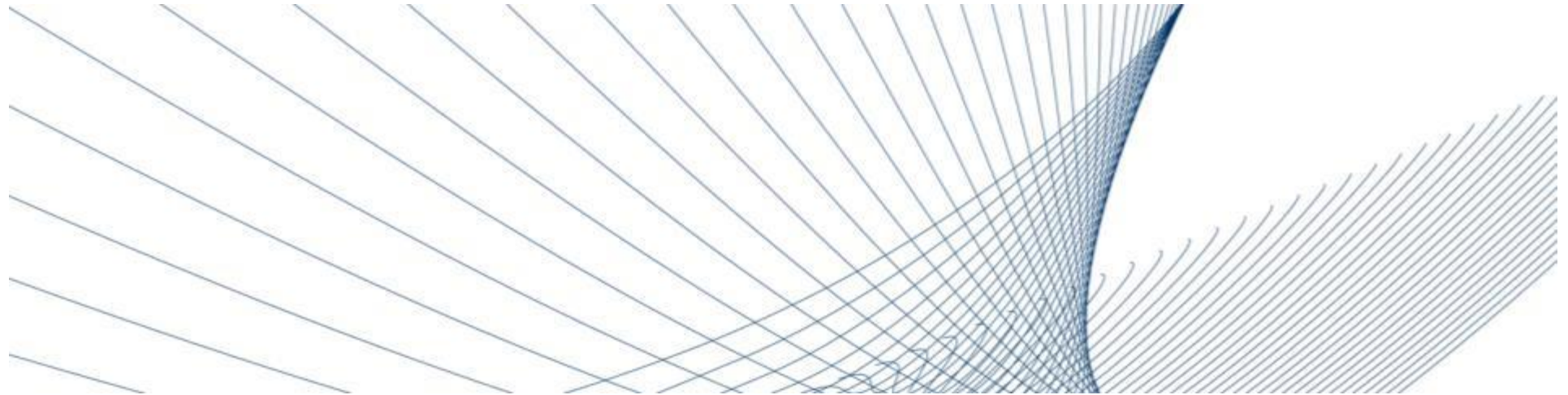




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# **Volkswagen Group GDPR Seminar**

**March 2018**



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## **Introduction**

**Mark Say - Head of CRM and Customer Data**



# Introductions



## AGENDA

Welcome and introduction – Mark Say	10:30
Key Principles & Privacy Statements – George Roberts	10:50
Re-Permissioning and Marketing – Nigel Brotherton	11:05
<i>Coffee Break</i>	<i>11:40</i>
Wider GDPR Considerations – George Roberts	11:50
Q and A Panel session – Chaired by Mark Say	12:05
Reprise and close – Mark Say	12:40

## Housekeeping

- Fire Drill
- Phones
- Slides sent out to you
- Sessions filmed & on Hub
- Parking
- Questions



# What are you looking to get out of today?





Are you prepared for the launch of GDPR on May 25<sup>th</sup>?

Please complete the  
'pre Event' section

## The basis for today's session

- We cannot do this for you
- Issue of Advice v. Liability
- We will explain
  - How we are approaching the task
  - What you need to do for us
- Relate it to your own circumstance
- Question, probe and understand





## Our approach to GDPR

- Volkswagen Group Programme commenced August 2016
- Risk-based Approach – do the essentials first
- We can provide some guidance but you are responsible for your own compliance
- What about Brexit?
- Not ‘big bang’, but start of a journey





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## **GDPR Overview, Key principles and Privacy Statements**

