

Privacy Policy for use of the Customer Care

A. Data controller

Thank you for your interest in our products and services. The responsible office for the customer care and data controller for the processing of data described herein is Volkswagen Group Charging GmbH, Mollstr. 1, 10178 Berlin, Germany, info@elli.eco, entered in the Commercial Register of the District Court of Charlottenburg under No. HRB 208967 B ('Volkswagen Group Charging GmbH'). Please find information on how your data is collected, processed and used in conjunction with use of the customer care services.

B. Processing of Personal Data when using Customer Care

I. Processing of Requests and Customer Care, Self-Service

1. Data Processing with regard to the Processing of Requests and Customer Care

You may contact Customer Care with requests regarding our digital services and apps or our products and services (e.g. by post, email, contact form or telephone). In this context, we process the personal data required to deal with your request and for the purpose of Customer Care (name, email address, address, telephone number, country and language). We may also process additional data to deal with individual requests, such as contract data (your contract and customer numbers, consent granted), transaction data (order and invoice data), hardware data (device type, device manufacturer, device serial number), software data (e.g. firmware, operating system, app version), IT usage data (registration for services, use of functions) or payment data (bank details). If you contact us repeatedly, we also process existing information about your previous concerns.

We also process personal data from requests provided by third parties – particularly by the national sales company responsible for your country (importer), your Volkswagen dealership and the Volkswagen AG– if you address requests directly to such third parties or your request is in relation to our products and services and this request can only be processed by us (information on data protection in relation to such third parties may be found in the relevant third party's Privacy Policy).

Should we receive a request from you which is not within the remit of the Customer Care but is within the remit of a third party, or that we cannot process without input from such a third party, we shall forward your request to the relevant third party mentioned above in encrypted form, if this is necessary for the purposes of processing your request and providing Customer Care and where this leads to faster and more customer-friendly processing in your legitimate interest and in ours (see Article 6, paragraph 1, letter f) GDPR). If such a third party is based outside the European Economic Area and/or (read) access to data from third countries cannot be ruled out, a corresponding EU standard data protection agreement shall be concluded accordingly to ensure sufficient protection of your personal data. You can download the EU standard contractual clauses from the URL <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087>.

When you refer to Customer Care, we only process your personal data insofar as this is necessary to process your request and for the purposes of Customer Care (see Article 6, paragraph 1, letter b) GDPR) and unless otherwise specified for individual functions or services in this Privacy Policy. In this context, we store your data only for as long as necessary for the respective stated purposes for which we process your data. The relevant retention period may range from three months (e.g. for simple requests or complaints) or five years (e.g. for claims indicating a dispute) to up to 10 years (e.g. for claims for damages in conjunctions with 'production certificates'). If your data is required and processed for multiple purposes, as soon as the last specific purpose has been fulfilled your data is automatically deleted or stored in anonymised form, which prevents the data from being associated directly with you.

2. Data Processing with regard to the Self Service

If you do not wish to contact us directly, you may also use our Self Service instead. Our Self Service answers your frequently asked questions (FAQs) directly by suggesting a relevant answer to the question

you enter in the input field. You do not have to enter any personal data in our Self Service input field and may ask your question anonymously. If you do enter personal data in our Self Service input field, we delete personal data as far as possible – with the exception of your name as well as name of town and street, which we are unable to do for technical reasons – before we answer your question. To do this, we scan your entries automatically and systematically disguise sequences of numbers such as postcodes and house numbers so that we can only distinguish a town or city or a street. We are then no longer able to trace the details back to you as a person. For Self Service quality assurance purposes, we do store a generic session ID for every request by every user. However, we cannot trace this back to you as a person. This data processing is based on our legitimate interest (see Article 6, paragraph 1, letter f) GDPR) of providing you with the best possible service and answering frequently asked questions (FAQs) as needed. We delete all entries from our Self Service input field after 100 days or in accordance with legal requirements, for instance, once the purpose for which it was collected becomes invalid and if deletion is not contrary to any other retention obligations.

3. Information about Processors

We use service providers to provide the Customer Care and individual functions. If service providers process personal data on our behalf, we have concluded a data processing agreement and agreed appropriate guarantees on safeguarding the protection of personal data with these service providers. We select our service providers with care. They process personal data exclusively for the purposes of fulfilling their responsibilities and are contractually bound by our instructions, have suitable technical and organisational measures for the protection of personal data at their disposal and are regularly monitored by us.

