**Privacy Notification / Data Protection Declaration**

of VfL Wolfsburg (Beijing) Football Club Co. Ltd. (as of November 2023)

for companies working with VfL Wolfsburg (Beijing) Football Club Co. Ltd.

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# A. Responsible Personal Information Handler

The publisher of this privacy notification is VfL Wolfsburg (Beijing) Football Club Co., Ltd, whose registered address is at Unit 0901A, Tower D1, No. 19 Dongfang (Dong) Road, Chaoyang District, Beijing China and whose unified social credit code is 9110105MA01Q6X30E. Whenever reference is made below to "VfL Wolfsburg", "we" or "us", this always refers to VfL Wolfsburg (Beijing) Football Club Co., Ltd..

# B. General Principles

VfL Wolfsburg (Beijing) Football Club Co., Ltd.. is a subsidiary of VfL Wolfsburg-Fußball GmbH and as such a subsidiary of Volkswagen AG, one of Germany's largest corporations. This results in a great responsibility for our employees. We hereby inform you as an employee about how we collect, process and transfer your personal data, why we do this, what rights you have and how you can contact us. We regularly use your personal data in many processes. Of course, we do not sell your data, nor do we make it available to other unauthorized third parties. Furthermore, we only pass on your data to the extent necessary within our company and to authorized third parties.

# C. Processing of your Personal Data

We receive most of the data directly from you. We may also receive data from third parties, e.g. from authorities, health insurance companies or other companies such as VfL Wolfsburg-Fußball GmbH or other Volkswagen group companies.

We use the data received in connection with, among other things for:

For initation of a possible sponsoring or other contract we may process your personal data in order to check to check the integrity of a potential contractual partner in advance. The company data is checked, for example, with regard to the creditworthiness and criminal misconduct of the responsible persons.

In the course of the implementation of any contractually agreed services, such as the provision of advertising services or the organization of individualized events, personal data may be processed when performing the service(s) to be provided.

Sponsor, licensee, dealer and supplier contacts may be stored and processed in customer management systems as creditors for the operational process of the supply chain. Here, in particular the processing of names and contact options such as e-mail addresses or telephone numbers of contact persons is required as part of the execution of the contract.

In addition, we would like to point out that we may have drawn up separate data protection declarations for certain topics, which will be made available to you when the respective processes are carried out.

# D. Categories of your processed Personal Data

The following categories of your personal data are processed as part of the above-mentioned processes:

* **contract data**
* **professional contact and (work) organizational data** (e.g. surname, first name, signature, business address, business e-mail address and telephone number, personnel number, area, department, cost centre)
* **data on personal/professional circumstances and characteristics**

**Bank data**

# E. Legal Basis for Processing your Personal Data

Your personal data will only be collected, processed and transmitted for a specific purpose and only if there is a relevant legal basis for doing so. The purposes described above are based on the following legal bases:

* **consent** e.g. for release of a photo on the intranet, participation in selection procedures as part of personnel development, registration for information events (c.f. Art. 13 Nr. 1 PIPL)
* establishment, performance or termination of a **contract** or contract initiation with the data subject (c.f. Art. 13 Nr. 2 PIPL)
* collective agreement (e.g. company agreements, collective agreements) (c.f. Art. 13 Nr. 2 PIPL)
* **special statutory regulation** outside PIPL (c.f. Art. 13 Nr. 3 and Nr. 7 PIPL)**protection of vital interests** (c.f. Art. 13 Nr. 4 PIPL) (e.g. contact tracing during pandemics

# F. Passing Personal data to third Parties

In individual cases, we may pass on your data to authorized third parties. These may be, for example:

* **mother company** (e.g. as part of joint sponsoring activities or as part of services to be provided to each other).
* **other Volkswagen Group companies** (e.g. as part of leasing contracts to Volkswagen Leasing GmbH, as part of your development planning to Volkswagen AG, in connection with the provision of services to Volkswagen Group Services GmbH)
* **Public authorities** (e.g. as part of your payroll accounting to pension insurance companies and tax offices, health insurance companies)
* **Hotels and airlines** (e.g. as part of business travel services)
* **Umbrella sporting associations** (DFB or DFL for the implementation of match operations and for obtaining licenses). This primarily concerns data of officials on match days (e.g. event managers, security and fan officers) and in general (e.g. finance officer, media officer, coaching staff, management)The **local police**

We may entrust other companies the handling of your data to processors. These processors are subject to the instructions of VfL Wolfsburg (Beijing) Football Club Co., Ltd. and may not themselves decide on the data processing purposes and the use of the data.