George Roberts - Compliance Counsel, Volkswagen Group UK



EVOLUTION  
**NOT**  
REVOLUTION

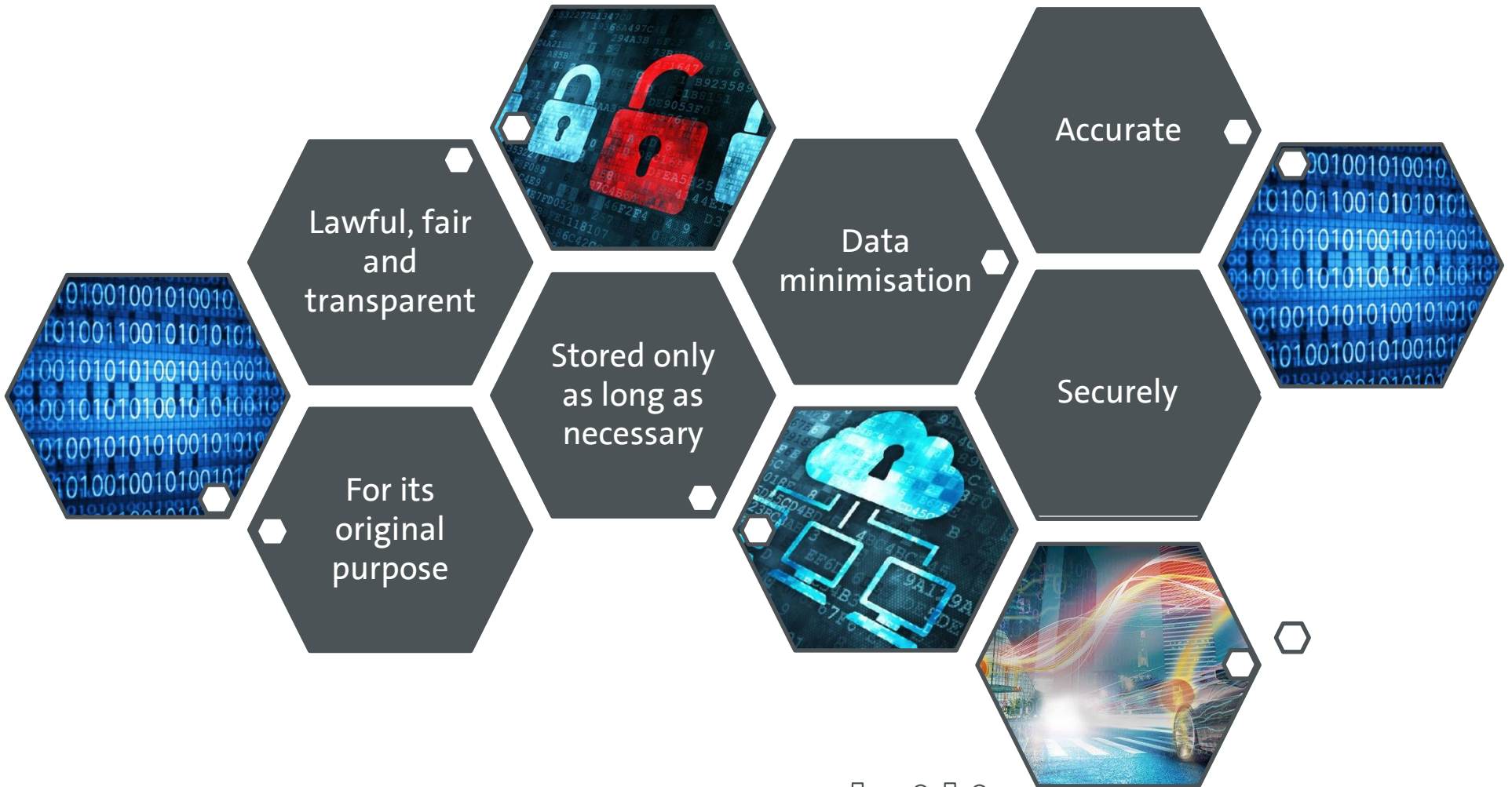


25th of May

2018

# The myths...





# Accountability



# Why have a Privacy Statement?

Individual rights under GDPR include the right to be informed, that means....

What data are you collecting?

How long will you keep it?

How are you going to use it?



Who are you sharing it with?

