

Global Payment Solution (“GPS”)

Data Privacy Notice

The following Data Privacy Notice contains important information regarding the collection and processing of your personal data within the scope of GPS services. In addition, it provides information on your rights you possess with respect to us and how you can exercise them. Any processing of your data will be carried out with the greatest possible care observing the highest security standards.

GPS is a payment solution of Volkswagen Payments S.A. based in Luxembourg. It is licensed as “Electronic Money Institution” (EMI) and it is a subsidiary of Volkswagen Financial Services AG based in Germany (VW FS AG). VW FS AG is a subsidiary of Volkswagen AG (VW AG).

With its multinational e-commerce platform GPS offers private and commercial customers innovative payment solutions on online platforms of other group companies of VW AG as well as external providers (marketplace operators). On these platforms, customers can submit orders to merchants (acceptance points) and pay through EMI. EMI cooperates with providers of payment systems and further external providers in order to process payments. The payment procedure is typically seamlessly integrated in the marketplace operator’s website.

We place the utmost importance on the protection and confidentiality of your data. The collection and use of all data, in particular your personal data, takes place exclusively in accordance with the strict provisions of applicable European and national data protection law, in particular in accordance with the provisions of the Regulation (EU) 2016/679 (General Data Protection Regulation, GDPR).

For transactions on websites of marketplace operators, the privacy notices and the terms of use of the respective company apply, which are accessible on their websites at any time. By means of agreements with marketplace operators, acceptance points and payment system providers (cooperation partners), we ensure that the collection, recording, processing and use of personal data with regard to subject matter, duration, nature and scope takes place exclusively within the limits of this notice.

The data protection principles laid down in this Data Privacy Notice may be revised over time, in particular by amending, extending or restricting the payment functions offered as well as further development of our business model. We reserve the right to amend this Data Privacy Notice at any time and to publish the revised version on our website. We will inform you about an amendment to our Data Privacy Notice in due time before the amendment is implemented unless legally compelling reasons indicate otherwise.

Persons without or with limited contractual capability are not entitled to use GPS.

Following we would like to inform you about data we collect in the context of our offered payment features as well as data we receive from our cooperation partners and for which purpose this data is processed by us.

We recommend that you read this Data Privacy Notice carefully, download and save it on your personal device.

Controller

Controller according to applicable data protection provisions is

Volkswagen Payments S.A.

19-21 route d'Arlon

Serenity Building – Bloc D

L 8009 Strassen

Luxembourg

We appointed a Data Protection Officer who ensures the adherence to our high data processing standards. If you have any questions regarding data protection, please contact our Data Protection Officer:

Volkswagen Payments S.A.

19-21 route d'Arlon

Serenity Building – Bloc D

L-8009 Strassen

Luxembourg

Email: DataProtectionVWFSLUX@vwfs.com

Object of data processing

Using our payment features, personal data, i.e. personal details, payment data and usage data, is collected and processed depending on the payment process. In this context, we sometimes receive data from marketplace operators as well as from risk management partners and credit agencies. This data is transferred in encrypted form. Personal data is considered any information relating to an identified or identifiable natural person. The data we process includes:

- Personal details such as first and last name, title, address, date of birth, user name and password (log in data), contact information such as (mobile) phone number and e-mail address (contact data) as well as information on place of birth, citizenship, occupation and income as well as identity documents, e.g. ID card number (further personal data);

- Payment data: Such (personal) data required to process payment transactions, hence order data such as shop name and reference key, shopping cart details, amount to be paid and currency as well as billing and delivery address, payment transaction data such as amount to be paid and currency, number, date and time of a payment as well as credit card and bank connection details such as account holder, account type, account number, validity date as well as verification code of a credit card and bank account details (provider, IBAN, BIC);
- Usage data: Such (personal) data, either collected automatically when using our services or forwarded to us by participating marketplace operators (see annex) when processing a payment. This includes, (i) technical and device related interaction data such as your IP-address, device identification (so-called device fingerprint / device ID), functional and web tracking data, as well as data about log-in behaviour and the use of website as well as (ii) geographical usage data such as location-based interaction data.

