VOLKSWAGEN FINANCIAL SERVICES

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Protection of Personal Information Act

VWFS SA Customer Privacy Policy

Level	Group
Framework owner	Information Governance Officer
Approving Committee	VWFS Exco Committee
Date	July 2026
Noting Committee	Management Risk Committee
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1. Background and Purpose of this Notice:

This important document explains how Volkswagen Financial Services South Africa (Pty) Ltd ('VWFS SA'/ "the organisation") and related parties will process customers personal information:

- Volkswagen Financial Services South Africa (Pty) Ltd
- FirstRand Limited and its subsidiaries
- Volkswagen Group subsidiaries and associates
- Any of VWFS SA's affiliates, associates, cessionaries, delegates or successors in title or appointed third parties such as its authorised agents, advisors, partners and contractors.

Protecting customers' personal information is important to VWFS SA. To do so, VWFS SA follows general principles in accordance with applicable privacy laws. The organisation has developed this customer privacy policy to enable its customers to understand how VWFS SA collects, uses and safeguards their personal information in the course of its business.

The organisation collects personal information about its customers. This includes, but is no limited to, what customers inform the organisation about themselves, what VWFS SA learns by having a customer or when a customer makes use of a solution, as well as the choices customers make about the marketing they elect to receive. This notice also outlines customers' privacy rights and how the law protects customers.

In terms of applicable privacy laws, this notice may also apply on behalf of other third parties (such as authorised agents and contractors), acting on the organisations behalf when providing customers with solutions. If, however, in circumstances where the organisation processes personal information for or on behalf of another party under a

contract or a mandate, that party's privacy policy or notice will apply.

In this notice, "process", means how the organisation collects, uses, stores, makes available, destroys, updates, discloses, or otherwise deals with customers personal information. As a general rule, the organisation will only process customer personal information if this is required to deliver or offer a service, provide a product or carry out a transaction with the customer. VWFS SA respects the customers privacy and will treat the customers personal information with the utmost confidentiality. The organisation may combine customers personal information and use the combined personal information for any of the purposes stated in this Customer Privacy Policy/notice.

VERY IMPORTANT: If customers use the organisations services, goods, products and service channels, or by accepting any agreement, contract, mandate or annexure with the organisation, customers agree that in order to:

- conclude and fulfil contractual terms & conditions or obligations to a customer;
- comply with obligations imposed by law; or
- to protect or pursue customers', the organisations, or a third party's legitimate interests, including offering solutions that best meet customers' needs;

customers' personal information may be processed through centralised functions and systems across companies and may be used for the purposes, in the manner, and with the appropriate controls as set out in this notice. Where it is necessary to obtain consent for processing, the organisation will seek customers' consent separately.

Customers should read the consent request carefully as it may limit their rights.

NOTE: VWFS SA is part of a global organisation which may result in the processing of

personal information outside the borders of South Africa but will be processed according to the requirements and safeguards of applicable privacy law or privacy rules that bind the global organisation.

VWFS SA can change this Customer Privacy Policy from time to time as and when the law or the VWFS SA's business practices require it. The latest version of the notice displayed on the VWFS SA website will apply to customers' interactions with the organisation and is available at: Privacy Policy

Volkswagen Financial Services South Africa (Pty) Ltd is the Responsible Party as defined in the Protection of Personal Information Act.

The Information Officer is responsible for ensuring compliance with POPIA. Customers may contact the Information Office for any privacy-related queries, requests, or complaints:

- Email: informationoffice@vwfs.co.za
- Website: www.vwfs.co.za

Further details are available in the PAIA Manual accessible on the website.

2. Definitions

The following concepts will be used throughout this minimum standard and are defined as follows:

Term	Description
Child	As defined in POPIA means "a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him or herself."
Competent Person	As defined in POPIA means "any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child."
Consent	As defined in POPIA "means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information."
Customer	Means a person who buys goods and/ or services from VWFS SA.

