

VOLKSWAGEN

GROUP UNITED KINGDOM LTD



Guidelines for Volkswagen Group Network

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Table of Contents

| | |
|---|-----------|
| Introduction..... | 3 |
| Understanding how you process personal data | 3 |
| What we have done..... | 4 |
| What you need to do | 4 |
| Volkswagen Group’s new Privacy Statement..... | 5 |
| What we have done..... | 5 |
| What you need to do | 6 |
| Marketing Consent Management – GDPR..... | 6 |
| What we have done..... | 7 |
| What you need to do | 9 |
| Local Marketing & POLK – retailer’s/dealer’s/centre’s CRM..... | 10 |
| To Re-permission or not to re-permission? | 10 |
| POLK - IHS..... | 11 |
| GDPR readiness & on-going compliance | 11 |
| What we are doing..... | 11 |
| What you need to do | 12 |
| Next Steps | 12 |
| Appendix 1 – Glossary of GDPR Terms..... | 14 |
| Appendix 2 – Privacy Statement (Volkswagen example) | 15 |
| Appendix 3 – SLI Screen Example..... | 23 |

Introduction

The General Data Protection Regulations (“GDPR”) enter into force on 25th May 2018. The GDPR is a European law regulation designed to align data privacy laws across the whole of Europe.

The UK’s current data protection legislation (the Data Protection Act 1998) is now 20 years old. The GDPR has been described as the natural ‘evolution’ of current data privacy laws, bringing them in line with the advances in technology over the past two decades.

As a responsible company Volkswagen Group UK Limited (“VWG UK”) wishes to support its retailer/dealer/centre network in achieving compliance with the new regulations particularly in the way in which we share personal data between us. Protecting the personal data of our customers, employees and connected third parties is a core priority of the way in which we do business.

This guideline has been produced to guide you through the changes VWG UK is making in readiness for GDPR and our recommendations for what you should also be doing in order to comply. This document will cover the following key topics:

- 1) Understanding how you process personal data;
- 2) Volkswagen Group’s new Privacy Statement;
- 3) Consent management under GDPR;
- 4) Local marketing & POLK – retailer’s/dealer’s/centre’s CRM;
- 5) GDPR readiness & on-going compliance.

For definitions of the key terms used throughout this guideline document please see Appendix One.

PLEASE NOTE: This guideline has been drafted on the basis that the reader will have a basic level of understanding of GDPR and the practical impacts it has on your business. Should you require further information regarding GDPR generally, we recommend you review the Information Commissioner’s website at www.ico.org.uk.

This document is provided for guidance purposes, it is not legal advice or intended to replace or reduce retailers’/dealers’/centres’ own obligations to comply with GDPR.

Understanding how you process personal data

One of the first steps towards achieving GDPR compliance is to fully understand all the ways in which you process personal data. GDPR requires all data controllers to hold and maintain a record of all of these processing activities within your business.

The documentation of processing activities is a new requirement under the GDPR. There are some similarities between documentation under the GDPR and the information you provided to the ICO as part of registration under the Data Protection Act 1998. You need to make sure that you have in place a record of your processing activities by 25 May 2018.

A template for the register of processing activities is available from the ICO and can be found [here](#).

What we have done

As part of our GDPR programme, VWG UK undertook detailed business audits within each function and brand. We used the outputs of these audits to create:

- 1) **Data map** – a visual representation of the way in which personal data flows through our business and systems (including the sharing of this data with third parties);
- 2) **Risk Matrix** – A risk score for each processing activity which enabled us to prioritise the highest risk areas first; and
- 3) **Register of Processing Activities** – A full register of all processing activities undertaken where Volkswagen Group UK is the “data controller”.

Using the above documentation as the starting point for GDPR compliance ensured we had a full understanding of processing activities before commencing a gap analysis and remedial actions.

VWG UK will be using an IT solution to maintain its register of processing activities.

What you need to do

We hope that you have already undertaken a review of the way in which your business currently processes personal data. If not, you should start this process as soon as possible.

Once you have collated the list of processing activities you should document what lawful basis you are relying on in order to undertake that activity – this will assist you with ensuring you have covered everything you need to in your GDPR compliant Privacy Statement. There are six lawful bases to consider:

1. **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.

2. **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
3. **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).
4. **Vital interests:** the processing is necessary to protect someone's life.
5. **Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
6. **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

It is a common misconception of GDPR that consent is required for all processing activities – it is not.

Volkswagen Group's new Privacy Statement

Similarly to existing data privacy laws, under GDPR individuals have 'the right to be informed' in a clear, concise and transparent way, of how their personal data will be processed and shared. Typically this is achieved by presentation of a Privacy Statement at the point where personal data has been captured, or as soon as feasibly possible afterwards.