Nature, scope and configuration of data processing depend on the payment function offered by us and our cooperation partners and chosen by the customer in individual cases. Here are to distinguish:

- The completion of a transaction via a so-called guest payment. In this case, the customer does not register neither with the EMI, nor with the marketplace operator, but merely provides his log-in data and contact information to the marketplace operator for a single transaction. Only individual payment data as well as potentially further personal data is collected and processed by EMI and only individual payment data is processed to complete the transaction.
- The completion of a transaction after registration of the customer with the marketplace operator, in which log-in, contact and payment data of the customer is stored for subsequent transactions by the marketplace operator. No registration of the customer with EMI takes place. Only individual payment data as well as potentially further personal data is collected and processed by EMI and only individual payment data is processed to complete the transaction.
- The completion of a transaction after registration of the customer with the marketplace operator and EMI, in which the log-in, contact and payment data of the customer is stored for subsequent transactions in his digital EMI customer account. EMI uses payment data and further personal data also to conduct its own risk management.
- The completion of a transaction by means of an electronic money account (wallet) in which, after the customer has registered with EMI, in which the log-in, contact and payment data of the customer is stored for subsequent transactions in his digital EMI customer account and a digital account is kept for the customer and electronic money (emoney) is credited, withdrawn and used as currency for orders. Transactions are processed via e-money accounts of customers, marketplace operators and acceptance points. EMI uses payment data, further personal data and usage data also

to conduct its own risk management and to continuously fulfill its due diligence obligations.

We would like to point out that the available functional scope of GPS may be limited depending on different parameters such as the scope of services offered by the respective marketplace operator, your place of residence or registered office or the location of access to our services.

Automated processing

When accessing our services and the websites of our partners, your Internet browser automatically transfers certain usage data as part of its normal functioning. This includes, inter alia:

- IP address
- Device fingerprint /device ID

Furthermore, due to the usage of cookies and tracking technologies we automatically receive certain data being transmitted by your internet browser.

When using our websites, cookies are stored on your computer. The term refers to small text-files that are placed in the buffer storage of your browser. These text-files enable our websites to remember your preferences and actions for a limited timeframe. All cookies used by us are necessary for the operation of our websites and therefore being referred to as functional cookies, whose application you cannot reject, if you want to make use of our services.

On the basis of Art. 6 para. 1 lit. f) GDPR we apply session-cookies as well as permanent-cookies. Session-cookies are automatically deleted when your session is ended referring to the moment you close your browser or perform a log-out. Permanent-cookies are automatically deleted after an individually defined period. Our cookies serve the purpose of providing you with functions and services as well as preventing misuse of your data and fraud attempts. More specifically we use cookies for the following purposes:

- Authorisation: A permanent cookie that is deleted one hour after the beginning of the authorisation procedure.
- Prevention of fraud: A session-cookie that is deleted after the conclusion of each individual process (i.e. completion of payment).
- Usage of payment data: A session-cookie that is deleted with closing of the browser.

Other tracking tools or cookies than the aforementioned are not applied. Your browser usually allows you to manage your cookies in the browser-settings and, for example, to disable, manually delete or block certain cookies. Further information can be found using the help function of your browser. However, we want to point out that the deactivation of cookies might have a negative impact on the usability of our websites.

The collection of usage data, function and web tracking data as well as data regarding log-in behavior initially takes place without assignment to a person for the purposes of troubleshooting and optimization of the user interface, which are described below in more detail, on the legal basis specified therein. An evaluation of the data by means of so-called user profiles will take place exclusively in pseudonymised form, in particular by means of so-called hashing. We reserve the right to ask for your consent in this regard.

Purpose and legal basis of data processing

We use the data processed by us in order to provide our customers with our payment features and to carry out and improve our services. The processing of personal data of our customers takes place for the following purposes and serves the fulfilment of our contractual obligations with our customers and cooperation partners or to perform the contract as well as to be compliant with legal provisions and, if necessary, other specifically named legitimate interests. In detail the following data is collected:

- Your log-in data, contact data and further personal data as well as potentially further individual payment data for the purpose of your registration and, if applicable, the creation of a customer account with EMI after validation of the log-in data and confirmation of your identity as well as verification of the information and contact information provided by you. This is necessary to fulfil our contractual obligations with you (Art. 6 para. 1 sent. 1 lit. b) GDPR) and also serves our legitimate interest in the identification of our contractual partners and your interest in an effective access restriction to your customer account (Art. 6 para. 1 sent. 1 lit. f) GDPR);
- Your payment data to process the payment transaction, referencing the transaction and thus fulfilment of our contractual obligations under the contracts concluded with you, thus to provide you with our service to pay at marketplace operators and acceptance points and if necessary to claim reimbursement (Art. 6 para. 1 sent. 1 lit. b) GDPR);
- Your personal details and contact data to contact you during the ongoing contractual relationship, provided that this is necessary for its performance (Art. 6 para. 1 sent. 1 lit. b) GDPR), as well as for marketing purposes, provided that this meets our legitimate interests (Art. 6 para. 1 sent. 1 lit. f) GDPR) as well as, if necessary, on the basis of a separately obtained consent (Art. 6 para. 1 sent. 1 lit. a) GDPR);
- Your log-in and payment data for automated verification of the payment options available to you (credit card and direct debit). In this process, the means of payment you have specified are only verified. A credit assessment or scoring does not take place. This is necessary to perform the contract, as we need to check which payment options can be offered to you (Art. 6 para. 1 sent. 1 lit. b) GDPR).
- Your log-in data as well as payment and other usage data, for
 - risk management, that is to execute risk analysis
 - minimize risk of fraud as well as

- fraud prevention and
- to avoid abusive or incorrect use of our payment features

This serves to be compliant with legal provisions that we as a Electronic Money Institution are subject to (Art. 6 para. 1 sent. 1 lit. c) GDPR) and our legitimate interest in preventing risks that may arise as a result of abusive or incorrect use by us and our contractual partners (Art. 6 para. 1 sent. 1 lit. f) GDPR). For fraud prevention and risk management, we use the services of risk management partners and credit agencies, which may vary depending on your location;

- Your personal details, payment and usage data, to the extent necessary to comply with legal obligations, in particular tax, bank and money-laundering regulations as well as accounting regulations (Art. 6 para. 1 sent. 1 lit. c) GDPR);
- Your log-in and usage data for internal processes including troubleshooting, performance of data analysis and internal testing, statistical purposes and development of software solutions in this context, to provide a flaw less and failure-free service and therefore to be able to fulfil our contractual duties in the best way possible (Art. 6 para. 1 sent. 1 lit. b) GDPR and Art. 6 para. 1 sent. 1 lit. f) GDPR);
- Your usage data, specifically technical and device-related data such as browser and system settings in order to ensure our legitimate interest in optimising the user interface and ensuring that information for you and the devices you use are displayed as optimally as possible (Art. 6 para. 1 sent. 1 lit. f) GDPR). This also serves the purpose of providing a flaw less and failure-free service and therefore to be able to fulfil our contractual duties in the best way possible (Art. 6 para. 1 sent. 1 lit. b) GDPR);
- Log-in data, payment and usage data for the following purposes:
 - Continuous improvement of our services in order to be able to offer you a service tailored to your needs also in the future, i.e. to be able to fulfil our contractual obligations in the best way possible (Art. 6 para. 1 sent. 1 lit. b) GDPR). This also serves our legitimate interest in keeping our offer up to date (Art. 6 para. 1 sent. 1 lit. f) GDPR);
 - Business development and exploration of future business opportunities, for example by improving risk models and developing new products, functions and services, as far as our legitimate interests outweigh (Art. 6 para. 1 sent. 1 lit. f) GDPR) or as far as you have given us your consent (Art. 6 para. 1 sent. 1 lit. a) GDPR). We will use your data for the above purposes only when rendered anonymous and in aggregated form, so that a conclusion on your person is excluded.

If we carry out personal analyses of data in addition to the above, this will be done in accordance with the respective applicable data protection regulations. In particular, we will inform you about

appropriate changes in the purpose of data processing and – if required by data protection law – will ask you for a corresponding consent.

Data processing for advertising purposes and with consent

We may also use your postal and e-mail address to send you relevant information about used and similar services, and to conduct customer satisfaction surveys (processing for marketing purposes, provided that this – as described above – meets our legitimate interests, Art. 6 para. 1 sent. 1 lit. f) GDPR). If you have given us your **consent**, we may also use other information collected by us and transmitted to us for the aforementioned purpose. If you do not wish to receive this communication, you can withdraw a consent granted for this purpose at any time and submit your withdrawal to the address mentioned under "Contact" or an online contact option specified there. We will point this out to you again via customer communication in each individual case.