Data Subject	As defined in POPIA means the person to whom personal information relates". In reference to VWFS SA this means customers, employees, and operators/suppliers.
Employee	As defined in the Labour Relations Act 66 of 1995 means: (a) any person, excluding an independent contractor, who works for another person or for the State and who receives, or is entitled to receive, any remuneration; and (b) any other person who in any manner assists in carrying on or conducting the business of an employer."
Deputy Information Officer	Means the person delegated by the Information Officer (as prescribed in PAIA) to ensure overall compliance to privacy legislation.
Information Office	Department mandated with the responsibility of overseeing privacy compliance in VWFS SA.
Juristic Person	Means an existing company, partnership, trust, not-for-profit organisation, estate, or other legal entity recognised by law as having rights and duties.
Natural Person	Means an identifiable, living human being.
Operator	As defined in POPIA means "a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party." This means any party that provides a service to collect, process, handle, store and destroy information on behalf of VWFS SA.
PAIA	Promotion of Access to Information Act 2 of 2000
Personal Information ("PI")	As defined in POPIA "means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. In reference to this policy, PI must be seen as personal information of VWFS SA, VWFS SA customers, employees, and suppliers.

Processing	Processing as defined in POPIA “means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including: 1) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; 2) dissemination by means of transmission, distribution or making available in any other form; or 3) merging, linking, as well as restriction, degradation, erasure or destruction of information.” VWFS SA processes personal information in accordance with the following principles: • Accountability • Processing limitation (lawfulness, minimality, consent where required) • Purpose specification • Further processing limitation • Information quality • Openness and transparency • Security safeguards • Data subject participation These principles guide all processing activities undertaken by the organisation.

POPIA	Protection of Personal Information Act no 4 of 2013 (“ POPIA”); limiting the collection, processing and disclosure of Personal Information; Purpose Specification, ensure quality of Personal Information; retain Personal Information as required; ensure the openness and transparency of Personal Information; ensure accessibility to Personal Information; ensure the security of Personal Information; manage trans/cross border flows of Personal Information; automated processing of Personal Information and Incident Management; and Third Party Management as it relates to the processing of Personal Information and Special Personal Information.
Record	As defined in POPIA means “any recorded information: (a) regardless of form or medium, including any of the following: (i) Writing on any material; (ii) information produced, recorded, or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded, or stored;

	(iii) label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means; (iv) book, map, plan, graph, or drawing; (v) photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced; (b) in the possession or under the control of a responsible party; (c) whether or not it was created by a Background and Purpose of this Notice (d) party; and (e) regardless of when it came into existence."
Responsible Party	As defined in POPIA "means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information." In reference to this policy, the Responsible Party is VWFS SA.
Special Personal Information ("SPI")	As defined in POPIA "means any personal information of a data subject, concerning: (a) the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or (b) the criminal behaviour of a data subject to the extent that such information relates to: (i) the alleged commission by a data subject of any offence; or (ii) any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings."

Supplier	Means a Natural or Juristic person that provides a product or renders services to VWFS SA.

3. What is Personal Information (PI) and Special Personal Information (SPI): Personal information refers to any information that identifies a customer or specifically relates to a customer. Personal information includes, but is not limited to, the following information about a customer:

- marital status (like married, single, divorced);
- national origin;
- age;
- language; birth; education;
- financial history (like income or buying, investing and banking behaviour based on, amongst others, account transactions);
- identifying number (like an account number, identity number or passport number);
- e-mail address; physical address (like residential address, work address or physical location);
- telephone number;
- online identifiers;
- social media profiles;
- biometric information (like fingerprints, signature or voice);
- race; gender; sex; pregnancy; ethnic origin; social origin; colour; sexual orientation;
- physical health; mental health; well-being; disability; religion; belief; conscience; culture;
- medical history (like HIV / AIDS status); criminal history; employment history;
- personal views, preferences and opinions;
- confidential correspondence; and / or
- another's views or opinions about a customer and a customer's name also constitute personal information.

Depending on the applicable law of the country, a juristic entity (like a company) may also have personal information which is protectable in law and which may be processed in terms of this notice.

There is also a category of personal information called Special personal information (SPI), which includes the following personal information about a customer:

- religious and philosophical beliefs (for example where a customer enters a competition and is requested to express a philosophical view);
- race (e.g. where a customer applies for a solution where the statistical information must be recorded);
- ethnic origin;
- trade union membership;
- political beliefs;
- health including physical or mental health, disability and medical history (e.g. where a customer applies for
- an insurance policy);
- biometric information (e.g. to verify a customer's identity); or
- criminal behaviour where it relates to the alleged commission of any offence or the proceedings relating to that offence.

