

## Privacy Policy

### 1. DEFINITIONS IN THIS NOTICE

**Approved Volkswagen Dealer** means a dealer who is a member of the dealer network of Volkswagen Group (Ireland) Limited and is authorised to sell Volkswagen Branded Motor Vehicles in Ireland.

**Data Protection Laws** means (i) any applicable legislation in force from time to time which implement European Community Directive 95/46/EC and Directive 2002/58/EC and (ii) the General Data Protection Regulation (Regulation (EU) 2016/679) (“**GDPR**”) and any applicable legislation in force from time to time which implement the GDPR and any amendments, revisions or replacement in respect of the foregoing; “**Personal Data**”, “**Data Subject**”, “**Processing**”, “**Data Controller**”, and “**Supervisory Authority**” shall have the same meaning ascribed to them under applicable Data Protection Laws. **Data Protection Officer** means an officer designated by Volkswagen Financial Services Ireland Limited (VWFSIL) responsible for advising VWFSIL of its obligations under Data Protection Laws, monitoring compliance and co- operating with the Supervisory Authority, if required.

**Notice** means this privacy information notice.

**Product (s)** has the meaning given to it in Paragraph 3 of this Notice.

**Volkswagen Branded Motor Vehicles:** is made up of Volkswagen Passenger Car, Volkswagen Commercial Vehicles, Audi, ŠKODA, SEAT and CURPA

**Volkswagen Group Companies** means any subsidiary or affiliate of VWFSIL within the meaning of Section 7 and 8 of the Companies Act 2014.

**Website** means [www.vwfs.ie](http://www.vwfs.ie).

**you or your** means a customer of the Products.

### 2. ABOUT THIS NOTICE

Volkswagen Financial Services Ireland Limited (“**VWFSIL**” or “**us**” or “**we**” or “**our**”, also trading as Volkswagen Financial Services; Audi Financial Services; SEAT Financial Services; CUPRA Financial Services; and ŠKODA Financial Services) recognises that protecting Personal Data and the Processing of special categories of Personal Data, is important to you. We published this Notice to outline how we collect, use, store, protect and retain your Personal Data. We are also committed to securely protecting the information you provide us from loss, misuse, and unauthorised access or disclosure. This takes into account the sensitivity of the information collected, processed and stored, and the current state of technology. Please take time to read this Notice carefully and show it to anyone else who is a party to your agreement with VWFSIL, including authorised signatories and beneficial owners if you are a business. In addition, please ensure that anyone else whose information is shared with VWFSIL under your agreement is also provided with a copy of this Notice.

Volkswagen Financial Services Ireland Ltd  
Registered Address: Block C,  
Liffey Valley Office Campus, Dublin 22,  
Ireland (D22 CF60)  
Phone: +353 (0) 1 211 8391

Vat Number: 3473131LH  
Registered Number: 602602  
Private company limited by shares  
Company Directors:  
Jens Legenbauer (German)  
Tony McPoland  
Carl zu Dohna (German)  
Caragh Madden

Account: Volkswagen Financial  
Services Ireland LTD  
Bank Address: Bank of Ireland  
2 College Green, Dublin 2  
BIC: BOFIE2D  
IBAN: IE47 BOFI90001736329342

### 3. PRODUCTS AND SERVICES

VWFSIL offers and sells motor vehicle finance solutions, leasing and other services connected with motor vehicles to customers (consumers and/or nonconsumers) in Ireland through Approved Volkswagen Dealers. VWFSIL also offers and sells motor vehicle leasing solutions, service plans and other services connected with motor vehicles directly to customers (consumers and non- consumers). These are products offered by VWFSIL are collectively referred to throughout this Notice as the “**Product**” or collectively, the “**Products**”.

### 4. DATA CONTROLLER

For the purposes of Data Protection Laws, VWFSIL is the Data Controller.

### 5. DATA PROTECTION OFFICER

You may contact the Data Protection Officer of VWFSIL about all issues related to this Policy, and to exercise your rights under Data Protection Laws.