# Why the change?

Transparent

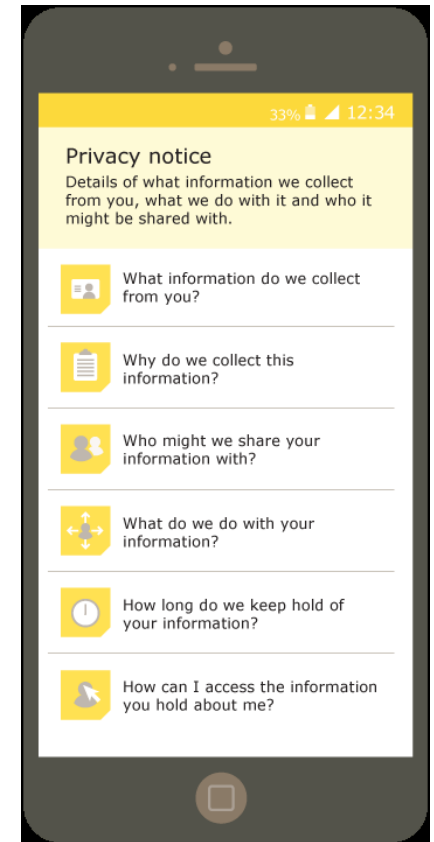
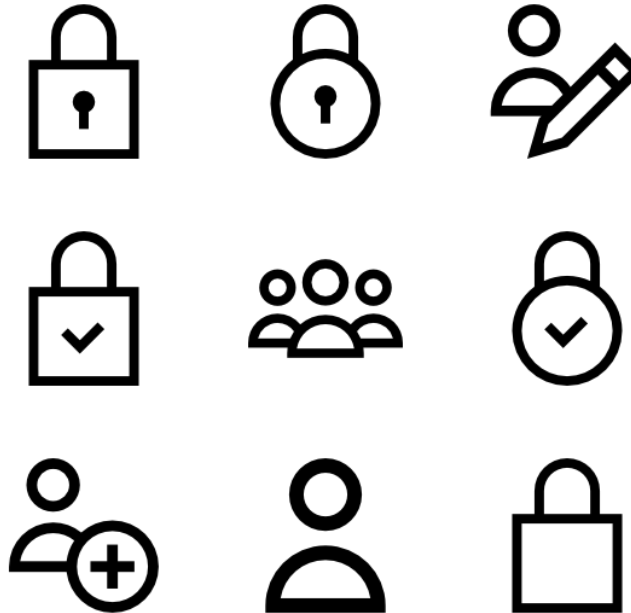
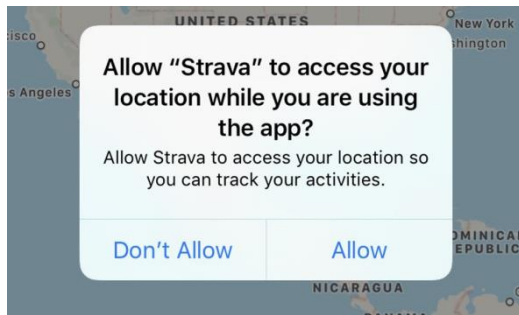
Clear and plain language

**ACCESSIBLE**

**CONCISE**

# The Volkswagen Group Privacy Statement

- Created from data audits and data review
- Living document – will be updated from time to time
- Privacy Statement is part of a wider “transparency” project
- Tool tips
- “Just in time” notices
- Layered Privacy Statement





# What we need you to do

- Linking to our Privacy Statement within your own

*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....*

- Including reference to our Privacy statement as part of collecting brand consents on our behalf

*For more information of how [brand] uses your information, see the full Privacy Statement at [url]*

## Changes to consent capture

- Consent capture at Brand level only
- All channels are ‘opt in’
- Clear link to our Privacy Statement

## Keeping in touch

We'd love to keep in touch with you. If you'd like us to do so, please select the relevant options below.

I am happy to receive marketing information\* from:

Volkswagen Group United Kingdom Ltd in relation to **[brand's]** products and services;

I am happy to be contacted by (please tick all that apply):

Email  SMS  Phone  Post;

You can opt out of receiving such messages at any time using the unsubscribe option in the messages you receive.

We (Volkswagen Group United Kingdom Ltd) and our group companies may also contact you from time to time with: customer surveys and targeted ads on social media and other online platforms, unless you object (see Privacy Statement).

You have the right to withdraw your consent at any time. You also have the right to object at any time to any use of your personal information in certain circumstances such as use for direct marketing and related profiling. To find out more about how we use your personal information and your rights, please see our Privacy Statement.

