



Data Protection Information

Employees of Audi sales partners

In the following, we inform you in accordance with Art. 13, 14 GDPR of the processing of your personal data by AUDI AG, Auto-Union-Straße 1, 85057 Ingolstadt, Germany in connection with your professional engagement as an employee of an Audi sales partner.

Personal data means any information relating to an identified or identifiable natural person. 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 one or more factors specific to the physical, psychological, genetic, mental, economic, cultural, or social identity of that natural person. **Processing** means 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;

1. Who is responsible for the data processing and who can provide me with consultation?

The **controller** for the processing of your personal data is:

AUDI AG, Auto-Union-Straße 1, 85057 Ingolstadt, Germany.

For matters concerning data protection, you can also consult our **company data protection officer**:

AUDI AG, Data Protection Officer, 85045 Ingolstadt, Germany

E-Mail: datenschutz@audi.de

If you wish to assert your **data protection rights**, please use the contact options at:

<https://gdpr.audi.com/>

There, you will find further information regarding how you can assert your data protection rights.

You may also send your request via mail:

AUDI AG, DSGVO-Betroffenenrechte, 85045 Ingolstadt, Germany

2. What kind of data do we process and what are their sources?

We process personal data that we legally obtain from you or legally record about you within the scope of our business relations with an Audi sales partner (Audi partner, Audi service partner, Audi importer or large dealer) at whom you are employed and within the scope of your interaction with us. This includes, in particular, the use of IT systems (including websites, platforms, dealer systems) and communication tools, contact to employees of AUDI AG or the customer service of AUDI AG, information that we obtain from your superiors and colleagues, registration for newsletters, participation in trainings and continued education events of AUDI AG, participation in sales partner meetings and events, participation in raffles and competitions, or the receipt of non-cash benefits.

The relevant personal data includes:

Professional contact and (work) organizational data (e.g. last name, first name, title, academic degree, sex, address, date and location of birth and citizenship, residence and work permits

company, department, activity, email address, address, telephone numbers),

Data regarding personal/professional circumstances and characteristics (e.g. professional classification, duties, activities, qualifications, training and continued education data, data protection-related declarations such as declarations of consent for the processing of personal data, language skills),

Special category: Photographs (e.g. portrait that is processed or published on the basis of a special consent for internal purposes, e.g. on the internal social media platforms),

IT usage data (e.g. user ID, roles and authorizations, (system) permissions, login times, computer name, IP address, user-specific settings, documentation of changes, etc.),

Data from legal monitoring systems (e.g. data from IT security programs (including log files with AP addresses, MAC addresses, entry logs),

Qualification data (e.g. qualification history, educational planning, educational appointments, Assessment Center, potential interviews).

Beyond this, we may process further personal data of yours that you provide to us within the scope of our business relationship, e.g. in the use of portals or within the scope of your contact with our employees.

3. For what purposes do we process your data and on what legal basis?

We always process your personal data for a specific purpose and only to the extent necessary for the fulfillment of this purpose.

The processing may occur on the basis of the following legal principles:

- The processing is necessary for the performance of a contract of which you are a contractual party or in order to take steps at your request prior entering into a contract (Art. 6 Par. 1, Subpar. 1 Letter b) of the General Data Protection Regulation (GDPR);
- The processing is necessary for compliance with a legal obligation according to EU law or the law of an EU member state to which AUDI AG is subject (Art. 6 Par. 1, Subpar. 1 Letter c) of the GDPR;
- The processing is necessary in order to protect your vital interests or those of another natural person (Art. 6 Par. 1, Subpar. 1 Letter d) of the GDPR);
- The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the AUDI AG (Art. 6 Par. 1, Subpar. 1 Letter e) of the GDPR);
- The processing is necessary for the purpose of the legitimate interests pursued by the AUDI AG or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where the data subject is a child (Art. 6 Par. 1, Subpar. 1 Letter f) of the GDPR).

