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Offboard Diagnostic Information System Engineering Privacy Policy

A. Controller

This privacy policy provides information about the collection, processing and use of your personal data by **Volkswagen AG**, Berliner Ring 2, 38440 Wolfsburg, listed in the register of companies at Braunschweig District Court under register no. HRB 100484 (“Volkswagen AG”), insofar as it concerns a vehicle of VW AG; by **AUDI AG**, Auto-Union-Str. 1, 85045 Ingolstadt, listed in the register of companies at Ingolstadt District Court under register no. HRB 1 (“AUDI AG”), insofar as it concerns a vehicle of AUDI AG; by **ŠKODA AUTO a.s.**, Tř. Václava Klementa 869, Mladá Boleslav II, 293 01 Mladá Boleslav, Czech Republic, listed in the register of companies at Prague City Court, reference number B 332 (“ŠKODA AUTO a.s.”) insofar as it concerns a vehicle of ŠKODA AUTO a.s.; by **SEAT, S.A.**, Autovía A-2, Km. 585, Martorell, Barcelona, Spain, with tax identification number A-28 049 161 (“SEAT, S.A.”), insofar as it concerns a vehicle of SEAT, S.A.; by **Bentley Motors Ltd.**, Pym's Lane, Crewe, Cheshire, CW1 3PL, UK, registered in England, number 992897 (“Bentley Motors Ltd.”), insofar as it concerns a vehicle of Bentley Motors Ltd.; by **Automobili Lamborghini S.p.a.**, Via Modena 12, 40019, Sant’Agata Bolognese, Italy, VAT no. IT 00591801204 (“Automobili Lamborghini S.p.a.”), insofar as it concerns a vehicle of Automobili Lamborghini S.p.a.; by **Bugatti Automobiles S.A.S.**, 1 Château Saint Jean, 67120 MOLSHEIM (France) listed in the Saverne register of companies under the no. 433 873 437 (“Bugatti Automobiles S.A.S.”), insofar as it concerns a vehicle of Bugatti Automobiles S.A.S.; by **MAN Truck & Bus SE**, Dachauer Straße 667, 80995 München, listed at Munich District Court under the number HRB 247520 (“MAN Truck & Bus SE”), insofar as it concerns a vehicle of MAN Truck & Bus SE - referred to hereinafter as the “**controller**”.

Insofar as the vehicle is not a Volkswagen AG vehicle, Volkswagen AG is the **processor** for the respective controller.

The “Volkswagen Offboard Diagnostic Information System Service” is abbreviated in the following to “ODIS Engineering”.

B. Collection, processing and use of your personal data

I. Basic principles

During the execution of work with the “ODIS Engineering” diagnostic system, the following information about you may be stored:

- Importer or dealership number
- Global User ID
- IP address
- Email address

We use this data exclusively for the purpose of allowing you access to Group systems when using Guided Fault Finding, self-diagnosis and when loading data (“Flash mode”). This access is necessary in order to authenticate you for protected functions and provide you with additional information such as software configurations that you need to carry out the repair. The process of authenticating you for protected functions takes place automatically in the background when you have already logged into the Group systems; otherwise you will be requested to do so. To activate protected functions, a token is required which is automatically retrieved after prior authentication. In addition, the aforementioned personal data can be processed in the event that software support must be provided. The email address provided will be used and processed as the communication platform.

We will process the listed data on the basis of an overriding legitimate interest (Article 6 para. 1 s.1 lit. f) GDPR). The legitimate interest is ensuring a smooth repair process.

The recorded personal data will be deleted at the controller within a period of 30 days after ending the ODIS Engineering diagnostic session on the diagnostic tester itself, or on conclusion of the support case. The personal data may also be processed by a development partner to ensure a smooth support process. Again, in this case the data will be deleted within 30 days. If a token had to be retrieved to activate protected functions, this is logged and your Global User ID is stored for a maximum of 30 years.

The controller places great importance on data security in the vehicle. For this reason, the controller takes state-of-the-art technical and organisational measures and implements tested mechanisms and standards for integrated security. Our security measures include access controls, system hardening, network vulnerability checks, network vulnerability management, awareness training, logging and managing security events and transmission and storage encryptions.

