

General

Volkswagen Commercial Vehicles Ireland a trading division of the Volkswagen Group Ireland Limited (“we”/“us”), are committed to protecting and respecting any personal information you share with us.

This statement describes what types of information we collect from you, how it is used by us, how we share it with others, how long we keep your information for, your rights, how you can manage the information we hold and how you can contact us.

We require and use your information in order to fulfil and deliver services associated to your vehicle and its maintenance. As a business we sometimes communicate product information, offers and services; however, we will only do this if you have already given us the appropriate permission. We will not send you unsolicited ‘junk’ email or communications, or share your data with anyone else. We do not sell your information to third parties, but we do work with closely selected partners who help us to provide you with the information, products and services that you request from us. For example, Allianz Worldwide Partners who provide roadside assistance on our behalf.

Definitions

The data protection declaration of Volkswagen Commercial Vehicles Ireland is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, among others, the following terms:

1. Personal data: Personal data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
2. Data subject: Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing (i.e. a **customer**; an employee [in relation to the company as the employer]).

3. Processing: Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
4. Restriction of processing: Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.
5. Profiling: Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
6. Pseudonymisation: Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.
7. Controller or controller responsible for the processing: Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
8. Processor: Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
9. Recipient: Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
10. Third party: Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

11. Consent: Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

What information do we collect?

We collect information in the following ways:

Information you give us, about you and your vehicle when you engage with our main office, a member of our authorised dealer and repairer network, or via our websites and applications. We only collect information which is necessary, relevant and adequate for the purpose you are providing it for.

Information we get from your use of our services or service providers. We collect information about you or your vehicle when you use our website, applications and contact our customer care centres. We also obtain information about you or your vehicle from our authorised dealers and repairers. Some of this information does not identify you personally, but provides us with information about how you use our services and engage with us (we use this information to improve our services and make them more useful to you). The information we collect includes some or all of the following:

1. Name (including title);
2. Address including Eircode;
3. Phone number;
4. Date of birth (only where and if strictly necessary);
5. Email address;
6. Vehicle information (including registration number, VIN, service reminders, mileage and warranty-covered repair information);
7. The date and time you used our services;
8. The pages you visited on our website and how long you visited us for;
9. Your IP address;
10. Your GPS location (where you have permitted access to this and only if relevant);
11. The internet browser and devices you are using;
12. Cookie, Pixels or Beacon information (for more information please see our Cookies policy);
13. The website from which you accessed our website;
14. Details of any transactions between you and us or members of our authorised dealer network;
15. Where you engage with us in a business context, we may collect your job title, company contact details (including email addresses), fleet size and company details;
16. Voice recordings of calls you make to our customer service centres;
17. "Live chat" records;

- 18. Any information within correspondence you send to us; and
- 19. CCTV in our premises.

How do we use this information?

Volkswagen Commercial Vehicles Ireland will only process information that is necessary for the purpose for which it has been collected.

If you do not provide us with the information we require, relevant and appropriate to the reason for which we request it, this may prevent you from fully availing of our services.

We may use the personal data we gather for any or all of the following purposes:

Purpose	Description	Lawful Basis for Processing
Purchasing a Vehicle or Part – Customer Administration	<p>When a customer orders a vehicle or motor part from us, information is collected by the dealer for their own internal processing and on behalf of Volkswagen Commercial Vehicles Ireland and Volkswagen Commercial Vehicles AG (the Manufacturer) for the fulfilment of warranties and services associated to the purchase of the vehicle or parts/accessories.</p> <p>These details are sent via the dealer platform to Volkswagen Commercial Vehicles Ireland and stored within our systems.</p>	<p>The processing is necessary for the performance of a contract to which the customer is party.</p>

Purpose	Description	Lawful Basis for Processing
Booking Vehicle Service	<p>When a customer books a vehicle service, information is collected by the dealer for their own internal processing and also on behalf of Volkswagen Commercial Vehicles Ireland and Volkswagen Commercial Vehicles AG (the Manufacturer) for the fulfilment of warranties associated to the service provided and logged as part of the service history of the vehicle.</p> <p>These details are sent via the dealer platform to Volkswagen Commercial Vehicles Ireland and stored within our systems.</p>	<p>The processing is necessary for the performance of a contract to which the customer is party.</p>
Requesting a Quote/ Requesting a brochure / Booking a Test drive	<p>When a customer visits our website and requests a brochure or a quote for specific vehicle, or when booking a test drive, essential identification and contact details are collected in order to deliver the requested material and, where applicable, those details are sent to the relevant dealer who will fulfil the service requested.</p>	<p>The processing is in our legitimate interests in developing business leads with potential customers.</p>