We process personal data that we obtain from the use of IT systems, participation in events or qualification measures, as well as competitions and raffles, in order to take steps prior entering into a contract and to perform the respective contract on the basis of Art. 6 Par. 1 Subpar. 1 Letter b) of the General Data Protection Regulation (GDPR), to the extent to which you are contractual party. To the extent to which registrations, logins, or usage occurs through the sales partner at whom you are employed, we process your data on the basis of a balancing of interests pursuant to Art. 6 Par. 1 Subpar. 1 Letter f) of the GDPR. Here, the legitimate interest of AUDI AG is the performance of the contract concluded with the respective Audi sales partner.

In connection with the explanations above, we process your personal data on the basis of the following legal principles for the following purposes, in particular:

Purpose	Examples	Legal basis	Legitimate interest in balancing of interests
Administration of the business relationship with the sales partner, / performance of sales partner contracts (e.g. dealer and service partner contracts)	<p>General communication and contact with sales partner</p> <p>User administration (granting of permissions, IT support, system access, authorization administration)</p> <p>Organization/invitations to meetings, management of events and participants</p> <p>Invoicing</p> <p>Reporting (e.g. Sales und Performance Reporting)</p> <p>Administration</p> <p>Audi Partner Portal, Audi trading forum</p> <p>Audi Partner Center</p> <p>Contact persons/liaisons for the business relationship, e.g. contact persons for calculation of bonuses, orders, requests</p> <p>Satisfaction surveys for employees of the sales partner</p> <p>Sales promotions</p>	Balancing of interests	Fulfillment of services promised to the respective sales partner, maintenance of the sales network
Branding and support of sales partners	<p>Sending of newsletters and product/company information, communication and brand/product events (e.g. conferences)</p>	Balancing of interests and performance of contract	Internal and external image of AUDI AG
IT administration	<p>User setup and administration, assignment of roles, creation of profiles</p>	Balancing of interests and performance of contract	
Dealer and personnel development, training, targeted instruction and continued education	<p>Qualification management</p> <p>Qualification programs</p> <p>Qualification administration (e.g. self-recording of internal/external qualification measures, scheduling/resource planning for qualification measures, administration of external speakers)</p> <p>Sending of newsletters to employees (to the extent requested by the employee)</p> <p>Performance of qualification measures</p> <p>Personnel development and potential meetings and review of qualification/specialty competence of the sales partner</p> <p>Invoicing of training and qualification measures</p>	Balancing of interests and performance of contract	Review of required specialist competence and qualification of commercial employees as well as ensuring quality and review of the adherence to contractual obligations of the respective sales partner, in particular with respect to the qualification concept.
Audit	<p>Audits and special inspections</p> <p>Internal investigations</p>	Balancing of interests	Review of the adherence to contractual and legal obligations by the respective sales partner

Performance of competitions and raffles	Audi Twin Cup	Performance of contract	
Taxes	Calculation and reporting of monetary advantages as non-cash benefits Legal documentation with respect to recipients of hospitality and gifts	Fulfillment of our legal tax-related obligations	
Assertion and defense of our rights or disclosure within the scope of official/judicial measures	Exercising and assertion of rights and claims Disclosure within the scope of official/judicial measures for the purposes of collection of evidence, prosecution, and enforcement of civil claims Processing of surveys of affected parties in accordance with the GDPR	Compliance with legal obligations, Balancing of interests	Assertion and defense of our rights and fulfillment of legal and official orders
Prevention, combatting, and discovery of terrorism financing and crimes that endanger assets, reconciliations with European and international anti-terror lists	Reconciliation with anti-terror lists	Compliance with legal obligations, Balancing of interests	Fulfillment of legal and official orders
Retention and archiving	Archiving on the basis of retention obligations under tax and commercial law	Compliance with legal obligations, Balancing of interests	Fulfillment of legal and official orders, internal policies, and industry standards
Prevention of embezzlement and money laundering		Compliance with legal and official orders	
Statistical assessment for company steering, cost recording and controlling	Reporting on key business figures	Balancing of interests	Assessment for steering our business processes and cost control
Query of GDPR relevant contact persons	Data protection officer Persons authorized to issue instructions Persons authorized to receive instructions	Fulfilling statutory obligations, balancing of interests	Collaboration with business partners, feasible structure of (GDPR) processes within the business relationship, fulfilment of statutory and regulatory requirements

