

Porsche Digital

Privacy Policy

for measures taken in market research (user research)

We, Porsche Digital GmbH (hereinafter: "we" or "PDG"), are pleased that you are interested in our company. Your privacy is of vital concern to us, and we take protection of your personal data and confidential treatment thereof very seriously. The processing of your personal data is effected exclusively within the parameters of the statutory provisions of data protection law, including, but not limited to, the General Protection Regulation (the "GDPR").

In this Privacy Policy, we will inform you about the processing of your personal data and about your data protection rights within the framework of initiating, conducting, and evaluating market research studies, including, but not limited to, surveys concerning customer satisfaction and expectations (the "Studies"). The Studies are conducted in various formats, particularly within the framework of group discussions, workshops and interviews as well as by accompanying product use over a certain period of time with the collection of feedback on the usage experience. Customers, prospects, experts, service providers, employees of PDG and PAG (Porsche AG) as well as affiliated companies, and other suitable participants are invited to participate.

Information concerning products and services of the PDG and concerning offers from other companies of the Porsche group can be found in the respective privacy policies for such services or Porsche companies.

1. Controller and data protection officer; contact

The controller within the meaning of the data protection laws is:

Porsche Digital GmbH
Grönerstraße 11/1
71636 Ludwigsburg
Germany
Phone: +49 (0) 711/911-37000
Email: betroffenenrechte@porsche.digital

Please contact us if you have any questions or suggestions concerning data protection.

You can reach our data protection officer at:

Porsche Digital GmbH
Beauftragter für Datenschutz
Grönerstraße 11/1
71636 Ludwigsburg
Germany
Email: datenschutzbeauftragter@porsche.digital

2. Nature of data protection

The nature of data protection is the protection of personal data. Such data include all information that pertains to an identified or identifiable natural person (the so-called data subject). Included herein is information such as names, mailing addresses, email addresses, or telephone numbers.

3. Purposes and legal basis of data processing

In what follows, you will find an overview of the purposes and legal basis of data processing within the framework of measures in the area of market research or within the framework of the Studies.

3.1 Consent (Article 6(1)(a) GDPR)

If you have issued your consent for specific purposes, then these purposes will follow from the respective content of the consent declaration provided. We obtain consent particularly in order to invite you to participate in Studies and to collect and evaluate your data in the course of conducting such Studies.

Data processing is effected upon the basis of Article 6(1)(a) GDPR. We will inform you expressly in the event you need to provide data for this purpose. Without the provision of such, we cannot implement the measures encompassed by the consent. You may withdraw your consent at any time without the withdrawal affecting the lawfulness of the processing that took place based on your consent until its withdrawal.

3.2 Safeguarding of legitimate interests Article 6(1) GDPR

We process your personal data also for the purpose of safeguarding legitimate interests of ours or of third parties. In particular, we pursue the following interests which, at the same time, are the respective purposes, depending upon, as applicable, the individual case:

- correspondence in connection with initiating, conducting, or evaluating Studies
- evaluating the Studies and preparing the results
- further development of products, work, services, and support offers, as well as other measures for controlling business transactions and processes

Data processing is effected on the basis of Article 6(1) GDPR. We will inform you expressly in the event you need to provide data for this purpose. Without the provision of such data, we cannot implement the measures in the area of market research.

3.3 Processing requests or fulfillment of contractual and pre-contractual duties (Article 6(1)(b) GDPR)

We process personal data whenever this is necessary to process a request from you. The specific purposes will depend upon the specific request and may include in particular:

- Processing of questions, comments and complaints

Data processing is effected upon the basis of Article 6(1) GDPR. You must provide the personal data necessary for processing your respective request. Without these data, it is possible that we will not be in a position to process your request.

3.4 Meeting statutory obligations (Article 6(1)(c) GDPR) or processing of personal data in the public interest (Article 6(1)(e) GDPR)

We process your personal data also for the purpose of compliance with statutory obligations to which we are subject. The obligations may follow from, e.g., commercial, tax, or telecommunications law, or from laws governing money laundering or finance, or from the penal code. The purposes of processing follow from the respective statutory obligation; processing usually serves the purpose of complying with governmental monitoring and information obligations.

Data processing is effected upon the basis of Article 6(1)(c) or (e) GDPR. If we collect data based on a legal obligation or in the public interest, then you will have to provide the personal data necessary to satisfy the legal obligation. Without the provision of such data, it is possible that we will be unable to process your request or to comply with these obligations.

4. Recipients of personal data

Internal recipients: within the PDG, access is held only by those persons who require it for the purposes set forth in (3) above.

External recipients: we will transfer your personal data to external recipients outside the PDG only (i) if such is necessary for initiating, conducting, and evaluating the measures in the area of market research, (ii) if there exists any other statutory permission or obligation, or (iii) if you have consented to such transfer.

External recipients can be:

- **Processors**
Companies of Porsche Group or external service providers that we use for rendering services, e.g., in the areas of participant recruitment (invitations for research activities), participant support or of conducting and evaluating Studies. We carefully select such processors and review them at regular intervals in order to ensure that security and confidentiality of your personal data are protected. The service providers may use the data exclusively for the purposes prescribed by us.
- **Public bodies**
Authorities and governmental institutions, such as public prosecutors, courts, or financial authorities, to which we are compelled by law to submit personal data. The transfer is then effected upon the basis of Article 6(1)(c) GDPR.
- **Private bodies**
Companies of the Porsche Group, cooperation partners, or assistive personnel to which data are transferred based upon your consent, for the purpose of processing your query, or to safeguard legitimate interests. Transfer is then effected based upon Article 6(1)(a), (b), or (f) GDPR.