Purpose	Description	Lawful Basis for Processing
Registering interest	<p>When a customer visits our website and registers interest in any of our products, essential identification and contact details are collected in order to provide the information over time and, where and if applicable, those details may be sent to the relevant dealer for follow up.</p>	<p>The customer has given explicit consent to the processing.</p>
Purchasing products / accessories via our website	<p>When a customer orders a product via our website some information (billing and delivery details) is collected and, where applicable sent to the dealer for the fulfilment.</p> <p>Payment details are gathered and processed by a third party who encrypts and stores the data within their servers without sharing that data with us. (i.e. Realex, enables payments via credit/debit card for online transactions).</p>	<p>The processing is necessary for the performance of a contract to which the customer is party.</p>

Purpose	Description	Lawful Basis for Processing
Marketing to Potential Customers	<p>Information is collected by our Sales and Marketing staff and agencies at brand sponsored/organised events. We record this data in our Customer Relationship Management System and use the data to market to you.</p> <p>When visiting our website and further to any specific queries, visitors may be asked for consent for future marketing. This may include newsletters, specific product campaigns or notification on upcoming events.</p> <p>This data may be sent to third party service providers such as, but not limited to, Dealer Marketing Ltd, C Marketing and Mailchimp, who carry out some of the marketing activities on our behalf.</p>	The customer has given explicit consent to the processing.
Customer Satisfaction Survey	<p>We send out customer satisfaction surveys based on data provided by dealers over purchased vehicles and parts/accessories, as well as provision of maintenance services. This process is only performed with verified customers.</p>	<p>The processing is in our legitimate interests in ensuring the quality of services provided by our network of authorised representatives. Completion of the surveys is voluntary, not mandatory, and the customer can request to be removed from any future correspondence.</p>

Purpose	Description	Lawful Basis for Processing
Dealer quality assessment – service	We invite customers to take part in our Dealer service quality assessment. The purpose of the assessment is to verify that our Dealer network is maintaining the stringent standard specified by Volkswagen Commercial Vehicles Ireland.	The processing is in our legitimate interests in ensuring the quality of services provided by our network of authorised representatives. Participation on the program is voluntary, not mandatory, and the customer can request to be removed for any future contact.
Dealer quality assessment – mystery shopping	We contact our Dealers to engage in mystery shopping to assess quality of services and may collect Dealer employee personal data.	The processing is in our legitimate interests in ensuring the quality of services provided by our network of authorised representatives.
Customer Service/Care	When a customer contacts our customer service/care centre, personal and vehicle details are collected for identity verification and in order to assist the relevant queries. Other details may be required depending on the nature of the contact, such as specific location in the event of the customer requiring mechanical assistance to the vehicle or temporary accommodation arrangements.	The processing is necessary for the performance of a contract to which the customer is party.

Purpose	Description	Lawful Basis for Processing
Quality Improvement / Staff Training	<p>All phone-calls, written communications and related details received via our customer service centre are stored on our internal server.</p> <p>Similarly, all communications / queries received through our website are kept on our server. These communications are stored for both quality improvement and staff training purposes.</p>	<p>The processing is in our legitimate interests in providing a high standard of services to our customers, by assessing the ongoing development and identifying areas for improvement.</p>
CCTV	<p>We operate a CCTV system on our premises to protect the safety and security of our staff, visitors and property.</p>	<p>The processing is in our legitimate interests as a private company regarding safety and security.</p>
Safety Incidents / Product recall	<p>We may use your personal data to contact you regarding an urgent safety measure and / or a product recall.</p>	<p>The processing is necessary for compliance with a legal obligation to which the controller is subject.</p>