4. Is there an obligation to provide personal data?

Within the scope of the business relationship, you must only provide the personal data that is necessary for the performance of the business relationship or that we are legally obligated to collect. To the extent to which you must provide us with personal data on the basis of a legal or contractual obligation, we will notify you of this fact upon collecting the data, with a reference to the respective obligation. If you do not provide us with the respective data, certain services may not be provided. For example, if you do not provide us with your contact information, we cannot contact you with regards to certain matters.

5. Who receives my data?

Due to the size and complexity of the data processing by AUDI AG, it is not possible to individually list every recipient of your personal data in this data protection information, for which reason we generally only list categories of recipients. Within AUDI AG, your data is received by the offices that require it within the scope of their activities (e.g. Sales Germany, IT).

Service providers engaged by us on the basis of a contract (so-called contract processors) may also receive your data for these purposes. These include, but are not limited to:

- companies of the VW Group who provide services (e.g. IT services) for AUDI AG (e.g. VW AG)
- print providers,
- media providers,
- archiving providers,
- hosting providers,
- IT service providers.

Beyond this, we forward your personal data to the following recipients or categories of recipients who are acting as controllers:

- customers, service providers, and suppliers of AUDI AG with whom you interact within the scope of your professional activities or within the scope of our business relationship,
- external consultants of AUDI AG (e.g. attorneys, tax consultants, economic auditors),
- insurance companies,
- officials within the scope of their competence (e.g. tax office, police, public prosecutor, social insurance carriers),
- courts,
- other third parties to the extent to which they instruct us to forward your data or grant your consent.

6. Is my data transmitted to third-party countries?

We generally do not transmit your data to third-party countries (countries that are neither members of the European Union nor of the European Economic Area) or to international organizations.

There are exceptions if you are employed at a sales partner that is based in a third-party country or an event takes place in a third-party country. Additionally, some of our service providers may be located in third-party countries. In some cases, personal data may also be transmitted to officials and courts in third-party countries.

Please note that not all third countries have a level of data protection recognised as adequate by the European Commission. For data transfers to third countries where there is no adequate level of data protection, We ensure that, prior to disclosure, the recipient has either an adequate level of data protection (e.g. adequacy decision of the EU Commission or agreement of so-called EU Standard Contractual Clauses of the European Union with the recipient), or We have obtained express consent from our users. You can obtain a copy of these measures. Please use the contact information below.

7. How long will my data be stored?

To the extent necessary, we process and store your personal data for the duration of your employment relationship with the respective sales partner or for the duration of your interaction with us.

Beyond this, we are subject to various retention and documentation obligations under the German Commercial Code [*Handelsgesetzbuch*] (HGB) and the German Tax Code [*Abgabenordnung*] (AO), among others. The retention and documentation terms described there may last up to ten years. Ultimately, the storage duration is governed by the legal statute of limitations, which may, for example, last up to 30 years according to §§ 195 et seqq. of the German Civil Code [*Bürgerliches Gesetzbuch*] (BGB), although the normal retention term is three years.

In some circumstances, your data must be retained for a longer period, e.g. if a legal hold or litigation hold is ordered in connection with an official or judicial proceeding (i.e. a ban on the deletion of data for the duration of the

proceeding).

8. What rights do I have?

As a data subject, you are entitled to the following data protection rights:

Access: You have the right to access information regarding the personal data related to you and stored about at AUDI AG and the scope of the data processing and data transfer performed by AUDI AG and to obtain a copy of the personal data stored about you.

Rectification: You have the right to demand immediate rectification of incorrect personal data as well as the completion of incomplete personal data stored about you at AUDI AG.

Erasure: You have the right to demand the immediate deletion or erasure of your personal data stored by AUDI AG if the legal requirements are satisfied.

