

VOLKSWAGEN

GROUP RUS

Policy for Personal Data Processing

1. Scope of Regulation

This Policy for Personal Data Protection (hereinafter the Policy) at VOLKSWAGEN Group Rus OOO (hereinafter the Operator) was developed in compliance with the requirements of the Federal Law of the Russian Federation No. 152-FZ of July 27, 2006 On Personal Data, cl.2 p.1 and p.2. It outlines the principles and conditions of personal data processing, the rights of the subjects and the Operator of personal data and the procedures for personal data protection at VOLKSWAGEN Group Rus OOO in order to ensure the protection of the rights and freedoms of the individual and citizen during their personal data processing, including the right to personal and family privacy.

Protection of personal data is one of the top-priority tasks at VOLKSWAGEN Group Rus OOO. The personal data processed at VOLKSWAGEN Group Rus OOO are considered restricted information and are subject to protection. The need to keep such information confidential is determined by the requirements of the effective legislation of the Russian Federation.

2. Scope of Application

This Policy applies to VOLKSWAGEN Group Rus OOO and its territorially autonomous divisions.

3. Principles of Personal Data Processing

Personal data processing at VOLKSWAGEN Group Rus OOO is performed according to the following principles:

- legitimacy and justice of the purposes and methods of personal data processing;
- conformity between the purposes for personal data processing and the purposes defined in advance and declared at personal data collection;
- conformity between the amount and character of personal data subject to processing, the methods of personal data processing and the purposes for personal data processing;
- adequacy of personal data, their sufficiency for the purposes of processing, inadmissibility of processing of personal data that are excessive with regard to the declared purposes of personal data processing;
- inadmissibility of joining databases with personal data created for purposes inconsistent with each other;
- storage of personal data in the form that allows to identify the personal data subject for a term not longer than required for the purposes of personal data processing;
- destruction of personal data after the purposes of processing have been fulfilled or if the need to fulfill these purposes no longer exists.

4. Conditions of Personal Data Processing

Personal data processing at VOLKSWAGEN Group Rus OOO is performed in compliance with the principles and rules stipulated by the RF legislation. Personal data processing shall be allowed in the following situations:

- personal data are processed with the consent to the processing of personal data given by the subject. In situations provided for in the RF legislation personal data shall be processed only with written consent of the personal data subject;
- personal data processing is necessary for the fulfillment of the purposes stipulated in an international treaty of the Russian Federation or the law, for the fulfillment and performance of the functions, powers and obligations imposed by the law of the Russian Federation on the Operator;
- personal data processing is required for the delivery of justice, enforcement of a judicial act, an act of another authority or official subject to enforcement pursuant to the law of the Russian Federation on enforcement;
- personal data processing is required for execution of powers of federal executive bodies, bodies of state non-budgetary funds, state executive bodies of the regions and republics of the Russian Federation, local government bodies and functions of organizations that participate in provision of state and municipal services respectively stipulated by the Federal Law No. 210-FZ dated July 27, 2010 On Organization of the Provision of State and Municipal Services, including registration of personal data subject on unified portal for state and municipal services and/or regional portals for state and municipal services;
- personal data processing is required for the fulfillment of contract where the personal data subject is a party, beneficiary or guarantor, and for the signing of contract on the initiative of the personal data subject or contract where the personal data subject will be a beneficiary or guarantor;
- personal data processing is required for the protection of life, health and other vital interests of the personal data subject, if it is impossible to get the consent of the personal data subject;
- personal data processing is required for exercising the rights and legal interests of the Operator or third parties or for the fulfillment of socially significant purposes provided that the rights and freedoms of the data subject are not violated;
- personal data processing is required for the professional activity of a journalist and (or) the legal activity of the mass media or scientific, literary or any other creative activity provided that the rights and freedoms of the data subject are not violated;
- personal data processing is performed for statistical or other investigatory purposes provided always that personal data are depersonalized, with the exception of purposes of goods, works and services promotion on the market through direct contact with potential customers via means of communication;
- processing concerns the personal data, public access to which has been granted by the personal data subject or at such subject's request;
- processing concerns the personal data which is subject to publishing or compulsory disclosure pursuant to the federal law.

5. Purposes of Personal Data Processing

VOLKSWAGEN Group Rus OOO processes personal data in accordance with the norms of the effective legislation and local regulations of VOLKSWAGEN Group Rus OOO.