4. When will VWFS SA Process Personal Information?

VWFS SA will only process customers personal information for lawful purposes in the course of its business if the following applies:

- if the customer has specifically consented thereto;
- if a person legally authorised by the customer, the law or a court, has consented thereto;
- if it is necessary to conclude or perform under a contract the organisation has with the customer;
- if the law requires or permits it;
- if it is required to protect or pursue the customers, the organisations or a third

party's legitimate interest; and / or

- if the customer is a child and a competent person (like a parent or guardian) has consented thereto.

5. When will VWFS SA Process Customers Special Personal Information?

VWFS SA may process customer Special Personal Information (SPI) in the following circumstances:

- if the customer has specifically consented to the processing;
- if the processing is needed to create, use or protect a right or obligation in law;
- if the processing is for statistical or research purposes and all legal conditions are met;
- if the special personal information was made public by the customer;
- if the processing is required by law;
- if racial information is processed, and the processing is required to identify the customer; and
- where personal information is collected directly from a customer, VWFS SA will inform the customer of:
    - The purpose for which the information is being collected;
    - Whether the supply of the information is voluntary or mandatory;
    - The consequences of failing to provide the information (for example, inability to conclude or perform a contract);
    - Any applicable legal basis for the collection; and
    - The existence of rights described in this notice.

6. When and how will VWFS SA Process the Personal Information of Children?

A child is a person who is defined as a child by a country's legislation and who has not been recognised as an adult by the courts of a country.

VWFS SA may process the personal information of children if the law permits.

VWFS SA will only process the personal information of children if any one or more of the following circumstances apply:

- a person with the ability/legal capacity to sign legal agreements has consented to the processing, being a parent or guardian;
- the processing is needed to create, use or protect a right or obligation in law, such as where the child is nominated as an heir in a Will, a Beneficiary of a Trust, a beneficiary of an insurance policy or an insured person in terms of an insurance policy;
- the child's personal information was made public by the child, with the consent of a person who has the legal capacity to agree;
- the processing is for statistical or research purposes and all legal conditions are met/ have been complied with;
- where the child is an heir in a Will, if required to give effect to the Will;
- where the child is a Beneficiary of a Trust, if required to give effect to the Trust Deed;
- where the child is legally old enough to open a bank account without assistance from their parent or guardian;
- where the child is legally old enough to sign a document as a witness without assistance from their parent or guardian;
- where the child benefits from a bank account like an investment or savings account; and a person with the ability/legal capacity to sign legal agreements has consented to the processing and / or
- where the child is an insured person or beneficiary of an insurance policy, if required to give effect to the policy.

7. When and from where may VWFS SA obtain Personal Information about Customers?

The organisation collects information about customers in the following instances (which is not limited):

- directly from customers;
- based on customers' use of the organisations products, services or service channels (such as websites and applications)
- based on how customers engage or interact with the organisation, such as on social media, and through emails, letters, telephone calls and surveys;

- based on a customer's relationship with the organisation;
- from public sources (such as newspapers, company registers, online search engines, deed registries, public posts on social media);
- customers' engagement with advertising, marketing and public messaging; and
- from third parties that the organisation interacts with for the purposes of conducting its business (such as partners, reward partners, customer loyalty rewards programmes', retail and online partners);
- from credit bureaus, regulators and government departments or service providers.

The organisation collects and processes customers' personal information at the start of, and for the duration of their business relationship with the organisation. The organisation may also process customers' personal information subsequent to the customers business relationship with the organisation having ended.

If the law requires the organisation to do so, it will ask for customer consent before collecting personal information about them from third parties. The third parties (which may include parties the organisation engages with as independent responsible parties, joint responsible parties or operators) from whom the organisation may collect customers' personal information include, but are not limited to, the following:

- Any connected companies, subsidiary companies, its associates, cessionaries,
- delegates, assignees, affiliates or successors in title and/or appointed third parties (such as its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this notice;
- The customers spouse, dependents, partners, employer, joint applicant or account holder and other similar sources;
- people the customer has authorised to share their personal information, like a medical practitioner for insurance purposes;
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
- payment processing services providers, merchants, banks, credit providers and

other persons that assist with the processing of customer payment instructions;

- insurers, brokers, other financial institutions or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims and other related purposes;
- law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
- regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities;
- credit bureaus;
- qualification information providers;
- trustees, Executors or Curators appointed by a court of law;
- courts of law or tribunals;
- participating partners, whether retail or online, in organisational product campaigns; and
- VWFS SA joint venture partners;
- marketing list providers;
- social media platforms; or
- online search engine providers

8. Reasons VWFS SA may Need to Process Customer Personal Information

The organisation may process customers' personal information for the reasons outlined below.