What we have done

The output from our GDPR audits provided us with all of the relevant information we needed in order to inform an individual on how we use their data. We have created a new Privacy Statement; which contains the following information:

- 1) What information we collect;
- 2) How do we use this information;
- 3) How do we share your information;
- 4) How long do we keep your information for;
- 5) How customers can manage the information we hold about them;

The Privacy Statement is "pan-brand" (the coverage and content is consistent across each of our brands albeit with room for adaption to each individual Brand's tone). A full version of the Privacy Statement can be found at Appendix Two.

Importantly, any Privacy Statement is a living document and will change and evolve in line with VWG's processing activities.

We are planning to have the new Privacy Statement live on our websites and communications from 9 April 2018.

What you need to do

In order to be transparent with your customers, you will need to inform all individuals of the way in which you (as a retailer/dealer/centre) process their information and also the ways in which VWG will process information that you share with us.

To ensure complete transparency, we would like you to present all individuals with an easy way to review our Privacy Statement.

We recommend that this is achieved by providing a web link to our Privacy Statement. Please see the example below:

"In order to process vehicle sales, servicing, warranty claims and record vehicle service history we will share your information with the relevant manufacturer of your vehicle. For more detail of the ways in which your information is used by these manufacturers, please see the below links:

| Manufacturer | Privacy Statement |
|--------------------------------|--------------------------|
| Audi | Links to be confirmed |
| Volkswagen | Links to be confirmed |
| SEAT | Links to be confirmed |
| SKODA | Links to be confirmed |
| Volkswagen Commercial Vehicles | Links to be confirmed |

Marketing Consent Management – GDPR

It is a common misconception of GDPR that consent is now required for a wide array of processing activities. Actually, GDPR permits businesses to undertake a great deal of processing without consent. Generally speaking, if you are using data in ways that individuals would reasonably expect and that have a minimal privacy impact, consent is not normally required.

That being said, there are circumstances where consent is the only option. Existing marketing legislation (Privacy and Electronic Communications Regulations – known as PECR) governs the sending of unsolicited electronic marketing. In many instances where you are sending electronic marketing to individuals, consent is required. The

GDPR introduces a higher burden of consent and confirms what information should be retained when someone consents to receive marketing from you.

To summarise, consents must be:

- ✓ **Freely given and unbundled** – if consent is refused you must not process personal data. Consents must not be buried in long form T+C's and must not be required in order to perform a contract (i.e. you must opt in for marketing to purchase a product).
- ✓ **Granular and specific** – It must be clear on what is being asked and the individual must be given choice. Third parties must be named according to the draft [ICO guidance](#) and arguably separate consent should be sought for both first party and third party marketing where legitimate interests cannot be relied upon.
- ✓ **Permission, not notice** – mere notification is not the same as permission.
- ✓ **Unambiguous** – Must be obvious with no pre-ticked boxes. Silence or inaction cannot indicate consent.
- ✓ **Explicit for sensitive personal data** (see Appendix One) – this higher standard requires an affirmative, clear statement.
- ✓ **Retrospective** – Consents based on existing standards may not be valid in the GDPR era.
- ✓ **Time bound** – Consent is unlikely to last forever – a basis for treating a consent as continuing should be established or a clear time period for retention stated.
- ✓ **Evidenced** – Details of who consented, what they consented to, why and when they consented must be captured and recorded.
- ✓ **Easily withdrawable** – and individual must be capable of withdrawing consent at any time as easily as it was given.

What we have done

We're changing our approach to consent management, making it clearer to individuals and compliant with GDPR;

- We will only be collecting consents for each Brand's individual marketing activities. We will no longer be collecting consent on a retailer's/dealer's/centre's behalf – this is to ensure that we do not overwrite the retailer's/dealer's/centre's own consents;
- We will not be sharing marketing consents between Brands or with third parties;
- All front end capture points for consent are in the process of being updated, this includes all Brand websites and apps as well as SLI and VMS – See proposed example in Appendix Three.

- We will have systems in place to evidence how and when consents have been captured and will be introducing an expiry period (3.5 years from 'opt-in').
- We will no longer accept Brand consents from retailers/dealers/centres which have been collected in any system other than SLI and VMS.
- Like many other businesses we will be re-permissioning our current customer database, as we wish to bring our database in line with GDPR compliance prior to the 25th May 2018.

