

**VOLKSWAGEN GROUP**

# Vehicle Diagnostics Protection (SFD)

## Privacy Policy

for Users of Diagnostic Tools from Third-party Suppliers

**Responsible:** SFD-Team  
**Status:** published  
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Via this Privacy Policy, we are informing you of how your personal data is collected, processed and used, and about the rights you have as a data subject in the context of using SFD.

Use of SFD encompasses, among other things:

- Requests sent to the SFD IT backend for retrieving activation tokens (hereafter referred to as "service requests");
- Logging the service requests in the SFD IT backend

## A. Controller

The controller according to Article 4(7) of the GDPR, other national data protection laws of the member states of the European Union and other data protection provisions is:

### **Volkswagen AG**

Berliner Ring 2, 38440 Wolfsburg, Germany,  
entered in the register of companies of Braunschweig District Court under no. HRB 100484  
("Volkswagen AG"),  
insofar as vehicles of Volkswagen AG are involved

### **AUDI AG**

Auto-Union-Strasse 1, 85045 Ingolstadt, Germany,  
entered in the register of companies of Ingolstadt District Court under no. HRB 1 ("AUDI AG"),  
insofar as vehicles of AUDI AG are involved

### **ŠKODA AUTO a.s.**

Tř. Václava Klementa 869, Mladá Boleslav II, 293 01 Mladá Boleslav, Czech Republic,  
entered in the register of companies of Prague Municipal Court, file number B 332  
("ŠKODA AUTO a.s."),  
insofar as vehicles of ŠKODA AUTO a.s. are involved

### **SEAT, S.A.**

Autovía A-2, Km. 585, Martorell, Barcelona, Spain,  
with tax identification number A-28 049 161 ("SEAT, S.A."),  
insofar vehicles of SEAT, S.A. are involved

### **Bentley Motors Ltd.**

Pyms Lane, Crewe, Cheshire, CW1 3PL, United Kingdom,  
Registered in England: number 992897 ("Bentley Motors Ltd."),  
insofar as vehicles of Bentley Motors Ltd. are involved

### **Automobili Lamborghini S.p.A.**

Via Modena 12, 40019, Sant'Agata Bolognese, Italy,  
VAT no. IT 00591801204 ("Automobili Lamborghini S.p.A."),  
insofar as vehicles of Automobili Lamborghini S.p.A. are involved

### **Bugatti Automobiles S.A.S.**

1 Château Saint Jean, 67120 Molsheim, France,  
entered in the register of companies of Saverne under no. 433 873 437  
("Bugatti Automobiles S.A.S."),  
insofar as vehicles of Bugatti Automobiles S.A.S. are involved

### **Dr. Ing. h.c. F. Porsche AG**

Porscheplatz 1, 70435 Stuttgart, Germany,  
entered in the register of companies of Stuttgart District Court under no. HRB 730623  
("Porsche AG"),  
insofar as vehicles of Porsche AG are concerned

### **MAN Truck & Bus SE**

Dachauer Strasse 667, 80995 Munich, Germany,  
entered in the register of companies of Munich District Court under no. HRB 247520 ("MAN  
Truck & Bus SE"),  
insofar as vehicles of MAN Truck & Bus SE are concerned

each referred to below as the **controller** (insofar as the vehicles of the relevant company support the SFD function).

Where the vehicles involved are not Volkswagen AG vehicles, Volkswagen AG acts as the **processor** for the respective controller.

## B. Collection, processing and use of your personal data

### 1. Data processing purpose and content

“Vehicle Diagnostics Protection (SFD)” is a system that is intended to help protect software-controlled vehicle functions against misuse and unauthorised changes. The vehicle diagnostic tester requests an activation token from the SFD IT backend. The SFD IT backend generates and signs the activation token and sends it to the vehicle diagnostic tester. The vehicle diagnostic tester then transmits the token to the control unit; this checks the activation token and activates itself.

Within this context, the SFD IT backend manages all access operations centrally and logs them to provide a subsequent evidence trail. The VIN, vehicle brand, diagnostic address and control unit ID of the customer vehicle are stored together with your user ID and your IP address. The service request time stamp is also stored. This makes it possible to determine who made the changes to the control unit in the event of misuse.

Various items of your data may be stored and processed while SFD is being used.

In the event of a service request, the following data (hereafter referred to as “service request data”) is transmitted to the SFD IT backend and stored there:

- Pseudonymised user ID
- Pseudonymised workshop ID
- Country
- IP address

Real names and contact details are never transmitted to the SFD IT backend or to other Volkswagen AG systems; they remain with the diagnostic tool manufacturer.

In the event of misuse or an objectively reasonable suspicion of misuse, the relevant service request data will be analysed internally and, if necessary, handed over to the responsible investigative authorities together with the associated user data.

### 2. Legal basis for data processing

We will use this data exclusively for the purpose of allowing you to request individual SFD activation tokens. This request operation is necessary in order for SFD-protected control units to be activated for selected diagnostic services.

We process the listed data on the basis of an overriding legitimate interest (Article 6 (1f) of the GDPR). The legitimate interest arises from the obligation to document access to protected control units and to provide evidence of changes made to protected control units.

### 3. Erasure policy

The **service request data** will be erased 30 years after the relevant service request, provided that this is not prevented by concrete investigations owing to a case of misuse or a suspected case of misuse.