8.1 Contract:

The organisation may process customers' personal information if it is necessary to conclude or perform under a contract that the organisation has with a customer or to provide a solution to a customer. This includes, but is not limited to the following:

- assessing and processing applications for solutions;

- assessing the organisations lending and insurance risks;
- conducting affordability assessments, credit assessments and credit scoring;
- providing a customer with solutions they have requested;
- opening, managing and maintaining customer accounts or relationships with the organisation;
- enabling the organisation to deliver goods, documents or notices to customers;
- communicating with customers and in order to carry out customer instructions and requests;
- responding to customer enquiries and complaints;
- to develop, test and improve the organisations products and services;
- enforcing and collecting on any agreement when a customer is in default or breach of the terms and conditions of the agreement, such as tracing a customer or to institute legal proceedings against a customer;
- disclosing and obtaining personal information from credit bureau's regarding a customer's credit history;
- meeting record-keeping obligations;
- conducting market and behavioural research, including scoring and analysis to determine if a customer qualifies for solutions, or to determine a customer's credit or insurance risk;
- enabling customers to participate in and make use of value-added solutions;
- enabling customers to participate in customer rewards programmes: determining customer qualification for participation, rewards points and rewards level
- customer satisfaction surveys, promotional and other competitions;
- insurance and assurance underwriting and administration;
- processing or considering or assessing insurance or assurance claims;
- providing insurance and assurance policies, products and related services;
- security and identity verification, and checking the accuracy of customer personal information; or
- any other related purposes.

8.2. Law:

The organisation may process customers' personal information if the law requires or permits it. This includes, without limitation, the following:

- complying with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules);
- complying with voluntary and involuntary codes of conduct and industry agreements;
- fulfilling reporting requirements and information requests;
- processing payment instructions (such as a debit order);
- meeting record-keeping obligations;
- detecting, preventing and reporting theft, fraud, money laundering, corruption and other crimes. This may include the processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading or dishonest information when opening an account with the organisation, or avoiding liability by way of deception, to the extent allowable under applicable privacy laws;
- conducting market and behavioural research, including scoring and analysis to determine if a customer qualifies for solutions, or to determine a customer's credit or insurance risk;
- enabling customers to participate in and make use of value-added solutions;
- enabling customers to participate in customer rewards programmes, determining customer qualification for participation, rewards points, and rewards level;
- customer satisfaction surveys, promotional and other competitions;
- assessing the organisation's lending and insurance risks;
- conducting affordability assessments, credit assessments and credit scoring;
- disclosing and obtaining personal information from credit bureaus regarding a customer's credit history;
- developing credit models and credit tools;
- insurance and assurance underwriting and administration;

- processing or considering or assessing insurance or assurance claims;
- providing insurance and assurance policies, products and related services; or
- any other related purposes.

8.3 Legitimate interest:

The organisation may process customers' personal information in the daily management of its business and finances as well as to protect the organisations customers, employees, service providers and assets. It is to the organisations benefit to ensure that its procedures, policies and systems operate efficiently and effectively. The organisation may process customers' personal information to provide them with the most appropriate solutions and to develop and improve solutions and the organisations business.