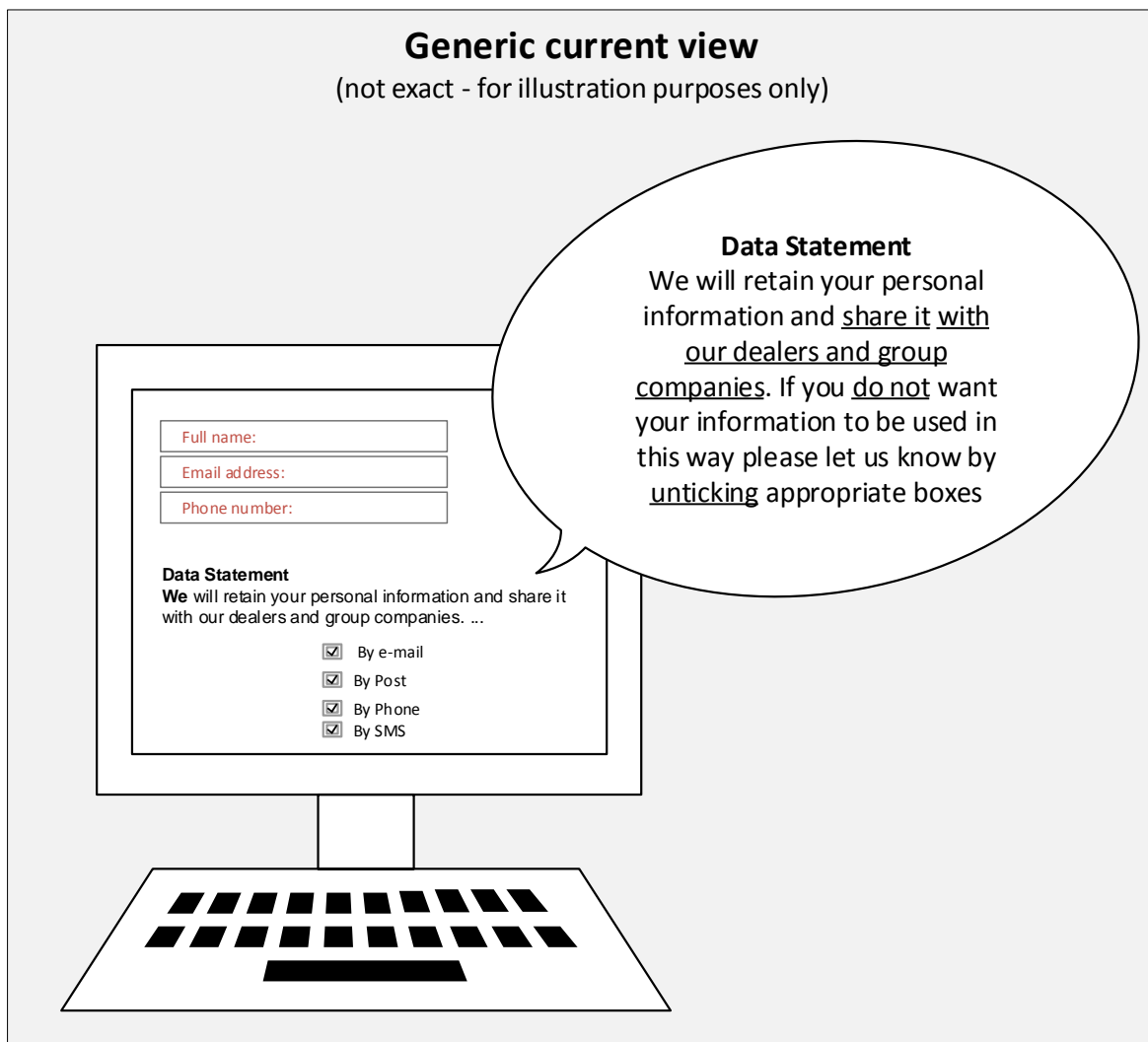


fig 1 – Generic view of existing consent capture screen

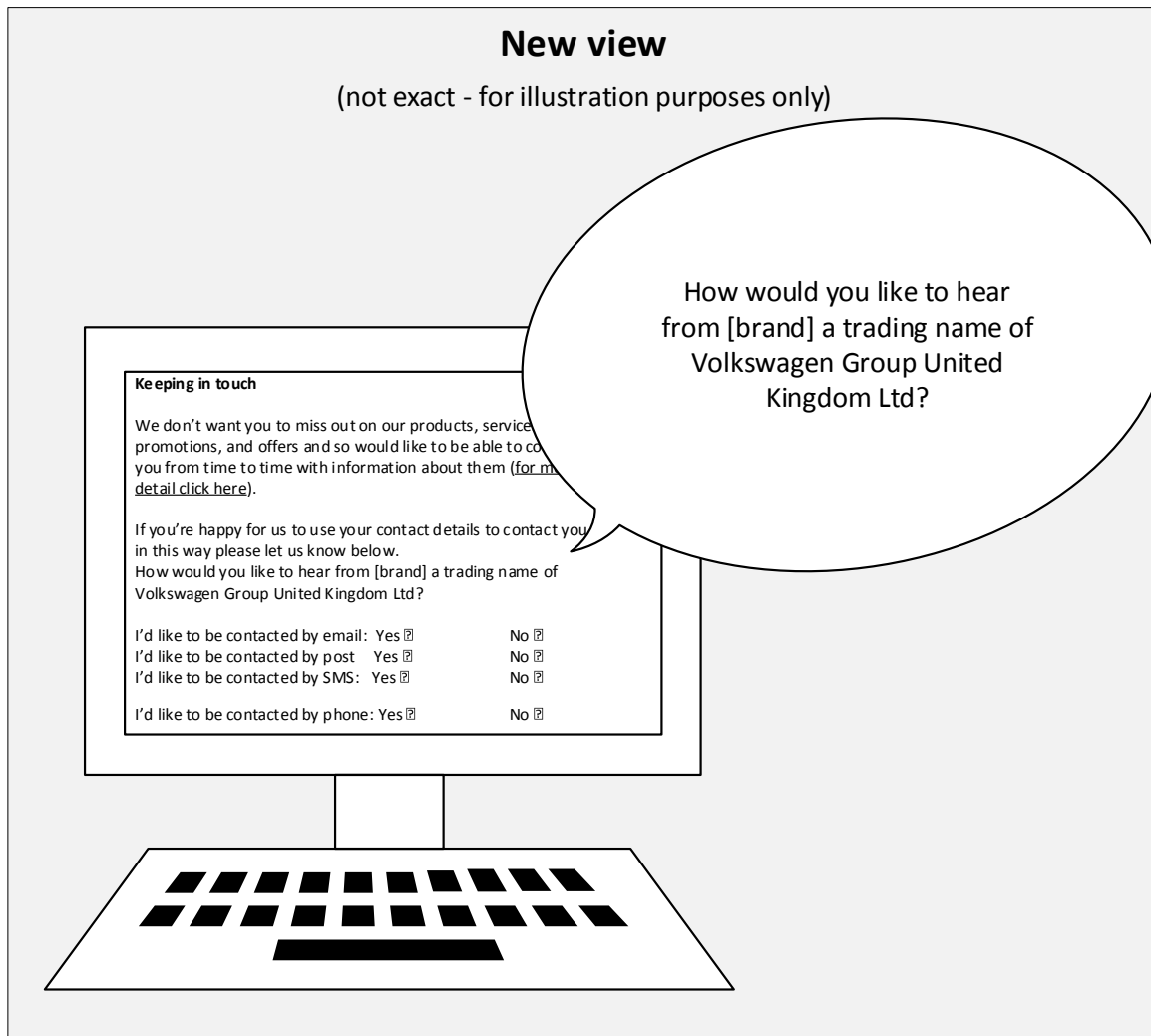


fig 2 – Generic view of proposed consent capture screen

What you need to do

- **Be aware:** we will not be sharing marketing consents with you, but we will still be sharing some data! The decision to not collect “retailer/dealer/centre” marketing consent is for our mutual benefit and protection to ensure that we all have the required span and control within our internal systems and interfaces to manage the wishes of individuals. Importantly, this does not mean we cannot share information and leads that fall under legitimate interest. However, we will no longer be able to pass customer details to you through the CRM portals, as we do now, for campaign follow up.
- **Continue to collect consents for brand marketing:** We rely on our retailers/dealers/centres to ensure maximum growth of our marketing

database so that you can continue to enjoy the benefits of our centrally driven marketing campaigns. We are being very specific about how we are asking you to capture consents for us ('opt in' rather than 'opt-out') and will be providing you with new user interfaces in SLI and VMS (See Appendix Three), along with full training in order to make the adjustments easily and compliantly. There will be more on this in future communications.

- **Compliantly process central leads:** We will not be sharing marketing consents with you via lead management systems, however this will not prevent us continuing to send you valuable leads so it is worth being really clear on our expectation on how you process the leads;
 1. We are processing leads on the basis of 'legitimate interest' (not consent).
 2. We will inform the prospective customer that we will be sharing their data with you in order to fulfil the lead. This will be communicated via embedded tool tips in the websites and the Privacy Statement.
 3. By forwarding the lead onto you we would expect that you use the data provided in a manner which the prospective customer would expect in order to fulfil the request and provide exceptional customer service.
 4. However, you cannot retain the data in your marketing database beyond the purpose for which it was obtained unless you have sought and recorded consent directly and in compliance with GDPR from the individual.

Local Marketing & POLK – retailer's/dealer's/centre's CRM

The consequence of incorrectly marketing to someone can result in a very large fine, and reputational damage; therefore it is critical that your own retailer/dealer/centre marketing consents are compliant and accurate before engaging in any Local Marketing activities.

