

# Privacy Policy

We, Porsche Sales & Marketplace GmbH (hereinafter referred to as 'we' or 'PSM GmbH'), are pleased about your use of the Porsche Digital Service Infrastructure and our other digital offers (hereinafter individually or jointly also referred to as 'services' and jointly 'Porsche Digital Service Infrastructure'). This Privacy Policy provides information about the processing of your personal data and your privacy rights as a data subject in connection with your use of the Porsche Digital Service Infrastructure and our services. For information on the individual services, please refer to the further Special Data Protection Notices of the respective service.

## 1. Data controller and data protection officer

Unless otherwise expressly stated in this Privacy Policy and, if applicable, in the further Special Data Protection Notices of the respective service, the entity responsible for data processing is:

Porsche Sales & Marketplace GmbH  
Porscheplatz 1  
70435 Stuttgart  
Germany  
E-mail: [smartmobility@de.porsche.com](mailto:smartmobility@de.porsche.com)

You can reach our data protection officer at the above address with the addition of 'Data Protection Officer', or at [dataprotection.salesandmarketplace@porsche.de](mailto:dataprotection.salesandmarketplace@porsche.de)

This Privacy Policy for Porsche Connect Services in the vehicle describes not only processing under the responsibility of PSM GmbH, but also processing which (also) falls under the responsibility of Dr. Ing. h.c. F. Porsche AG (hereinafter: Porsche AG) as the manufacturer of the vehicle. Where this is the case, reference is made to this in the relevant sections.

The entity responsible for this data processing is:

Dr. Ing. h.c. F. Porsche AG  
Porscheplatz 1  
70435 Stuttgart  
Germany  
Tel: +49 (0) 711 911-0  
E-mail: [info@porsche.de](mailto:info@porsche.de)

You can reach the data protection officer of Porsche AG at the above address with the addition of 'Data Protection Officer', or at <https://www.porsche.com/privacy-contact/>

In relation to certain processing operations, we may be joint controllers with Porsche AG, its group companies and/or third parties ('we' then also stands for these joint controllers). In relation to such joint processes, we jointly determine the purposes and means of processing personal data. In such cases, in an agreement on joint responsibility pursuant to Article 26 of the GDPR, we accordingly also define the respective tasks and responsibilities in the processing of personal data and the parties responsible for fulfilling data protection obligations. In particular, we define how an appropriate level of security and your rights as a data subject can be ensured, how we can jointly comply with information obligations under data protection law and how we can monitor potential data protection incidents. This also includes ensuring that we can fulfil our reporting and notification obligations. Insofar as you contact us, we will come to an agreement in accordance with the aforementioned agreement pursuant to Article 26 of the GDPR in order to answer your enquiry and guarantee your data subject rights. We will provide information on the existence and circumstances of joint responsibility on a case-by-case basis in the relevant section of this Privacy Policy.

## 2. Subject matter of Data Privacy

The subject matter of Data Privacy is the protection of personal data. This is any information that relates to an identified or identifiable natural person (so-called data subject). This includes, for example, information such as the name, postal address, e-mail address or telephone number, but also other information that is generated in the course of using the online offer, in particular information about the start, end and scope of its use as well as the transmission of your IP address.

### 3. Purposes and legal bases

This Privacy Policy hereinafter provides you with an overview of the purposes and legal bases of data processing in the context of registering, creating and using your Porsche ID user account as well as of other data processing during your customer relationship. We process your personal data in particular if this is necessary for the performance of a contract to which you are a party or for the performance of pre-contractual measures that take place at your request. In these cases, data is usually processed on the basis of Article 6 Paragraph 1 (b) of the GDPR.

We also process your personal data, insofar as this is necessary, to comply with legal obligations to which we are subject. The data processing takes place on the basis of Article 6 Paragraph 1 (c) of the GDPR. The obligations may result, for example, from commercial, tax, money laundering, financial or criminal law. The processing generally serves the purpose of complying with state obligations with regard to monitoring and duty of disclosure.

The provision of personal data by you may be required by law or contract when using the services or may be necessary for the conclusion of a contract. We will inform you separately if you are obliged to provide personal data and what the possible consequences of not doing so would be (e.g. a loss of claims, or we might have to inform you that we cannot provide the requested service without being provided with certain details).

#### 3.1 Provision of the website

To a certain extent, it is possible to use this website without logging in. Even if you use the website without logging in, personal data may still be processed. Below you will find an overview of the type, scope, purposes of and legal grounds for automated data processing that takes place when using our website. For information on the processing of personal data when using the individual specific features and services, please refer to the points below.

The following data will be processed by us when you access our website with your device:

Date and time of access,

- Duration of visit,
- Type of device,
- Operating system used,
- The features you use,
- Amount of data transmitted,
- Type of event,
- IP address,
- Referrer URL,
- Domain name.