Purpose	Description	Lawful Basis for Processing
<p>Service campaigns about non-safety recalls and technical measures</p>	<p>We may use your personal data, including vehicle, ownership, address and contact details, to conduct service campaigns about non-safety recalls and technical measures. For the purposes of these campaigns we may obtain the following personal information from the Department of Transport: name, address, vehicle registration.</p>	<p>The processing is in our legitimate interests to inform you about service campaigns for non-safety recalls and technical measures for your vehicle so that you can determine whether you wish to bring your vehicle to a Dealer. In identifying this basis, we have weighed our legitimate interest as a business against your rights and freedoms and determined that that it will not unfairly impact your rights. If you would like further information on how we balanced these interests, you can contact us using the details below. Please note that you have a right to object to processing of your personal data where that processing is carried on for our legitimate interest. Please see the part g) Right to object in What are your Rights? below.</p>

Purpose	Description	Lawful Basis for Processing
Staff Data	For data subjects who are Employees of the Company, we may use your personal data during our operations such as for human resources, payroll purposes business continuity and health & safety.	The processing is in our legitimate interests as a private company as well as to fulfil legal requirements in connection to Employment and Industry.

How do we share this information?

We may, where applicable and if relevant, disclose your information to companies or organisations to which we pass the responsibility to handle services on our behalf such as roadside assistance, customer contact centres, direct marketing communications, market research or market analytics.

We will also share your information with our authorised dealers and repairers in situations where we need to pass your information to them to manage any request you have made of us. For example, where you have requested a test drive, we will need to share your personal information with your authorised dealers so that they can contact you to arrange for the test drive to take place.

We ensure that any third-party partners who handle your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to anonymise your information or use aggregated none specific data sets where ever possible.

Your data will not be passed to any third-party for their own independent marketing purposes.

Due to the international nature of our business, there may be some instances where your information is processed or stored outside of the EU. In those instances, we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law.

There are circumstances where we share your information with our parent (or other companies within our Group) in order to fulfil orders, transactions or provide you with a service or information

that you have requested. For example, the Manufacturer, Volkswagen AG in Germany, who is ultimately responsible for the warranty over the vehicles.

Volkswagen Commercial Vehicles Ireland use a third party provider, Zendesk, to supply and support our LiveChat service. If you use the LiveChat service we will collect your name and email address if you provide this and any other personal information that you volunteer to us. This is used for the legitimate business purpose of handling customer enquiries in real time and then following up. The data is stored by ZenDesk in the EEA and sometimes the US. If the data is stored in the US it is done so under the EU-US privacy shield framework (which provides protections for an individual's personal data when it is transferred from the EU to the US). The data is stored indefinitely by Zendesk. If you are new to Volkswagen Commercial Vehicles Ireland the personal data you include in your chat may also be used to create a digital file for you in our Customer Relationship Manager (CRM) software. You may view Zendesk's privacy policy [here](#). For additional information about Zendesk Live Chat and data protection [click here](#).

How long do we keep your information for?

When we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws.

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

We may need your information to establish, bring or defend legal claims. In these cases, we will always retain your personal information for 6 years after the date it is no longer needed by us for any other purposes listed under "How do we use your personal information".

The only exceptions to this are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;

you exercise your right to have the information erased (where applicable as per section 6.d) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further How can I manage the information we hold about you).

What are your 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 one month after we have received any request.

a) Right of confirmation

You have the right to obtain from the controller the confirmation as to whether or not personal data which concerns you is being processed. Should you wish to avail of this right of confirmation, you may, at any time, contact our Privacy Officer.

b) Right of access

You have the right to obtain from the controller free information about your personal data stored at any time and a copy of such information.

Should you wish to avail of this right of access, you may, at any time, contact our Privacy Officer.

c) Right to rectification

You have the right to obtain from the controller without undue delay the rectification of inaccurate personal data which concerns you. Taking into account the purposes of the processing, you shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Should you wish to exercise this right to rectification, you may, at any time, contact our Privacy Officer.

d) Right to erasure (Right to be forgotten)

You have the right to request from the controller the erasure of personal data which concerns you without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The customer withdraws consent to which the processing is based and where there is no other legal ground for the processing.
- The customer objects to the processing and there are no overriding legitimate grounds for the processing.
- The personal data has been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

If one of the aforesaid reasons applies, and you wish to request the erasure of personal data stored by **Volkswagen Commercial Vehicles Ireland**, you may, at any time, contact our Privacy Officer, who shall promptly ensure that the erasure request is complied with immediately.

e) Right of restriction of processing

You have the right to request from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the customer, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the customer opposes the erasure of the personal data and requests instead the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the customer for the establishment, exercise or defence of legal claims.
- The customer has objected to processing, pending the verification whether the legitimate grounds of the controller override those of the customer.

