, 38440 Wolfsburg), Audi (Auto-Union-Str. 1, 85057 Ingolstadt), ŠKODA AUTO a.s. (tř. Václava Klementa 869, 293 01, Mladá Boleslav), and SEAT CUPRA, S.A.U. (Autovía A-2, km 585, 08760 Martorell), and forwards them to the service provider with whom you have entered into a contract:

- Vehicle Identification Number (VIN)
- Brand of Vehicle
- Subscription ID
- State of Health (SoH) of the Battery in % or Percentage Range
- Mileage at last SoH Value
- Date of Last SoH Value

Volkswagen Group Info Services AG receives the contract number/documentation for the contract concluded between the service provider and you from the service provider with whom you have concluded a contract, in order to ensure that the above-mentioned data is only provided by Volkswagen Group Info Services AG if there is a valid contract between the service provider and you.

E. Legal basis

The processing of personal data by Volkswagen Group Info Services AG is based on the legitimate interest (Art. 6 para. 1 lit. f GDPR) and the necessity for the performance of the contract (Art. 6 para. 1 lit. b GDPR) concluded between you, as the registered primary user of the vehicle, and the service provider you have selected for the use of digital services aimed at optimizing your energy consumption and charging costs.

Volkswagen Group Info Services AG is the central interface for the provision of mobility data of several brands of the Volkswagen Group and has the legitimate interest to provide the data transmitted by the Volkswagen Group brands to Volkswagen Group Info Services AG to authorized service providers centrally via our Data Hub (<https://drivesomethinggreater.com/>).

In the event that other vehicle users of your vehicle use the vehicle under the primary user account, identification by us is generally not possible. If we become aware of this at all, the processing of personal data of these other vehicle users is carried out on the basis of the legitimate interest of Volkswagen Group Info Services AG (Art. 6 para. 1 lit. f GDPR).

F. Data recipient

Your data will be provided to the following data recipients for the purpose defined above:

- the service provider you selected;
- data processors on behalf of the service provider you selected;
- data processors on behalf of Volkswagen Group Info Services AG.

G. Data source

We have received your data from the following sources:

- Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg
- Audi, Auto-Union-Str. 1, 85057 Ingolstadt
- ŠKODA AUTO a.s., tř. Václava Klementa 869, 293 01, Mladá Boleslav
- SEAT CUPRA, S.A.U., Autovía A-2, km 585, 08760 Martorell
- As well as from the service provider with whom you have entered into a contract.

H. Storage duration

Generally, your personal data will not be stored by Volkswagen Group Info Services AG. The Volkswagen Group Info Services AG - as a central interface for mobility data of several brands of the Volkswagen Group - provides your data from the respective brand to the respective service provider with whom you concluded a contract. Therefore, the data is merely transferred through without being stored by us.

For commercial accounting (German HGB), tax compliance (German AO) and data protection accountability (Art. 5 para. 2 GDPR) reasons, Volkswagen Group Info Services AG only archives in a revision-proof manner that the data of the "State of Health" product (see point D.) for a specific VIN was provided to a data recipient without storing the provided charging data (see point D.) itself.

The contract number/documentation and the Vehicle Identification Number (VIN) will be stored for a maximum period of 4 years from the end of the contract with the data subject.

I. Your rights

You may assert your rights against Volkswagen Group Info Services AG free of charge at any time.

For more information on how to exercise your rights, please visit: <https://drivesomethinggreater.com/legal-notice/privacy-notice/data-hub>.

Right of access

You have the right to access, i.e., to request confirmation from us as to whether and - if so - which personal data concerning you are being processed and to whom which data has been disclosed as data recipient. In addition, you generally have the right to receive a copy of your personal data processed by us. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits data but does not store the transmitted data itself (see point H.).

Right to rectification

You have the right to demand that we correct any personal data relating to you that is incorrect or incomplete. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits data but does not store the transmitted data itself (see point H.).

Right to erasure

You have the right to demand the deletion of your data if the conditions specified in Art. 17 GDPR are met. According to this, you can, for example, demand the deletion of your data if it is no longer necessary for the purposes for which it was collected. In addition, if we process your data based on your consent and you revoke this consent, you can demand its deletion. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits data but does not store the transmitted data itself (see point H.).

Right to restriction of processing

You have the right to request the restriction of the processing of your data if the conditions of Art. 18 GDPR are met. This is the case, for example, if you dispute the accuracy of your data. You can then request the restriction of processing for the duration of the verification of the accuracy of the personal data. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits data but does not store the transmitted data itself (see point H.).

Right to data portability

If the data processing is based on consent or the performance of a contract, and if it is also carried out using automated processing, you have the right to receive your data in a structured, common and machine-readable format and to have it transferred to another controller. In addition, you have the right to transmit that data to another controller without hindrance directly from us to another controller. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits data but does not store the transmitted data itself (see point H.).

Right of objection

If we process your data on the basis of legitimate interests, you have the right to object to the processing of your data at any time on grounds relating to your particular situation. If your objection relates to data processing for direct marketing purposes, you have a general right to object, which we will implement without giving reasons.

Right of withdrawal

If the data processing is based on your consent, you have the right to revoke your consent at any time free of charge with effect for the future by email to:

gis-support@cariad.technology

Notice according to Article 11 GDPR

We would like to point out that in many cases we, as Volkswagen Group Info Services AG, are not able to identify the additional vehicle users of a vehicle and that we are not obligated to obtain or process additional information in order to identify data subjects in accordance with Article 11 GDPR.

If you assert rights against us, we must verify your status as a data subject according to GDPR and may ask you for further information if necessary. This also serves to ensure that we may not violate the rights of third parties when providing personal data according to GDPR data subject rights.

Automated individual decisions

There is no automated decision-making according to Article 22 GDPR.

Right of appeal

You also have the right to complain to a supervisory authority about the processing of your data by us. The competent supervisory authority for Volkswagen Group Info Services AG is:

**The State Commissioner for Data Protection of Lower Saxony,
Prinzenstraße 5,
30159 Hanover,
poststelle@lfd.niedersachsen.de**

Status September 2025