We process this data on the basis of Article 6 Paragraph 1 (b) and (f) of the GDPR for the purpose of providing the website, safeguarding its technical operation and identifying and resolving malfunctions. In doing so, we also pursue the aim of permanently ensuring the technical functionality of the website, improving performance and optimising the user experience. This data is processed automatically when you access our website. Without the provision of data, you cannot use our website. We do not use this data for the purpose of drawing conclusions about your person or your identity.

#### 3.2 Porsche ID user account

Registration and creation of a Porsche ID user account on My Porsche are required to make full use of the Porsche Digital Service Infrastructure and the services offered under it. Here, personal data is processed and, if necessary, transmitted to third parties as described below in order to fulfil our contractual obligations in this context. Unless otherwise stated, we carry out all processing operations described in this section in order to fulfil our contract with you on the basis of Article 6 Paragraph 1 (b) of the GDPR.

### **3.2.1 Registration for Porsche ID**

You can choose to register and create your Porsche ID user account either through your Leasing Finance Dealer or as part of the self-registration process.

#### **(a) Mandatory data when registering and creating a Porsche ID user account**

Both in the case of self-registration and of registration through a Leasing Finance Dealer, your e-mail address, a password, your name and name suffixes, contact and address data, mobile phone number, e-mail address and, if applicable, the language in which you want to communicate with us are processed. This personal data is required to set up and manage your Porsche ID user account for you so that you can use the full range of our services as part of the Porsche Digital Service Infrastructure. In selected countries, you can also use our offer as an interested party. In this case, you only need to provide your name, e-mail address and a password. Last but not least, we also need this and possibly other personal data in order to be able to respond to requests, questions and criticism. We also save the time of your last log-in. When you register and create your Porsche ID user account, we check your name and address data by means of a plausibility check.

If you want to use services that require vehicle ownership, you must also submit a copy of an identification document and proof of ownership and, in the event you are not the owner of the vehicle, a power of attorney from the vehicle owner after entering your vehicle identification number. These documents are forwarded to Porsche Connect Support or, in countries where the official language is not supported by Porsche Connect Support, directly to the dealer selected by you and are then checked locally using our verification criteria. As proof of successful verification, we also save the names, dates and places of birth and addresses shown in the relevant identification documents along with the validity dates of the documents, as well as the vehicle identification numbers, owner names and addresses shown in the proof of ownership. After verification is complete, the copies of the documents will be deleted. Alternatively, you can use the video identification procedure for verification via our Porsche Connect Support.

Self-registration requires uploading images from your device. You will therefore be asked to grant permission for the app to access your device's camera or photo library. The permissions can be revoked at any time by changing the respective system settings.

Processing of the aforementioned personal data takes place within the scope of a (pre-)contractual relationship on the basis of Art. 6 Paragraph 1 (b) of the GDPR.

#### **(b) Voluntary data when registering and creating a Porsche ID user account**

When registering and creating your Porsche ID user account, you also have the option of entering additional voluntary details such as additional name information (e.g. academic title, etc.), company contact details, date of birth, additional telephone numbers, credit card information (this is only stored by the payment service provider), your vehicle license plate number and a personal vehicle name. In addition, you can provide information about your interests, preferences and the contact channels you would like to use. Please note that this information is not required when registering and creating your Porsche ID user account and that you alone decide whether you want to disclose this personal data to us. If you decide to provide voluntary information, we will process it on the basis of our legitimate interest in accordance with Art. 6 Paragraph 1 (f) of the GDPR. Our interest lies in achieving the best possible alignment of our offers with your preferences and interests, as well as in providing the most comprehensive range of functions possible for our offers.

### **3.2.2 Use of the Porsche ID**

After registering for a Porsche ID, you have the option of using various services that require a Porsche ID, such as our online portal or functions within your vehicle. For authentication within the scope of these services, you must always log in with your Porsche ID and your password. We process this data in order to be able to provide you with the services you desire. The legal basis for this is Art. 6 Paragraph 1 (b) GDPR.

### **3.2.3 Integration of the Porsche ID into third-party offers**

In some cases, we also enable cooperation partners to offer a registration and login procedure involving the Porsche ID. This means that you do not have to remember any new login data for the third-party offer. If you decide to use the registration and login procedure involving the Porsche ID as part of the third-party offer, you will be redirected to the PSM GmbH login/registration screen for the Porsche ID. Here you log in with your user name

and password for the Porsche ID. We will then send a message to our cooperation partner that you have successfully registered. As part of the registration and login process, you can confirm to us that the cooperation partner may access the profile data of your Porsche ID user account. This then also applies to the payment data stored there, if applicable. This means that you do not have to re-enter or maintain your profile data and, if applicable, payment data (e.g. if your address changes) in order to create your user profile for the third-party offer. Conversely, changes to the profile data in the user account of the third-party offer are then also synchronised accordingly in your user account for the Porsche ID.

Data processing within the scope of the registration and login procedure involving the Porsche ID is carried out on the basis of Article 6 Paragraph 1 (b) and (f) GDPR in order to register you for the third-party offer using your user account or to identify you when you register. In addition to carrying out your desired procedure, we are interested in making the registration and application process efficient and convenient. We and our cooperation partner are jointly responsible for this.