*\*“Marketing information” means information about appointment reminders, products and services including advertisements, offers, promotions, competitions and prize draws.*



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**Re-Permissioning and Marketing**  
**Nigel Brotherton – CRM Development Manager**

## Why do we need to re-permission?

- ‘Old-world’ consents are not compliant
- After 25<sup>th</sup> May 2018 we cannot use them
- If we want to market to our customers, we need a compliant consent
- Therefore, what is Marketing?
- We need to contact our customers to:
  - Tell them how we use their data
  - Ask for permission for marketing



End of Contract  
 Re-Purchase  
 Order to Delivery  
 Magazine  
 Parity  
 Product Launches  
 Service Reminders  
 Product Campaigns  
 Driving Experiences  
 WELCOME  
 Newsletter  
 Prospect Nurture  
 Events

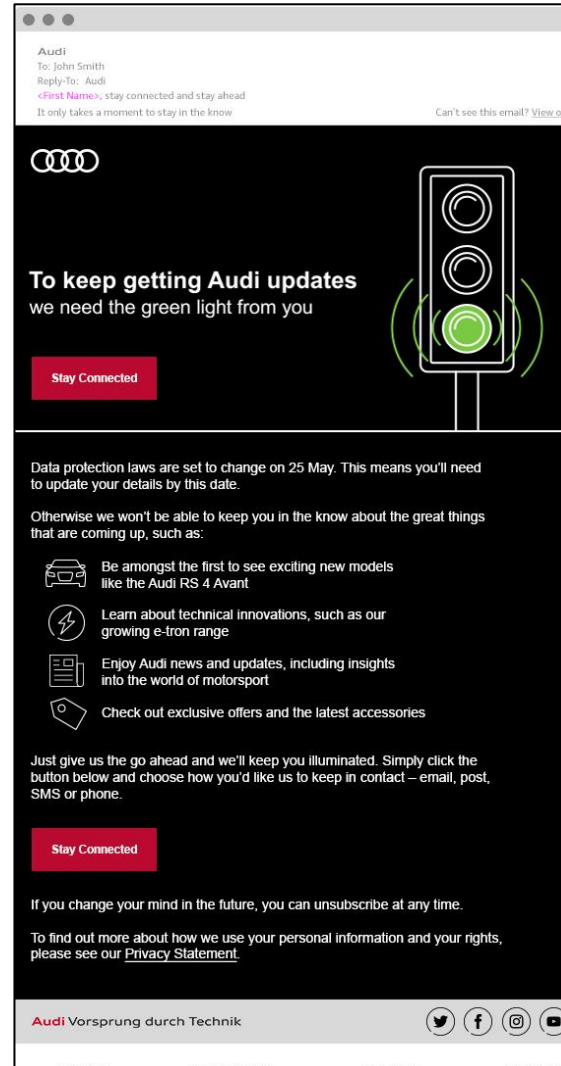
## Three Options for Re-Permissioning

- Re-permission all customers and prospects
- Target who we want to re-permission
- Dump our data and start again



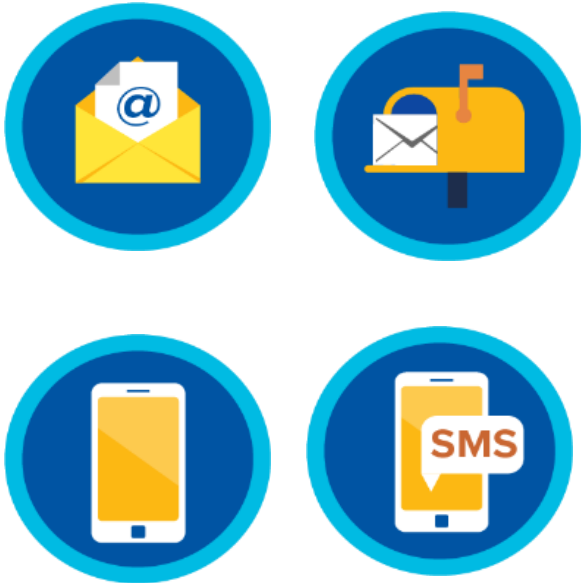
## The Scale of the Task

- 17.5 million people
- Therefore we are targeting
  - Most **valuable** Current customers
  - Prospects and Lapsed customers that are most **likely to be changing their vehicle in next 12 months**
- Need to serve our Data Privacy Statement
- Big Database Cleaning Exercise!