To Re-permission or not to re-permission?

As per the previous section, VWG UK has taken the decision to re-permission its database. VWG UK are unable to advise retailers/dealers/centres if they need to do the same as the requirement to re-permission is based on several complex variables regarding the way you currently collect, process and manage marketing consents.

You must ensure your marketing consents are compliant from 25th May 2018 – you should seek independent legal advice to clarify your position. Remember there are

many other **legal bases** for interacting with customers and prospects which are not consent reliant – **make sure you have established your legal basis for processing.**

POLK - IHS

POLK is a predictive marketing tool which is utilised by most of our Brands. It allows retailers/dealers/centres to send Brand consistent marketing to its customers. POLK is an extremely valuable tool within aftersales; it takes core vehicle data (service history, service schedules, service plan) from VWG UK and combines it with specific customer data from your DMS system to ensure specific, targeted and relevant marketing is sent to your customers.

Importantly, all marketing sent via POLK is sent on behalf of the retailer/dealer/centre. Consequently, it is your responsibility to ensure that it has the correct and necessary consents required to send this marketing.

You should:

- 1) Review your current POLK processes (including unsubscribes, consent requirements);
- 2) Ensure you review the POLK marketing fulfilment lists each and every time they are sent to you;
- 3) Ensure your DMS marketing permissions are kept up to date – POLK uses this data to fulfil marketing on your behalf.

GDPR readiness & on-going compliance

Each of us holds obligations to be ready for GDPR come 25th May 2018. This guidance note is not exhaustive and concentrates on the core risk areas which you should be reviewing prior to May 2018.

What we are doing

In addition to the above, VWG UK is also working hard to align its current internal policies and procedures with GDPR including:

- 1) Updated Data Retention Policy;
- 2) Updated Breach Notification Process;
- 3) Creation of Breach Notification form;
- 4) Updated Data Protection Guidelines;
- 5) GDPR e-learning for all employees;
- 6) Revised Information Security audits;
- 7) Review of all Data Processing Agreements with 3rd parties;

- 8) Review and amendment of individual rights process; and
- 9) Creation and roll out of retailer/dealer/centre 'data addendum' to your Franchising Agreement (throughout March 2018)

Our overarching aim is to implement data compliance as an integral part of the 'way we do things' at VWG UK.

What you need to do

We know that you already treat the privacy and protection of personal data with the utmost importance and will have many suitable processes already in place to comply with the Data Protection Act.

This document sets out the kind of activities we would expect our retailer/dealer/centre Network to be progressing in order to be ready for the addition uplift being introduced with GDPR. **Remember – in many cases you are a Data Controller** and as such you have an obligation to ensure that all relevant policies and processes are in place by 25 May 2018.

For further information, please see the "Getting ready for the GDPR" section of the ICO's website, which can be found [here](#). It contains a useful checklist which will give you an indication of your GDPR readiness.

Next Steps

In March 2018, we will be running GDPR events to which your GDPR nominee has been invited. These events will cover much of the content of this communication in more detail and will offer you the opportunity to ask questions. After the events some of the most important elements will be posted on each brands' Hub so those that cannot attend will be able to see the key points made during the session. We plan to supplement this with the most frequent questions and their answers.

Whilst we will endeavour to provide as much information as we can, the onus is on you. Only you and the other members of your company can ensure its compliance with GDPR. Failure to do so could expose your business to significant fines as well as a serious loss of reputation.

So please consider the content of this communication carefully and ensure you take all the steps necessary to be GDPR compliant by 25th May 2018.

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This document is for guidance only should not be regarded as legal advice. If in doubt you should seek independent legal advice.

Appendix 1 – Glossary of GDPR Terms

Key terms

| | |
|-----------------------------|---|
| GDPR | General Data Protection Regulations. |
| Data Controller | A controller determines the purposes and means of processing personal data. |
| Personal Data | A single or combination of data which could lead to the identification of an individual. |
| Sensitive Personal Data | Personal data that reveals racial, ethnic origin, political opinions, religious or philosophical beliefs, genetic data, biometric data, health data, sexual orientation or sex life. |
| Processing Activities | Process or task which involves capture, use or storage of personal data. |
| Lawful Basis for processing | There are 6 lawful bases for processing personal data; Consent, Contract, Legal Obligation, Vital Interest, Public Task, Legitimate interest. A lawful basis for processing must be assigned to each processing activity. |
| Privacy Statement | A legal document which discloses how personal data is used within an organisation. |

Appendix 2 – Privacy Statement (Volkswagen example)

Pan Brand Privacy Statement Template

Volkswagen UK, a trading division of Volkswagen Group United Kingdom Limited (“we”/”us”) are committed to protecting and respecting any personal information you share with us.