We have concluded an data processing contracts with each of our processors and agreed appropriate guarantees to safeguard the protection of personal data. The processors have suitable technical and organizational measures in place to protect personal data and are regularly monitored by us.

# G. Cross Border (outbound) Data Transfer

According to Art. 39 PIPL we would like to inform you about possible outbound data transfers.

Data may be exchanged between companies, e.g. within the Volkswagen Group as well as with joint ventures or other business partners outside and also in countries other than China, e.g. for processes in regard to the mother company, for the processing of international sponsoring measures or when using cloud software.

We would like to point out that the level of data protection in other countries outside the scope of the PIPL may not correspond to the same level of data protection. However, for instance the GDPR in Europe provides for extremely high standards in regard to data protection.

As of this date, your personal data is transferred by VfL Wolfsburg (Beijing) Football Club Co. Ltd. to the following companies:

* VfL Wolfsburg (Beijing) Football Club Co., Ltd. transfers employee data to **VfL Wolfsburg-Fußball GmbH**, In den Allerwiesen 1, 38446 Wolfsburg, Germany. The data transferred may include contract data, professional contact and (work) organizational data, bank data. Your rights can be exercised by contacting [datenschutz@vfl-wolfsburg.de](mailto:datenschutz@vfl-wolfsburg.de). Your rights towards VfL Wolfsburg-Fußball GmbH are the same as under PIPL (please see below). For exercising your right to complain please contact the local data protection authority “Landesbeauftragter für den Datenschutz Niedersachsen”, you can complain online under: <https://lfd.niedersachsen.de/startseite/meldeformulare/online_beschwerde/>

# H. Detention Periods / Deletion of your Personal data

Your personal data will only be processed and stored for as long as the respective purpose exists or as required by law. We delete your data in accordance with our deletion concept, which includes the company wide KSU-system.

# I. Your Rights

You can assert your rights at any time free of charge by using the contact details provided in this declaration:

**Right to information:** In accordance with Art. 44 PIPL you have the right to receive information from us about the processing of your personal data. According to Art. 45 PIPL you also have the right to right to consult and copy your personal information. According to Art. 48 you have the right that we explain the personal information handling rules to you.

**Right to rectification** in accordance with Art. 46 PIPL: You have the right to obtain from us the rectification of inaccurate or incomplete personal data concerning you.

**Right to deletion** in accordance with Art. 47 PIPL: You have the right to request the erasure of your data if the conditions specified in Art. 47 GDPR are met. For example, you can request the erasure of your data if it is no longer necessary for the purposes for which it was collected. You can also request erasure if we process your data on the basis of your consent and you withdraw this consent.

**Right to rescind** your consent according to Art. 15 PIPL. Where personal information is handled based on individual consent, you have the right to rescind the consent.

**Right to complain** according to Art. 61 Nr. 2 PIPL. Your have the right to complain towards the respective data protection authorities.

# J. Future Adjustments

We reserve the right to update this document from time to time. Updates to it will be published on the intranet. Changes will apply from the date of publication. We therefore recommend that you visit the intranet regularly to check for any updates.

# K. Contact Person

Your contact person is the data protection responsible at VfL Wolfsburg (Beijing) Football Club Co., Ltd. The contact person is available under:

Data protection responsible

VfL Wolfsburg (Beijing) Football Club Co., Ltd,

Unit 0901A, Tower D1,

No. 19 Dongfang (Dong) Road,

Chaoyang District,

Beijing

China

Email: [Data-protection@vfl-wolfsburg.cn](mailto:Data-protection@vfl-wolfsburg.cn)