

Data Protection and Privacy Information of Porsche Financial Services GmbH

Porsche Card Program for consumer and business customers (including partner cards)

With the My Porsche App, Porsche Sales & Marketplace GmbH (hereinafter "**PSM**") offers you a central application with which you can use not only PSM functions and services, but also services from other providers. We, Porsche Financial Services GmbH (hereinafter "we" or "**PFS**"), appreciate your use of the Porsche Card Portal in the My Porsche App and the associated functions (hereinafter "**Porsche Card Portal**") and your interest in PFS and our products. The following data protection and privacy information relates both to the Porsche Card Portal and to our data processing in connection with the application, administration and use of the credit card when participating in the Porsche Card Program and Porsche Card Program Business for business customers ("**Porsche Card**"), including participation in the Porsche Card Program for partner cardholders ("**Porsche Card (Partner Card)**"), unless explicitly stated otherwise. For the use of the My Porsche App, we also refer to the specific data protection and privacy information for the My Porsche App of PSM.

The Porsche Card is issued by Enfuze License Services Ltd. (hereinafter "**Enfuze**") pursuant to licence by Visa Europe Limited (hereinafter "**VISA**"). Enfuze is licensed by the Finnish Financial Supervisory Authority as an Electronic Money Institution. PFS is the manager of the Porsche Card program and Bankaktiebolaget Nordiska (publ) (hereinafter "**Nordiska**") acts as credit provider in the cooperation. Nordiska is a bank authorized by the Swedish Financial Supervisory Authority (Finansinspektionen). Accordingly, our cooperation partners also collect and process your data partly as independent controllers and partly as joint controllers with us. We also act as a processor for our cooperation partners for certain data processing. In this respect, we refer you to the data protection and privacy information of our cooperation partners, which you can access here [\[link\]](#) in Section "Downloads" for Enfuze and Nordiska. Further information on joint processing with and data transfer to our cooperation partners can be found in Section 2.2 and 6.3 of the complete data protection and privacy information.

Summary of the data protection and privacy information

In the following, we would like to provide you with this summary of our data protection and privacy information to give you an overview of the processing of your data. Subsequent to this summary you will find the complete data protection and privacy information for the Porsche Card Program of PFS. You can also access the respective Sections of the complete data protection and privacy information via a link provided at the end of each Section.

1. Scope of application

This data protection and privacy information applies to the processing of your data by PFS for the use of the Porsche Card Portal and the associated functions as well as the application, administration and use of the Porsche Card and the associated card services and benefits. You can find further information on this in Section 1 of the complete data protection and privacy information.

2. Contact

If you wish to exercise your rights as a data subject or have any other questions regarding this information, please contact the controller via financial.services@porsche.de or the controller's data protection officer via pfs-datenschutz@porsche.de. You can find further information on this in Section 2 of the complete data protection and privacy information.

3. Processing of your data

We process data that you or third parties provide to us when using the Porsche Card portal and the associated functions, as well as when applying for, managing and using the Porsche Card and the associated card services and benefits. This may include the following data in particular: Your name and other master and contact data, communication data, banking detail data (only Porsche Card), contract data, signature, transaction data, card data, billing data, technical data as well as authentication and authorization data, customer relationship and vehicle data and, if applicable, other data related to the performance of the business relationship. Less personal data is processed as part of the Porsche Card Business Program (for example, only the company's bank details for certain business customers). You can find further information on this in Section 3 and 5 of the complete data protection and privacy information.

4. Processing purposes and legal bases of the processing of your data

Your data is processed for the following specific product-related purposes:

- Processing the application to participate in the Porsche Card Program
- Registration in the Porsche Card Portal using Porsche ID
- Provision of the Porsche Card Portal (incl. the interaction with you)
- Only for the Porsche Card: Provision of the Porsche Card Account
- Management of the physical and virtual Porsche Card (e.g. creation, delivery, replacement, exchanges, settings, plausibility checks)
- Authentication, processing and display of card transactions and access to card invoices
- Granting of card services and benefits associated with the credit card
- App tracking for user support, usage analysis and evaluation, user analysis and evaluation, requirements analysis and user segmentation, strategic brand positioning, review and optimization of products and services

In addition, your data may be processed for the following general purposes: Customer inquiries including complaint management, auditing, accounting and taxes, ensuring legally compliant actions and compliance with legal requirements, disclosure in the context of official/judicial measures, assertion of and defense against legal claims (including storage and archiving), ensuring availability, operation and security of technical systems as well as technical data management, controlling, business/risk management as well as process and product improvement and customer and prospective customer care/advertising. We only process your data, if there is a corresponding legal basis. You can find further information on this in Section 4 of the complete data protection and privacy information.