This statement describes what types of information we collect from you, how it is used by us, how we share it with others, how you can manage the information we hold and how you can contact us.

We will always give you the option not to receive marketing communications from us. We will never send you unsolicited ‘junk’ email or communications, or share your data with anyone else who might. We do not sell your information to third parties, but we do work closely with selected partners who help us to provide you with the information, products and services that you request from us. For example, the AA who provide roadside assistance on our behalf.

The contents of this statement may change from time to time so you may wish to check this page occasionally to ensure you are still happy to share your information with us. Where possible, we will also contact you directly to notify you of these changes.

What information do we collect?

We collect information about you and your vehicle when you engage with our website, applications or authorised repairer network. We only collect information which is necessary, relevant and adequate for the purpose you are providing it for.

We collect information about you or your vehicle when you use Volkswagen UK’s websites, applications and our customer service centres. We also obtain information about you or your vehicle from our authorised repairers. Some of this information does not identify you personally, but provides us with information about how you use our services and engage with us (we use this information to improve our services and make them more useful to you). The information we collect includes some or all of the following:

1. Name (including title);
2. Address;
3. Phone number;
4. Date of birth;
5. Email address;
6. Vehicle information (including registration number, VIN, service reminders, mileage and warranty repair information);

7. The date and time you used our services;
8. The pages you visited on our website and how long you visited us for;
9. Your IP address;
10. Your GPS location (where you have permitted access to this);
11. The internet browser and devices you are using;
12. Cookie, Pixels or Beacon information (for more information please see our [Cookie Policy](#));
13. The website address from which you accessed our website;
14. Details of any transactions between you and us or any authorised repairer;
15. Where you engage with us in a business context, we may collect your job title, company contact details (including email addresses), fleet size and company details;
16. Voice recordings of calls you make to our customer service centre;
17. “Live chat” records; and
18. Any information within correspondence you send to us.

How do we use this information?

Volkswagen UK will only process information that is necessary for the purpose for which it has been collected. You will always have the option not to receive marketing communications from us (and you can withdraw your consent or object at any time). We will never send you unsolicited ‘junk’ email or communications, or share your personal information with anyone else who might.

There are various ways in which we may use or process your personal information. We list these below:

Consent:

Where you have provided your consent, we may use and process your information to:

1. Contact you from time to time about promotions, events, products, services or information which we think may be of interest to you (don’t worry, we won’t bombard you);
2. Use automatic number plate recognition when you visit our authorised repairer network to alert them to your arrival at their premises.
3. To share your personal information with our recommended third party partners, so that they can contact you with marketing information about their products and services (we will, of course, give you details about these third parties before you give your permission for us to send information to them).

You can withdraw your consent at any time by contacting us on the details [here](#) or, in relation to any marketing messages you receive, by using the unsubscribe option included in those messages.

Contractual performance

We may use and process your personal information where this is necessary to perform a contract with you and to fulfil and complete your orders, purchases and other transactions entered into with us (or one of our authorised repairers or selected partners).

Legitimate Interests

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

Processing necessary for us to support customers with sales and other enquiries

1. To respond to correspondence you send to us and fulfil the requests you make to us (for example: test drives, service requests, brochure requests or information about specific vehicles);
2. To provide vehicle support and services (for example warranty services);

Processing necessary for us to respond to understanding customers' and drivers' needs

3. To analyse, evaluate and improve our products and services so that your visit and use of our website, applications, customer service centre and authorised repairer network are more useful and enjoyable (we will generally use data amalgamated from many people so that it doesn't identify you personally);
4. To undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a customer and provide tailored offers, products and services that we think you will be interested in. We will only send marketing communications to you if you have provided your consent for us to do so or which we have obtained in the ways mentioned in the paragraph above;
5. For product development purposes (for example to improve vehicle quality, performance and safety);
6. In some cases we may use automated methods to analyse, combine and evaluate information that you have provided to us (including the sharing of your personal information within our group of companies (see details about [our group companies](#) for a full list). We collect and analyse this information in this way so that we can deliver the most appropriate customer experience to you by

tailoring and making relevant all our service and communications (for example, when your mileage suggests your vehicle is due for a service);