## How and When

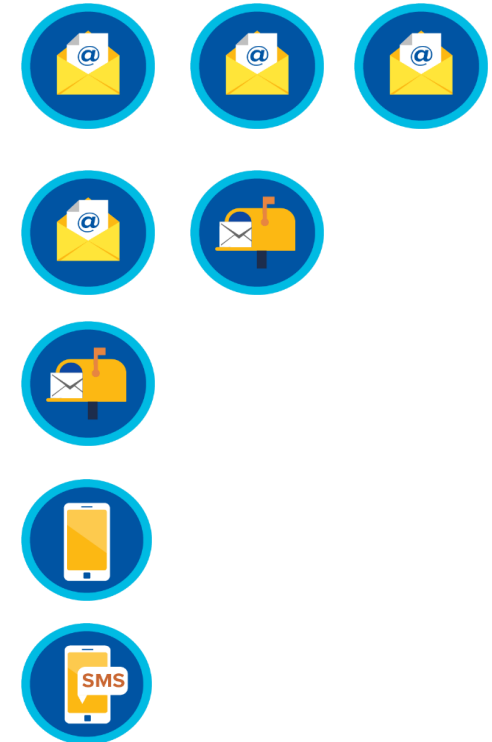
4 x Channels



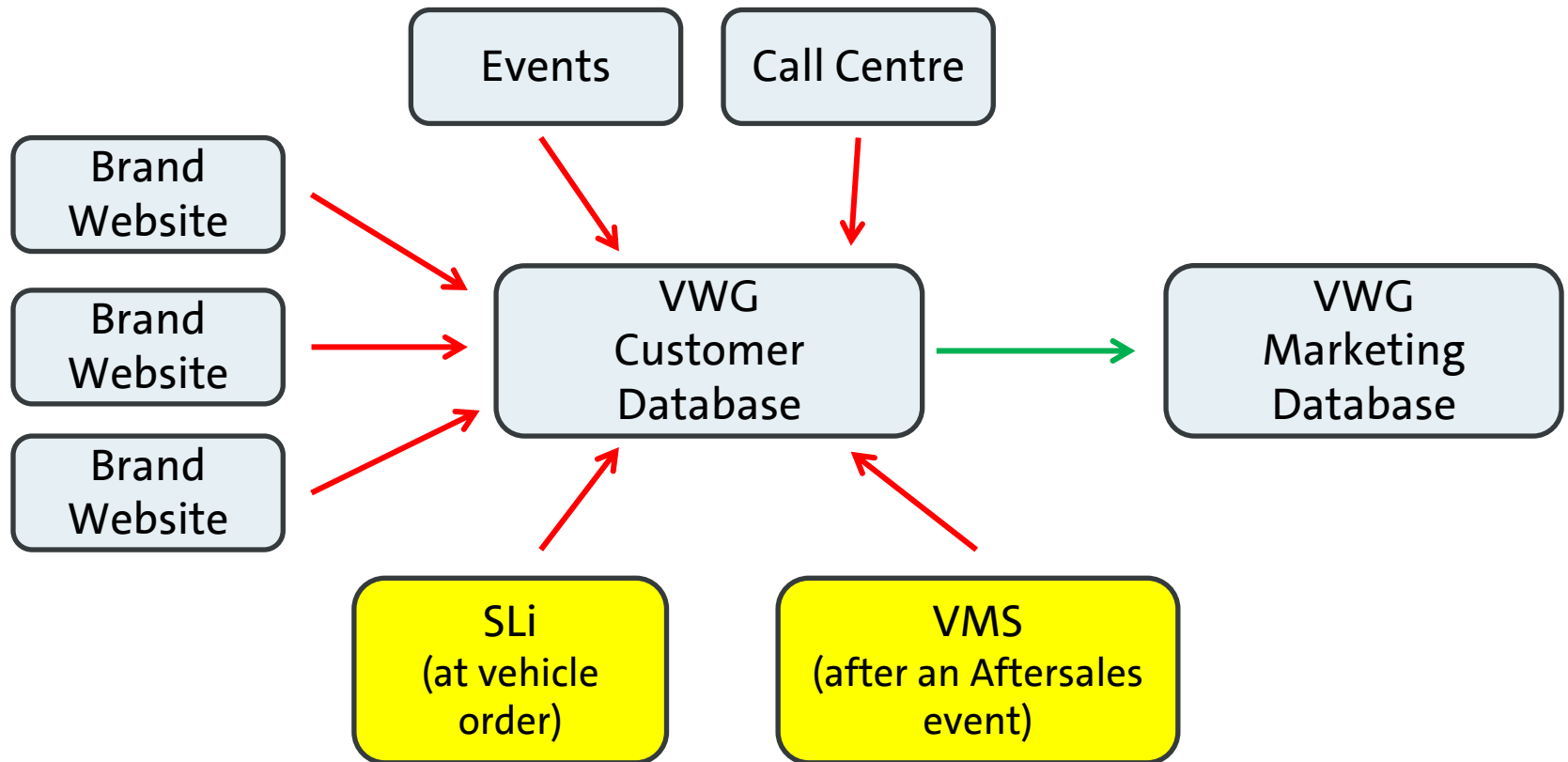
4 x Waves