If one of the aforementioned conditions is met, and you wish to request the restriction of the processing of personal data stored by the **Volkswagen Commercial Vehicles Ireland**, you may at any time contact our Privacy Officer, who will arrange the restriction of the processing.

f) Right to data portability

You have the right to receive the personal data which concerns you, which was provided to a controller, in a structured, commonly used and machine-readable format. In order to assert the right to data portability, you may at any time contact our Privacy Officer.

g) Right to object

You have the right to object, on grounds relating to your particular situation, at any time, to processing of personal data which concerns you, which is based on public interest or in the legitimate interest of the Controller. This also applies to profiling based on these provisions.

Volkswagen Commercial Vehicles Ireland shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the customer, or for the establishment, exercise or defence of legal claims.

If **Volkswagen Commercial Vehicles Ireland** processes personal data for direct marketing purposes, you have the right to object at any time to processing of personal data which concerns you for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If you object to **Volkswagen Commercial Vehicles Ireland** to the processing for direct marketing purposes, **Volkswagen Commercial Vehicles Ireland** will no longer process the personal data for these purposes.

In addition, you have the right, on grounds relating to your particular situation, to object to processing of personal data which concerns you by **Volkswagen Commercial Vehicles Ireland** for

scientific or historical research purposes, or for statistical purposes, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, you may directly contact our Privacy Officer.

Furthermore, you are free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use your right to object by automated means using technical specifications.

h) Automated individual decision-making, including profiling

As a responsible company, we do not use automatic decision-making or profiling.

Each customer shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the customer and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the customer's rights and freedoms and legitimate interests, or (3) is not based on the customer's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the customer and a data controller, or (2) it is based on the customer's explicit consent, **Volkswagen Commercial Vehicles Ireland** shall implement suitable measures to safeguard the customer's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the customer wishes to exercise the rights concerning automated individual decision-making, he or she may at any time directly contact our Privacy Officer.

i) Right to withdraw data protection consent

You have the right to withdraw your consent to the processing of your personal data at any time. Should you wish to exercise the right to withdraw the consent, you may at any time directly contact our Privacy Officer.

j) Right to lodge a complaint

Volkswagen Commercial Vehicles Ireland aims to resolve all queries or complaints that you may have. If you have any specific data protection concerns or a complaint, you can address it to our Data

Protection Team at privacy@volkswagen.ie or contact us at the address and telephone numbers in section 8 below.

If we cannot resolve your query, you have the right to contact the Office of the Data Protection Commissioner by using the details below:

Data Protection Commissioner

Canal House
Station Road
Portarlinton
R32 AP23 Co. Laois

Telephone: +353 (0)761 104 8000

Telephone: +353 (0)57 868 4800

Email: info@dataprotection.ie

LoCall Number: 1890 252 231

Fax: +353 57 868 4757

Information about Volkswagen Commercial Vehicles Ireland

Volkswagen Commercial Vehicles Ireland is a trading division of Volkswagen Group Ireland Limited (company registration number 436954, VAT registration number IE9654536U), whose registered office is at Block C, Liffey Valley Office Campus, Dublin 22 - D22 CF60.

Name and Address of the controller

The Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

Volkswagen Commercial Vehicles Ireland

Block C
Liffey Valley Office Campus
Dublin 22
D22 CF60

Phone: + 1800 812 761

Email: privacy@volkswagen.ie

Website: <https://www.volkswagen.ie>

Contact the Privacy Officer

Any data subject may, at any time, contact our Privacy Officer directly with all questions and suggestions concerning data protection. **Volkswagen Commercial Vehicles Ireland** is not required to appoint a *Data Protection Officer*.

All enquiries on data protection matters should be directed to our Privacy Officer, who can be contacted at:

Email: privacy@volkswagen.ie

Phone: + 1800 812 761

Volkswagen Commercial Vehicles Ireland

Block C

Liffey Valley Office Campus

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