#### Contact Information is:

Address: Volkswagen Financial Services Ireland Limited, Block C,  
Liffey Valley Office Campus, Dublin 22

Email: [DPO@vwfs.com](mailto:DPO@vwfs.com)

Telephone: 00353 (1) 2118391

### 6. PERSONAL DATA WE COLLECT

The Personal Data VWFSIL requires of you will be gathered and stored as set out in this Notice. Your Personal Data will either be directly collected by VWFSIL staff or through an Approved Volkswagen Group Dealer. We also collect Personal Data through the Website and online applications. Approved Volkswagen Group Dealers act on behalf of VWFSIL and are the initial point of contact with you. The ongoing administration and management in relation to our Product(s) is provided by VWFSIL as Product owner unless the Processing is conducted by a third party as outlined in this Notice. Depending on your Product choice, the type of Personal Data collected, and method of collection will vary.

#### A. CATEGORIES OF PERSONAL DATA

The categories of Personal Data collected by VWFSIL may change depending on the Product and the specific purpose for which the Personal Data is collected. The category headings and types of Personal Data set out below are non- exhaustive and may be used for a range of Processing. Personal Data may also be gathered from other parties who are connected

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with your agreement such as second hirers, directors, beneficial owners, drivers of leased vehicles or guarantors.

#### Individuals

- **Identification data:** name, addresses, contact details, date of birth, evidence and verification of identification, home ownership.
- **Financial data:** income, evidence of income, bank account details, financial obligations
- **Employment details:** occupation, employer, employment status, time with employer.
- **Electronic data:** Email address and IP address.
- **Vehicle data:** registration number.
- **Data collected from other sources:** penalty points, vehicle details and history, Website usage or information relating to an accident concerning a vehicle.

#### Businesses

- **Company/details of business:** business type, address, business history, contact details.
- **Financial details:** financial obligations, trading position, business contract details.
- **Owners/director's personal details:** names addresses, contact details, date of birth, evidence and verification of identification, income details.
- **Beneficial owners':** shareholding/controlling interest, name, address, date of birth.
- **Electronic data:** Email address and IP address.
- **Data collected from other sources:** penalty points, vehicle details and history or information relating to an accident concerning a vehicle.

## **B. PURPOSE OF THE COLLECTION OF YOUR PERSONAL DATA**

- **Basis for collection.** Your Personal Data will only be collected, utilised or shared if the Processing is: undertaken on the basis of your consent; necessary for the performance of (or entering into) a contract; as a result of an existing legal obligation to which we are subject; in your vital interests; in the public interest; and in VWFSIL's legitimate interests.
- **Contractual necessity.** For VWFSIL to provide you with the Product you have requested, it will be necessary to capture Personal Data to process your request and establish a contract detailing the terms, conditions and contractual obligations on VWFSIL and you as a Customer. In that context, VWFSIL will continue to process your data to administer such contract on an ongoing basis. This will involve the storing of Personal Data including back-ups from a business continuity management perspective. Prior to the end of contract, we will correspond with you by letter notifying you that your end of term is approaching. After these letters issue and to support you in completing the end of term process, your Approved Volkswagen Group Dealer will contact you to discuss your options and help you with

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the end of term process. The 'end of term' options are specific to your agreement.

- **Legal obligations.** We obtain, collect and process your Personal Data to comply with all our legal obligations. This includes processing Personal Data required under (but not limited to): GDPR and the Data Protection Act 2018; Consumer Credit Act 1995; Criminal Justice (Money Laundering and Terrorist Financing) Acts 2010-2018; Companies Act 2014; Taxes Consolidation Act 1997; and the Credit Reporting Act 2013.

- **Your vital interests.** We may process Personal Data where it is deemed to protect your vital interests. This is a rare circumstance for Processing Personal Data and usually only occurs when essential for the life of the Data Subject or that of another individual.

- **Our legitimate interests.** We may process Personal Data where it is within our legitimate interests to do so e.g. for financial and statistical analysis. Where we use legitimate interest or you have given consent (for marketing), you have a right to object to the Processing of your Personal Data. VWFSIL has a legitimate interest in adding value to its Product and may process Personal Data to improve and adapt the range of Products we offer. We have a legitimate interest in receiving feedback from customers on business performance, Products, and satisfaction levels to

respond to their needs. A key method to support this activity is by way of market research and customer surveys conducted by our business partners.

