Privacy Notice for the Development of Driving Systems to Improve Overall Traffic Safety

A. Scope of the privacy notice

In this privacy notice we are informing you as a bystander, e.g. pedestrians, road users or other individuals that may be recorded by Audi vehicles in relevant traffic situations, as described below, about the automated, electronic processing of your personal data by AUDI AG, a company engaged in the manufacture of luxury motor vehicles, Auto-Union-Straße 1, 85057 Ingolstadt, Deutschland / Germany (”we”, or ”Audi”) in connection with the development of driver assistance systems and automated driving functions as well as services that may be suitable for increasing general road safety, for which we use several IT systems in our responsibility.

Personal data means any information relating to an identified or identifiable natural person or, if forseen under local law, legal, including, as the case may be, sensitive personal data as defined under the laws of the country where you are located at the relevant time (‘data subject’); a data subject is one that can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Controller means the natural or legal person which determines the purposes and means of the processing of personal data.

In order to develop and validate driver assistance systems and automated driving functions as well as services that can be suitable for increasing general road safety, the use of sensors and image capture technology is used to record data in predefined and, normally, very rarely occurring traffic situations. These traffic situations can be safety-critical situations such as emergency braking or local peculiarities, such as poor lane markings, special traffic signs or identification of unexpected systems deviations. The recognition of relevant situations and the subsequent training of the systems and functions is an important component for their continuous development and validation. This data processing may affect anyone who is in the vicinity of a data-recording vehicle in the event of a relevant traffic situation or is involved in the traffic situation. At no time does Audi identify individual persons in the data records. Persons, vehicles and other objects are only considered as "objects" in the context of traffic and environmental situations, e.g. as "pedestrians on the right-hand side of the road". In addition, AUDI AG is working with the data to continuously refine the software for the removal of personal characteristics.

B. General Information

I. Who is the controller for the processing?

The controller for the processing of your personal data is:

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

Tax identification number / Registration number: DE811115368 / HRB Nr./Commercial Register No.: 1

For further details on AUDI AG, including representatives, please see our legal notice [https://www.audi.com/en/legal-notice/

II. Who can I contact?

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

https://data-subject-rights.audi.com/

There, you will find further information regarding how you can assert your data protection rights. You may also send your request

- via mail: AUDI AG, DSGVO-Betroffenenrechte, 85045 Ingolstadt, Germany

We take data subject rights very seriously and will respond to any request that you might have as soon as possible.

III. Contact details of the data protection officer

For matters concerning data protection, you can also consult our **company data protection officer**, using your own language:

AUDI AG, Data Protection Officer, 85045 Ingolstadt, Germany

- Email: datenschutz@audi.de
- Telephone number: +49841 890
- Office address of the company data protection officer: AUDI AG, Data Protection Officer, Auto-Union-Straße 1, 85057 Ingolstadt, Germany

IV. Which rights do I have?

All the below described rights concerning the personal data and the processing thereof may be subject to limitations, according to the applicable EU and/ or national laws. Depending on your jurisdiction, as the data subject, you may be entitled to the following data protection rights. **Please note**: Your data protection rights under the local laws of the country where you are located at the relevant time may differ from the rights described below. Please see Annex 1 for additional, country-specific information, in particular on rights that you might have under local laws. Such rights apply, to the extent the legal requirements are met, in addition to your rights provided under the GDPR.

For more information about rights you may have in connection with our processing of your personal data, please click here:

https://data-subject-rights.audi.com/

1. Right to be informed

You have the right to be informed about the collection and use of your personal data, by us and with whom we share your data, in a readily accessible manner, and in plain and clear language. We are implementing your right to be informed, also through this policy, the content of which may be updated from time to time.

2. Access

You have the right to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case information on the data concerning you which are stored at Audi and information regarding the data processing as well (i.e. purposes of data processing, envisaged period for which the data is stored, recipients or categories of recipients to whom the personal data is disclosed, data transfer performed by Audi etc.), and to obtain a copy of the personal data stored concerning you.