1-3 attempts



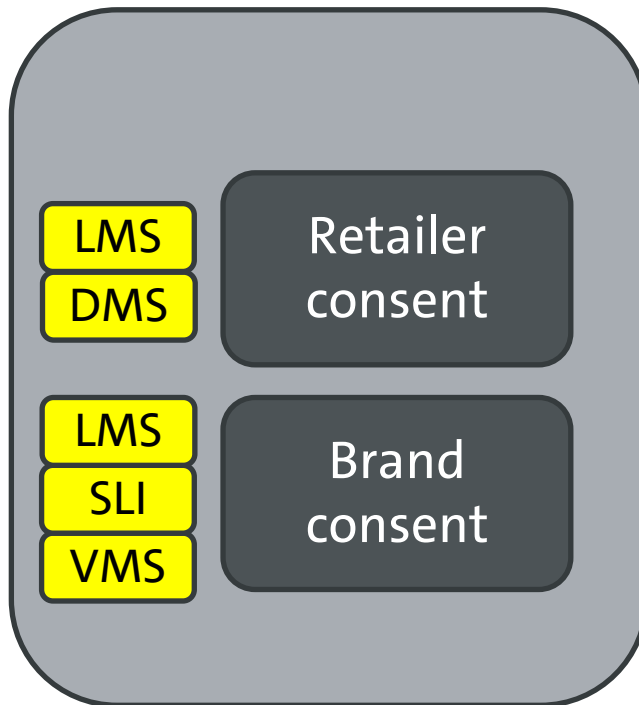
## Need to be able to capture 'new world' consents on an on-going basis