This is the case, in particular, if:

- your personal data is no longer needed for the purposes for which it was collected;
- the sole legal basis for the processing was your consent and you have withdrawn such consent;
- you have objected to processing on the legal grounds relating to your particular situation, and we cannot prove that there are overriding legitimate grounds for processing;
- your personal data were processed unlawfully; or
- your personal data must be erased in order to comply with legal requirements.

If we have transmitted your data to third parties, we will inform them about the erasure to the extent required by law. Please note that your right to erasure is subject to certain limitations. For example, we may not and/or must not erase data that we are still required to retain due to statutory retention obligations. In addition, your right of erasure does not extend to data that we need in order to assert, exercise or defend against legal claims.

Restriction to the processing:

- Under certain conditions, you have the right to request that processing be limited (i.e., the marking of stored personal data with the aim of limiting its processing in the future). The requirements are: The accuracy of your personal data is contested by you and Audi AG must verify the accuracy of the personal data;
- the processing is unlawful, but you oppose the erasure of the personal data and request the restriction of their use instead;
- Audi AG no longer needs the personal data for the purposes of processing, but you require the data to establish, exercise or defend your legal claims.
- you have objected to processing pending the verification of whether the legitimate grounds of Audi AG override your legitimate grounds.

Where processing has been restricted, such data will be marked accordingly and, with the exception of storage, will be processed only with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest the EU or an EU Member State.

Data Portability: To the extent that we automatically process your personal data that you have provided to us based on your consent or any contract with you (including your employment contract), you have the right to receive such data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from Audi AG.. You also have the right to have the personal data transmitted directly from Audi AG to another controller where technically feasible, provided that such transmission does not adversely affect the rights and freedoms of others.

Right to Object: If we process your personal data on grounds of legitimate interests or in the public

interest, then you have the right to object to the processing of your personal data on grounds relating to your particular situation. In addition, you have an unrestricted right to object if we process your data for our direct marketing purposes. Please see our separate note in the section titled “Information about your right to object”.

In certain situations, in the context of a balancing of interests, we will grant you an additional unrestricted right to object.

Withdrawal of consent: If you have given consent to the processing of your personal data, then you can withdraw such consent at any time. Please note that the withdrawal applies prospectively only. Processing that occurred before the withdrawal of consent is unaffected.

Complaint: Furthermore, you have a right to file a complaint with a data protection authority, if you believe that the processing of your personal data is unlawful. The right to file a complaint is without prejudice to any other administrative or judicial remedies. The address for the data protection supervisory authority that is competent for AUDI AG is:

Bayerisches Landesamt für Datenschutzaufsicht [Bavarian Regional Office for Data Protection Supervision]

Promenade 18
91522 Ansbach
Germany

Information regarding your right to object

Right of objection for personal reasons

You have the right to object to the processing of your personal data on grounds relating to your particular situation. The prerequisite for this is that the data processing takes place in the public interest or on the basis of a balancing of interests. This applies also to profiling.

Insofar as we base the processing of your personal data on a balancing of interests, we generally assume that we can demonstrate compelling legitimate grounds but will, of course, examine each individual case.

In the event of an objection, we will no longer process your personal data, unless:

- we can demonstrate compelling legitimate grounds for the processing of these data that override your interests, rights and freedoms, or
- your personal data serves the establishment, exercise or defence of legal claims.

Objection to the processing of your personal data for our direct marketing

To the extent to which we process your personal data in order to operate direct marketing, you have the right to object to the processing of personal data pertaining to you for the purposes of such marketing at any time; this also applies in the case of profiling, to the extent to which it is connected to such direct marketing.

If you object to the processing for the purposes of direct marketing, then we will no longer use your personal data for these purposes.

Objection to the processing of your personal data for product improvement and general customer analysis

Within the scope of the balancing of interests, we will grant you a special right to object with respect to the processing of your personal data for product improvement and general customer analysis.

If you object to the processing for purposes of product improvement and/or general customer analysis, we will no longer process your data for these purposes in a personal manner. This does not affect purely statistical evaluations of aggregated data or data anonymized in some other fashion.

Exercising your right to object

The objection can be filed in any form and should be submitted to the contact person(s) described in this data protection information, if possible.