### **3.3 Booking and handling of payment information**

You can book individual or several My Porsche Services and Porsche Connect Services and activate service licences. When selecting the respective service or service package, you can also view the respective information on the processing of personal data within the scope of the services concerned under the offer details. In order to carry out and fulfil a booking and the associated contractual relationship, we process, in addition to the respective booking information, your personal data collected during registration and creation of your Porsche ID user account as well as data that you provide in the course of booking the service (for example your date of birth, a security question for verification in the event of theft, your vehicle's colour or your licence plate number). You can change your billing address before completing the booking process. In this case, we use the address data provided by you for invoicing and processing.

We use a payment service provider to process payments for our paid services and products within the scope of My Porsche, Porsche Connect and the online marketplace. For this purpose, we and the payment service provider used will process your credit card information and the respective payment information. The payment service provider's systems are used to manage your credit card information and to process payments. When you enter your credit card information, it is done directly via an input field of the payment service provider which encrypts, stores and uses this information independently for your payments. The encrypted information is then transferred by Porsche / by us to the payment service provider, where it is stored and used for your payment. Our legal basis for processing your personal data in order to process the payment is the fulfilment of the contract pursuant to Article 6 Paragraph 1(b) GDPR.

The payment service provider commissioned will process your customer and contact information (for example name, address, email address, Porsche Connect customer number, and if applicable, company and affiliates) and the vehicle identification number shown in the proof of ownership for the sole purpose of accounts receivable management (including compliance checks, where legally required) and to carry out credit checks. The legal basis for processing the named personal data for the aforementioned purposes, in accordance with Article 6 Paragraph 1 (c) of the GDPR, is the fulfilment of a legal obligation incumbent on us and, in accordance with Article 6 Paragraph 1 (f) of the GDPR, our legitimate interest in appropriate accounts receivable management and credit controls, provided we are not subject to any legal obligation.

When purchasing through online shops, our payment service provider determines the fraud risk using customer data (e.g. name and identifier, sales history, etc.). The transaction data is checked and examined for abnormalities (e.g. frequency of password changes, delivery address differing from the invoicing address). The legal basis for the processing of the mentioned personal data for the aforementioned purposes is, in accordance with Article 6 Paragraph 1 (b) GDPR, the fulfilment of a contract, or, pursuant to Article 6 Paragraph 1 (f) GDPR, our legitimate interest in preventing fraud.

After completing the booking, you can activate the services. This saves the authorisation for use on the system side and updates the list of available services accordingly.

Unless stated otherwise, we carry out the processing described in this section for fulfilment of our contract with you on the basis of Article 6 Paragraph 1 (b) GDPR.

### 3.4 Proof of identity

The laws in some countries may require an identity check based on identification documents in order to book certain telecommunications services. In relation to data processing when carrying out such identity checks, we are jointly responsible with

- IDnow GmbH, Auenstr. 100, 80469 Munich, Germany.

You can view the privacy policy of our cooperation partner IDnow GmbH via the following link:

<https://idnow.io/privacy/>

There are two methods available for performing identity verification. One method is that, as part of the service booking procedure, you can be redirected to the external page or app of the above-mentioned service provider, who supports us in performing the person verification. As part of the process, we will, at your request, transmit the information to be verified (your name, your address and your date of birth) as well as a reference number to the service provider that will allow us to assign the test result at a later point. As part of the identity check, the service provider will compare the aforementioned data with your identification document and store the data, as well as an optoelectronic copy of the identification document, a photo of the verified person and an audio record of the session. The service provider will then inform us of the result of the identity check, using the reference number.

Your other option is to have identity verification performed at a participating Porsche Centre. This involves staff at the Porsche Centre verifying your identity on the basis of an identification document and sending the verified information (your name, address and date of birth) and a reference number to the service provider via a Porsche system. By entering this reference number, you can use the service provider's app to submit an optoelectronic copy of your identification document to the service provider at your convenience. The service provider will then inform us of the result of the check, using the reference number.

Personal data resulting from this identity check will only be shared with third parties if we are legally obliged to do so. Only in such cases will we obtain access to a copy of your identification document from the service provider, for the purpose of fulfilling our legal obligations.

The legal basis for our processing of your personal data in order to carry out an identity check is Article 6 [1] (c) and/or (f) GDPR, as the identity check is the fulfilment of a legal obligation by which we are bound, or reflects to our legitimate interest in complying with legal requirements.

### 3.5 Provision of information via the website

With the help of functions such as the provision of service and warranty information as well as My Porsche messages, we provide you with the information you need in a clear form. It is necessary to register in advance and create a Porsche ID user account in order to use these functions.

In order to provide you with information about your vehicle, current warranties and recall campaigns in the 'My Porsche' section of our website, we process equipment and vehicle master data such as the vehicle identification number shown on the proof of ownership, current warranties, the model year and a model picture.