5. Data processing in third countries

If a data transfer takes place to entities whose registered office or place of data processing is not located in a member state of the European Union, another state party to the Agreement on the European Economic Area or a state for which an adequate level of data protection has been confirmed by a decision of the European Commission, we will ensure prior to the data transfer that it is either covered by a statutory permit, guarantees for an adequate level of data protection with regard to the data transfer (e.g. through the agreement of contractual safeguards, officially recognized regulations or binding corporate rules at the recipient) or that you have given your consent to the data transfer.

If the data transfer takes place on the basis of Articles 46, 47 or 49 (1) (sub 2) GDPR, you can obtain a copy of the guarantees for an adequate level of data protection in relation to the data transfer from us. For this purpose, please use the information provided under item 1.

6. Sources and data categories for third-party collection

We process not only personal data that we receive directly from you. As the case may be, we receive some personal data from third parties as well. Below you can find an overview with examples of the sources and data categories in the event of collection from third parties, depending upon each individual case:

- contact and identification data, contract data and vehicle, as well as vehicle usage, data for companies of Porsche Group as well as cooperation partners
- contact details from publicly accessible directories, e.g., phone books or websites

Collection is then effected upon the basis of Article 6(1)(f) GDPR for the purpose of safeguarding our legitimate interests in efficiently and reliably initiating, conducting, and evaluating measures in the area of market research.

7. Automated decision-making and profiling

We do not use either automated decision-making or profiling for initiating, conducting, or evaluating measures in the area of market research.

8. Storage term, erasure

We store your personal data only as long as necessary to satisfy the purposes set forth in this document or in any further documents provided to you in the course of a Study or – in the event of your consent – as long as you have not withdrawn your consent. If you object to processing, then we shall erase your personal data, unless further processing is permitted in accordance with the relevant statutory provisions. We shall also erase your personal data if we are obligated to do so for any other legal reasons.

Subject to application of these general principles, we shall erase your personal data without undue delay:

- after the discontinuance of the legal basis, provided that no other legal basis (e.g., archiving periods under commercial and tax law) intervenes. If the latter applies, then we will erase your data after discontinuance of the other legal basis.
- if (i) they are no longer needed for the purposes, pursued by us, of preparation of and performance on an agreement, and contract pursued by us and if (ii) no other legal basis (e.g., archiving obligations under commercial and tax law) intervenes. If the latter applies, then we will erase your data after discontinuance of the other legal basis.
- if the collection purpose pursued by us for collection discontinues and no other legal basis (e.g., archiving periods under commercial and tax law) intervenes. If the latter applies, then we will erase your data after discontinuance of the other legal basis.

9. Anonymization and evaluation without reference to individual names

We anonymize your data when a personalized processing is not necessary any more for the purposes as pursued by us and to the extent no other legal basis applies in this respect. After anonymization, no conclusion to your person can be drawn any more.

Irrespective of anonymization, our evaluation of Studies as well as the development of products, and other measures for controlling business are, to the extent possible, executed without including direct reference to your name in the work products based on the Studies (presentations, reports, etc.). A use including direct opportunity for identification is only made when this is strictly necessary considering the purposes as pursued by us (or any other applicable legal basis).

10. Rights of data subjects

As a data subject, you have numerous rights available to you, specifically:

Right of access: You have the right to demand information on the data stored by us concerning your person.

Right to rectification and erasure: You may demand from us rectification of incorrect data and – to the extent that the statutory prerequisites are fulfilled – erasure of your data.

Restriction of processing: To the extent that the statutory prerequisites for such have been fulfilled, you can demand that we restrict the processing of your data.

Data portability: If you have provided data to us based upon an agreement or consent, then you may demand, provided that the statutory prerequisites are met, (i) receipt of the data provided by you in a structured, commonly used, and machine-readable format, or (ii) their transfer by us to another controller.

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Objection to processing activities in the event of the legal basis "legitimate interests": You have the right to object to data processing by us at any time for reasons that result from your particular situation, as far as this is based on the legal basis "legitimate interest." If you avail yourself of your objection rights, then we will cease processing of your data unless we can – in accordance with statutory guidelines – verify compelling reasons for further processing that merit protection and outweigh your rights.

Objection to data processing for the purpose of direct marketing: if applicable, we also process your personal data on the legal basis of "legitimate interests" for the purpose of conducting direct marketing. You have the right to object to this processing at any time.

Withdrawal of consent: if you have given us your consent for processing of your data, then you may withdraw this consent at any time, effective for the future. Such shall not affect the lawfulness of processing of your data until your withdrawal.

Right to lodge a complaint with a supervisory authority: You may also file a complaint with the competent supervisory authority if you believe that processing of your data is in violation of applicable law. For this purpose, you may contact the supervisory authority responsible for your place of residence or country, or the supervisory authority responsible for us.

Your contact with us and exercise of your rights: Furthermore, you may contact us free of charge if you have any questions concerning processing of your personal data, your rights as a data subject, and any consent granted. To exercise the rights named above, please contact betroffenenrechte@porsche.digital or contact the address indicated above in (1) via surface mail. Please ensure that clear identification of your person is possible. In the event of withdrawal of your consent, you may also choose the contact method which you used to give your consent.

10. Third-party market research studies

Studies and other measures in the area of market research with regard to PDG and other companies of the Porsche Group may be performed by third parties as well (in particular by service providers in the field of research, e.g., market research institutes, testing institutes, advisory agencies, etc.); or, as applicable, such may be done in our interest or upon our order. To the extent that the execution and the connected processing of personal data are subject to the responsibility of such third parties directly, however, they are also directly responsible under data protection law. In this regard, please also observe the respective third-party privacy policies.