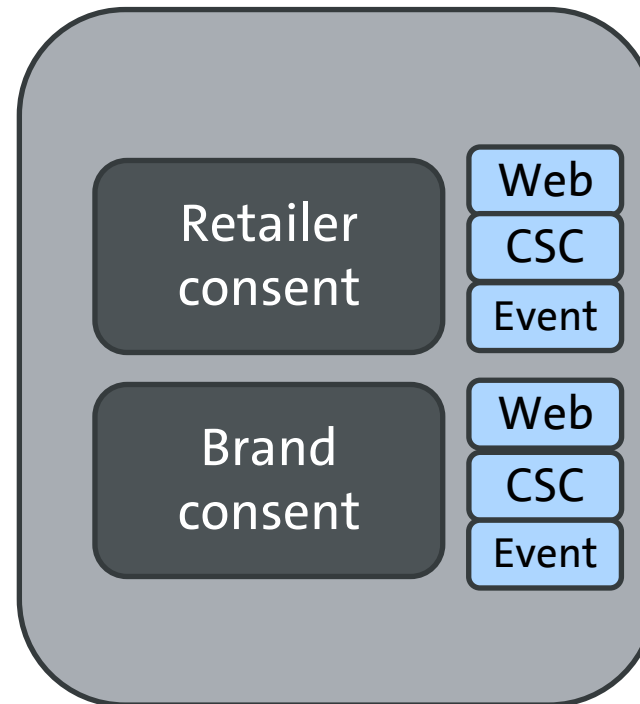


## Our 'Old World' consent landscape under the DPA

### Retailer

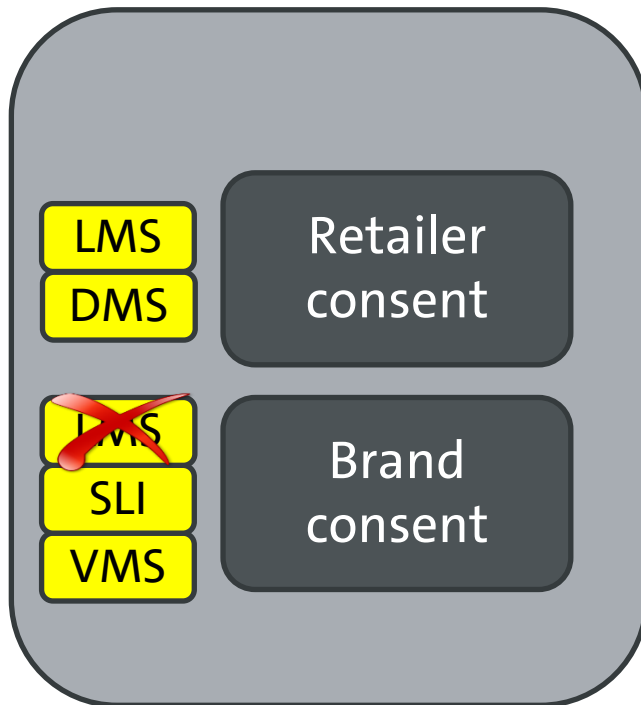


### Volkswagen Group

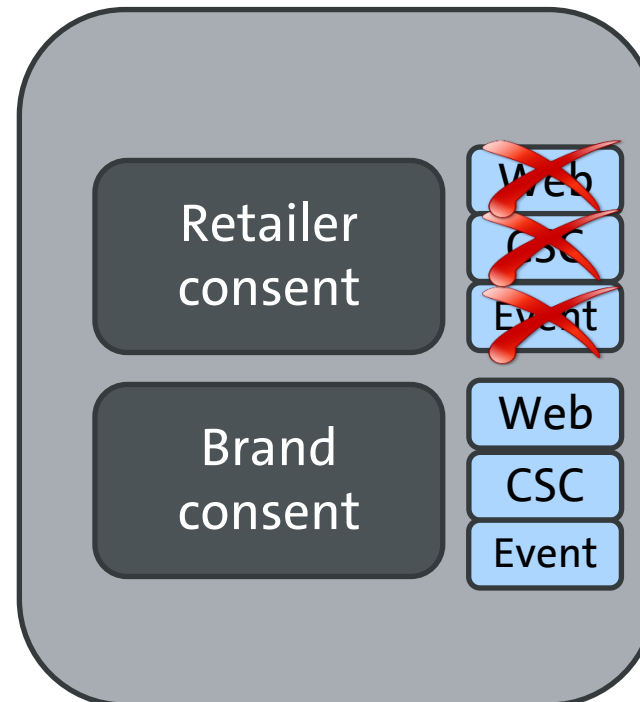


## Our 'New World' consent landscape under GDPR

### Retailer



### Volkswagen Group





## What does this mean?

Changes to Central Leads

Changes to how Volkswagen Group collects marketing consents

Changes to Volkswagen Group's relationship with the LMS suppliers

## Changes to Central Leads

- These will still come to you...but without any consents
- Processed under Legitimate Interest
- You should handle as normal
- You should use every opportunity to collect your marketing consent

Test Drive Requests

Brochure Requests

Event Leads

Register of Interest

Legitimate interest

## Process for using SLI and VMS

Contact Information

Customer:

**Contact**

Home Number:

Mobile Number:

Business Number:

Fax:

e-mail:

Customer E-mail not available

**Marketing Permissions**

Only Choose (Yes or No) when you have asked the customer

Volkswagen a trading name of Volkswagen Group United Kingdom Ltd:

**Permissions Per Channel**

E-mail:

Sms:

Telephone:

Post:



## Process for using SLI and VMS

Contact Information

Customer:

**Contact**

Home Number:  Fax:

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**Marketing Permissions**

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Volkswagen a trading name of Volkswagen Group United Kingdom Ltd:

**Permissions Per Channel**

E-mail:

Sms:

Telephone:

Post:

## The legal requirement on Volkswagen Group with your LMS suppliers

- Personal data must be passed securely
- Customer data is personal data
- 17 x LMS Suppliers audited - All failed their first audit!
- Working with them to achieve compliance
- 85% are moving in the right direction
- Yellow / Red Card System