6. Rights of Personal Data Subject

The personal data subject has the right to obtain information related to processing of their personal data, including, but not limited to:

- the confirmation of the fact of processing of the personal data by the Operator;
- the purposes of personal data processing and its legal grounds;
- the purposes and methods of personal data processing used by the Operator;
- the name and the location of the Operator, the information on the individuals (excluding the Operator's employees) who have access to personal data or may obtain personal data on the grounds of a contract with the Operator or pursuant to the federal law;
- the processed personal data concerning the relevant data subject, the source of the data, unless any other way of data provision is stipulated by the federal law;
- the term of the personal data processing, including the term of its storage;
- the procedure for the subject's exercise of rights stipulated by the Federal Law No.152-FZ dated July 27, 2006, On Personal Data;
- the information on the performed or probable cross-border personal data transfer;
- the name or the full name and address of the individual processing the personal data at the request of the Operator, if processing is or will be entrusted to such individual;
- other information stipulated by the legislation of the Russian Federation.

7. Rights of Personal Data Operator

VOLKSWAGEN Group Rus OOO has the right to:

- defend its interests in court;
- provide subjects' personal data to third parties if it is stipulated by the effective legislation of the Russian Federation (law enforcement authorities, tax authorities, etc.) and/or related to the execution of a contract where the personal data subject is a party or beneficiary;
- refuse to provide personal data in situations stipulated by the legislation of the Russian Federation;
- process personal data of a subject without their consent in situations stipulated by the legislation of the Russian Federation;
- with consent of the personal data subject entrust another individual with personal data processing, unless otherwise stipulated by the federal laws, based on the contract executed with such individual.

8. Personal Data Protection

VOLKSWAGEN Group Rus OOO shall take all necessary organizational and technical measures to ensure protection of personal data against unauthorized or accidental access, destruction, change, blocking, copying, provision, dissemination and other illegal actions with respect to personal data. In certain cases in order to fulfill part of the functions related to personal data protection VOLKSWAGEN Group Rus OOO may engage third-party companies holding fully executed licenses for the activity of technical protection of confidential information. All personal data processed at VGR shall be protected. In order to coordinate the measures for personal data protection at territorially autonomous divisions VOLKSWAGEN Group Rus OOO shall appoint individuals responsible for the organization of personal data processing and individuals responsible for the protection of personal data in information systems.

9. Improvement of Management Procedures and of Personal Data Processing and Protection

VOLKSWAGEN Group Rus OOO shall regularly improve management procedures and personal data processing and protection to bring them in compliance with regular amendments to the requirements of the effective legislation of the Russian Federation and to the characteristics of the procedures for personal data processing and protection, and to implement recently developed new approaches to and practices of personal data protection and processing.

The improvement is achieved by refining (reviewing) local regulations that govern personal data protection and processing, by using the results of internal control and audit (governmental monitoring of compliance), by corrective and preventive actions.

This Policy shall be regularly reviewed, not less than once within a year after the last review of the Policy. The Policy shall be approved again if some amendments are introduced after the review of the Policy. The Policy may be reviewed and approved before the indicated term if some amendments are made to the laws and regulations on personal data protection and processing.

VOLKSWAGEN Group Rus OOO shall adopt measures to identify and eliminate reasons for non-compliance with the requirements of the effective legislation of the Russian Federation on personal data and of local regulations in order to prevent such situations in the future.

VOLKSWAGEN Group Rus OOO shall determine the actions necessary to eliminate the reasons for potential non-compliance with the requirements of the effective legislation of the Russian Federation on personal data processing and protection and of the Operator's regulation in order to prevent such situations in the future.

The Working Group for improvement of management procedures and of personal data processing and protection shall include:

- 1) individuals responsible for managing personal data processing;
- 2) individuals responsible for ensuring personal data safety in information systems and/or representatives of the Operator's structural divisions responsible for ensuring personal data safety in information systems;
- 3) representatives of the Operator's structural divisions responsible for ensuring observation of laws and legal defense of the Operator's interests;

- 4) representatives of other structural divisions of the Operator that process personal data;
- 5) in certain situations third parties (external organizations) with relevant competency shall be engaged.

10. Storage of the Policy

The current version of the Policy in hard copy shall be stored at VOLKSWAGEN Group Rus OOO at the following address: 1, Avtomobilnaya, Kaluga Region

The electronic copy of the current version of the Policy shall be placed on the official website of VOLKSWAGEN Group Rus OOO at the following address

http://www.volkswagengroupus.ru/upload/politika_obrabotki_dannykh.pdf.

Approved by:

General Director

Marcus Osegowitsch