Processing necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns

7. To send you marketing information from time to time after you have purchased a product or service from us or made a purchasing enquiry, closed your browser with items in your shopping basket or requested a test drive, brochure or other information of interest. We will only contact you with information about our own products and services (and in ways the law allows), which we hope you will like. You have the right to object to us sending you this information at any time;
8. To contact you from time to time with marketing information (unless you object) if you have expressly indicated to us that you are acting on behalf of a business or where we have obtained your business contact details from our authorised repairer network or an online or public business directory. In relation to any such information we send by email or SMS, we will include an option allowing you to object to receiving future messages by unsubscribing;
9. To contact you with targeted advertising delivered online through social media and other platforms operated by other companies, unless you object. You may receive advertising based on information about you that we have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us;
10. To identify and record when you have received, opened or engaged with our website or electronic communications (please see our [Cookie Policy](#) for more information);
11. To administer competitions and promotions that you enter with us from time to time and to distribute prizes;

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

12. To verify the accuracy of information that we hold about you and create a better understanding of you as a customer;

13. For network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access;
14. To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
15. To inform you of updates to our terms and conditions and policies.

Legal Obligation

We may process your personal information to comply with our legal requirements (for example to register your car with the DVLA).

Vital Interest

Sometimes we will need to process your personal information to contact you if there is an urgent safety or product recall notice and we need to tell you about it.

How do we share this information?

We do not sell your information to third parties, but we do work closely with our authorised repairer network and with third party suppliers who fulfil business activities for us (like roadside assistance, marketing, events and market research etc.)

We do not sell your information to third parties. However, we may from time to time disclose your information to the following categories of companies or organisations to which we pass the responsibility to handle services on our behalf: roadside assistance service providers, customer contact centres, mobility and car hire providers, direct marketing communications agencies and consultants, market research and market analytics service providers, our legal and other professional advisors.

We will also share your information with our authorised repairer network in situations where we need to pass your information to them in order to manage any request or complaint you have made to us. For example, where you have requested a test drive, we will need to share your personal information with your selected authorised repairer so that they can contact you to arrange for the test drive to take place.

We take steps to ensure that any third party partners who handle your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to anonymise your information or use aggregated non-specific data sets where ever possible.

Due to the international nature of our business, there may be some instances where your information is processed or stored outside of the EU. In those instances, we will

ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law.

There are circumstances where we share your information with our parent (or other companies within our Group) in order to fulfil orders, transactions, handle complaints or provide you with a service or information that you have requested. For example we will share information with Volkswagen Financial Services UK Limited where you enquire about their services through us or where you make a complaint to us and later make the same or similar complaint to them. Volkswagen Financial Services UK Limited may use your information to provide you with information and carry out their obligations arising from contracts you enter into with them. For more information, please see their [privacy statement](#).

How long do we keep your information for?

We will not hold your personal information in an identifiable format for any longer than is necessary. If you are a customer or otherwise have a relationship with us we will hold personal information about you for a longer period than if we have obtained your details in connection with a prospective relationship.

We do not retain personal information in an identifiable format for longer than is necessary.

If we have a relationship with you (e.g. you are a customer or the registered driver of a leased or other vehicle purchased from us or an authorised repairer), we hold your personal information for 6 years from the date our relationship ends. We hold your personal information for this period to establish, bring or defend legal claims. Our relationship may end for a number of reasons including where the vehicle warranty or lease expires, or we have been made aware that you no longer own or drive that vehicle.

Where we have obtained your personal information following a request for information, test drive, brochure, quotation or any other information on any of our products or services, we hold your personal information for 1 year and 6 months from the date we collect that information, unless during that period we form a relationship with you e.g. you purchase or lease a vehicle. We hold your personal information for this period to give us an opportunity to form a relationship with you.

The only exceptions to the periods mentioned above are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;

- Where you have raised a complaint or concern regarding a product or service offered by us, in which case we will retain your information for a period of 6 years following the date of that complaint or query; or
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further [How can I manage the information we hold about you](#));

How can I manage the information we hold about you

You have the right as an individual to access your personal information we hold about you and make corrections if necessary. You also have the right to withdraw any consent you have previously given us and ask us to erase information we hold about you. You can also object to us using your personal information (where we rely on our business interests to process and use your personal information).

You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received any request.

You have the right to:

- 1) Ask for a copy of the information that we hold about you;
- 2) Correct and update your information;
- 3) Withdraw your consent (where we rely on it). Please see further [How do we use this information](#);
- 4) Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any continuing lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information for direct marketing, we will always comply with your right to object;
- 5) Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information;
- 6) Transfer your information in a structured data file (in a commonly used and machine readable format), where we rely on your consent to use and process your personal information or need to process it in connection with your contract.

You can exercise the above rights and/or manage your information by contacting us using the details below:

Post: [Volkswagen Customer Care, Selectapost 12, Sheffield, S97 3ZU](#)

Email: customerservices@volkswagen.co.uk

Phone: [0800 333 666](tel:0800333666)

If you have any specific data protection concerns or a complaint, you can address it to our Data Protection Team at dataprotection@vwg.co.uk.