The organisation may process a customer's personal information if it is required to protect or pursue the customers, the organisations, or a third party's legitimate interest. This includes:

- developing, implementing, monitoring and improving the company's business processes, policies and systems;
- managing business continuity and emergencies;
- protecting and enforcing the organisations rights and remedies in the law;
- developing, testing and improving solutions for customers, this may include connecting customer personal information with other personal information obtained from third parties or public records to better understand customer needs and develop solutions that meet these needs. The organisation may also consider customer actions, behaviour, preferences, expectations, feedback and financial history;
- tailoring solutions which would include consideration of a customer's use of third-party products, goods and services and marketing of appropriate solutions to the customer, including marketing on the organisations own or other websites and / or social media;

- marketing other solutions to customers via various means including on organisations and other websites and social media;
- responding to customer enquiries and communications including the recording of engagements and analysing the quality of the organisations engagements with a customer;
- responding to complaints including analytics of complaints to understand trends and prevent future complaints and providing compensation where appropriate;
- enforcing and collecting on any agreement when a customer is in default or breach of the terms and conditions of the agreement, such as tracing the customer, or to institute legal proceedings against the customer. In such a scenario, the organisation may aggregate the contact details provided to any of its affiliate entities to determine the customer's most accurate contact details in order to enforce or collect on any agreement the customer has with the organisation;
- processing payment instructions (such as a debit order);
- meeting record-keeping obligations;
- fulfilling reporting requirements and information requests;
- complying with voluntary and involuntary codes of conduct and industry agreements;
- detecting, preventing and reporting theft, fraud, money laundering, corruption and other crimes. This may include the processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading or dishonest information when opening an account with the organisation, or avoiding liability by way of deception, to the extent allowable under applicable privacy laws. This may also include the monitoring of the organisations buildings, including CCTV cameras and access control;
- conducting market and behavioural research, including scoring and analysis to determine if a customer qualifies for solutions, or determining a customer's credit or insurance risk;

- statistical purposes, such as market segmentation or customer segments (i.e. placing customers in groups with similar customers based on their personal information);
- enabling customers to participate in customer rewards programmes, determining customer qualification for participation, rewards points and rewards level;
- customer satisfaction surveys, promotional and other competitions;
- assessing the organisations lending and insurance risks;
- disclosing and obtaining personal information from credit bureaus regarding a customer's credit history;
- developing credit models and credit tools;
- any other related purposes.

9. Why does the Organisation further use or process Customers Personal Information for other purposes?

At the time that the organisation collects personal information from a customer, it will have a reason or purpose to collect that personal information. In certain circumstances, however, the organisation may use that same personal information for other purposes. The organisation will only do this where the law allows it and where the other purposes are compatible with the original purpose/s applicable when the organisation collected the customer's personal information. The organisation may also need to request a customer's specific consent for the further processing in limited circumstances. Examples of these other purposes are included in the list of purposes as set out in section 8 above.

The organisation may also further use or process a customer's personal information if:

- the personal information about the customer was obtained from a public record, e.g. the deed's registry;
- the customer made the personal information public, e.g. on social media;
- the personal information is used for historical, statistical or research purposes,

the results will not identify the customer;

- proceedings have started or are contemplated in a court or tribunal;
- it is in the interest of national security;
- if the organisation must adhere to the law, specifically tax legislation; but any other generally applicable law or
- the Information Regulator has exempted the processing.

The organisation may also further use or process a customer's personal information if the customer has consented to it or, in the instance of a child, a competent person has consented to it. Any enquiries about the further processing of customers personal information can be made through the contact details as set out in section 16 of this notice.

10. Centralised Processing by Affiliates:

The organisation aims to create efficiencies in the way it processes information across the organisation and with its affiliates. Customers' personal information may therefore be processed through centralised functions and systems held by affiliates, which includes the housing of their personal information in a centralised group data warehouse.

This centralised processing is structured to ensure efficient processing that benefits both the customer and the organisation. Such benefits include, but are not limited to:

- improved information management, integrity and information security;
- the leveraging of centralised crime and fraud prevention tools;
- better knowledge of a customer's financial service needs so that appropriate solutions can be advertised and marketed to the customer;
- a reduction in information management costs; and
- streamlined transfers of personal information for customers with solutions across different businesses or affiliates .

Details of further interests which are promoted by the centralised processing can be found under section 8.3. (Legitimate interest) of this privacy notice. Should a customer wish to exercise their privacy rights in terms of personal information provided to an affiliate, or

enquire about the centralised processing procedure, enquiries can be made through the contact details as set out in section 16 of this notice.