### C. WHAT WE USE YOUR PERSONAL DATA FOR

- **Your application for a Product.** When you request a Product from us, we collect Personal Data from you to assess your application and to determine whether your application will be progressed to sale of a Product. The Processing of Your Personal Data for this purpose may involve conducting credit assessments; assessing credit limits; and calculating and disclosing settlement figures. VWFSIL also collects data for the ongoing administration of the Product you have purchased from VWFSIL.

- **Automated decision making.** In assessing your application, VWFSIL uses automated decision-making methods to assist with credit assessment and underwriting/loan approval. VWFSIL uses scorecard functionality which analyses each application using variables such as the finance application details, credit history and finance requirements to potentially automate the underwriting process. The scorecard does not automatically decline proposals. Any application which is not automatically approved will be subject to a manual underwriting decision by a member of the VWFSI credit team.

- **Credit Checks.** To generate a full and accurate credit application, we will also need to perform a credit check. A credit check may be carried out with the Central Credit Register (CCR), who will also record the details of the check.

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- Please review CCR's Fair Processing Notice which is available at <https://www.centralcreditregister.ie/>

**NOTICE: Under the Credit Reporting Act 2013 lenders are required to provide personal and credit information for credit applications and credit agreements of €500 and above to the Central Credit Register. This information will be held on the Central Credit Register and may be used by other lenders when making decisions on your credit application and credit agreements.**

(Please note that with effect from the close of business on the 1st October 2021 the ICB will cease its credit reference service and the purpose for the ICB to retain the credit records will no longer exist).

- **Anti-Money Laundering (AML) or fraud.** To evaluate your application and comply with the relevant legal obligations in the Criminal Justice (Money Laundering and Terrorist Financing) Acts 2010-2021, your identity (name, address and date of birth) will be scanned through a screening system. This is necessary for the detection and prevention of fraud, money laundering obligations, and to assist the Gardaí or any other authorized investigatory body or authority with their inquiries or investigations. In some cases, VWFSIL is required by law to report details of certain criminal activities and suspected criminal activities to the appropriate authorities as well as provide them with documentation which may contain Personal Data but only where there is a legal basis to provide it.

- **Marketing Consent.** In certain situations, we may obtain, collect and process your Personal Data to send you marketing communications about our Products. We will only send you such materials if you have consented and in accordance with your preferences for receiving marketing communications. For the purposes of marketing consent or for profiling which may lead to the establishment of legal effects between you and VWFSIL. In providing consent, VWFSIL and/or its business partners may market directly to you or share your information with providers of promotional services who act on our behalf. Personal Data shared with our business partners is processed in strict adherence to Data Processing Agreements or contractual terms including confidentiality obligations and covering our respective obligations under Data Protection Laws. You have the right to withdraw your consent at any time for any Processing that you have consented to. See below at Paragraph 7 for more.

- **Telephone contact.** A personal landline, a work landline and personal mobile phone numbers may be required in the event that we need to contact you regarding the assessment of your credit application and for the ongoing management of your contract should you take out finance with VWFSIL. VWFSIL may also need to contact you for the ongoing management of the terms and conditions relating to any other Product. If you have consented, we may contact you at your place of work. Where You have not consented, and strictly in accordance with Section 46 of Consumer Credit Act 1995 in respect of PCP/HP, VWFSIL may contact you at your place of work, in the event that you reside there, or where all other reasonable efforts to contact you have failed.

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- **Customer Relationship Management (CRM).** Your Personal Data may be processed for CRM purposes which includes lead generation for Approved Volkswagen Group Dealers or Volkswagen Group Companies, classification and statistical analysis. This Processing is undertaken to (a) acquire an aggregated overview of customers without making any predictions or drawing any conclusion about an individual or (b) tailor offers to you based on your profile or customer segment in order to avoid sending you unwanted or inappropriate offers. In addition, an Approved Volkswagen Group Dealer may contact you to discuss your end of term options. If you have opted-in for marketing purposes an Approved Volkswagen Group Dealer may also contact you to provide information on other Products provided by VWFSIL.

- **Digital services.** VWFSIL collects Personal Data through the Website and other online platforms in order to accept your instructions to make changes to your data or to manage the terms of your agreement. Volkswagen Financial Services Ireland uses Adobe Analytics, a tool for web tracking, by Adobe Systems Software Ireland Limited (“Adobe”).