5. Data transfers and recipients and legal justification for such transfers

Within PFS, your data is received by those departments that require these in the course of their practice. We will only pass on your data to external recipients outside PFS (e.g. Nordiska, Enfuze, PSM) if this is necessary for the processing or handling of your request or for the performance of the contract or if another legal permission (e.g. an overriding legitimate interest) exists or if your valid consent is provided for this. You can find further information on this in Section 6 and 8 of the complete data protection and privacy information. Further data protection information on the implementation of customer and prospective customer support at Porsche can be found in Section 7 of the complete data protection and privacy information.

6. Automated decision-making and profiling

The credit check carried out as part of the digital application process is the responsibility of Nordiska. PFS does not use automated decision-making pursuant to Article 22 General Data Protection Regulation ("GDPR") for the preparation, establishment and execution of business relationships in the Porsche Card Program. We create a customer profile for you in order to personalize customer and prospect support. You can find further information on this in Section 9 of the complete data protection and privacy information.

7. Retention periods for and deletion of your data

Your data will be deleted as soon as it is no longer required for the purposes for which it was originally collected or if this is required in accordance with the applicable statutory provisions, unless there are contractual or statutory retention periods or retention rights that prevent deletion. You can find further information on this in Section 10 of the complete data protection and privacy information.

8. Your statutory rights

In accordance with the applicable legal provisions, you have certain rights, such as the right to information about your data and to rectification, erasure or restriction of processing, as well as the right to data portability. Please direct your questions to the contact details provided in Section 2 of the complete data protection and privacy information. You can find further information on this in Section 11 of the complete data protection and privacy information.

Complete Data Protection and Privacy Information

1. To whom does this data protection and privacy information apply?

This data protection and privacy information applies to the processing of your data by PFS in connection with the use of the Porsche Card Portal in the My Porsche App and the associated functions, as well as the application, administration and use of the Porsche Card and the associated card services and benefits

We provide you with the Porsche Card in cooperation with our partners VISA, Enfuze and Nordiska. Accordingly, our cooperation partners also collect and process your data partly as independent controllers and partly as joint controllers with us. We also act as a processor for our cooperation partners for certain data processing. In this respect, we refer you to the data protection and privacy information of our cooperation partners, which you can access here [\[link\]](#) in Section "Downloads" for Enfuze and Nordiska. Further information on joint processing with and data transfer to our cooperation partners can be found in Section [2.2](#) and [6.3](#).

This data protection and privacy information does not apply to the expiring Porsche Card S credit card issued by Deutsche Kreditbank AG.

2. Who is responsible for data processing and who can you contact on the topic data protection?

2.1 Controller and data protection officer

Porsche Financial Services GmbH

Porschestraße 1,
D-74321 Bietigheim-Bissingen, Germany
Phone: +49 711 911-12003
E-Mail: financial.services@porsche.de

If you have any questions about data protection, you are welcome to contact our data protection officer. He can be contacted by post at the aforementioned address of the controller with the addition "Data Protection Officer, PFS Group Data Protection" or by e-mail at pfs-datenschutz@porsche.de.

2.2 Joint controlling

With regard to processing in the context of intra-group administration and division of labor through centralized systems, we are generally joint controllers with other group companies of Dr. Ing. h.c. F. Porsche AG. The joint processes relate in particular to the operation and use of shared databases, platforms and IT systems. Information on joint controlling in connection with customer and prospective customer support can be found in Section [Z](#).

A joint controlling with PSM in relation to the processing of personal data exists in relation to

- The provision of the sales platform (My Porsche App), including associated applications and the possibility of product placement by PFS as well as digital marketing on the sales platform and
- Registration and login procedure using the Porsche ID for the purchase and processing of PFS products via corresponding websites and apps. This means that you do not have to remember any new login details for our online services. The Porsche ID and the corresponding service are provided by PSM. Details on registering a user account for a Porsche ID can be found in PSM's privacy policy. Additional information on data protection when using the relevant websites and apps can also be found in the respective online application Section.

Further Information can be found in Section [6.1](#).