11. How does the Organisation use Customer Personal Information for Marketing?

- VWFS SA will use customer personal information to market vehicle finance, insurance products and other financial related services;
- The organisation may also market other non-financial products, goods or services,
- VWFS SA will do this in person, by post, telephone, or electronic channels such as but not limited to, SMS, email, and on-line;
- If a person is not a customer, or in any other instances where the law requires, the organisation will only market to them by electronic communications with their requisite consent; and
- In all cases, a person can request to stop receiving marketing communications at any time by following an Opt-Out process.

12. When will the Organisation use Customers Personal Information to make Automated Decisions?

An automated decision is made when a person's personal information is analysed to make a decision without human intervention in that decision-making process. VWFS SA may use customer personal information to make an automated decision as allowed by the law. An example of automated decision making is the approval or decline of a credit application when a person applies for vehicle or related finance. Customers have the right to query any such decisions made, and the organisation will provide reasons for the decisions as far as reasonably possible. Automated decisions are based on predefined criteria such as credit risk scoring, affordability assessments, and behavioural analytics. These decisions may affect the availability or pricing of financial products and services.

13. When, How and with Whom does the Organisation Share Customers Personal Information?

In general, VWFS SA will only share customer personal information if any one or more of the following apply:

- if the customer has consented to this;
- if it is necessary to conclude or perform under a contract the organisation has with the customer;
- if the law requires it; and
- if it is necessary to protect or pursue the customer's, the organisations or a third party's legitimate interest.

Where required, each member of VWFS SA may share customers personal information with the below listed persons, which may include parties or affiliates that the organisation engages with as independent responsible parties, joint responsible parties or operators. These persons have an obligation to keep customers' personal information confidential:

- any connected companies, affiliate companies, associates, cessionaries, delegates, assignees, or successors in title and/or appointed third parties (such as its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this notice;
- VWFS SA employees as required by their employment conditions;
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
- payment processing services providers, merchants, banks, credit providers and other persons that assist with the processing of the customers payment instructions;
- insurers, brokers, other financial institutions or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance, the assessment of insurance and assurance claims and other related purposes;
- law enforcement and fraud prevention agencies and other persons tasked with the

prevention and prosecution of crime;

- regulatory authorities, industry ombudsmen, governmental departments, local and international tax authorities and other persons the law requires VWFS SA to share customer personal information with;
- credit bureaus;
- the organisations service providers, agents and sub-contractors like couriers and other persons that VWFS SA uses to offer and provide products and services to customers;
- qualification information providers
- persons to whom the organisation has ceded rights or delegated its obligations to under agreements, such as instances where a business is sold;
- Asset remarketing agents which includes storage, valuation, disposal, release of assets which have been repossessed or returned;
- courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications;
- the general public where customers submit content to the organisations social media sites like the organisations Facebook page;
- participating partners, whether retail or online, in organisational product campaigns;
- trustees, Executors or Curators appointed by a court of law; and
- VWFS SA joint venture and other partners with whom the organisation has concluded business agreements.

14. When and how the Organisation obtains and shares Customer Personal Information from / with a Credit Bureau?

VWFS SA may obtain customers' personal information from credit bureaus, for amongst others, any one or more of the following reasons:

- if the customer requested the organisation to do so, or agreed that it may do so;
- to verify a customer's identity;
- to obtain or verify a customer's employment details;
- to obtain and verify a customer's marital status;

- to obtain, verify, or update a customer's contact or address details;
- to obtain a credit report about a customer, which includes their credit history and credit score, when the customer applies for a credit agreement to prevent reckless lending or over-indebtedness;
- to determine a customer's credit risk;
- for debt recovery;
- to trace a customer's whereabouts;
- to update a customer's contact details;
- to conduct research, statistical analysis or system testing;
- to determine the source(s) of a customer's income;
- to build credit scorecards which are used to evaluate credit applications;
- to assess the application for insurance cover;
- to determine which solutions to promote or to offer to a customer.

VWFS SA will share a customer's personal information with the credit bureau for, amongst others, any one or more of the following reasons:

- to report the application for a credit agreement;
- to report the opening of a credit agreement;
- to report the termination of a credit agreement;
- to report payment behaviour on a credit agreement; /or
- to report non-compliance with a credit agreement, such as not paying in full or on time.

Customers should refer to their specific credit agreement with the organisation for further information.

