



# Volkswagen Commercial Vehicles Ireland

## Cookie Policy



### Information about cookies and similar technologies and the related processing of personal information

#### 1. Introduction

Welcome to the Volkswagen Commercial Vehicles Ireland website ("this Website") which is operated by Volkswagen Group Ireland Limited (Company registration number 436954) ("we", "our", "us" or "Volkswagen Commercial Vehicles Ireland" as applicable). Please see the end of this policy for our legal and contact information.

We use cookies and other similar technologies that access or store information on the device you use to visit this Website. To make this policy easier to read, we refer to all of these technologies using the expression "cookies".

This policy provides you with information about how cookies work and when, how and why we, and the third parties we work with, use them. Almost all cookies work by collecting and storing some form of personal information about you, so this policy also describes the personal information we process or allow others to access when using cookies, as well as your related data protection rights.

Our separate [Privacy Statement](#) provides equivalent information relating to our processing of your personal information more broadly in connection with this Website.

We may update this policy from time to time. All changes made to this policy will be published on this Website and in the event of any substantial changes, we will notify you of these using an appropriate communication method.

#### 2. Who is the controller of your personal information?

We set and read some cookies on your device in cooperation with Volkswagen AG. Some cookies are set and read only by ourselves and some may be set by third parties such as our suppliers or our commercial partners. For the purposes of data protection laws, we and Volkswagen AG are the "joint controllers" of the processing of your personal information for all of these cookies as described in Sections 5 and 6, unless this Cookie Policy expressly states that we are sole "controllers" of the processing of personal data in relation to certain cookies.

A controller is the person that decides why and how your personal information is processed. In relation to cookies set by third parties through this Website, those parties may also be a controller of your personal information, which means they will also have a legal responsibility to you in respect of the personal information they receive. Please see the section [How we work with third parties and the legal reasons for processing](#) for further details.

#### 3. What are 'cookies'?

Cookies are small files or other information stored on your device or accessed from your device that help us and others to collect data about your activities. The expression 'cookies' can refer to browser cookies as well as a number of similar technologies including tracking pixels/web beacons, local shared objects/flash cookies and access to device information (including sensors). Please see the next section for details of the types of 'cookies' used by this Website.

Cookies allow us to deliver essential features of this Website. We also use them for purposes which are not essential but very useful to us or to you, including to store your settings and preferences, remember your access information, provide targeted content and marketing communications, help us to understand which part of this Website is the most popular and analyse the functioning of this Website.



#### 4. What types of cookies do we use?

As cookies relate to any information stored on or accessed from your device, they take a variety forms. We use the following types of 'cookies':

##### **Browser cookies**

Cookies may come from us ("first party cookies") or from third parties whose services we use or that we partner with ("third party cookies") and who we permit to set their cookies by configuring this Website accordingly. In some cases, we will receive the information collected using a third party cookie whilst in others, the third party will provide a service to us without sharing that information in the form it was collected with us.

Cookies may be used for your browsing session only ("session cookies") or for longer ("persistent cookies"). Please see the section below for further details regarding each type of cookie that we use.

##### **Analytical scripts**

Analytical scripts are small pieces of computer code that can be used to track users and their behaviour on websites. This tracking may be basic, for example, tracking whether and when a user has visited this Website, or advanced tracking, for example, tracking whether and when a user has added a vehicle to their shortlist, selected a test drive or submitted a form. Analytical scripts can provide the information collected to a third party, which is often the provider of the script. These scripts also help us personalize the content and advertisements that are served on the Website as well as provide you with relevant offers at other websites.

##### **Device data**

In some cases information is accessed and read from your device without storing or accessing a file on your device. When you use the configurator tool, your chosen configuration will be stored in your web browser's local storage. The configurator tool data does not contain any personal data. However, some of our other cookies may store personal information. As this information is usually personal information, details are provided in the section below.