The exchange of personal data between us and other group companies as joint controllers is generally carried out on the basis of Article 6(1)(f) GDPR, as we have a legitimate interest in the effective implementation of processing within the framework of internal group administration and division of labor through centralized systems. Data processing as part of the registration and login process involving the Porsche ID is carried out on the basis of Article 6(1)(b) and (f) GDPR in order to register you with your user account for our online services or to identify you during your login. In addition to carrying out the procedure or process you have requested, we are interested in designing the registration and login process efficient and convenient.

A joint controlling with Enfuze and Nordiska exists within the framework of the Porsche Card Program with regard to the support services if, for example, you use the services of the Porsche Customer Relations Hub, unless the request relates to topics that are the sole responsibility of Enfuze and/or Nordiska from a regulatory perspective. A joint controlling with VISA exists regarding specific card-linked promotions (e.g. general cashback offers and e-charging discount offers). The exchange of personal data between us and Enfuze, Nordiska and VISA as joint controllers is carried out on the basis of Article 6(1)(b) and (f) GDPR in order to offer and guarantee you a functioning Porsche Card program.

Together with the respective companies, we determine the purposes and means of processing personal data in relation to joint processes. In accordance with Article 26 GDPR, we have entered into an agreement with the relevant companies on joint controlling. This agreement defines how the respective tasks and responsibilities for processing personal data are structured, as well as which data protection obligations each party fulfills. In particular, we have defined how an appropriate level of security and your rights as a data subject can be ensured, how we can jointly fulfill the information obligations under data protection law and how we can monitor potential data protection incidents. This also includes ensuring that we can fulfill our reporting and notification obligations (insofar as we are obliged to do so). You can request further information on this agreement via the contact options listed above. We will then provide you with the essential provisions in justified cases.

PFS is available to you as a central point of contact. However, you can also assert your rights in relation to processing under joint controllership against a jointly responsible company. If you contact us, we will coordinate with the relevant companies in accordance with the agreement referred to in Article 26 GDPR in order to answer your request and guarantee your rights as a data subject.

3. Where does your data come from and what data is processed?

We process your data in accordance with the principles of data avoidance and data minimization only to the extent that it is necessary, we are permitted to do so on the basis of applicable legal requirements or we are legally obliged to do so or you have given your consent.

3.1 Categories of personal data

We initially process data that you provide to us in the context of using the Porsche Card Portal and the associated functions and in connection with the application, administration and use of the Porsche Card. Relevant data is usually:

- Master data (in particular first and last name, date of birth)
- Only for the Porsche Card (Partner Card): Relationship between main cardholder and partner cardholder (marriage, partnership, childhood, parenthood)
- Contact details (in particular address, telephone numbers, email addresses)
- Communication data (e.g. data from postal, electronic and telephone communication)
- Only for the Porsche Card: Bank details (e.g. bank name, IBAN/BIC, account holder)
- Technical data (in particular device identifiers, log files)
- Authentication and authorization data (in particular your signature, Porsche ID, CIAM)
- Customer relationship data (e.g. existing/new customer status, voucher codes)
- Information about your Porsche vehicle (e.g. age, model, specifications) and
- Other data related to the performance of the respective business relationship.

Special categories of personal data: According to the GDPR, special categories of personal data include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. While we do not process these categories of personal data directly, such data may be derived from transaction data, e.g. based on the recipient of a payment (e.g. in the case of a religious or political organization).

Less personal data is processed as part of the Porsche Card Business Program (for example, only the company's bank details for certain business customers). For employees of companies within the Dr. Ing. h.c. F. Porsche AG Group, employment data, transaction data relating to costs and fees, as well as information regarding the type and scope of use of products and services of group companies of Dr. Ing. h.c. F. Porsche AG are also processed.

If you have already entered data in your Porsche ID user account, this user account data is automatically transferred to the corresponding fields of the digital application. The Porsche ID user account is operated by PSM. For information on data processing by PSM, please refer to PSM's privacy policy, which is available in the My Porsche app (under "Legal" → "Privacy policy").

3.2 Data from other sources

In compliance with the legal requirements, information about your person for the purpose of contract initiation and processing within the framework of the Porsche Card Program and for customer and prospective customer support may also be requested and processed by our cooperation partners (e.g. Enfuze, Nordiska and cooperation partners for the granting of card services and benefits) and other third party sources, e.g.:

- Contract data (e.g. card data such as card type, card number, issue and expiration date, CVV code, card PIN, card status and limit, card color, card fees and discounts)
- Transaction data (in particular date and location, total, currency, name of recipient, description of turnover, reversals/chargebacks)
- Information on personal circumstances (in particular civil status)
- Only for the Porsche Card: Information about personal financial circumstances (in particular income and financial circumstances, other creditworthiness data)
- Usage data relating to the use of card services and benefits (in particular booking and reservation information)
- Billing data (in particular invoice date, total amount of the transaction made with the credit card, billing amount)
- App usage data (in particular information on app interactions).