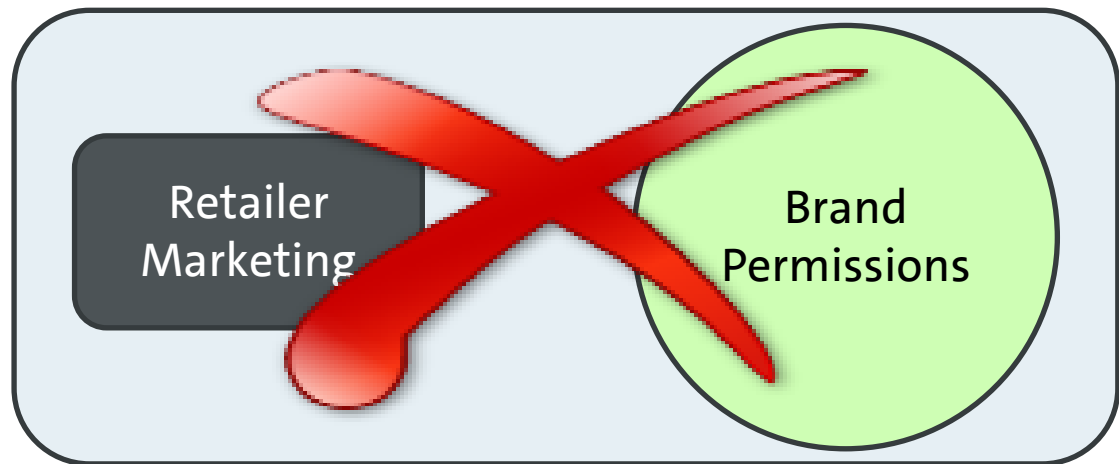
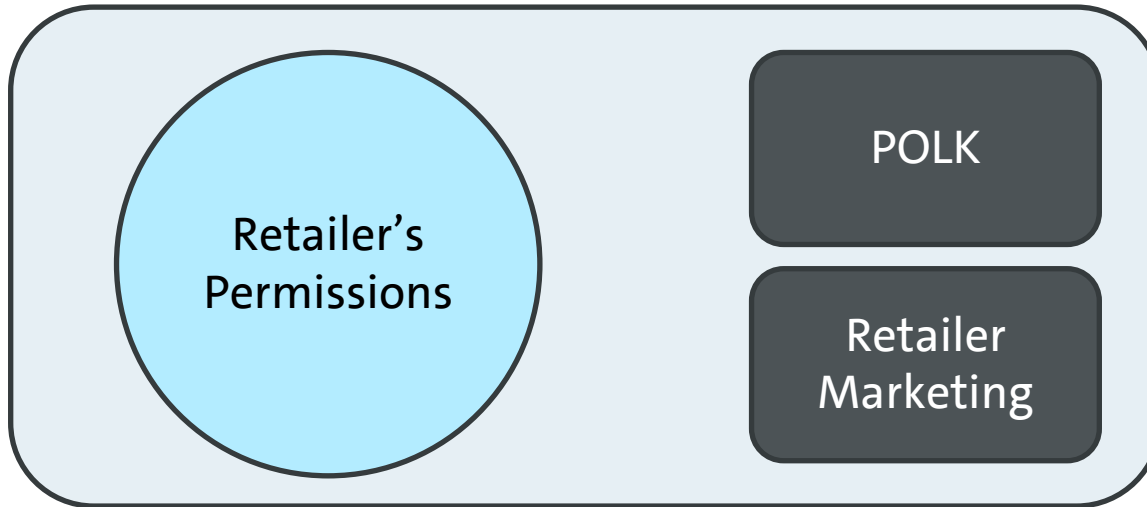


## Volkswagen Group's relationship with the LMS suppliers

- 1 IT Security Audit
- 2 Remediation plan
- 3 Data Processing Agreement

**How are you ensuring your data security?**

## Driving Retailer Marketing



## Coffee break – 10 minutes



Feel free to bring refreshments back to the room



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## **Wider GDPR considerations**

George Roberts – Compliance Counsel

# What else should you be thinking about?



= 51 working days

- Data Audit
- Lawful basis for processing
- GDPR Privacy Statement (include sharing with OEM)
- Review your marketing consents;
- Review your arrangements with third parties
- Build Awareness – Staff training
- Individual Rights
- Breach notification
- Privacy By Design
- DPIA (Data Protection Impact Assessment);



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**Q and A session**  
**Chair – Mark Say**

## Q and A

- Please write your questions on the sheet provided
- Any unanswered questions will be answered in an FAQ document and published on the Hub







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**Reprise and close**  
**Mark Say – Head of CRM and Customer Data**

# What are you looking to get out of today?



Are you prepared for the launch of GDPR on May 25<sup>th</sup>?



**Please complete the  
'post Event' section**



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**Thank you**

Keep In Touch: [GDPR@vwg.co.uk](mailto:GDPR@vwg.co.uk)

Search for GDPR on the [Hub.vwg.co.uk/](https://hub.vwg.co.uk/)



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