3. Rectification

You have the right to obtain without undue delay the rectification of inaccurate personal data concerning you as well as the completion of incomplete personal data stored concerning you at Audi.

4. Erasure

You have the right to obtain the erasure of the personal data concerning you stored at Audi without undue delay if the statutory requirements are met.

This may be the case, in particular, if

- Your personal data are no longer necessary in relation to the purposes for which they were collected;
- The sole legal ground for the processing was your consent and you have withdrawn it;
- You have objected to the processing based on the legal ground of legitimate interests on grounds relating to your particular situation and we cannot prove that there are overriding legitimate grounds for the processing;
- Your personal data have been unlawfully processed; or
- Your personal data have to be erased for compliance with a legal obligation.

If we have shared your data with third parties, we will inform them about the erasure, insofar as required by law.

Please note that your right to erasure is subject to restrictions. For example, we are not required or allowed to delete data that we are still obligated to retain due to statutory retention periods. Similarly, data that we need for the establishment, exercise or defence of legal claims are excluded from your right of erasure.

5. Restriction of processing

You have the right to obtain, under certain conditions, restriction of processing (i.e. the marking of stored personal data in order to restrict their future processing). The requirements are, in particular:

- The accuracy of your personal data is contested and Audi must verify the accuracy of your personal data;

- The processing is unlawful, but you oppose the erasure of the personal data and instead request the restriction of the use of the personal data;
- Audi no longer needs your personal data for the purposes of processing, but you require the data for the establishment, exercise or defence of legal claims or
- You have objected to the processing and the verification is pending whether the legitimate grounds of Audi override yours.

In the event of a restriction of the processing, such data will be marked accordingly and will be – except for their storage – only processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State or of the country where you are located at the relevant time, in each case only to the extent permitted under applicable data protection laws.

Please note that the restriction of the processing of your personal data may be also employed as an alternative to the erasure of your personal data, where permitted by applicable law.

6. Data portability

To the extent that we automatically process your personal data provided to us based on your consent or a contract with you, you have the right to receive the data in a structured, commonly used and machine-readable format and to transfer those data to another controller without hindrance from Audi. You also have the right to have the personal data transferred directly from Audi to another controller where technically feasible and provided that this does not adversely affect the rights and freedoms of others.

7. Objection

If we process your personal data on the basis of legitimate interests or in the public interest, you have the right to object to the processing of your personal data on grounds relating to your particular situation. In addition, you have an unrestricted right to object if we process your data for our direct marketing purposes. Please see our separate note in note in Section B.IV.10 "Information on your right to object".

In certain cases, we also grant you, beyond the privacy settings, an additional unlimited right to object within the scope of legitimate interests. We will inform you about this in connection with the respective feature or service.

8. Withdrawal of consent

If you have given consent to the processing of your personal data, you may withdraw it at any time. Please note that the withdrawal shall only be effective for the future. Processing that occurred before the withdrawal shall not be affected.

9. Complaint

In addition, you have the right to lodge a complaint with a data protection supervisory authority if you believe that the processing of your personal data is unlawful. The right to lodge a complaint is without prejudice to any other administrative or judicial remedy. The address of the data protection supervisory authority responsible for Audi is:

Bayerisches Landesamt für Datenschutzaufsicht

Promenade 18

91522 Ansbach

Deutschland / Germany

However, you can also lodge a complaint with any other data protection supervisory authority competent for you within or outside the EU, in particular with the one in the Member state of your habitual residence, place of work or place of the alleged infringement. Please find hereinafter a link where you can find all contact details of the national authorities in all member states: https://edpb.europa.eu/about-edpb/board/members_en.

See Appendix 1 "Additional rights of data subjects and further country-specific information" for contact details of national supervisory authorities and further country-specific information.

