

## 1. Area of application

This guideline is applicable to the following legal entity:

Volkswagen Finance Pvt. Ltd. (VWFPL) - INDIA

The area of application of this guideline includes all users (external and internal employees) working alone or together with somebody else at a workstation.

## 2. Purpose

In the course of using this website or availing the products and services vide the online application forms and questionnaires or any other application, Volkswagen Finance Private Limited (“**VWFPL**”) may become privy to the personal information of its customers, including information that is of a confidential nature. VWFPL is committed to protection of information, including personal information and sensitive personal data of every individual (“**Protected Information**”) received by it on the website [www.volkswagen-finance.co.in](http://www.volkswagen-finance.co.in) and other offline sources and intends to ensure compliance with the provisions of the Information Technology Act, 2000 (“**Act**”) and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (“**Rules**”).

VWFPL does not tolerate any act which may constitute a breach or failure to ensure protection of Protected Information under the Act/Rules and any incident of breach of this Policy shall be viewed as a misconduct under every policy/rule/regulation applicable, whether as a Company policy or by operation/implication of any contract or statute.

## 3. Collection of Information

We may collect the following information.

- i. **Personal Data:** Personal Data of an individual (“**Disclosing Individual**”) along with other personal data belonging to the disclosing individual such as residential address, date of birth, telephone numbers, email address, etc. shall be collected, processed and stored in a confidential manner and be subject to access controls. Access to any such information shall be granted only for the purposes of the VWFPL’s legitimate business or smooth internal functioning purposes on a need to know basis on terms of strict confidentiality terms.
- ii. **Other information.** If you use our website, we may collect information about your IP address, browser details and other demographic information. We might look at what site you came from, duration of time spent on our website, pages

accessed or what site you visit when you leave us. We might also collect the type of mobile device you are using, or the version of the operating system your computer or device is running.

### iii. **Manner of Collection of Information**

- a) **We collect information directly from you.** We collect information directly from you when you provide detail directly on our website. We also collect information if you post a comment on our websites or ask us a question through phone or email or any of our social media pages like Facebook /Twitter etc.
- b) **We collect information from you when you apply of any facility.** We collect information when you apply for loan or any other services. All reports /documents submitted by you at the time of applying for loan.
- c) **We collect information from you passively.** We use Tracking tools like Google Analytics, Google Webmaster, browser cookies and web beacons can be used for collecting information about your usage of our website.
- d) **We get information about you from third parties.** For example, if you use an integrated social media feature on our websites. The third-party social media site will give us certain information about you. This could include your name and email address.

### iv. **Use of the Information**

VWFPL will use or permit the use of the Information strictly and only for the purpose for which it is collected and no other purpose. VWFPL or any third party recipient to whom VWFPL may engage for collection or passing on any Sensitive Personal Data and/or Additional Information for retention will not retain the information or the Sensitive Personal Data and/or Additional Data collected from the Disclosing Individuals for longer than such period as may be mandated by any law.

VWFPL is not and cannot be held responsible for the authenticity of any Sensitive Personal Data and/or Additional Personal Information collected from Disclosing Individuals which shall always be collected in good faith. VWFPL disclaims any liability which may arise in this regard including due to the information being false/forged/fake/incorrect or found unauthentic in any manner howsoever/whatsoever and all liability/responsibility in this regard shall vest solely unto the concerned Disclosing Individual.

## **4. Disclosure or Transfer**

VWFPL in pursuance of its business/management of its affairs may from time to time disclose any of the Sensitive Personal Data and/or Additional Personal Information provided by Disclosing Individuals to any third party. Additionally, in keeping with modern day information technology and levels of software upgradation, VWFPL is required to outsource functions from time to time. Thus, disclosures for the aforesaid reasons is a necessary aspect as part of the VWFPL's constant endeavour to improve the efficiency of its business and data/information processing systems and for efficient performance of the lawful contract between VWFPL and Disclosing Individuals. Hence, VWFPL may share Sensitive Personal Data and/or Additional Personal Information provided by Disclosing Individuals to external persons/corporates with this aim in mind. VWFPL may be required to disclose customer personal and financial information to the statutory authorities in connection with any legal process that may be initiated by such authorities in accordance with applicable laws. VWFPL may also share customer information to provide customers with superior services and a range of offers. VWFPL may use this information to advise customers about products, services and other marketing materials, which VWFPL think may be of interest to customers. Any disclosure not connected with the VWFPL's business/management of its affairs shall be undertaken only after obtaining permission from the information provider unless the disclosure is legally necessary or contractually agreed upon or if VWFPL is obliged to share the same with any Government agencies mandated under the law in terms of any law including the Act and/or Rules. Please note that this Privacy Policy does not cover any third party sites to which VWFPL may provide links on the website. Such third party sites may have their own privacy policies and/or terms and conditions of use.

## **5. Standard of Reasonable Security Practice and Procedure**

In keeping with the requirements of the Act/Rules, VWFPL is required to comply with reasonable security practices and procedures. VWFPL has therefore adopted the International Standard IS/ISO/IEC 27001:2013 standard framework and is audited by an independent auditor on a periodic basis. VWFPL may adopt different or better standards as may become necessary under the Act/Rules or generally as required by the Central Government from time to time.

## 6. Grievance Officer

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are provided below:

Mr. Hilton Lobo

Volkswagen Finance Pvt. Ltd.  
Silver Utopia, 3<sup>rd</sup> Floor, Cardinal Gracious Road,  
Chakala, Andheri (East), Mumbai, 400 099, India  
Tel No: +912239521458  
Email:hilton.lobo@vwfs.com

.

## 7. Jurisdiction

If you choose to visit the website, your visit and any dispute over privacy is subject to this Policy and the website's terms of use. In addition to the foregoing, any disputes arising under this Policy shall be governed by the laws of India.