In addition, with the My Porsche Messages function, we offer you the option of calling up your messages both in the app and via the My Porsche Messages portal. This usually entails information relevant to the contract in connection with the purchase and/or use of your account, your vehicle or digital content from Porsche. For this purpose, we process the following personal data in particular: master data, contact data, contract data, dealership data and car data.

We process the above personal data on the legal basis of Article 6 Paragraph 1 (b) GDPR in order to fulfil our contract with you to provide the app and its functions as well as on the basis of the legal basis of Article 6 Paragraph 1 (f) GDPR in order to fulfil our justified interest in providing services in connection with your contract.

### 3.6 Appointments and registrations with Porsche dealers and service companies

In addition, we offer you functions on our website that you can use to arrange service appointments with Porsche dealers or service companies, or that you can use to register for a selected Porsche event. It is necessary to register in advance and create a Porsche ID user account in order to use these functions.

To request service appointments with Porsche dealers and service companies in the 'My Porsche' section of our website and app, we may provide customer and car data to companies of your choice at your request. If you wish,

we will provide your name, address, telephone number, e-mail address, Porsche ID, vehicle identification number shown in the proof of ownership, vehicle model, the service dates you have selected, the scope of service you desire, and a supplementary message to your request as well as the desired contact channels for the dealer chosen by you for the relevant request. Or a service company that is supposed to do the work.

The Event Booking function allows you to register for selected Porsche events in the app and via the My Porsche portal. For this purpose, we process the following personal data in particular: master data, contact data and data requested for the implementation of the event. Responsibility for the implementation of the respective event and for the further data processing required for the implementation of the event lies with the organiser named in the registration form for the respective event. One week after the event, the data requested for the organisation of the event will be deleted.

We process the above personal data on the legal basis of Article 6(1)(b) of the GDPR in order to fulfil the contract with you to provide the app and its functions as well as on the legal basis of Article 6(1)(f) of the GDPR in order to fulfil our legitimate interest in providing services.

### **3.7 Data processing in the Porsche Finder, Sell your Porsche and Porsche Shop in joint responsibility with marketplace participants**

As part of the online marketplace, we offer you a central platform where you can book or purchase services and products from us, our group companies and third-party providers (hereinafter also referred to as 'participants'). The respective participant is provided with an area on our platform to present and offer their products and services (hereinafter referred to as 'shop').

Customers with a Porsche ID user account can use the marketplace sections 'Porsche Finder', 'Sell your Porsche' and 'Porsche Store'. Customers without an existing Porsche ID contract can also use the marketplace section 'Porsche Store' via the 'Guest access' feature.

Processing within the scope of the online marketplace is carried out partly by us, partly by the respective participant and partly under joint responsibility.

With regard to the following processing, we are jointly responsible with the respective participants of the online marketplace who have placed the offer on the respective page and with whom you may book services or products:

- Data processing as part of the visit and the booking, application or reservation process in the respective shop of the marketplace participant, but not the downstream service processing outside the platform;
- Automated data collection, data processing to improve our online service, storage of cookies and data analysis (see Point 1.1 of this Privacy Policy);
- Data processing within the scope of advertising, communication and marketing features of the platform, especially cross-selling modules;
- Payment processing for paid bookings, applications and reservations within the scope of the respective shop of the online marketplace;
- Customer support with regard to the respective shop in the marketplace.

In relation to these data processing activities, we determine the purposes and means of processing personal data in cooperation with the respective marketplace participants.

In an agreement with the relevant marketplace participants on joint responsibility, we have defined, pursuant to Article 26 of the GDPR, the respective tasks and responsibilities in the processing of personal data and the responsible parties to fulfil data protection obligations. In particular, we have defined how an appropriate level of security and your rights as a data subject can be ensured, how we can jointly comply with information obligations under data protection law and how we can monitor potential data protection incidents. This also includes ensuring that we can fulfil our reporting and notification obligations.

PSM GmbH remains at your disposal as your central point of contact with regard to the aforementioned processing in joint responsibility. You can assert your rights in relation to processing operations under joint responsibility but also vis-à-vis a jointly responsible marketplace participant. Insofar as you contact us in relation to these processing operations, we will consult with the relevant marketplace participant in accordance with the aforementioned agreement under Article 26 of the GDPR in order to answer your enquiry and to guarantee your data subject rights. In this case, the statements in Section 13 of the General Privacy Policy apply.

This joint responsibility does not affect, in particular, the processing operations mentioned in the previous chapters of this data privacy policy, including those for master data administration (Porsche ID) and data processing on the platform, which are carried out under the sole responsibility of Porsche Sales & Marketplace GmbH. In particular,

the service processing of the purchase, booking, application or reservation contract as well as invoicing does not take place under joint responsibility, but under the sole responsibility of the relevant marketplace provider.