10. Information on your right to object

a) Right to object on grounds relating to your particular situation

You have the right to object to the processing of your personal data on grounds relating to your particular situation. The prerequisite for this is that the data processing takes place in the public interest or on the

basis of legitimate interests. This also applies for any profiling. Insofar as we base the processing of your personal data on legitimate interests, we generally assume that compelling legitimate grounds can be demonstrated, but we will, of course, examine each individual case. In the event of an objection, we will no longer process your personal data, unless

- we can demonstrate compelling legitimate grounds for the processing of such data which override your interests, rights and freedoms or
- your personal data are used for the establishment, exercise or defence of legal claims or
- there are grounds permitting the processing of your personal data, notwithstanding your objection, under applicable local laws, provided that such processing is not restricted under the GDPR.

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

As part of the legitimate interests, we grant you a separate right of objection with regard to the processing of your personal data for product improvement and general customer analysis.

If you object to the processing for the purpose of product improvement and/or general customer analysis, we will no longer process your personal data for these purposes. Purely statistical evaluations of aggregated or otherwise anonymous data remain unaffected by this.

c) Exercise of the right to object

The objection can be exercised in any form and should preferably be addressed to the contact details listed in Section B.II.

C. Processing for which Audi is the sole controller

I. Which data do we process?

For the purposes of developing driver assistance and automated driving functions and services that may be suitable for increasing general road safety, the following data may be processed in particular:

- Recordings, i.e. image and video recordings of other road users and passers-by (vehicles and people)
- Vehicle data, i.e. license plates and lettering on vehicles
- Other data, i.e. lettering on shops and street signs, and other information in the immediate vicinity of the vehicles that is recorded by means of external sensors,

with the addition of location data, i.e. GPS position and timestamp.

II. For which purposes do we process your data and which legal bases apply?

We process your personal data in accordance with the provisions of the General Data Protection Regulation ("**GDPR**") and the German Federal Data Protection Act (*Bundesdatenschutzgesetz*, "**BDSG**") and other applicable local law for various purposes. The specific data processed, and purposes of data processing primarily depend on the services we provide to you. We, in general, may process your personal data based on the following legal grounds for the following purposes. **Please note**: If the applicable local law of the country where you are located at the relevant time foresees additional requirements regarding the legal bases, we will comply with such additional requirements and will inform you accordingly.

Purpose	Data Processing Activities	Legal Basis	Legitimate interest	Categories of data
Review and optimisation of systems, facilities, workflows and processes		Legitimate Interest	Control of product quality and prevention of product damage, preventive complaint management	
Review and optimisation of products and services	Data collection for the development of driver assistance and automated driving functions and services, i.e. extracting recordings	Legitimate Interest	The processing serves the (further) development, testing, validation and release of safety relevant driver assistance systems for active	Cf. SectionC.I.

	from the vehicle environment in narrowly defined situations (e.g., emergency braking or sudden evasive maneuvers) to develop driver assistance and automated driving functions and services; increasing product, vehicle and road safety Evaluation of recordings captured from real traffic situations, i.e. Evaluation of recordings from the vehicle environment including collection, processing and storage of video, audio and image recordings; improving driver assistance and driver information systems in terms of recognising road users, situations and other objects		and passive safety up to automated and autonomous driving systems that can improve overall road safety, as well as environment detection, obstacles and conditions as well as traffic participants including their direction of movement to derive the correct vehicle response	
Development and testing of components, products and services		Legitimate Interest	See above, including Improvement of road safety and own products, promotion of science	Cf. Section C.I.
Legal affairs and compliance	Safeguarding and defending our rights and disclosure in the context of governmental/judicial measures, i.e. Exercising and asserting rights and claims; disclosure for evidence collection; criminal prosecution and enforcement of civil claims Handling data subject requests under the GDPR; handling reports of potential personal data breaches	Compliance with a legal obligation, public interest, fulfilment of legal obligations, legitimate interest, fulfilment of contract	- Compliance with legal and regulatory requirements - Verification of compliance with legal provisions, internal company guidelines, rules and standards of Audi, Volkswagen group companies, employees, business partners and other third parties, - Compliance with legal and regulatory requirements, assertion, exercise or defence of legal claims of Audi or the respective Audi dealer	Recordings, location

			- Verification of compliance with contractual and legal obligations by Audi, its employees and its sales partners, suppliers, etc., if necessary using the vehicle identification number	

Please kindly refer to the right to object (please refer to Section B.IV).

