

VW Flex Privacy Notice

Privacy Notice

Effective Date: March 27, 2024

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1. Online Privacy Notice for Individuals

Thank you for choosing VW Flex (an operating unit of VW Credit, Inc. DBA Volkswagen Financial Services) (“VW Flex,” “we”, “our”, or “us”). We are committed to protecting your personal information and your right to privacy. This Privacy Statement is designed to inform you about how we collect, use, and share the personal information with which you have entrusted us when you use or visit our websites, platforms, and other applications (“Digital Properties”), use our products and services, or otherwise interact with us. However, this Privacy Notice does not apply to:

- Information about our own employees, contractors, agents, and job applicants; or
- Information about individuals that we collect in the context of business-to-business communications and transactions.

Please note that our services are intended exclusively for residents of the United States of America. Additionally, our services are not intended for children under 18, and we do not knowingly collect personal information from individuals under 18.

We reserve the right to amend this Privacy Statement from time to time and will give you reasonable notification.

2. How We Collect Information/Sources of Information

We collect personal information when you register for a subscription account, use our products or services, use or visit our Digital Properties, or otherwise interact with us. These sources could include:

- **You or the Vehicle you are using:** For example, when you inquire about, or sign up for, our products and services, or use a vehicle in connection with your subscription.
- **Cookies and online technologies:** We may use cookies and other online tools to automatically collect information about you or your device when you interact with our Digital Properties, as described in Section 8.
- **Service Providers:** Companies acting on our behalf, who act under contract to help us provide the business services you have requested and help us run our business.
- **Affiliates:** Other Volkswagen group companies with which you may have a relationship.
- **Third Parties:** Entities that may provide independent products or services, with whom you may or may not have a direct relationship. For example, we may collect driving history data from consumer reporting agencies.

3. Information We Collect

The types of personal information we collect, use, and share depend on the product or service you have with us. When you inquire about or use our products and services, we may collect the following personal information from or about you:

- **Basic Identifiers:** Personal identifiers or contact information, such as your name, email address, postal address, or other similar identifiers.
- **Sensitive personal information (SPI):** Information such as your driver's license number, your vehicle's precise geolocation information, or other similar sensitive information
- **Protected Class Information:** Information relating to a protected class under State or Federal law, such as age, date of birth, gender, or similar information.
- **Commercial Information,** including:
 - Motor vehicle records and driving history;
 - Payment details; products or services purchased, obtained, or considered; other purchasing or consuming histories or tendencies; and
 - Vehicle usage data transmitted from the vehicle you are using in connection with your subscription, including general vehicle status data (such as warning lights, upcoming service schedule, fuel level, battery level, and tire pressure); service history and fault or trouble codes; vehicle performance data and other data about your vehicle, including its identification, condition, equipment status, or collision information; vehicle/technology usage data (such as usage of lock/unlock and remote start technology) and driver behavior data (such as vehicle speed and information about braking habits).
- **Biometric Information:** Facial geometry scans (drawn from your driver's license photo or a liveness video) used to verify your identity when you complete an application.
- **Internet / Electronic Network Activity:** Information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with our Digital Properties, as further described in Section 8.
- **Geolocation Data:** Precise or approximate geographic location of an object, such as your vehicle's precise geolocation information.
- **Inferences:** Inferences drawn from any of the above information

Personal information does not include publicly available information, or information that has been de-identified so that it cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to a particular consumer.

4. How We Use Your Information

We may use your information for several business purposes, including:

- **Auditing:** Monitoring and verifying the performance of transactions and consumer interactions to ensure success and compliance with legal, regulatory, contractual, or other standards/requirements
- **Debugging:** Identifying and repairing errors that impair existing intended functionality

- **Short-Term, Transient Use:** Executing one-time transactions, or acting as an intermediary to facilitate transactions.
- **Performing Services on Behalf of Our Business:** Including to provide you with products and services you request; support the vehicle and products and services you are using; verify your identity; determine your eligibility for a vehicle subscription; diagnose, repair and track service and quality issues; communicate with you about the vehicle you are using and other products or services; install and configure changes and updates to your services; authenticate users of our products and services; or verify your eligibility for certain programs or benefits and marketing
- **Internal Research:** For technological development and demonstration
- **Quality Assurance:** For our own internal business purposes, such as to evaluate the usage, performance and safety of our vehicles, products and services; improve, upgrade or enhance the quality of our vehicles, products and services and design new products and services; operate our Digital Properties, as well as customize the content; and maintain internal records
- **For Legal, Safety or Security Reasons:** Such as to comply with legal requirements; protect the safety, property, or rights of the Volkswagen Group of Companies, owners, registered users, drivers, passengers or others; detect, prevent, and mitigate security incidents, malicious, deceptive, fraudulent, or illegal activity; detect, prevent, and mitigate misuse of vehicles, products, or services; and at our discretion, to prosecute those responsible for that activity.