15. Under what Circumstances will the Organisation transfer Customers Personal Information to other Countries?

VWFS SA will only transfer a customer's personal information to third parties in another country in any one or more of the following circumstances:

- where a customer's personal information will be adequately protected under the

other country's laws or in terms of an agreement with the third-party recipient;

- where the transfer is necessary to enter into, or perform, under a contract with the customer or a contract with a third party that is in the customer's best interest;
- where the customer has consented to the transfer; and/or
- where it is not reasonably practical to obtain the customer's consent, but the transfer is in the customer's best interest.

TAKE NOTE: As VWFS SA is part of a global organisation, customers personal information may be shared within VW Group in other countries and processed in those countries under the privacy rules that bind/govern that country. This transfer will happen within the requirements and safeguards of the law. Where possible, the party processing customers personal information in the other country will agree to apply the same level of protection as available by law in their country or if the other country's laws provide better protection the other country's laws would be agreed to and applied.

16. Customers Duties and Rights About the Personal Information VWFS SA has about them

Customers must provide the organisation with proof of identity when enforcing the rights below. Customers must inform the organisation when their personal information changes, as soon as reasonably possible after the change. Customers warrant that when they provide the organisation with personal information of their spouse, dependents or any other person, the customer must have permission from them in order to share their personal information with the organisation. VWFS SA will process the personal information of the customer's spouse, dependent or any other person which the customer has shared with it as stated in this notice.

16.1 Right to access:

Customers have the right to request access to the personal information that VWFS SA has about them by contacting the organisation. This includes requesting:

- confirmation that the organisation holds the customer's personal information;
- a copy or description of the record containing the customer's personal information; and
- the identity or categories of third parties who have had access to the customer's personal information

VWFS SA will attend to requests for access to personal information within a reasonable time. The customer may be required to pay a reasonable fee to receive copies or descriptions of records, or information about third parties. The organisation will inform the customer of the fee before attending to the request.

Customers should note that the law may limit their right to access information.

Please refer to VWFS SA's Promotion of Access to Information Act 2 of 2000 Manual (PAIA Manual) for further information on how customers can give effect to the rights listed below. The PAIA Manual is located on the company/VWFS SA website at www.vwfs.co.za or contact can be made to the Information Office at: informationoffice@vwfs.co.za

16.2 Right to correction, deletion or destruction:

Customers have the right to request the organisation to correct, delete or destroy the personal information that it has about them if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or if the organisation is no longer authorised to keep it. The request must be made in writing.

Please refer to VWFS SA's Promotion of Access to Information Act 2 of 2000 Manual (PAIA Manual) for further information on how customers can give effect to these rights. The PAIA Manual is located on the company/VWFS SA website www.vwfs.co.za or

contact can be made to the Information Office at: informationoffice@vwfs.co.za

The organisation will take reasonable steps to determine if the personal information is correct and make any correction needed. It may take a reasonable time for the change to reflect on the organisations platform/systems. The organisation may request documents from the customer to verify the change in personal information. A specific agreement that a customer has entered into with the organisation may determine how the customer must change their personal information provided by the customer at the time when they entered into the specific agreement.

Customers must adhere to these requirements. If the law requires the organisation to keep the personal information, it will not be deleted or destroyed upon the customer's request. The deletion or destruction of certain personal information may lead to the termination of a customer's business relationship with the organisation.

16.3 Right to objection:

Customers may object on reasonable grounds to the processing of their personal information where the processing is contrary to their legitimate interest, the organisations legitimate interest or in the legitimate interest of another party.

VWFS SA will not be able to give effect to the customers objection if the processing of the personal information was and is permitted by law; the customer had provided consent to the processing and the organisations processing was done according to the customers consent or the processing is necessary to conclude or perform under a contract with the customer.

Customers must inform the organisation of their objection in the prescribed form by referring to the VWFS SA PAIA Manual, Annexure 1 which will provide further information in this regard, including the process the customer should follow to give effect to this right. The organisation will also not be able to give effect to a customer's objection if the objection is not based upon reasonable grounds and is not substantiated with appropriate evidence.

16.4 Right to withdraw consent:

Where a customer has provided their consent for the processing of their personal information, the customer may withdraw their consent. If they withdraw their consent, the organisation will explain the consequences to the customer. If a customer withdraws their consent, the organisation may not be able to provide certain solutions to the customer. VWFS SA will inform the customer if this is the case. The organisation may proceed to process customers' personal information, even if they have withdrawn their consent, if the law permits or requires it. It may take a reasonable time for the change to reflect on the organisations systems and during this time, the organisation may still process the customer's personal information.