III. Is there an obligation to provide data or to give consent?

In the context of data recordings for the development of driver assistance and automated driving functions, please note that the identification of individual persons is not intended at any time and is not required for the purposes listed below. Persons, vehicles and other objects are only considered as "objects" in the context of traffic and environmental situations, e.g., "pedestrian at the right-hand roadside". Without your active contribution and provision of further data, we will not be able to attribute the data collected to a natural person.

IV. Who receives my data?

Due to the size and complexity of data processing by Audi, it is not possible to list each recipient of your personal data individually in this Privacy Notice, which is why generally only categories of recipients are specified.

Within Audi, those entities receive your data that they need to meet the purposes listed above, e.g. technical development.

1. Processors

Our service providers (so-called processors) that we utilise and engage may also receive data for these purposes.

Service providers which are used and act on behalf of Audi and that do not process data for any of their own purposes (so called "processors") may receive data for the purposes mentioned above. We utilise processors of the following categories for the provision of specific services, who support us in the execution of our business processes:

- Service providers/suppliers
  - Vehicle/component manufacturers/suppliers
  - Hosting service providers
  - Technical support service providers
  - Technical development service providers
- Group companies

These processors are used in the context of product optimization.

2. Third parties

We will generally share your personal data with third parties only if this is necessary to achieve the aforementioned purposes, in particular, if we or the third party have a legitimate interest in the disclosure, or if you have given your consent, subject to applicable local laws. In addition, data may be shared with third parties (including investigative or security authorities) to the extent we should be required to do so by law or by enforceable regulatory or judicial orders.

V. Is data transferred to a third country?

We process your data in the European Union. A transfer of data to third countries (i.e. countries that are neither members of the European Union nor of the European Economic Area) may take place, to the extent this is required for the provision of services to you, is required by law, or you have given us your consent (in the absence of any other appropriate safeguarding mechanism under applicable law). **Please note**: Under the applicable local laws of the jurisdiction where you are located at, a transfer to a third country might be defined as a transfer outside of the territory or country where you are located at the relevant time.

Under the same circumstances, we may also share your personal data with processors in third countries.

In individual cases, personal data may also be passed on to authorities and courts in third countries.

Please note that not all third countries have a level of data protection recognised as adequate by the government / competent authority of the country where you are located at the relevant time (e.g. the European Commission). Audi will only transfer your personal data to third countries to the extent permitted by applicable local law. Insofar as Audi relies on appropriate safeguards in accordance with applicable law (e.g Standard Contractual Clauses or Binding Corporate Rules pursuant to Art. 46 (2) GDPR for third country transfers), Audi will take additional technical and/or organizational measures to the extent necessary to maintain an adequate level of protection of your personal data. An adequate level of protection includes the implementation of reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification or disposal, or similar risks, and the loss of any storage medium or device on which personal data is stored.

If applicable, you can obtain from us a copy of the specific applicable or agreed provisions to ensure an adequate level of data protection. To do so, please use the information in the contact Section B.II.

VI. How long will my data be stored?

We store your data as long as necessary to achieve the mentioned purposes or if we have a legitimate interest in the continued storage. Further storage of your data may be necessary for the purpose of quality assurance and troubleshooting. Your data will be deleted at the latest as soon as the purpose for which we collected and processed the data no longer applies.

In addition, we are subject to various retention and documentation obligations, which result, inter alia, from the German Commercial Code (*Handelsgesetzbuch,* "**HGB**") and the German Tax Code (*Abgabenordnung,* "**AO**"). The periods specified therein for retention and documentation are up to ten years. Finally, the storage period is also assessed according to the statutory limitation periods, which can be up to thirty years, for example, according to Sections 195 et seqq. of the German Civil Code (*Bürgerliches Gesetzbuch*, "**BGB**"), with the regular period of limitation being three years.