#### 5. What types of personal information do we receive through cookies

We receive the following types of personal information about you through the cookies we use, which includes information we access directly from your computer, phone, tablet or other device without storing or accessing a file:

- **Cookie browser data:** cookie identifiers, time/date, services/products selected, whether and to which cookies you have consented,;
- **Device data:** device type, screen resolution, operating system version, browser rendering core, its version and basic settings ;
- **Log data:** Time and duration of usage of this Website and search data;
- **Location data:** Data about your country of access as proclaimed by your device;
- **Behavioural data:** Data about your usage of this Website that we may process if you visit or use third party sites or applications to cooperate with us, and data on how you participate with the content of this Website (such as pages visited, if you came from a marketing campaign, button clicks, car configuration details etc.).

We may combine personal information about you or your activities with other information we receive from third parties or publicly available sources where this is permitted by law. Please see our general [Privacy Statement](#) for further details of the sources of information we may use.



## 6. Purposes for which we use cookies

Cookies are an extremely common technology for remembering certain information about how users interact with websites and use their devices. The vast majority of websites currently make use of cookies and they are commonly used for a wide range of reasons.

We, in cooperation with our other joint controller, Volkswagen AG, use cookies for the following purposes:

### Essential purposes

- **Strictly necessary cookies.** Necessary means the cookies are essential for the provision of the site and any requested services, but do not perform any additional or secondary function. For example, remembering previous actions (e.g. user-entered configurations in the car configurator or purchases added to 'carts') when navigating back to a page in the same session.

### Useful but non-essential purposes

- **Analytics.** These cookies help us to understand website performance and how users interact with the site. This includes data such as the duration of the user's visit, whether the visitor is a return visitor and how many pages the visitor has viewed. Geographical and browser information is also recorded.
- **Personalisation.** These cookies allow custom content to be presented based on a user's interaction with the website to ensure the most relevant content is shown to the user. This can include personalised ads on ad platforms that a user may see when they leave the website, and personalised content when the user returns to the site during additional visits.
- **Ads and Social.** When a consumer visits a web site, the user's browser submits information about what he / she is looking at to third-party advertising networks (e.g. pages visited, time spent viewing each page, links clicked on, searches made, interaction, etc.) to create a 'profile' that links to that visitor's web browser. Users can clear these cookies periodically to clear out their record with ad networks

Our configurator tool stores information about your chosen configuration in your browser's local storage on your device. There is no personal information stored. Our vehicle configurations change regularly and your chosen configuration may no longer be valid depending on how long it is before you return to the website. You can remove the configuration files stored in the browsers local storage by emptying the browser's clear cookies. A number of browsers let you do this using Ctrl-Shift-Del to open the Clear All History menu.

These are the current [cookies](#) used on our website.

## 7. Your consent to use cookies and associated personal information

### **Cookies and associated personal information used for essential purposes**

In accordance with data protection laws, we do not request your consent to use these cookies as they are necessary to ensure this Website works properly.

### **Cookies and associated personal information used for non-essential purposes**

We will only store or read cookies on your device for non-essential cookies and process associated personal information (or allow our third party services providers and partners to do so) if you have given, and not withdrawn, your consent. We request this using the cookie tool that appears when you visit any page of this Website.

### **How to provide your consent for non-essential cookies and associated personal information**

When you visit this Website for the first time, you will be prompted with a request to provide your consent for non-essential cookies and the personal information we receive as a result of their use. You can consent to all non-essential cookies by selecting "Accept all Cookies" or you can choose to consent to cookies by their individual categories of purposes of use by selecting "Manage Cookies".

If you do not provide your consent for these cookies, we will not use them nor process any personal



information in connection with them. Consequently, your provision of any personal information associated with the cookie is voluntary and you may withdraw your consent at any time. Any use of the cookie or associated personal information before you withdraw your consent will be valid and lawful. Please see the [What are your rights?](#) and [How can you exercise your rights?](#) sections below for further information regarding your data protection rights.

### **The duration for which your consent lasts**

Your consent will last for 6 months from the date you last provide it to us using the cookie tool on this Website. After this period, the cookie tool will automatically treat your consent as withdrawn.