If you are unhappy, you have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office, the data protection regulator in the UK, are below:

Post: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Call: [0303 123 1113](tel:03031231113)

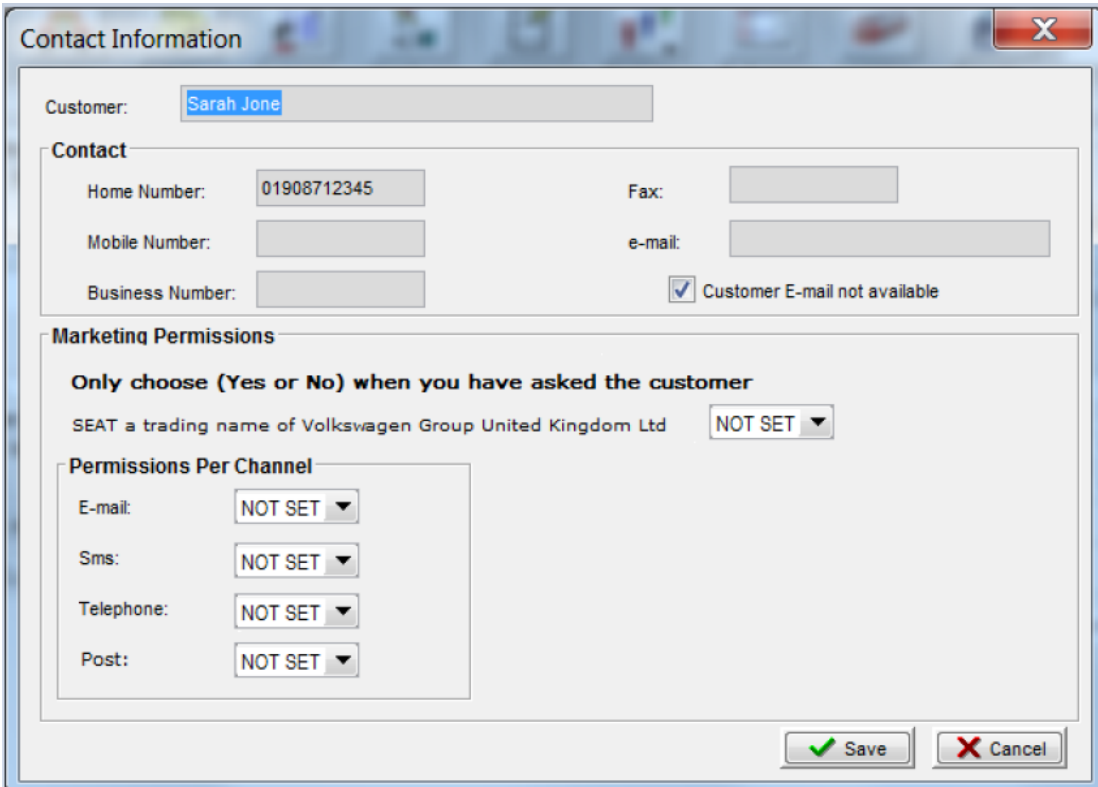
Email: casework@ico.org.uk.

Appendix 3 – SLI Screen Example

This is an example screenshot of the changes currently being made to SLI. The new screen features a 'not set' option for both the Brand marketing consent and each of the channels for communication. It is important that you only change the 'not set' option once you have confirmed with the customer whether they are happy to receive marketing information and if so, through which channel.

By having a 'not set' option it becomes absolutely clear whether a customer has consented, declined or has not been asked.

“Are you happy to receive marketing information from [Brand]. If so, would you be happy to receive that information via e-mail (agree or decline), SMS (agree or decline), telephone (agree or decline) and post (agree or decline)”



The screenshot shows a window titled "Contact Information" with a close button (X) in the top right corner. The window contains the following fields and sections:

- Customer:** A text box containing "Sarah Jone".
- Contact:** A section containing:
 - Home Number: 01908712345
 - Mobile Number: (empty)
 - Business Number: (empty)
 - Fax: (empty)
 - e-mail: (empty)
 - Customer E-mail not available
- Marketing Permissions:** A section with the instruction "Only choose (Yes or No) when you have asked the customer".
 - SEAT a trading name of Volkswagen Group United Kingdom Ltd: NOT SET (dropdown)
 - Permissions Per Channel:** A sub-section containing:
 - E-mail: NOT SET (dropdown)
 - Sms: NOT SET (dropdown)
 - Telephone: NOT SET (dropdown)
 - Post: NOT SET (dropdown)

At the bottom right of the window are two buttons: "Save" (with a green checkmark icon) and "Cancel" (with a red X icon).

Fig 3 – SLI Example screen shot