

## **Privacy and Data Protection Policy for WVG PlusBus**

This is a data protection declaration by the Wolfsburger Verkehrs-GmbH (hereinafter WVG), Borsigstraße 28, 38446 Wolfsburg, FRG. It applies to all applications (hereinafter referred to as `App`) used for WVG PlusBus.

The following outlines the data we collect from you when you use our App, and how we use it. It also covers your rights and objections. Personal data refers to all personal information specific to the customer, e.g. name, home address, e-mail address, user behaviour.

### **1. Who is responsible for processing my personal data and who to contact**

The responsibility for compliance with data protection legislation, e.g. DS-GVO (= GDPR/ General Data Protection Regulation), when processing personal data lies with the:

Wolfsburger Verkehrs-GmbH

CEOs: Timo Kaupert and Dr Frank Kästner

Borsigstraße 28

38446 Wolfsburg

Tel.: + 49 5361 189 8888

Fax: +49 5361 189 8605

E-Mail: [info@wvg.de](mailto:info@wvg.de)

Contact our Data Protection Officer for questions regarding the processing of your personal data at:

Datenschutzbeauftragter

Borsigstraße 28

38446 Wolfsburg

E-Mail: [datenschutz@wvg.de](mailto:datenschutz@wvg.de)

### **2. What kind of personal data will be processed ? To what purpose and what governance legislation will it be based on?**

The data we collect from you and how we process it will be for specific purposes only. These may be technical or contractual requirements or in order to fulfill requests made by the user.

Before using our services, you must register in the App with your first name, surname, e-mail address and if registering via mobile phone, also with your mobile number. Use of the App requires us to access and store the following data for technical reasons:

- pick up point
- destination
- departure date/time and or arrival date/ time

In accordance with Article 6 (1) lit.a DSGVO, we must obtain your specific consent to use your personal data in order to process it (through a direct click). The contract will form the legal basis pursuant to Article 6 (1) lit.b DSGVO when processing the personal data required to enter a contract. Article 6 (1) lit.b DSGVO also serves as the basis for pre-contractual use, e.g. enquiries about our products or services. Should our company be subject to a legal obligation, such as tax, requiring your personal data to be processed, it will be based on Article 6 (1) lit.c DSGVO. To continually improve our offer, we store and analyse usage data from the App on a pseudonym basis. The legal basis for this is Art. 6 (1)f DSGVO.

#### **4. Will my personal data be shared with others or transferred to or in other countries?**

In compliance with Art.28 DS-GVO, your personal data will only be disclosed or shared with processors who process your data exclusively on our behalf and in accordance with the contracts concluded for the purposes mentioned under point 2. The third parties will use the data solely for the purpose of fulfilling your order or request and according to the obligations or tasks assigned to these third parties. We will also disclose your personal data to third parties where required by law. Your personal data will not be transferred to or in third countries or to international organisations.

#### **5. How long will my personal data be stored?**

Any personal data collected and used in accordance with our legal data retention policy and through your consent will basically only be retained for as long as it is necessary to fulfill the processes under point 2 or alternatively until you withdraw your consent for us to process your personal data.

If you are a customer of ours, we may be obliged for legal reasons, especially archive regulations, to retain data beyond the contractual agreement and the processing of your contract. Consequently, we may be required by statutory commercial or tax laws to store your address, payment and order data for a period of ten years. Should this be the case, we will set your personal data for archiving purposes only and block all other access. Once the retention period has expired, your data will be deleted.

#### **6. What are my rights with regard to the processing of my personal data**

The following are your rights vis-à-vis us:

- Right to see any personal information that we hold about you (Art.15 DS-GVO)

- Right to rectify incorrect, out of date or otherwise inaccurate stored data concerning you (Art. 16 ,DS-GVO)
- Right to ask us to delete data if processing has been completed and storage is therefore no longer necessary or you have revoked your given consent to process certain personal data (Art. 17 DS-GVO),
- Right to restrict processing if one of the conditions set out in Art. 18(1)(a) to (d) DS-GVO applies (Art. 18 DS-GVO),
- Right to transfer the personal data concerning you and provided by you (Art. 20 DS-GVO),
- Right to withdraw consent given, whereby the withdrawal does not affect the processing carried out up to that point legally on the basis of the consent (Art. 7(3)(c) DS-GVO)
- the right to lodge a complaint with a supervisory authority (Art. 77 of the DS-GVO).

#### **7. Will changes be made to this data protection policy or will there be updates?**

We will need to update this data protection statement in line with functional changes and changes by law. We recommend checking this statement regularly. Should your consent be required or should the changes in the regulations affect your contract, the changes will follow only through your consent.