Under certain circumstances, your data may also need to be retained for a longer period of time, such as when a so-called legal hold or litigation hold (i.e. a prohibition of data deletion for the duration of the proceedings) is ordered in connection with administrative or judicial proceedings.

We may also be subject to retention and documentation obligations in line with the local legislation of your country.

VII. What practices and procedures are implemented to secure my data?

We have implemented and maintain at all times encompassing technical and organisational measures (*TOMs*) to protect your data in accordance with the high standards of the GDPR and the standards required under other applicable local laws of the jurisdiction you may be located at. This includes, but is not limited to, pseudonymisation and encryption, measures to ensure the ongoing confidentiality, integrity and availability of your data (including the ability to restore data in case of an incident). We are regularly reviewing our TOMs and apply enhancements where needed to keep your data safe and to comply with applicable laws. We have put in place appropriate procedures to deal with any personal data breach (i.e. a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed) and will notify you as the data subject and relevant supervisory authority when we are legally required to do so.

VIII. Updates of this privacy notice

We might update this privacy notice from time to time by making available updates to this privacy notice on our website.

Version: 01/2026

Annex 1 – Additional data subject rights and further country-specific information

Please note that the data protection level of GDPR, as described above, displays the baseline requirements. If country-specific data subject rights apply or further information on processing or contact persons are required, you will find these in the following country-specific supplements.

Albania

Besides, from the legal bases described in Part I the legal bases for processing personal data under Albania law is a consent given by the data subjects. The consent of the data subjects is given either by registering for the mobile online services, after they have confirmed that they have read and accepted the Privacy Policy, or by using the vehicle in knowledge of the data processing.

In addition or rather supplementary to your rights listed above under B. VII. the following applies

You have the right to file a complaint regarding the processing of your personal data to the Information and Data Protection Commissioner (https://www.idp.al/?lang=en) as the competent data protection authority.

Contact person for exercising your rights:
If you wish to exercise your rights in relation to the processing of your personal data, you can contact us using the contact details above or via the authorized local contact person using the contact details below.

Data controller representative in Albania:

Porsche Albania Sh.p.k

Autostrada Tirane-Durres

Km. 3, Tirane,1051

dataprotection@porsche.al

Andorra

In addition or rather supplementary to your rights listed above under B. VII. the following applies

You have the right to file a complaint regarding the processing of your personal data at the Andorran Data Protection Agency (https://www.apda.ad).

Bosnia and Herzegovina

In deviation from the legal bases described in Part B the legal bases for processing personal data under the law of Bosnia and Herzegovina is a consent given by the data subjects. The consent of the data subjects is given either by registering for the mobile online services, after they have confirmed that they have read and accepted the Privacy Policy, or by using the vehicle in knowledge of the data processing.

Contact person for exercising your rights:
If you wish to exercise your rights in relation to the processing of your personal data, you can contact us using the contact details above or via the authorized local contact person using the contact details below.

PORSCHE BOSNA I HERCEGOVINA

Porsche BH d.o.o. Sarajevo

Porsche Inter Auto BH d.o.o. Sarajevo

BIH-71000 SARAJEVO | Bulevar Meše Selimovića 16

Bosnia and Herzigovina

zastita.podataka@porschebh.ba

Faroe Islands

In addition or rather supplementary to your rights listed above under B. VII. the following applies.

You have the right to file a complaint regarding the processing of your personal data at the Data Protection Authority in the Faroe Islands, Dátueftirlitið. You can find the Data Protection Authority's contact information here: www.dat.fo.

France

To the extent the access to the data and the data processing fall within the scope of the data protection laws of France, you also have the right to define directives concerning the fate of your personal data after your death (post-mortem right).

Liechtenstein

To the extent the access to the data and the data processing fall within the scope of the data protection laws of Liechtenstein, references to the European Union (EU) are to be interpreted as references to the European Economic Area (EEA).

Monaco

In addition or rather supplementary to your rights listed above under B. VII. the following applies.

You have the right to file a complaint regarding the processing of your personal data at the Commission de Contrôle des Informations Nominatives (CCIN), located at 11 rue du Gabian, 98000 Monaco.