### **How to withdraw your consent for non-essential cookies and the processing of associated personal information**

You may withdraw consent you have previously provided for cookies in one of two ways depending on the type of cookie:

- **Using the cookie tool we make available from this Website.** You can access at any time the cookie tool from any page of this Website by clicking on Manage Cookies in the footer of your browser screen and withdraw your consent by setting the option for the relevant category of cookie to the ["off"] position. Please note email tracking cookies cannot be turned off using this tool.
- **Adjusting the settings in your web browser.** Most web browsers are set by default to accept all cookies. However, you may have the option to configure your web browser settings in such a way that the cookie information is displayed before storage, or to categorically reject them. You can find details on the various available settings for cookies and related changes for the most common web browsers by clicking on the relevant link below:

Google Chrome: <https://support.google.com/accounts/answer/61416?hl=en>

Internet Explorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

Microsoft Edge: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Opera: <http://www.opera.com/help/tutorials/security/privacy/>

Safari: [https://support.apple.com/kb/PH19214?locale=cs\\_CZ&viewlocale=en\\_US](https://support.apple.com/kb/PH19214?locale=cs_CZ&viewlocale=en_US)

Please note that any change to your web browser settings will only apply to the particular web browser for which you have adjusted your settings. If you use more than one web browser on a device, you must change the settings separately for each browser and each device. Additional information regarding cookies may be available within the "help" feature of the browser or operating system or the operating manual for your device.

### **Cookies and associated personal information stored on your device after you withdraw your consent**

After you withdraw your consent for non-essential cookies, this Website will no longer access or read these cookies. Depending on the cookies, this means that files, scripts, codes and other cookie-related information may remain stored on your device. You can delete these cookies by clearing your cookies and your browsing cache using your web browser settings. Please see the links for each of the common browsers above for further information on how to do so.

### **What are the consequences of refusing/withdrawing your consent to cookies and the processing of associated personal information?**

If you refuse or withdraw consent to the use of any non-essential-cookies or associated personal information, then the corresponding functionality or features of this Website may not work properly, or at all. Your use of the core functions and features of this Website will not be affected.

If you disable essential cookies (or all cookies) using your web browser settings, one or more core functions and features of this Website, including those intended to ensure your visit is safe and secure,



will not work properly, or at all.

## 8. How we work with third parties and the legal reasons for processing

We will set and read certain cookies on this Website and receive personal information about you through their use. Third parties may also be involved in setting, reading or using personal information obtained from cookies.

The roles and responsibilities that these third parties have in relation to your personal information will depend on the specific circumstances, as follows:

- We or a third party may set cookies on your device which provide access to your personal information to a third party data processors. However, as the processing of personal information by such processors is carried out to strict instructions or us or a relevant third party, we or a relevant third party is/are a controller for the processing as the third parties do not make any decisions over your information. Where this applies (and it does so in the majority of cases), we or a relevant third party will have primary responsibility to you in relation to the processing of your personal information.

## 9. How long will we process and keep your personal information?

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

We process and retain your personal information for the following durations:

- With respect to essential cookies, the processing of your personal information ends with your browsing session after which your personal information is deleted (except in relation to cookies used to remember your consent preferences, which we retain and process for 6 months from the date you provide your consent).
- All other cookie-related personal information is processed until the consent which permits such processing is withdrawn or expires (i.e. after 6 months in most cases), at which point it is deleted.

The only exceptions to the periods mentioned above are where:

- the law, court or supervisory authority requires us to hold your personal information for a longer period, or delete it sooner;
- you have raised a legal claim, complaint or concern regarding the processing activities described in this policy, in which case we will retain your information for a period of 6 years following the date of that claim, complaint or concern; 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.

## 10. Who will receive or have access to your personal information relating to cookies?

We disclose your personal information to third parties or permit them to access that information in connection with the purposes mentioned above.

Our third party service providers, agents and subcontractors ("suppliers"), commercial partners, group companies and other third parties may receive cookie-related personal information either directly from you, us or from one of our suppliers.