Provided that the data processing data envisaged by us goes beyond legal requirements as well as the fulfilment of the purpose of the contract and provided that there is no predominant legitimate interest on our part, we reserve the right to ask you for your **consent**. In this case scope and purpose of the data processing arise from the respective declaration of consent (Art. 6 para. 1 sent. 1 lit. a) GDPR).

You have the right to withdraw your consent to the processing of your data for purposes beyond the performance of our services and legal obligations at any time, and you may explain your withdrawal to the address specified under "contact" or an online contact option specified there.

The withdrawal of consent does not affect the legality of the processing carried out on until the time of the withdrawal. Right of objection

Furthermore, we would like to point out your right of objection in accordance with Art. 21 para. 1 and 2 GDPR, pursuant to which you may object to the processing of your data, especially if it is used by us for purposes of direct marketing (this also applies to profiling, provided that it is associated with such direct advertising) or if there are grounds relating to your particular situation that contradict the data processing. In the latter case, the right of objection only exists if the data processing is based on a balance of interests (i.e. pursuant to Art. 6 para. 1 sent. 1 lit. f) GDPR). If you object to purposes of direct marketing, your personal data will no longer be processed for these purposes. In other cases of legitimate objection, we do not process your personal data any further, unless we can demonstrate legally binding legitimate grounds that outweigh your interests, rights and freedoms, or unless the processing serves the purpose of enforcing, pursuing defending legal claims.

Transfer of data and access rights

For the fulfillment of contracts that customers have concluded via the websites of marketplace operators with these or with acceptance points, the personal details, payment and usage data that are entered there are forwarded to us for the aforementioned purposes, in particular to perform the selected payment feature and to be able to complete the payment process.

Conversely, data that is provided to us by customers regarding the completion of payment processes is passed on to the respective cooperation partners, provided that it is necessary for the fulfilment of the contract. Specifically, information about the customer's payment transactions is communicated to the respective acceptance points that are involved in a transaction in order to facilitate the execution of the ordering process.

We will take appropriate legal, technical and organizational measures to ensure that your information is always treated securely and that a level of protection that complies with our high data protection standards is maintained when transmitting your data to cooperation partners, customers and selected third parties.

A mutual data transmission takes place in particular between us and:

- Our Customers, to fulfil contractual obligations with you or for any other purpose described in this Data Privacy Notice;
- Marketplace operators, to fulfil contractual obligations with our customers or for other purposes described in this Data Privacy Notice (see Annex 1);
- Acceptance points, therefore online merchants, where customers have made purchases as far as the transmission of your data to them is necessary for the execution, administration and reclamation of your order;
- Payment providers, if payment transactions are processed on the customer's request via the payment methods offered by these companies (see Annex 2);
- Risk management partners for the purpose of verifying the identity and determining the risk profile of our customers, in particular if a customer has chosen payment methods that require such verification (see Annex 3). Depending on the country in which customers use our payment functions, a limited review of the risk profile may also be carried out prior to selecting a payment method in order to be able to offer the customer a customized payment overview of the payment options;
- Authorities and other public bodies, such as law enforcement agencies, tax and fiscal authorities, as well as third parties who may have been harmed, provided that we are legally obligated to transmit data or if customers have given us their **consent** to do so. In particular, as an Electronic Money Institution, we are obligated to cooperate with the relevant authorities and to share requested data with them to combat tax crime, money laundering and terrorist financing.

It is possible that the structure of our company may change, for example by changing its legal form, establishing, purchasing or selling subsidiaries, company shares or parts of the company. In the event of transactions, data of customers and cooperation partners, which may include personal data, will be transmitted to parties of the transaction, in particular potential purchasers and sellers and their consultants in accordance with the data protection regulations regarding the protection of the legitimate interest on the side of the company owner (Art. 6 para. 1 sent. 1 lit. f) GDPR).

If we disclose personal data to third parties to the extent described above, we ensure that it is done in accordance with this Data Privacy Notice and European and national data protection

regulations. We will never sell or otherwise transfer personal data to third parties unless you have given us your explicit **consent** to do so.