We are assisted in processing your requests, providing Customer Care and advertising by Volkswagen AG (Germany), Majorel Berlin GmbH (Germany), Volkswagen Group Services GmbH (Germany), Volkswagen Group Services Lda (Portugal) and Salesforce.com EMEA Limited (United Kingdom) as processors with a cloud operated within the European Union. As Salesforce is based in the United States, (read) access to data from the United States cannot be ruled out. A corresponding EU standard data protection agreement was concluded accordingly to ensure sufficient protection of your personal data. You can download the EU standard contractual clauses from the URL <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087>. The data hosted in Europe is also protected through the conclusion of Binding Corporate Rules (appropriate guarantee on data processing in non-European countries).

When processing your requests and for the purposes of Customer Care and analysing your data for the purposes of quality assurance and improving Customer Care and our products and services, we are further assisted by Volkswagen AG (Germany) as a contract processor and Amazon Web Services EMEA SARL (Ireland) as a contract subprocessor with a cloud operated within the European Union. Recordings for the purposes of improving Customer Care are transcribed using the transcription software 'Amazon Transcribe'. As AWS is based in the United States, (read) access to data from the United States cannot be ruled out. A corresponding EU standard data protection agreement was concluded accordingly to ensure sufficient protection of your personal data. You can download the EU standard contractual clauses from the URL <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087>.

II. Preparing to obtain consent to receive advertising, advertising approaches, satisfaction surveys

Our agent will check as part of Customer Care whether you have previously given us your consent to receive advertising by using the e-mail address you have provided us when purchasing our products or subscribing to our services. If you have not yet given us your consent to receive advertising, you may prepare this during the course of a conversation. With your consent (see Sec. IV), we record your desire to consent by telephone and send you an email with an invitation to consent to receive direct advertising. You can give your consent to receive advertising personally tailored to you by clicking the link in the email invite within 30 days (see Article 6, paragraph 1, letter a) GDPR). We will delete the recording of your desire to

consent after receiving your consent by email. If you do not give us your consent we will delete your desire to consent after 60 days the latest.

If you have already given us your consent to receive direct advertising (see Article 6, paragraph 1, letter a) GDPR), our agent may approach and advise you on our products and services. In order to improve our agents' approach and advice, we process data from your user account and associated services as well as results from segmentations. If you are interested on any products or services, your interest is recorded and processed in order to subsequently send you advertising personally tailored to you. More information on data protection in this context of consenting to receiving advertising and advertising approaches can be found in our Privacy Policy at <https://www.elli.eco/en/privacy>.

If you have already given us your consent to receive direct advertising (see Article 6, paragraph 1, letter a) GDPR), once we have processed your inquiry, we will automatically send you an email with a link to a satisfaction survey which you can use to tell us whether you were satisfied with how we dealt with your request. If you take part in a satisfaction survey, we shall use different technologies and process log data which is fundamentally required (IP address, operating system, type of web browser, date and time of visit) and, depending on the survey type, cookies and/or personalised links (see Article 6, paragraph 1, letter a) GDPR). The use of personalised links allows you to access your progress if you have interrupted your participation in a satisfaction survey and allows us to prevent you from completing the survey multiple times and connect relevant data (e.g. country, age, type of product, type of matter) with the data collected in the survey (to do this, we calculate anonymously segmented metrics and statistics which cannot be traced back to you as a person in order to evaluate the quality of Customer Care). More information on the type of satisfaction survey and information on data protection and processing of cookies can be found in the footer of the website associated with the relevant satisfaction survey. We delete your data from satisfaction surveys after three years or in accordance with legal requirements, for instance, once the purpose for which it was collected becomes invalid and if deletion is not contrary to any other retention obligations.

III. Analysing of requests and satisfaction surveys (not including recordings of requests by telephone)

When you contact us with requests on our digital services or apps, we pseudonymise and analyse the requests captured by us in writing by the agent for the purposes of improving Customer Care and our products and services. For pseudonymisation purposes, we remove all direct identifiers (e.g. name, email, vehicle identification number, user IDs) and keep identifiers (pseudonyms) which can be indirectly traced back to you. This allows us to analyse (e.g. language recognition, syntactic analysis, semantic analysis), categorise and classify (e.g. allocation of subject areas, classification based on sentiments) the text of pseudonymous requests and calculate anonymous metrics and statistics.

This data processing takes place based on our legitimate interest in improving our advertising and Customer Care as well as our products and services (see Article 6, paragraph 1, letter f) GDPR). We delete your data from analysis and segmentation after three years (improving our advertising and Customer Care) respective five years (improving our products and services) or in accordance with legal requirements, for instance, once the purpose for which it was collected becomes invalid and if deletion is not contrary to any other retention obligations.