Our suppliers can be categorised as follows:

- Advertising technology (Adtech) and data exchange technology providers
- Advertising, PR, digital and creative agencies
- Cloud software system providers, including database, email and document management providers
- Facilities and technology service providers including scanning and data destruction providers
- Insurers and insurance brokers
- Legal, security and other professional advisers and consultants
- Market and customer research providers
- Social media platforms
- Website and data analytics/modelling platform providers
- Website and app developers



- Website hosting services providers

The majority of suppliers we use are processors with whom we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions. We only disclose to them or allow them to access personal information that is necessary for them to provide their services.

In relation to the cookies used on this Website, we use the following key suppliers in particular:

#### **Adobe**

This Website uses Adobe Analytics provided by Adobe, Inc. ("Adobe"), which uses cookies to analyse how users use this Website. The Website uses the following modules:

- Adobe Analytics - Account status and performance monitor, audience summary, active users, user explorer, analytics audience, visitor quality, conversion probability, comparison reports, demographics and interests, user flow report;

Information generated by a cookie about the use of this Website (including your IP address) may be transmitted and stored on Adobe's servers in the United States.

Adobe will use this information to evaluate the use of this Website by visitors, create reports about such use and to provide other services relating to activities on this Website and the use of the internet in general. Adobe may also provide this information to third parties if it is required by the law or if such third parties process this information for Adobe. You may disable the use cookies on this Website as described above or by changing appropriate settings in your browser, but if you do so for all types of cookies, you will not be able to make full use of all the features of this Website.

To opt out of being tracked by Adobe across all websites please visit:

<https://www.adobe.com/ie/privacy/opt-out.html#>

For detailed information about the modules listed above and Adobe's handling of personal information, please see <https://www.adobe.com/ie/privacy.html>.

#### **Other parties**

We may disclose your personal information to other third parties as follows:

- any third party who is restructuring, selling or acquiring some or all of our business or assets or otherwise in the event of a merger, re-organisation or similar event; and
- if we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation or request, including by the police, tribunals, regulators, the government or related agencies.

#### **Personal information received by other controllers**

When we disclose or allow access to your personal information to third parties that are also controllers of that information (e.g. certain suppliers, group companies or our commercial partners), they may disclose or transfer it to other organisations in accordance with their data protection policies. This does not affect any of your data subject rights as detailed below. Where you ask us to rectify, erase or restrict the processing of your information, we take reasonable steps to pass this request on to any such third parties with whom we have shared your personal information.

In particular, we disclose and provide access to your personal information to Volkswagen AG. For detailed information regarding how Volkswagen AG handles your personal information, please visit its privacy statement located at <https://www.volkswagenag.com/en/meta/data-protection-declaration.html>.

## **11. Source of your personal information**



All personal information obtained via cookies on this Website is obtained directly from you. We may receive this information from a third party if we are not the party setting the cookie on your device.

## 12. Transfers of your personal information overseas

Your cookie-related personal information may be transferred outside of Ireland and European Economic Area ("EEA"), if you grant us your explicit consent to do so or if we ensure adequate safeguards for the data protection of the transferred data.

In connection with Adobe Analytics and/or the use of analytical, marketing and social media cookies and other web technologies described above, once you consent to the data transfer your personal information will be transferred to USA-based companies and stored on servers located in the United States of America ("USA"). Please be aware that such transmission may pose a risk to your data processing due to the absence of an adequacy decision and appropriate safeguards. In particular, data transmission and data processing by our partners in the USA may be subject to surveillance programmes by US public authorities and your data may be then accessed by US intelligence agencies or federal investigators. Furthermore, non-United States persons have not got the same possibilities to counter surveillance performed by the National Security Agency or the Director of National Intelligence. Lastly, USA do not provide a single authority responsible for supervisory activities. Particular states in the USA have different points of contact regarding supervisory powers related to data protection with a special court, which deals with Foreign Intelligence Surveillance issues.