Adobe Analytics uses “cookies”, that are saved on your hard drive and allow to deduct information about visits of the Website, including metadata, time of the visit and the used browser. Analytics data can be accessed by the local VW FSI as well as by other Volkswagen Financial Services legal entities such as Volkswagen Financial Services AG. When cookie information about the use of the website is transmitted to an Adobe server, it is guaranteed that the IP-address is anonymized and replaced by generic IP address.

Volkswagen Financial Services AG has instructed Adobe to handle your data compliant to data privacy protection. Nevertheless, you can prevent storage of cookies in your browser menu. In this case you might not be able to use our Website completely. If you do not consent with this analytics service, you can object following this link:

<http://www.adobe.com/de/privacy/opt-out.html>

- The opt-out is only valid in the browser being used while visiting the Website and is stored on your device. If you delete the cookies in your browser, you must set the ‘Opt-Out’ again.

- **Market research.** Your Personal Data may also be used for market research which helps VWFSIL to deliver quality Products to you.

## 7. SHARING YOUR PERSONAL DATA

For the ongoing management of customer contracts, for business operations and in support of future business development, we may share your data with the following recipients:

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• **Approved Volkswagen Group Dealer:** much of your interaction with VWFSIL will occur through an Approved Volkswagen Group Dealer. Approved Volkswagen Group Dealers act on behalf of VWFSIL and provide the initial engagement with you. The ongoing administration and management in relation to the Product(s) will be undertaken directly by VWFSIL. Each of the Approved Volkswagen Group Dealers has entered into a Data Processing Agreement with us.

• **Volkswagen Group Companies:** we may share Personal Data with other Volkswagen Group Companies for the operation and functioning of our business, necessarily for the performance of contractual obligations with our customers or to fulfil legal or regulatory obligations.

▫ **Third Party Service Providers:** businesses we engage with to provide products or services that are necessary for the functioning and operation of our business. These entities may include: insurance companies, fleet services providers, management companies, market research companies and promotional service providers. These entities are limited to parties that we have relationships with to provide you with our Products and who support the functioning and operation of our business. All entities will have a Data Processing Agreement with us which commits them to obligations under Data Protection Laws and provides VWFSIL with the assurance that your Personal Data is being Processed to the highest of standards.

• **Other Third Party Entities:** State or government department's bodies or agencies, law enforcement agencies, external advisors or auditors.

## 8. WHY PERSONAL DATA MAY BE TRANSFERRED TO A THIRD COUNTRY

• In sharing Personal Data with third parties to help us provide you with the Products, VWFSIL send data to EEA countries and non-EEA countries including the United Kingdom and the United States of America.

• The transfer of your Personal Data takes place in compliance with the specific requirements of Article 44-49 GDPR. The appropriate level of protection is provided either by an adequacy decision of the European Commission in accordance with Article 45 GDPR or EU contractual clauses pursuant to Article 46 GDPR, in the case of no adequacy decision for that jurisdiction. If you would like more information about the relevant safeguards involved in international data transfers, please visit [http://ec.europa.eu/info/law/law-topic/data-protection/datatransfers-outside-eu\\_en](http://ec.europa.eu/info/law/law-topic/data-protection/datatransfers-outside-eu_en) or contact us using the contacts details in this Notice.

## 9. YOUR DATA PROTECTION RIGHTS

You have rights under Data Protection Laws which allow you to address any concerns or queries regarding the Processing of your Personal Data. We will respond to your request within 1 (one) month of receipt of your request. All of your rights may be exercised freely and at no cost.

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**Right of Access.** You have the right to access and obtain a copy of the Personal Data that we hold about you. This is known as a Data Subject Access Request. In order to facilitate this, we will need information to assist us in identifying you (such as your name, address and contract number) and the information you want access to. If you do not provide us with enough information, we may need to contact you for clarification.

**Right to Rectification.** You have the right to request that we correct any inaccuracies in your Personal Data. We would welcome any corrections/updates to your information if you become aware that it is incorrect in any way.