## C. Your rights

You may exercise the following rights in relation to the responsible contact person at any time, free of charge. Further information on asserting your rights is provided in section D.

**Right of access:** You are entitled to access information from us about how we process your personal data.

**Right to rectification:** You have the right to request that we rectify any of your personal data that may be inaccurate or incomplete.

**Right to erasure:** You have the right to have your data erased if the conditions set out in Article 17 of the GDPR are met. According to this, you can demand, for example, that your data is erased if it is no longer necessary for the purposes for which it was collected. In addition, you can demand erasure if we process your data on the basis of your consent and you withdraw this consent.

**Right to restriction of processing:** You have the right to ask for a restriction of the processing of your data if the conditions set out in Article 18 of the GDPR are met. This is the case, for example, if you dispute the accuracy of your data. You can demand restriction of processing for the period during which the data is being checked.

**Right to object:** You have the right to object to the processing of your data if the processing is based on an overriding interest or your data is used for the purpose of direct marketing. An objection is permitted if processing is conducted in either the public interest or for the exercise of official authority, or if it is conducted for a legitimate interest of Volkswagen AG or of a third party. If you object to the processing of your data, please notify us of the reasons for your objection. Furthermore, you have the right to object to data processing for the purposes of direct marketing. This also applies to profiling where this is connected to direct marketing.

**Right to data portability:** You have the right to receive your data in a structured, commonly used and machine-readable format and transfer the data to another data processor, provided that data processing is based on consent or contract fulfilment and that automated processing methods are used.

**Right to withdraw consent:** Where data processing is based on consent, you have the right to withdraw your consent to data processing, with future effect, at any time free of charge.

**Right to lodge a complaint:** You also have the right to lodge a complaint with a supervisory authority about our processing of your data. The contact details of the supervisory authority that is responsible in each case can be accessed via the relevant links under point D1.

## D. Your contact persons

### 1. Contact persons for exercising your rights

The contact persons for exercising your rights and further information can be found on the following websites:

Volkswagen AG:	<a href="https://datenschutz.volkswagen.de">https://datenschutz.volkswagen.de</a>
AUDI AG:	<a href="https://betroffenenrechte.audi.de">https://betroffenenrechte.audi.de</a>
ŠKODA AUTO a.s.:	<a href="https://www.skoda-auto.com/data-privacy">https://www.skoda-auto.com/data-privacy</a>
SEAT, S.A.:	<a href="https://www.seat.com/company/privacy-policy.html">https://www.seat.com/company/privacy-policy.html</a>
Bentley Motors Ltd.:	<a href="https://www.bentleymotors.com/en/pages/privacy-policy.html">https://www.bentleymotors.com/en/pages/privacy-policy.html</a>
Lamborghini S.p.A.:	<a href="https://www.lamborghini.com/de-en/privacy-policy">https://www.lamborghini.com/de-en/privacy-policy</a>
Bugatti Automobiles S.A.S.:	<a href="https://www.bugatti.com/data-protection-notice">https://www.bugatti.com/data-protection-notice</a>
Dr. Ing. h.c. F. Porsche AG:	<a href="https://www.porsche.com/germany/privacy">https://www.porsche.com/germany/privacy</a>
MAN Truck & Bus SE:	<a href="https://www.corporate.man.eu/en/Data-Protection.html">https://www.corporate.man.eu/en/Data-Protection.html</a>

### 2. Data protection officer

Our data protection officer is your contact person for matters relating to data protection:

Volkswagen AG: Berliner Ring 2, 38440 Wolfsburg, Germany Tel.: +49 (0) 5361-9-15010 Email: <a href="mailto:datenschutz@volkswagen.de">datenschutz@volkswagen.de</a>
AUDI AG: Auto-Union-Strasse 1, 85045 Ingolstadt, Germany Email: <a href="mailto:datenschutz@audi.de">datenschutz@audi.de</a>
ŠKODA AUTO a.s.: Pplk. Sochora 27, 170 00 Prague 7, Czech Republic Tel.: +420 234 665 111 Email <a href="mailto:dpo@skoda-auto.cz">dpo@skoda-auto.cz</a>
SEAT, S.A.: Autovía A-2, Km. 585, Martorell, Barcelona, Spain Email: <a href="mailto:dataprotection@seat.es">dataprotection@seat.es</a>
Bentley Motors Ltd.: Pyms Lane, Crewe, Cheshire, CW1 3PL, United Kingdom Email: <a href="mailto:dpo@bentley.co.uk">dpo@bentley.co.uk</a>
Lamborghini S.p.A.: Via Modena 12, 40019, Sant'Agata Bolognese, Italy Email: <a href="mailto:dpo@lamborghini.com">dpo@lamborghini.com</a>
Bugatti Automobiles S.A.S.: 1 Château Saint Jean, 67120 Molsheim, France Email: <a href="mailto:dataprotection@bugatti.com">dataprotection@bugatti.com</a>
Dr. Ing. h.c. F. Porsche AG: Porscheplatz 1, 70435 Stuttgart, Germany Email: <a href="mailto:betroffenenrechte@porsche.de">betroffenenrechte@porsche.de</a>

MAN Truck & Bus SE:  
Heinrich-Büssing-Strasse 1, 38239 Salzgitter, Germany  
Email: [data-protection-mtb@man.eu](mailto:data-protection-mtb@man.eu)

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