## **3.8 Customer and prospect management**

### **3.8.1 Contact via contact forms**

You can use various communication channels to contact us, in particular the service hotline if you wish to contact us by telephone, but also e-mail or live chat. If you contact our contact centre, we process personal data to the extent necessary to provide the contact centre service and to process your request. We may ask you to provide personal data that is necessary for the preparation and implementation of the contact to process your respective request. Without this data, we will not be able to process your request or fulfil your request. The purposes of processing arise specifically from your request and the services you have booked. These encompass, in particular, the processing of requests from interested parties, customers and dealers in relation to products and services from Porsche Sales & Marketplace GmbH. This includes, for example,

- Technical support services
- Assistance when purchasing services or products
- Answering general questions about sales & marketplace
- Technical support for customers and dealers, in particular through the provision of a service hotline for telephone contact.

Data is processed on the basis of Article 6 Paragraph 1 (b) GDPR for the purpose of fulfilling the contract with you and implementing pre-contractual measures.

We also process your personal data in order to comply with legal obligations to which we are subject. Obligations may arise, for example, from commercial, tax, telecommunications, money laundering, financial or criminal law. The purposes of processing arise from the respective statutory obligation; the processing generally serves the purpose of complying with state obligations with regard to monitoring and duty of disclosure.

Data is processed on the basis of Article 6 Paragraph 1 (c) or (e) GDPR. If we collect data on the basis of a legal obligation or in the public interest, you need to provide the personal data that is required to comply with the legal obligation. Without this, we might not be able to process your request or fulfil these obligations.

If you use support services in a Porsche Centre, your dealer can also retrieve this data. To facilitate this service, we also transmit the aforementioned data to the relevant dealer. In this case, we will process your personal data in accordance with Article 6 Paragraph 1 (f) GDPR on the basis of our legitimate interest in facilitating customer service at your preferred point of contact or through your preferred dealer.

### **3.8.2 Live chat**

In certain areas of the online offer, we offer a live chat for getting in contact and advice. Through the live chat, you can communicate with one of our consultants via text messages. If you call up and use the live chat, your browser automatically transmits the following data for technical reasons at the beginning of use, which we store separately from other data that you may transmit to us: date and time of access, duration of the visit our online offer, type of web browser including version, operating system used, amount of data sent, type of event, IP address (abbreviated/alienated). If you provide us with additional personal data via live chat, this is carried out on a voluntary basis.

No prior registration and creation of a Porsche ID user account is required to use this feature.

In certain areas of our website, we offer a live chat for getting in contact and advice. Through the live chat, you can communicate with one of our consultants via text messages. When you call up and use the live chat, your browser automatically transmits the following data at the beginning of use for technical reasons, which is stored by us separately from other data that you may transmit to us:

- Date and time of access,
- Duration of website visit,
- Type of web browser including version,
- Operating system used,

- Amount of data transmitted,
- Type of event,
- IP address.

We process this data on the basis of Article 6 Paragraph 1 (b) and (f) of the GDPR for the purpose of providing the function, safeguarding its technical operation and identifying and clearing up malfunctions. In doing so, we also pursue the aim of permanently ensuring the technical functionality of the function, improving performance and optimising the user experience. When you call up the function, this data will be processed automatically. Without the provision of data, you will not be able to use the function. We do not use this data for the purpose of drawing conclusions about your person or your identity.

If you provide us with additional personal data via live chat, this is carried out on a voluntary basis. If personal data is required to clarify your request, we will point this out to you and ask you for it. The texts you enter into the input form during the live chat are stored on our behalf on the server of an external service provider. The legal basis for this data processing is Article 6 [1] (b) of the GDPR.

### **3.8.3 Customer and prospect management**

In the following, we would like to provide you with further information on data protection in the context of the implementation of customer and prospect management at Porsche. The purpose of the measures is to safeguard customer and prospect-oriented management.

#### **Joint customer and prospect management at Porsche**

The measures mentioned in this section within the scope of customer and prospect management (in particular service and support, implementation of legal requirements, needs analyses, individual support via the desired communication channels) are not, in principle, carried out by the person responsible alone. In addition to PSM GmbH, the parties involved in customer and prospect management under the Porsche brand include Dr. Ing. hc F. Porsche AG as manufacturer, the responsible Porsche centres, the responsible importer – in particular Porsche Deutschland GmbH – and other companies affiliated with Porsche in the areas of financial and mobility services, digital services and lifestyle products.

By using a central platform, we avoid situations in which information about your products, contact details and interests is not available to your contact person at Porsche, which would result in you being referred to another company involved. This also applies if the operating company of your respective Porsche Centre changes. By exchanging and comparing data, we ensure that you receive optimal support and advice. Of course, only the companies involved have access to your data, which they also need for operational purposes. Data is processed on the basis of Article 6 Paragraph 1 (f) GDPR.

In certain cases, joint customer and prospect management can lead to joint responsibility. In an agreement pursuant to Article 26 of the GDPR, the participating companies have therefore defined the respective tasks and responsibilities in the processing of personal data and the parties responsible for fulfilling data protection obligations. In particular, stipulations have been made as to how an appropriate level of security can be achieved and how your data subject rights and data protection information obligations can be guaranteed. Alongside the other companies involved, Porsche Sales & Marketplace GmbH is available to you as a central point of contact.

