PRIVACY POLICY FOR THE PROVISION OF MILEAGE DATA BY VOLKSWAGEN GROUP INFO SERVICES AG FOR THE BRAND VOLKSWAGEN (MILEAGE 3.0 previously known by the name Pay As You Drive 2.0 (PAYD 2.0))

This privacy policy informs you about the processing of your personal data by Volkswagen Group Info Services AG.

Volkswagen Group Info Services AG is the central interface to mobility data of several brands of the Volkswagen Group. We provide your mobility data centrally to the insurance company you have selected.

A. Controller according to GDPR

The entity responsible for processing your personal data is Volkswagen Group Info Services AG. You can reach us at the following address:

Volkswagen Group Info Services AG

Berliner Ring 2

38440 Wolfsburg, Germany

gis-support@cariad.technology

Commercial Register Number HRB 207876 (Braunschweig Local Court)

Website: https://drivesomethinggreater.com

B. Data Protection Officer and Data Protection Representative

Our data protection officer is available to you as a contact for data protection-related concerns. Please direct your inquiries to:

Data Protection Officer of Volkswagen Group Info Services AG

Berliner Ring 2

38440 Wolfsburg, Germany

gis-privacy@cariad.technology

Volkswagen Group Info Services AG has appointed a Data Protection Representative in the United Kingdom. Details of our representative and contact details are as follows:

Data Protection Representative of Volkswagen Group Info Services AG
Volkswagen Group United Kingdom Limited
Yeomans Drive
Blakelands

Milton Keynes, MK14 5AN
United Kingdom
Email: ukrepresentative@vwg.co.uk

C. Purpose of data processing

Volkswagen Group Info Services AG provides the mileage data of your Volkswagen vehicle to an insurance company selected by you. This data is provided so that you can successfully use a "MILEAGE 3.0" insurance rate, agreed on with your insurance company. Volkswagen Group Info Services AG forwards the mileage data for your Volkswagen vehicle and provides your data to the insurance company (B2C product provider) selected by you, with whom you concluded a contract.

D. Data categories

Volkswagen Group Info Services AG receives the following personal data from Volkswagen AG (Berliner Ring 2, 38440 Wolfsburg, Germany) and forwards it to the insurance company you have selected and with whom you concluded a contract:

- mileage (km)
- timestamp
- VIN

Volkswagen Group Info Services AG receives the contract number/documentation for the contract concluded between the service provider and you from the service provider with whom you have concluded a contract, in order to ensure that the above-mentioned data is only provided by Volkswagen Group Info Services AG if there is a valid contract between the service provider and you.

E. Legal basis

The legal basis for the processing of personal data within the product framework by Volkswagen Group Info Services AG are:

- the necessary performance of contract concluded by you (Art. 6 para. 1 lit. b GDPR) with the insurance company you have selected, regarding the MILEAGE 3.0 insurance policy.
- the legitimate interest of Volkswagen Group Info Services AG (Art. 6 para. 1 lit. f GDPR).

Volkswagen Group Info Services AG is the central interface for the provision of mobility data of several brands of the Volkswagen Group and has the legitimate interest to provide the data transmitted by the Volkswagen Group brands to Volkswagen Group Info Services AG to authorized B2C product providers centrally via our Data Hub (https://drivesomethinggreater.com/).

In addition, the processing of potential additional vehicle users of your vehicle (if they are logged in as main users) - if we could even possibly become aware of them - is based on legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR.

F. Data recipient

Your data will be provided to the following data recipients for the purpose defined above:

- the insurance company you selected;
- [if applicable] data processor on behalf of the insurance company you selected;
- data processor on behalf of Volkswagen Group Info Services AG.

G. Data source

We receive your data from Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, Germany, as well as from the service provider with whom you have entered into a contract.

H. Storage duration

Generally, your personal data will not be stored by Volkswagen Group Info Services AG. The Volkswagen Group Info Services AG - as a central interface for mobility data of several brands of the Volkswagen Group - provides your data from the respective brand to the respective insurance company with whom you concluded a contract. Therefore, the data is merely transferred through without being stored by us.

For commercial accounting (German HGB), tax compliance (German AO) and data protection accountability (Art. 5 para. 2 GDPR) reasons, Volkswagen Group Info Services AG only archives in a revision-proof manner that the data of the "MILEAGE 3.0" product (see point D.) for a specific VIN was provided to a data recipient without storing the provided mileage data (see point D.) itself.

The contract number/documentation and VIN are stored for a maximum period of 4 years from the end of the contract with the data subject.

I. Your rights

You may assert your rights against Volkswagen Group Info Services AG free of charge at any time.

For more information on how to exercise your rights, please visit: https://drivesomethinggreater.com/legal-notice/privacy-notice/data-hub

Right of access

You have the right to access, i.e., to request confirmation from us as to whether and - if so - which personal data concerning you are being processed and to whom which data has been disclosed as data recipient. In addition, you generally have the right to receive a copy of your personal data processed by us. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits data but does not store the transmitted data itself (see point H.).

Right to rectification

You have the right to demand that we correct any personal data relating to you that is incorrect or incomplete. We would like to point out that Volkswagen Group Info Services AG, as the central

interface to mobility data of several brands of the Volkswagen Group, only transmits data but does not store the transmitted data itself (see point H.).

Right to erasure

You have the right to demand the deletion of your data if the conditions specified in Art. 17 GDPR are met. According to this, you can, for example, demand the deletion of your data if it is no longer necessary for the purposes for which it was collected. In addition, if we process your data based on your consent and you revoke this consent, you can demand its deletion. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits data but does not store the transmitted data itself (see point H.).

Right to restriction of processing

You have the right to request the restriction of the processing of your data if the conditions of Art. 18 GDPR are met. This is the case, for example, if you dispute the accuracy of your data. You can then request the restriction of processing for the duration of the verification of the accuracy of the personal data. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits data but does not store the transmitted data itself (see point H.).

Right to data portability

If the data processing is based on consent or the performance of a contract, and if it is also carried out using automated processing, you have the right to receive your data in a structured, common and machine-readable format and to have it transferred to another controller. In addition, you have the right to transmit that data to another controller without hindrance directly from us to another controller. We would like to point out that Volkswagen Group Info Services AG, as the central interface to mobility data of several brands of the Volkswagen Group, only transmits data but does not store the transmitted data itself (see point H.).

Right of objection

If we process your data on the basis of legitimate interests, you have the right to object to the processing of your data at any time on grounds relating to your particular situation. If your objection relates to data processing for direct marketing purposes, you have a general right to object, which we will implement without giving reasons.

Right of withdrawal

If the data processing is based on your consent, you have the right to revoke your consent at any time free of charge with effect for the future by email to: gis-support@cariad.technology.

Notice according to Article 11 GDPR

We would like to point out that in many cases we, as Volkswagen Group Info Services AG, are not able to identify the additional vehicle users of a vehicle and that we are not obligated to obtain or process additional information in order to identify data subjects in accordance with Article 11 GDPR.

If you assert rights against us, we must verify your status as a data subject according to GDPR and may ask you for further information if necessary. This also serves to ensure that we may not violate the rights of third parties when providing personal data according to GDPR data subject rights.

Automated individual decisions

There is no automated decision-making according to Article 22 GDPR.

Right to lodge a complaint with a supervisory authority

You also have the right to complain to a supervisory authority about the processing of your data by us. The competent supervisory authority for Volkswagen Group Info Services AG is:

The State Commissioner for Data Protection of Lower Saxony,

Prinzenstraße 5,

30159 Hannover,

poststelle@lfd.niedersachsen.de

Status October 2025