Nevertheless, the security of this data cannot be guaranteed completely if it is transmitted via the internet. Therefore, you should be aware that there may be circumstances that are unforeseeable for the controller and in which personal data is lost, disclosed, destroyed, manipulated, misused or otherwise unlawfully used. In such a case, the controller will inform you in accordance with the applicable laws and regulations or publish the relevant information. At the request of the responsible supervisory authority, the controller may report such circumstances to the authorities.

C. Your rights

You may exercise the following rights vis-a-vis the controller at any time free of charge. Further information on asserting your rights can be found in section D.

Right of access: You have the right to obtain information from us about how we process your personal data.

Right to rectification: You have the right to request that we rectify any of your personal data that may be inaccurate or incomplete.

Right to deletion: You have the right to have your data deleted if the conditions set out in Article 17 of the GDPR are met. For example, you may ask us to erase your data if it is no longer necessary for the purposes for which it was collected. You may also request erasure if we process your data based on your consent and you revoke that consent.

Right to restriction of processing: You have the right to ask for a restriction of the processing of your data if the conditions set out in Article 18 of the GDPR are met. This is the case, for example, if you dispute the accuracy of your data. You can then demand a restriction of the processing for the period it takes to verify the accuracy of the data.

Right to object: You have the right to object to the processing of your data if the processing is based on an overriding interest or if your data is used for the purpose of direct marketing. An objection is admissible if processing is performed in the public interest or in the exercise of official authority, or if it is performed for a legitimate interest of the controller or a third party. If you object to the processing of your data, please notify us of the grounds for your objection. You also have the right to object to data processing for the purposes of direct marketing. The same applies to profiling, insofar as it is related to direct marketing.

Right of data portability: You have the right to receive your data in a structured, commonly used and machine-readable format and transfer this data to another data processor, provided that data processing is based on consent or contract fulfilment and that automated processing methods are used.

Right to withdraw consent: If the data processing is based on consent, you have the right to withdraw that consent with effect for the future at any time, free of charge.

Right to lodge a complaint: You also have the right to lodge a complaint about our processing of your data with a supervisory authority (such as the Data Protection Commissioner for the State of Lower Saxony).

The contact details of the supervisory authority can be found on the website:

- Volkswagen AG: <https://datenschutz.volkswagen.de>
- AUDI AG: <https://betroffenenrechte.audi.de>
- ŠKODA AUTO a.s.: <http://www.skoda-auto.com/data-privacy>
- SEAT, S.A.: <https://www.seat.com/company/privacy-policy.html>
- Bentley Motors Ltd.: <https://www.bentleymotors.com/en/pages/privacy-policy.html>
- Automobili Lamborghini S.p.a.: <https://www.garanteprivacy.it>
- Bugatti Automobiles S.A.S.: <https://www.bugatti.com/de/datenschutz/>
- MAN Truck & Bus SE: <https://www.mantruckandbus.com/de/meta/datenschutz.html>

D. Your points of contact

Contact details for exercising your rights

The contact person for exercising your rights and further information can be found at the following website:

- Volkswagen AG: <https://datenschutz.volkswagen.de>
- AUDI AG: <https://betroffenenrechte.audi.de/>
- ŠKODA AUTO a.s.: <http://www.skoda-auto.com/data-privacy>
- SEAT, S.A.: <https://www.seat.com/company/privacy-policy.html>
- Bentley Motors Ltd.: <https://www.bentleymotors.com/en/pages/privacy-policy.html>

- Automobili Lamborghini S.p.a.: <https://www.lamborghini.com/en-en/contact-us>
- Bugatti Automobiles S.A.S.: dataprotection@bugatti.com
- MAN Truck & Bus SE: <https://www.mantruckandbus.com/de/meta/datenschutz.html>

Data protection officer

If you have any data protection concerns, please contact our data protection officer:

Volkswagen AG:
Berliner Ring 2, 38440 Wolfsburg, Germany
datenschutz@volkswagen.de

AUDI AG:
Auto-Union-Str. 1, 85045 Ingolstadt, Germany
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Pplk. Sochora 27, 170 00 Prague 7, Czech Republic
dpo@skoda-auto.cz

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Autovía A-2, Km. 585, Martorell, Barcelona, Spain
dataprotection@seat.es

Bentley Motors Ltd.:
Pymys Lane, Crewe, Cheshire, CW1 3PL, United Kingdom
DPO@bentley.co.uk

Automobili Lamborghini S.p.a.:
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