#### **Individual customer and prospect management**

Insofar as you have given voluntary consent to the individual customer and prospect management, your data – contact data, support and contract data (e.g. on purchase, leasing or financing), service information and data on interests, vehicles and the services and products that you use from the companies participating in the joint customer and prospect management – is used to send you personally tailored information and offers about vehicles, services and other products from Porsche, invitations to events and surveys on satisfaction and expectations via the desired communication channels and to create an individual customer profile.

The specific data used for this purpose depends on what data was collected on the basis of assignments, orders and consultations or made available by you (e.g. in the consultation at the Porsche Centre or as part of your activities under your Porsche ID at My Porsche). The data can also come from assignments or orders that are processed in collaboration with cooperation partners (e.g. insurance companies) and from whom we may then receive the information. If appropriate approvals have been granted, other data sources may also be included. This can be data



from the vehicle (e.g. on your driving behaviour) or on the use of digital media (e.g. on website use). You will receive further information on the merging of the data with the corresponding release.

To offer you an inspiring brand and support experience with Porsche and to make our communication and interaction with you as personal and as relevant as possible, the data mentioned is used for needs analyses and customer segmentation. On this basis, it is possible to determine affinities, preferences and potentials within the scope of the individual customer and prospect management by the participating companies. Key figures regarding your probable product interests and your level of satisfaction are examples of such measures to individualise support. The corresponding information and analysis results are stored in your customer profile and are then available for designing the customer and prospect management. The personal evaluation and assignment in a customer profile only takes place if you have given your voluntary consent to the individual customer and prospect management. We do not offer individual customer and prospect management without these optimisation and personalisation measures.

If you do not give your consent, we only use the data mentioned in the context of customer and prospect management to carry out general evaluations on the basis of aggregated data from customers and prospects, with the aim of optimising our offers and systems and aligning them with overarching interests. Please note that your data may also be evaluated outside the scope of customer and prospect management; this is then based on your specific consent or another legal basis.

When we send e-mails within the context of the individual customer and prospect management, we may use commercially available technologies such as tracking pixels or click-through links. This allows us to analyse which or how many e-mails are delivered and/or rejected and/or opened. The latter is carried out in particular by tracking pixels. If you have deactivated the display of images in your e-mail program, it is not possible to measure the opening rate of our e-mails in full using tracking pixels. In this case, the e-mail will not be displayed completely. It is nevertheless still possible for us to determine whether an e-mail has been opened if you click on the text or graphic link in the e-mail. Using click-through links, we can analyse which links have been clicked in our e-mails and determine the interest in certain topics. If you click on the corresponding link, you will be guided through our separate analysis server before accessing the target page. Based on the analysis results, we can make e-mails more relevant within the scope of the individual customer and prospect management, send them in a more targeted manner or prevent e-mails from being sent. We only send e-mails to you and evaluate their use if you have given your voluntary consent to the individual customer and prospect management. We do not offer individual customer and prospect management without the described evaluation for optimisation.

### **3.9 Product improvement**

In connection with the use of services, in the event of error messages or as part of defined data evaluation measures, certain vehicle, service and product data from the vehicle, from services or from other Porsche products may be transferred by Porsche Sales & Marketplace GmbH to Porsche AG in order to be available there for evaluation of the aforementioned purposes.

You can consent to this on the 'My Porsche' website.

The vehicle, service and product data comprise identification, basic, usage, analysis, environmental, traffic, location and movement data.

Some data cannot be deleted retroactively, as they are stored without specific vehicle identification. In this case the data will be deleted after 5 years at the latest.

### **3.10 Newsletter**

We send newsletters to people who have registered, i.e. with your consent. Insofar as the contents of the newsletter are specifically described when registering, these are decisive for the scope of the consent. In addition, our newsletters contain information about our products, offers, promotions and our company. The party responsible for processing your data is the respective company named in the registration process. Registration takes place by means of the so-called double opt-in procedure, i.e. after your registration you will receive an e-mail in which you will be asked to confirm your registration in order to prevent the misuse of your e-mail address. Registering for the newsletter is recorded by us to be able to prove the registration process and the consent in accordance with the legal requirements. The recording of the registration and the necessary processing of the data entered by you during the registration is carried out accordingly on the basis of our legitimate interests pursuant to Article 6 Paragraph 1

(f) GDPR. You may revoke your consent to receive our newsletter at any time, e.g. by unsubscribing from the newsletter. An unsubscribe link can be found at the end of every newsletter, allowing you to exercise your right.

## **4. Change of purpose**

Where we process your personal data for a purpose other than that for which it was collected, beyond appropriate consent or a compelling legal basis, we will take into account, in accordance with Article 6 Paragraph 4 of the GDPR, the compatibility of the original purpose and the purpose now pursued, the nature of the personal data, the possible consequences for you of further processing and the guarantee of the protection of the personal data.