If we transfer your information to other countries outside Ireland and EEA, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include:

- ensuring Irish / EEA countries to which transfers are made have been deemed adequately protective of your personal information for the purposes of data protection law by the relevant bodies;
- imposing contractual obligations on the recipient of your personal information using provisions formally issued by relevant bodies for this purpose. We use these provisions to ensure that your information is protected when transferred your personal information to our Suppliers outside Ireland and EEA; or

Please contact us using the details at the end of this policy for more information about the protections that we put in place and to obtain a copy of the relevant documents.

If you use this Website whilst you are outside Ireland and EEA, your information will be transferred outside those territories in order to allow you to use this Website.

## 13. Automated decision-making

We do not envisage that any processing to make decisions that have a legal or significant effect on you will be carried out using purely automated means, however we will update this policy and inform you if this position changes.

## 14. Security and storage of personal information

In order to protect your personal information against unauthorised access, disclosure alteration or destruction, we have taken appropriate organisational and technical measures including physical, electronic and management procedures to protect and secure the information gathered through this Website.

## 15. Data protection rights

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 1 month of receipt of any request (including any identification documents requested).



## What are your rights?

You have the following rights under data protection laws:



To access information we hold about you.



To withdraw your consent for cookies or processing (where we rely on it).



To correct and update your information.



To erase your information (if we do not have a lawful reason to continue to use it).



To restrict further processing of your information.



To transfer your information in a machine-readable format to you or another controller.



To object to the use of your information processed on the basis of legitimate interests (unless we have an overriding lawful reason) or for direct marketing.



To not to be the subject to automated decision-making that has a significant impact on you.



## How can you exercise your rights?

If you have any enquiries relating to this policy, our handing of your personal information generally or in relation your data protection rights, you can contact Volkswagen Commercial Vehicles Ireland and Volkswagen AG using the following information:

### Volkswagen Commercial Vehicles Ireland



**By email:**

[privacy@volkswagen.ie](mailto:privacy@volkswagen.ie)



**By phone:**

+ 1800 813 762



**By mail:**

Volkswagen Commercial Vehicles Ireland  
Block C Liffey Valley Office Campus  
Dublin 22 D22 CF60

In connection with the exercise of your rights, Volkswagen Commercial Vehicles Ireland may charge a reasonable fee taking into account the administrative costs for processing requests that are manifestly unfounded or excessive.

### Volkswagen AG



**By web:**

<https://www.volkswagenag.com/en/meta/data-protection-declaration.html>



**By e-mail:**

[datenschutz@volkswagen.de](mailto:datenschutz@volkswagen.de)



**By mail:**

Volkswagen AG.  
Data Protection Officer of Volkswagen AG  
Berliner Ring 2, 38440 Wolfsburg

In connection with the exercise of your rights, the Volkswagen AG may charge a reasonable fee taking into account the administrative costs for processing requests that are manifestly unfounded or excessive.



## Contacting our data protection team

For questions regarding this policy or the protection of your personal information generally, you can contact the Privacy Team at Volkswagen Commercial Vehicles Ireland or the Data Protection Officer (DPO) of Volkswagen AG.



<https://www.volkswagenfans.ie/en/privacy-statement.html>



[privacy@volkswagen.ie](mailto:privacy@volkswagen.ie)



<https://www.volkswagenag.com/en/meta/data-protection-declaration.html>



[datenschutz@volkswagen.de](mailto:datenschutz@volkswagen.de)



## Lodging a complaint

If you disagree with the way Volkswagen Commercial Vehicles Ireland or Volkswagen AG processes or handles your personal information you have the right to lodge a complaint with Volkswagen Commercial Vehicles Ireland, the Data Protection Officer (DPO) of Volkswagen AG, or a supervisory authority.



Data Protection Commissioner  
Canal House Station Road Portarlington  
R32 AP23 Co. Laois



Telephone: +353 (0)761 104 8000  
Telephone: +353 (0)57 868 4800  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)  
LoCall Number: 1890 252 231



<https://www.dataprotection.ie>



State Data Protection Officer for Lower  
Saxony, Germany



+49 (0511) 120 45 00



<https://lfd.niedersachsen.de/startseite/>