IV. Recording and analysing of requests by telephone and satisfaction surveys

If you contact us with questions on our digital services and apps or take part in satisfaction surveys over the phone, before the conversation begins, you can agree to your call being recorded for the purposes of quality assurance and improving Customer Care and products and services by following the relevant messages in the queue and giving a relevant instruction or pressing the relevant button on your telephone (see Article 6, paragraph 1, letter a) GDPR). You may revoke your express consent to the recording of the conversation at any time by informing the agent during the conversation itself or subsequently sending an email to privacy@elli.eco.

If you have given us your express consent to record one or more conversations, we will record and transcribe your conversation and link the recording to existing recordings of previous conversations for the purposes of quality assurance for our Customer Care and improving our Customer Care as well as our products and services (for instance with a request captured in writing by the agent in order to improve transcripts in case of recordings difficult to understand or with the result of a satisfaction survey to improve the interpretation of your satisfaction with our Customer Care).

For the purposes of quality assurance for our Customer Care, we analyse the recordings directly in text form (e.g. language recognition, syntactic analysis, semantic analysis) and categorise and classify them (e.g. allocation of subject areas, classification based on sentiments). This analysis allows us to draw conclusions on matters such as the duration, content and activity of the conversation and your satisfaction with the Customer Care. This allows us to identify and make use of customer-related matters for debriefs and training sessions with our agents (e.g. ensuring compliance with guidelines, communicating guidelines based on practical examples). We delete or anonymise your data from the recording analysis after 30 days by removing all identifiers and applying voice distortion to the recording so it can no longer be traced back to you.

In order to improve our Customer Care and our products and services, we pseudonymise and transcribe the recordings within 30 days and remove all direct identifiers (e.g. name, email, user IDs) and apply voice distortion to the recording. Following pseudonymisation, we analyse the recordings in text form (e.g. language recognition, syntactic analysis, semantic analysis) and categorise and classify them (e.g. allocation of subject areas, classification based on sentiments). This analysis allows us to draw conclusions on matters such as the duration, content and activity of the conversation and your satisfaction with the Customer Care and identify explicit and implicit problems with the usage of our products and services. This allows us to improve our Customer Care processes and technologies and develop our agents' guidelines or the language recognition in our queue, for instance, as well as our products and services, and eliminate errors in data transfer between the vehicle and mobile phone when using one of our apps, for instance, or make said app easier to use. We delete your pseudonymised recordings after three years or in accordance with legal requirements, for instance, once the purpose for which it was collected becomes invalid and if deletion is not contrary to any other retention obligations.

C. Your rights

You may assert the following rights vis-à-vis Volkswagen Group Charging GmbH at any time free of charge. Additional information on exercising your rights can be found in section D.

Right of access: You have the right to receive information from us (Article 15 GDPR) regarding the processing of your personal data.

Right to rectification: You have the right to request that we rectify (Article 16 GDPR) any of your personal data that is incorrect or incomplete.

Right to erasure: You have the right, in the event that the requirements specified in Article 17 GDPR have been met, to request the erasure of your data. Accordingly, you may request the erasure of your data, for instance, if it is no longer necessary for the purposes for which it was collected. Furthermore, you can also request 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 request the restriction of the processing of your personal data if the requirements specified under Article 18 GDPR have been met. This is the case, for example, if you dispute the accuracy of your data. You may then request that processing is restricted for as long as it takes to examine the accuracy of your data.

Right to object: If processing is based on an overriding legitimate interest you have the right to object to the processing of your data. An objection is permissible if processing is either in the public interest or on account of a justified interest of Volkswagen Group Charging GmbH or a third party. In the event of objection, you are kindly requested to notify us of your reasons for objecting to data processing.

Besides this, you also have the right to object to data processing for the purpose of direct marketing. The same applies to profiling, if this is related to direct marketing.

Right to data portability: Provided that the data processing is based on consent or on the fulfilment of a contract and that it is also carried out using automated processing, you have the right to receive your data in a structured, common and machine-readable format and to forward it to another data controller.

Right of withdrawal: Insofar as the data processing is undertaken based upon consent, you have the right to withdraw your consent, 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 (e.g. with the data protection officer for Berlin) regarding our processing of your data.

D. Your points of contact

Points of contact for exercising your rights

To exercise your rights and for further information please contact privacy@elli.eco by email or write to the Data Protection Officer of Volkswagen Group Charging GmbH, Mollstraße 1, 10178 Berlin.

Data Protection Officer

Our Data Protection Officer is your point of contact for issues related to data protection:

Datenschutzbeauftragter der Volkswagen Group Charging GmbH,

Mollstr. 1, 10178 Berlin, Germany

E-Mail: privacy@elli.eco