## **5. Access authorisations in the end device**

Some functions of our online offer require you to grant access to your end device (e.g. access to location data). Granting permissions is voluntary. However, if you wish to use the corresponding functions, you must grant the corresponding authorisations, otherwise you will not be able to use these functions. Permissions remain active unless you revoke them in your device by deactivating the relevant setting.

## **6. Cookies and comparable technologies**

We use cookies and similar technologies within the scope of the website, which serve to communicate with your terminal device and to exchange stored information (hereinafter collectively 'cookies'). These cookies are primarily used to make the functions of the website usable. General examples in which the use of cookies is technically necessary in this sense are the storage of a language selection, login data or a shopping or watch list. Accordingly, technically necessary cookies may be used by us to enable the processing operations described above and to ensure the proper and secure operation of the website. Data processing takes place on the basis of Article 6, Paragraph 1 (b) and (f) of the GDPR, as this is necessary in order to implement the functions that you select and in order to safeguard our legitimate interest in the functionality of our website.

If we also use cookies to analyse the use of the website and to target it to your interests and, if applicable, to provide you with interest-based content and advertisements, this will only be done on the basis of your voluntary consent in accordance with Article 6 Paragraph 1 (a) GDPR. You then have the option of making your corresponding settings via the consent management at <https://connect-store2.porsche.com/fi/en/cookiepolicy>. You can revoke your consent at any time with effect for the future. Further information on the cookies and their function in detail, as well as on setting and revocation options, is available directly in the corresponding areas of the consent management. Please note that we only provide consent management as part of the website if consent-based cookies are to be used in addition to the technically required cookies mentioned above.

If you do not wish to use cookies in general, you can also prevent any storage by means of the relevant settings on your device. Stored cookies can be erased at any time using the system settings of your device. Please note that blocking certain types of cookie may result in impaired use of our website.

We also use other technologies that, like cookies, serve to ensure the secure and user-friendly usability of the website (e.g. by protecting against misuse or evaluating usage). Technically, these other technologies differ from cookies, as they do not store any information on your end device or access information already stored there. Insofar as data falling under the data protection law (e.g. IP addresses) is processed using these additional technologies, we process this data on the basis of Article 6 Paragraph 1 (b) and (f) of the GDPR for the purpose of providing the website, safeguarding its technical operation and identifying and resolving malfunctions. In doing so, we also pursue the aim of permanently ensuring the technical functionality of the website, improving performance and optimising the user experience. This data is processed automatically when you access our website. Without the provision of data, you cannot use our website. We do not use this data for the purpose of drawing conclusions about your person or your identity.

## **7. Integrated third-party services**

Insofar as we integrate services of other providers within the scope of our online offer in order to provide you with certain content or functions (e.g. playing videos or route planning) and we process personal data in the process, this is done on the basis of Article 6 Paragraph 1 (b) and (f) GDPR. This is because the data processing is then necessary to implement the functions you have selected or to safeguard our legitimate interest in providing an optimum range of functions in the online offer. Insofar as cookies may be used within the scope of these third-party services, the explanations under section 5 apply. Please also consult the privacy policy of the respective provider with regard to the third-party services.

Services of other providers that we include or to which we refer are provided by the respective third parties. Third-party services generally also include services offered by other group companies of Porsche AG and by Porsche

Centres. As a matter of principle, we have no influence over the content and function of third-party services and are not responsible for the processing of your personal data by their providers, unless the third-party services are designed entirely on our behalf and then integrated by us under our own responsibility. Insofar as integrating a third-party service leads to our establishing joint processes with the service provider, we establish an agreement with this provider on joint responsibility pursuant to Article 26 of the GDPR, defining the respective tasks and responsibilities in the processing of personal data and the parties responsible for fulfilling data protection obligations. Insofar as cookies are also to be set on the basis of your consent, you will receive further information on the responsibility for setting these cookies or any associated third-party services in the corresponding areas of the consent management.

Unless otherwise stated, profiles on social media are only integrated into our online offer as links to the corresponding third-party services. After clicking on the embedded text/image link, you will be redirected to the service of the respective social media provider. After being redirected, personal data may be collected directly by the third-party provider. If you are logged into your user account of the respective social media provider during this time, the provider may be able to assign the collected information of the specific visit to your personal user account. If you interact via a 'Share' button of the respective social media provider, this information may be stored in the personal user account and possibly published. To prevent the collected information from being directly assigned to your user account, you must log out before clicking on the embedded text/image link.

## 8. Sources and data categories in the collection of data by third parties

We also process personal data that we receive from third parties or from publicly available sources. Below is an overview of the relevant sources and the categories of data obtained from these sources.

- Group companies, Porsche sales companies, Porsche centres and service companies: information about your products, services and interests
- Cooperation partners and service providers: for example, creditworthiness data from credit agencies.