We engage further external service providers (see Annex 4) in the areas of payment processing, risk assessment and management, dunning, billing, debtor management, accounting, auditing and account information and payment services, as a so-called data processors. We will always carefully select and regularly review these service providers to ensure compliance with our strict data protection requirements and the protection of your privacy. Service providers engaged by us may only use your data for the purposes specified by us and exclusively in accordance with this privacy notice and in accordance with applicable data protection regulations.

Determination of responsibilities

In general, EMI and its cooperation partners process your personal data in connection with the payment solution GPS separately from each other. Provided that, while collecting your data (i.e. log-in data, contact data and individual payment data and, if applicable, further personal data) for the first time, due to the linking of the payment solution GPS provided by EMI with the user interface ("Front-end") of the marketplace operators EMI and marketplace operator share responsibility in all four payment methods, EMI and the respective marketplace operator have defined and documented in an agreement how they separate their responsibilities from each other.

Pursuant to the agreement concluded between EMI and the marketplace operator, the duties to provide information are jointly exercised in accordance with Art.13 and 14 GDPR. Therefore, you will receive a Data Privacy Notice from both the EMI and the marketplace operator. The marketplace operator will make the EMI statement available on its website and will allow it to obtain consent, provided that this is necessary. You can exercise your rights as a data subject both directly against EMI and against the marketplace operator. Both will then coordinate and process your request.

At the end of this notice, you can find the contact options for the EMI. The contact options for the marketplace operator are available in a separate list (see Annex 1).

Place of data processing

We act globally and we will transfer your personal data to recipients based outside your country, including all memberstates of the EU as well as the European Economic Area. Our business is furthermore supported by cooperation partners and service providers based in third countries outside the EU and the European Economic Area. Hereby data will be transferred to third countries, for which the European Commission may not have determined the adequacy of the level of protection yet and which therefore do not necessarily ensure a level of data protection in accordance with the GDPR. Such transfer of data is secured in accordance with the legal provisions by sufficient guaranties, in particular through effective contractual provision to ensure an adequate data protection level.

If you access our services from outside the EU or the European Economic Area, your data may be transferred to and stored by cooperation partners or external service based in the country you

accessed our service from. Provided that the respective country is a third country, whose data protection level has not been certified by the EU yet, we have contractual protection clauses in place to assure an adequate data protection level.

Term of data processing and data retention

We will only store your data for as long as it is necessary to perform the contract concluded with you, to process the payment service or due to mandatory statutory retention obligations. If we need to retain your data after the fulfilment of the contract, for example to comply with the requirements of the Money Laundering Act or accounting regulations, we will store your data only for as long as it is required by law for the respective purpose. If your data is no longer required for the purposes stated in this agreement, we will automatically delete it. This applies in particular if you unsubscribe from your customer account, as far as we are not legally obligated or entitled to store your data for a longer period. The data we process will be stored for the period stated below and will be deleted subsequently:

- Log-in and contact data: With the end of contract for another 5 years to prevent money laundering, possibly longer if required by law .
- Payment data: With the end of contract for another 5 years to prevent money laundering, possibly longer if required by law .
- Usage data: With the end of contract for another 5 years to prevent money laundering, possibly longer if required by law .
- Data with tax relevance: 10 years.

Rights of data subjects

Upon request, you have the right to obtain information about the data we have stored about you, for example, to check what information we store about you and the purpose for which it is processed. Easily and at any time, you can request an excerpt from the data stored by us via the address stated under "contact" or via an online contact option specified there. The application for the excerpt with the data stored by us is, of course, free of charge.

You further have the right to receive the personal data provided by you and related to you in a common, structured and machine-readable format and the right to transmit this data to other parties without any barrier. As far as this is technically feasible, you can furthermore demand that we transmit the data to another controller.

At any time, you also have the right to contact the relevant regulatory authority.

National Commission for Data Protection, Grand Duchy of Luxembourg – CNPD

1, avenue du Rock'n'Roll

L-4361 Esch-sur-Alzette,

<https://cnpd.public.lu.html>

and any other supervisory authority of another member state to complain about data protection concerns.

You furthermore have the right to request that we correct inaccurate data about you and, if applicable, to request the deletion of data or the restriction of its processing. If you request the correction or deletion of your personal data or restriction of its processing, we will handle your request and arrange the correction, deletion or restriction of processing, to the extent this is required by the applicable data protection law, for instance when data is incorrect or incomplete.