Montenegro

Contact person for exercising your rights:
If you wish to exercise your rights in relation to the processing of your personal data, you can contact us using the contact details above or via the authorized local contact person using the contact details below.

Porsche Leasing doo

Member of Porsche Bank Group

Josipa Broza Tita 67

81000 Podgorica, Montenegro

info@porscheleasing.me

North Macedonia

In addition or rather supplementary to your rights listed above under B. VII. the following applies.

You have the right to file a complaint regarding the processing of your personal data at the Agency for Personal Data Protection of North Macedonia (https://azlp.mk/).

Contact person for exercising your rights:
If you wish to exercise your rights in relation to the processing of your personal data, you can contact us using the contact details above or via the authorized local contact person using the contact details below.:

Porsche Macedonia DOOEL, Skopje

Blvd. Bosnia and Herzegovina 4

1000 Skopje

North Macedonia

Email: dataprivacy@volkswagen.de

San Marino

In addition or rather supplementary to your rights listed above under B. VII. the following applies.

To the extent the access to the data and the data processing fall within the scope of the data protection laws of San Marino, pursuant to Article 13(1)(f) of Law n. 171 of 2018, we specify that, considering the data controller's intention to transfer personal data to third countries or international organizations, the following means by which to obtain a copy of them or information on where they have been made available are provided:

- You can contact us for exercising your rights, including the right to access your data and to obtain a copy of them, via the contact details provided above.
- The EU standard contractual clauses used can be accessed in EU languages at https://eur-lex.europa.eu/legal-content/it/TXT/?uri=CELEX%3A32021D0914.

You have the right to file a complaint regarding the processing of your personal data at at the Data Protection Authority of San Marino (https://www.garanteprivacy.sm/).

Serbia

In addition or rather supplementary to your rights listed above under B. VII. the following applies.

You have the right to be informed about appropriate safeguards in case of a data transfer to countries or international organizations outside Serbia that do not provide an adequate level of data protection recognized by a Serbian Government Decision. All EU / EEA Member states provide an adequate level of data protection recognized by a Serbian Government Decision.

You have the right to file a complaint regarding the processing of your personal data at the Commissioner for Information of Public Importance and Personal Data Protection (https://www.poverenik.rs/sr-yu/kontakt.html), as the supervisory authority for personal data protection in the Republic of Serbia.

Contact person for exercising your rights:
If you wish to exercise your rights in relation to the processing of your personal data, you can contact us using the contact details above or via the authorized local contact person using the contact details below.:

PORSCHE SCG DOO BEOGRAD

Zrenjaninski put 11

11210 Beograd

Serbia

Email: zastita.podataka@porschescg.rs

Spain

To the extent that access to and processing of data falls within the scope of Spanish data protection law, please note that your personal data will be deleted after the statutory retention period has expired if the legal basis for processing your personal data no longer applies (in particular if you withdraw your consent), if the processing of your personal data is no longer necessary for the respective purpose or if the purpose itself no longer applies.

Switzerland

To the extent data processing falls within the scope of the Swiss Federal Act on Data Protection (FADP), (a) the scope of "personal data" shall be determined in accordance with the FADP, and (b) references to the GDPR shall be understood as references to the FADP.

In addition or rather supplementary to your rights listed above under B. VII. the following applies.

You have the right to file a complaint regarding the processing of your personal data at the Swiss Federal Data Protection and Information Commissioner (FDPIC) https://www.edoeb.admin.ch/edoeb/en/home.html.

United Kingdom

To the extent data processing falls within the scope of the UK General Data Protection Regulation (UK GDPR) references to GDPR, in particular legal basis, shall be understood as references to the UK GDPR.

You have the right to file a complaint regarding the processing of your personal data or handling your data subject`s rights requests at Audi by following the same process for submitting a request and include “complaint” in your request. Subsequently, if Audi denies your complaint or does not acknowledge the complaint within 30 days, you may contact the UK Information Commissioner`s Office (ICO): https://ico.org.uk/global/contact-us/