We may also use your information to market our products and services to you (or to jointly market products and services with affiliated and non-affiliated companies).

We may also use your information in a de-identified or aggregate manner for any lawful purpose.

5. With Whom We Share Your Information:

We may share your information for any of the purposes described above with other companies, such as:

- **Banking:** Those who assist us in processing your transactions.
- **Collection Services:** Those who assist us in processing your transactions and enforcing our contracts with you.
- **Authorized Dealerships:** Independent companies that help us fulfill your subscription, manage vehicle inventory, service the vehicle you are using, and are licensed to operate such businesses using the trade names, trademarks, and service marks owned by us or our affiliates.
- **Volkswagen Group of Companies:** The group of companies related to us by common control or ownership.
- **IT Service Providers:** Provide information technology systems/solutions/services and to help protect the safety and security of your personal information.
- **Sales and Marketing Service Providers:** Deliver advertising or marketing communications on our behalf and help us manage the effectiveness of our operations and advertising campaigns.

- **Customer Support Service Providers:** Assist us in providing a service or support need for customer interactions.
- **Consumer Credit Service Providers:** Consumer reporting agencies who assist us in assessing and reporting on your motor vehicle records.
- **Government Agencies:** Those governmental entities who provide services to us, including postal services for mailing invoices or correspondence, tax services, or others.
- **Legal & Compliance Service Providers:** Those who assist us in maintaining regulatory compliance.
- **Financial Services Providers:** Those who assist us with accounting and financial operations services.
- **Risk Management Service Providers:** Those who assist us in assessing and managing corporate risk.

7. External Links

Our Digital Properties may contain links to other websites, including social networks, advertisers, VW Dealer websites, VW brand websites, other Volkswagen Group websites, including websites operated by VW AG, and websites belonging to other third parties. Some of these sites may share a similar “look and feel” to our websites. Please be aware that we are not responsible for the privacy practices of other websites. We encourage you to read the privacy statements provided by other websites before you provide information to them.

8. Our Use Of Cookies And Similar Technologies

We may use cookies and similar technologies such as web beacons (also known as web tags, pixel tags, or clear GIFs) as necessary to provide our services, to secure our services, to optimize our services, and to improve your user experience. Some cookies exist only during a single session and some are persistent over multiple sessions over time. These cookies and other technologies may be used to track you across time, devices, and different websites and online services. You may refuse to accept these technologies by activating the appropriate setting on your browser or mobile device. However, if you do so, you may be unable to access certain parts of our Digital Properties.

The information collected automatically helps us to improve our Digital Properties and to deliver a better and more personalized service, including by enabling us to:

- Verify your identity;
- Keep you logged in during your visit;
- Identify irregular site behavior;
- Prevent fraud and improve security;
- Recognize you when you return to our Digital Properties;
- Store your preferences and customize your online experience;

- Understand how you use our Digital Properties;
- Market our products and services, and jointly market the products and services of our and other businesses;
- Measure the effectiveness of our newsletters and advertising campaigns; and
- Estimate overall usage volumes and patterns.

Do Not Track

Some web browsers provide options to inform websites or internet services that you do not wish to have your activities tracked by cookies or similar technologies (commonly called “Do Not track” or “DNT” signals). As there is not yet an industry or legal standard for recognizing or honoring DNT signals, we currently do not respond to such signals.

In the interim, you can refer to your browser’s help instructions to learn more about cookies and other technologies, and limit their use on your browser.

9. Children’s Privacy

Our products and services are not intended for minors. We do not knowingly collect personal information from individuals under the age of 18. We request that such individuals do not provide personal information to us.

For more information about the Children’s Privacy, visit the FTC website: www.ftc.gov.

10. Contact Us

Should you have other questions or concerns about this Privacy Statement, you can contact us at 1-855-237-2888. Our menu will prompt you through your choices.