In particular, we will comply with your request to delete your personal data, as long as it is no longer required for the purpose for which it was collected and if storing it is not required by law or if it is not required to establish, exercise or defend legal claims. Provided that the cooperation of a cooperation partner is required, we have ensured through agreements with cooperation partners such as marketplace operators, acceptance points and other third party companies that a correction, deletion and restriction of collected data can take place in accordance with the applicable data protection provisions. A correction or deletion of your data as well as the restriction of the processing of your data can be requested easily and at any time via the address stated under "contact" or an online contact option specified there.

With regard to the initial collection of your data in the course of a registration, you can also exercise the aforementioned rights as a data subject with respect to the marketplace operator.

We would like to point out that as an Electronic Money Institution we are subject to specific legal obligations that do not allow us to delete certain information on demand. These obligations result from tax, banking and money laundering law as well as from accounting regulations and consumer law. However, we may block your data and thereby prevent processing for purposes other than those prescribed by law.

Contact

The Volkswagen Payments S.A. located at 19-21, route d'Arlon, L-8009 Strassen is a company incorporated under Luxembourg law, registered in the Luxembourg Trade Register under number B 215079.

You can contact us as follows:

Volkswagen Payments S.A.

19-21 route d'Arlon

Serenity Building – Bloc D

L-8009 Strassen

Luxembourg

Our data protection officer (s) can contact you as follows:

Volkswagen Payments S.A.

19-21 route d'Arlon

Serenity Building – Bloc D

L-8009 Strassen

Luxembourg

E-Mail: DataProtectionVWFSLUX@vwfs.com

Annex to the Data Privacy Notice

Annex 1: Marketplace Operators

Volkswagen AG
Berliner Ring 2
D – 38440 Wolfsburg
<https://www.volkswagenag.com/de/meta/contactform.html>

Volkswagen Group España Distribución
Parque de Negocios Mas Blau II, Carrer de la Selva, 22,
08820 El Prat de Llobregat, Barcelona, España
<https://www.volkswagengrupdistribucion.es/>

Annex 2: Payment Service Providers

Concardis GmbH (for credit card debits)
Helfmann-Park 7
D – 65760 Eschborn
<https://www.concardis.com/kontakt>

iDEAL by Currence Holding B.V. (for customers of iDEAL)
Gustav Mahlerplein 33 -35
NL – 1082 MS Amsterdam
<https://www.currence.nl/>

Klarna (for customers of Klarna)
Sveavägen 46
SE – 111 34 Stockholm
<https://www.klarna.com/de/uber-uns/kontakt/>

PayPal (Europe) S.à r.l. et Cie, S.C.A. (for customers of PayPal)
22-24, Boulevard Royal
L – 2449 Luxembourg
<https://www.paypal.com/de/webapps/mpp/imprint>

PayU (for customers of PayU)
ul. Grunwaldzka 182
60-166 Poznań
<https://www.payu.pl/en/contact>

Volkswagen Bank AG (for direct debit)
Schmalbachstraße 1
D – 38112 Braunschweig
<https://www.volkswagenbank.de/de/privatkunden/kundenservice/kontakt.html>

Annex 3: Risk Management Partner

CRIF Bürgel GmbH

Leopoldstraße 244
D – 80807 München
<https://www.crifbuergel.de/de/kontakt>

Annex 4: Further External Service Providers

IDnow GmbH
Auenstraße 100,
D – 80469 München
<https://www.idnow.io/de/>

ACI Worldwide (Deutschland) GmbH
Grillparzerstrasse 18
D – 81675 München
<https://www.aciworldwide.com/about-aci/contact-us>

Volkswagen AG
Berliner Ring 2
D – 38440 Wolfsburg
<https://www.volkswagenag.com/de/meta/contactform.html>

Contoworks GmbH
Leopoldstrasse 244
D – 80807 München
<https://contoworks.com>

CRIF Bürgel GmbH
Leopoldstraße 244
D – 80807 München
<https://www.crifbuergel.de/de/kontakt>

Volkswagen Financial Services Digital Solutions GmbH
Gifhomer Strasse 57
D – 38112 Braunschweig
https://www.vwfsag.de/de/home/unternehmen/VW_FS_Digital_Solutions_GmbH.html