**Right to Erasure.** In certain circumstances, you have the right to request that we erase your Personal Data. For example, you may exercise this right in the following circumstances: (i) your Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise Processed by us; (ii) where you withdraw consent and there is no other legal basis that permits the Processing; (iii) where you object to the Processing and there are no overriding legitimate or legal grounds for the Processing; (iv) your Personal Data has been unlawfully Processed; or (v) your Personal Data must be erased for compliance with a legal obligation.

**Right to Restriction.** You have the right to restrict the Processing of your Personal Data where any of the following circumstances apply: (i) the Personal Data which we hold about you is not accurate; (ii) the Processing is unlawful and you do not want your Personal Data to be erased and request the restriction of its use instead; (iii) where the need to process your Personal Data is no longer required (e.g. any of the purposes outlined above have been completed or expired), but is required in connection with legal proceedings; or (iv) you have objected to the Processing of your Personal Data pending the verification of whether or not our legitimate business interests override your interests, rights and freedoms. Where you exercise your right to restrict the Processing of your Personal Data, it will only continue to be Processed with your consent or in connection with legal proceedings or for the protection of the rights of other people or for reasons of important public interest.

**Right to Data Portability.** You have a right to receive the Personal Data you have provided to us. This right of data portability only applies to Personal Data that VWFSIL processes on the basis of consent or for the purpose of entering or performing a contract.

**Right to Object to Processing.** In certain circumstances, you have a right to object to the Processing of your Personal Data where it is processed on the legal basis of VWFSIL's legitimate business interest. We may not be able to comply with such a request where we can demonstrate that there are compelling legitimate reasons for us to continue to process your Personal Data which override your interests, rights and freedoms or where the processing of your Personal Data is required for compliance with a legal obligation or in connection with legal proceedings.

**Right to Object to Automated Decision-Making, including Profiling.** You have a right not to be the subject of decisions based solely on

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automated decision-making, including profiling, which produce legal effects concerning you.

**Please note:** A decision not to approve an application for finance will never be based solely on the outcome of an automated decision and a member of our staff, who is qualified, will review all applications that are not automatically approved.

## 10. ENFORCING YOUR DATA PROTECTION RIGHTS

If you feel that the processing of your Personal Data is not in line with VWFSIL's data protection obligations, you can complain to a Data Protection Supervisory Authority.

The Supervisory Authority for Volkswagen Financial Services Ireland is the Irish Data Protection Commissioner offices at:

**Telephone:** +353 (0)761  
104 800

**Lo Call Number:** 1890 252  
231

**Postal Address:** 21  
Fitzwilliam Square South  
Dublin 2, D02 RD28

**E-mail:**  
info@dataprotection.ie

**Fax:**+353 57 868 4757

## 11. DATA RETENTION

VWFSIL will retain your Personal Data for as long as it is necessary to fulfil the purposes for which it was collected. However, we may be required by applicable laws and/or regulations to hold your Personal Data for longer than this period (e.g. a legal case). Unless legally obliged to the contrary, VWFSIL will delete your Personal Data in line with our Data Retention Policy. Where there is a contradicting statutory obligation for us to retain your Personal Data, VWFSIL aims to restrict/block further processing and then delete the relevant Personal Data when we no longer have a requirement to retain it. Generally, we retain Personal Data for only as long as is necessary from the last transaction of the end of contract pursuant to our legal obligations.

## 12. COMMUNICATING WITH YOU

You may be contacted from time to time in relation to ongoing dealings with VWFSIL. This contact will relate to the purposes set out in or referred to in this notice and may include (without limitation):

- administration of your contract;
- at credit review stage;
- discussion of your end of contract term options;
- discussion of quotations already provided to you;
- arrears management;
- handling complaints;

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- marketing Products; and
- breach notification i.e. security breach causes an unauthorized intrusion into our system that materially affects you, we will notify you as soon as possible and later report the action we took in response to any breach.

### **13. CHANGES TO THIS POLICY**

VWFSIL may amend this Policy from time to time, in whole or part, at our sole discretion or to fulfil a legal obligation. We encourage you to check our Website to view the most recent version of this Policy. You may also request a copy of the most recent version of this Policy by contacting us. If, at any time, VWFSIL decides to use your Personal Data for a purpose that is different from the original purpose of collecting it, you will be advised of this change.

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