16.5 Right to complain:

Customers have a right to file a complaint with the organisation or any other regulatory body within the jurisdiction (in South Africa customers can contact the Information Regulator) about an alleged contravention of the protection of their personal information. VWFS SA will address customer complaints in as far as reasonably possible.

The contact details of the Information Regulator are provided below. JD
House, 27 Stiemens Street
Braamfontein
Johannesburg
2001

P.O Box 31533
Braamfontein
Johannesburg
2017

Tel no. +27 (0)10 023 5200

Website: https://justice.gov.za/inforeg/

Complaints email: complaints.IR@justice.gov.za

General enquiries email: inforeg@justice.gov.za

17. How VWFS SA Secures Customers Personal Information?

The organisation takes appropriate and reasonable technical and organisational steps to protect customers personal information according to industry best practices. The organisations security measures, including physical, technological and procedural safeguards, will be appropriate and reasonable. This includes the following:

- keeping organisational systems secure (like monitoring access and usage);
- storing records securely;
- controlling the access to organisational buildings, systems and/or records; and
- safely destroying or deleting records.

In the event of a security compromise involving personal information, VWFS SA will notify affected customers and the Information Regulator as required by applicable law, including POPIA, where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person.

18. How long does VWFS SA keep Customers Personal Information?

The organisation will keep customers personal information for as long as:

- the law requires the organisation to keep it;
- contract between the customer and the organisation requires VWFS SA to keep it;
- the customer has consented to VWFS SA keeping it;
- the organisation is required to keep it to achieve the purposes listed in this Customer Privacy Policy;
- it is required for statistical or research purposes;
- a code of conduct requires the organisation to keep it; and
- VWFS SA requires it for its own lawful business purposes.

VWFS SA determines retention periods based on:

- Applicable legal and regulatory requirements (e.g., FAIS, FICA, Companies Act);

- Contractual obligations;
- Prescription periods for legal claims; and
- Operational and business needs.
- Where personal information is no longer required, it will be securely deleted or anonymised.

Take note: The organisation may keep customers personal information even if they no longer have a relationship with the organisation or if they request VWFS SA to delete or destroy such personal information if the law permits or requires so.

19. Cookies:

A cookie is a small piece of data that is sent (usually in the form of a text file) from a website to the user's device, such as a computer, smartphone or tablet. The purpose of a cookie is to provide a reliable mechanism to "remember" user behaviour (keeping track of previous actions), e.g. remembering the contents of an online shopping cart, and actions the user performed whilst browsing when not signed up or logged into their online account.

The organisation does not necessarily know the identity of the user of the device but does see the behaviour recorded on the device. Multiple users of the same device would not necessarily be distinguishable from one another. Cookies could, however, be used to identify the device and, if the device is linked to a specific user, the user would also be identifiable.

VWFS SA uses cookies in accordance with applicable law. Where required, customers will be provided with the option to accept or manage cookie preferences. Continued use of the website after such notice may constitute consent where permitted by law.

20. How VWFS SA Processes Information about Persons Related to a Juristic Person i.e. Related Persons?

If a customer is a juristic person (e.g. a company or close corporation), the organisation may collect and use personal information relating to the juristic person's directors, officers, employees, beneficial owners, partners, shareholders, members, authorised signatories, representatives, agents, payers, payees, customers, guarantors, spouses of

guarantors, sureties, spouses of sureties, other security providers and other persons related to the juristic person. The aforementioned are related persons.

If customers provide the personal information of a related person to VWFS SA, they warrant that the related person is aware that the customer is sharing the related persons personal information with the organisation and that the related person has provided the requisite consent thereto.

The organisation will process the personal information of related persons as stated in this notice, thus references to “customer/s” in this notice will include related persons with the necessary amendments.

21. Policy Administration

Title	VWFS SA POPIA Customer Privacy Policy
Author	Pierre Engelbrecht
Owner	VWFS Information Office
Document version	Version 3.0
Version date	01 July 2026

Revision summary

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Review

Frequency of review	Next review date	Last review date
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