## 9. Data recipient

Within our company, the only people who have access to your personal data are those who need it for the purposes indicated above. We only pass on your personal data to external recipients if a legal licence exists or if we have your consent. Below you will find an overview of the corresponding recipients:

Porsche AG and PSM GmbH are part of the Porsche group of companies. Within the scope of our business, we have outsourced certain processing operations within the group of companies. In certain circumstances, data may therefore be transferred within our group of companies, for example in the context of customer relationships, for analysis and market research purposes or in the area of marketing. This is always done on the basis of an order processing relationship or within the scope of joint responsibility.

This also applies to the exchange of data with the Porsche Centres, insofar as this is necessary for maintaining active customer relationships as part of customer and prospect management or for processing support cases.

We transmit data from our customer relationship to the following recipients in particular:

- **Processors:** Porsche AG and its group companies or external service providers, for example in the areas of technical infrastructure and maintenance, who are carefully selected and checked. The processors may only use the data in accordance with our instructions.
- **Public bodies:** authorities and public institutions, such as public prosecutors, courts or tax authorities to which we (must) transfer personal data, e.g. to fulfil legal requirements or to safeguard legitimate interests.
- **Private entities:** Porsche AG and its group companies, Porsche sales companies, dealerships and service companies, cooperation partners, service providers (not bound by instructions) or authorised persons such as Porsche Centres and Porsche Service Centres, financing banks, credit agencies or transport service providers.

## 10. Transfer to a third country

If data is transferred to bodies whose headquarters or place of data processing is not located in a member state of the European Union, another country outside of the European Union that is a signatory to the Agreement on the European Economic Area or a state for which an appropriate level of data protection has been determined through a decision of the European Commission, we will ensure, before disclosure, that the data transfer is either covered by a legal authorisation, that there are guarantees for an adequate level of data protection with regard to the data

transfer (e.g. through the agreement of contractual warranties, officially recognised regulations or binding internal data protection regulations applied by the recipient) or that you have given your consent to the data transfer.

Insofar as data is transferred on the basis of Articles 46, 47 or 49, Paragraph 1, Subparagraph 2 GDPR, you can obtain from us a copy of the guarantees for the existence of an adequate level of data protection with regard to the data transfer or information on the availability of a copy of the guarantees. For this purpose, please use the information in Section 1.

## 11. Storage duration & deletion

The following shall apply if the description of the individual services does not include information about the specific duration of storage or the deletion of the personal data:

We store your personal data, if a legal permission exists for this, only as long as necessary to achieve the purposes pursued or as long as you have not revoked your consent. In the event that you object to the processing, we will delete your personal data unless further processing is permitted by the legal provisions. We will also delete your personal data if we are obligated to do so for other legal reasons. Pursuant to these general principles, we will usually delete your personal information immediately

- after the legal basis ceases to exist and unless another legal basis (e.g. commercial and tax retention periods) applies. If the latter is the case, we will delete the data once the other legal basis ceases to apply;
- if your personal data is no longer required for our purposes, and if no other legal basis (for example, commercial and tax retention periods) is applicable. If the latter is the case, we will delete the data once the other legal basis ceases to apply.

## 12. Rights of the data subject

**Right of access:** you have the right to receive information about your personal data stored by us.

**Permission and deletion right:** you may request us to correct incorrect data and – insofar as the legal requirements are fulfilled – to delete your data.

**Limitation of processing:** you may require us to restrict the processing of your data, provided that the legal requirements are met.

**Data transferability:** if you have provided us with data based on a contract or consent, you may, if the statutory requirements are met, obtain from us the data provided by you in a structured, commonly used and machine-readable format, or require us to transmit it to another responsible party.

**Right to object:** you have the right to object at any time, on grounds relating to your particular situation, to our processing of your data, provided this objection is based on the safeguarding of 'legitimate interests.' If you make use of your right to object, we will stop processing your data, unless we can prove compelling legitimate reasons for further processing that outweigh your rights and interests.

**Objection to direct marketing:** if we process your personal data for the purpose of direct marketing, you have the right to object to our processing of your data for this purpose at any time. If you exercise your right to object, we will stop processing for this purpose.

**Withdrawal of consent:** if you have given us consent to the processing of your personal data, you can revoke this at any time with effect for the future. The withdrawal of consent will not affect the lawfulness of processing before its withdrawal.

**Right of appeal to the supervisory authority:** you can also lodge a complaint with the responsible supervisory authority if you believe that the processing of your data violates applicable law. You can contact the supervisory authority responsible for your place of residence or country or the supervisory authority responsible for us.

**Your contact with us and exercising your rights:** furthermore, you can contact us free of charge with questions about the processing of your personal data and about your rights as a data subject. Please contact us by e-mail at [dataprotection.salesandmarketplace@porsche.de](mailto:dataprotection.salesandmarketplace@porsche.de), via the website at <http://www.porsche.com/international/privacy/contact/> or by post at the address provided in Section 1 above.

When doing so, please make sure that we can clearly identify you. If you wish to withdraw your consent, you can alternatively use the method of contact that you used when you gave your consent.

Date: 01/04/2023