Less personal data is processed as part of the Porsche Card Business Program (for example, marital status is processed only for certain business customers). For employees of companies within the Dr. Ing. h.c. F. Porsche AG Group, employment data and information regarding the type and scope of use of products and services of group companies of Dr. Ing. h.c. F. Porsche AG are additionally collected from third parties.

4. For which purposes are your data processed and on what legal basis?

We always process your data for a specific purpose and only to the extent necessary to fulfill this purpose. Your data is processed on the foundation of the following legal bases:

- You have given your consent (Art. 6 (1) (a) GDPR);
- The processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract (Art. 6 (1) (b) GDPR);
- The processing is necessary for compliance with a legal obligation to which PFS is subject (Art. 6 (1) (c) GDPR); and / or
- Processing is necessary for the purposes of the legitimate interests pursued by PFS or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data (Art. 6 (1) (f) GDPR).

The following overview specifies which of the data categories described in Section 3 are processed for which specific product-related purposes and the respective legal basis for the processing:

Purpose	Data categories	Legal basis	Legitimate interest in balance of interests
Processing the application to participate in the Porsche Card Program	Section 3.1	Contract initiation and performance (Art. 6 (1) (b) GDPR)	
Provision and verification of voucher code usage	Section 3.1.	Contract initiation and performance (Art. 6 (1) (b) GDPR), fulfillment of legal obligations (Art. 6 (1) (c) GDPR)	
Registration in the Porsche Card Portal via Porsche ID	Authentication and authorization data, technical data, app usage data, master data, communication data, vehicle data	Contract initiation and performance (Art. 6 (1) (b) GDPR), balance of interests (Art. 6 (1) (f) GDPR)	Efficient and convenient design of the registration and login process
Provision of the Porsche Card Portal (including interaction with you)	Master data, contact data, contract data, technical data, authentication and authorization data	Contract initiation and performance (Art. 6 (1) (b) GDPR)	

Purpose	Data categories	Legal basis	Legitimate interest in balance of interests
Only for the Porsche Card: Provision of the Porsche Card Account	Master data, contact data, bank details, contract data, technical data, authentication and authorization data	Contract initiation and performance (Art. 6 (1) (b) GDPR)	
Management of the physical and virtual Porsche Card (e.g. ordering, delivery, replacement, exchanges, personalization, plausibility checks)	Master data, contact data, contract data, technical data, authentication and authorization data Only for Porsche Card additionally: bank details	Contract initiation and performance (Art. 6 (1) (b) GDPR)	
Granting of card services and benefits associated with the Porsche Card (e.g. advantage/special conditions, parking, charging, insurance benefits)	Depending on the card service and benefit, some or all of the following data categories: Master data, contract data, usage data, authentication and authorization data, billing data, vehicle data	Contract performance (Art. 6 (1) (b) GDPR)	
Only for the Porsche Card: Risk management	In particular so called Class C agreements: Master data, contact data, contract data, information on personal circumstances (creditworthiness data)	Contract performance (Art. 6 (1) (b) GDPR), balance of interests (Art. 6 (1) (f) GDPR)	In certain cases, the PFS bears the default risk in order to offer these customers a Porsche Card with a certain credit card limit: Risk minimization and safeguarding of profitability when granting loans to so-called Class C customers.
App tracking for user support and user/usage analysis and evaluation,	App usage data	Consent (Art. 6 (1) (a) GDPR), balance of interests (Art. 6 (1) (f) GDPR to the extent permitted by law	Review and optimization of products and services, needs analysis and user segmentation, strategic brand positioning

The following overview specifies the additional general purposes for which all of the data categories described in Section 3 can be processed, as well as the respective legal basis for the processing:

Purpose	Legal basis	Legitimate interest in balance of interests
Customer inquiries including complaint management (insofar as this relates to processing for which we are responsible; otherwise, we may act as a processor for the cooperation partners)	Contract initiation and performance (Art. 6 (1) (b) GDPR), balance of interests (Art. 6 (1) (f) GDPR)	Practical design of processes within the business relationship
Audit	Fulfillment of legal obligations (Art. 6 (1) (c) GDPR), balance of interests (Art. 6 (1) (f) GDPR)	Effectiveness and appropriateness of risk management, in particular the internal control system, regularity and efficiency of activities and processes
Accounting and taxes	Fulfillment of legal obligations (Art. 6 (1) (c) GDPR)	
Ensuring legally compliant actions and compliance with legal requirements; disclosure in the context of official/judicial measures, assertion of and defense against legal claims (incl. storage and archiving)	Fulfillment of legal obligations (Art. 6 (1) (c) GDPR), contract initiation and performance (Art. 6 (1) (b) GDPR), balance of interests (Art. 6 (1) (f) GDPR)	Assertion and defense of our rights (including preservation of evidence for this), proof of compliance with legal requirements, prevention of and protection against legal violations
Ensuring the availability, operation and security of our technical systems and our technical data management	Fulfillment of legal obligations (Art. 6 (1) (c) GDPR), balance of interests (Art. 6 (1) (f) GDPR)	Risk/quality management, guaranteeing protection objectives (integrity and confidentiality, availability, traceability)
Controlling, business/risk management	Fulfillment of legal obligations (Art. 6 (1) (c) GDPR), balance of interests (Art. 6 (1) (f) GDPR)	Evaluations for controlling business processes (including incentives), cost control
Process and product improvement (including the development and further development of systems (including artificial intelligence) for process improvement)	Consent (Art. 6 (1) (a) GDPR), balance of interests (Art. 6 (1) (f) GDPR to the extent permitted by law	Ongoing process and product optimization (incl. front-end development)
Customer and prospective customer care/advertising (for more information, see Section 7)	Consent (Art. 6 (1) (a) GDPR), balance of interests (Art. 6 (1) (f) GDPR to the extent permitted by law	Ensuring customer and prospective customer support

5. Is there an obligation to provide personal data?

As part of the business relationship with you, you only have to provide the data that is necessary for the performance of the contract or for the implementation of pre-contractual measures, that we are legally obliged to collect or that is necessary to protect the legitimate interests of PFS. If you do not provide us with the relevant data, it may not be possible to provide certain services. If the processing of your data is not absolutely necessary for the conclusion and performance of the contract, your information is provided on a voluntary basis and is marked accordingly as voluntary information.

6. Who receives and processes your data?

Within PFS, only those departments that require your data in the course of their practice will receive these. We will only pass on your data to external recipients as part of the Porsche Card Program, if this is necessary for the performance of the contract to which you are a party or for the implementation of pre-contractual measures or if another legal permission (e.g. an overriding legitimate interest) exists or if we have your effective consent for this.

6.1 Provision of data in the PSM My Porsche App

With the My Porsche App, PSM offers you a central application with which you can not only use functions and services as part of the Porsche Card Program. In this respect, as well as for data processing by PSM, we refer to the specific privacy policy for the My Porsche App of PSM, in particular the General Information for the use of the My Porsche App (e.g. access authorizations in the end device, data processing for usage analysis and improvement of the app offer), available in the My Porsche App (Section "Legal" → "Privacy Policy").

Porsche Financial Services uses PSM's My Porsche app as part of the application processes, digital contract management and customer and prospect support. The availability of functions and services may vary depending on the product. The Porsche Card Portal in the My Porsche App allows you to use your Porsche ID to submit an application to participate in the Porsche Card Program and to manage your physical and virtual Porsche Card. The technical support and provision of technical solutions for contract initiation and performance within the framework of the Porsche Card Program (e.g. card configuration options), including the technical connection of the cooperation partners (e.g. for identity and, in case of the Porsche Card additionally, credit checks), (only for Porsche Card) the integration of the Porsche Card Account for the processing of sub-processes of the Porsche Card Account via the Porsche Card Portal (e.g. display and authentication of card transactions, display of credit card invoices, PIN assignment), as well as for the use of card-specific benefits and the initiation of additional products or follow-up contracts is carried out by PSM within the framework of data processing.

6.2 Data transfer to other companies or divisions of the Porsche Group

Companies or divisions of the Porsche Group perform certain data processing tasks for the affiliated companies in the Group centrally as part of a joint controlling or as processors (such as the provision of IT services) on behalf of PFS. As far as you conclude contracts with us, certain data may be transmitted within the Porsche Group for internal administrative purposes (e.g. for the central administration of address data, for customer service via the Porsche Contact Center, for contract and service processing, for claims management, for joint mail processing or internal auditing) and processed centrally by a Porsche Group company. Further information on customer and prospective customer support at Porsche can be found in Section 7.

For employees of companies within the Dr. Ing. h.c. F. Porsche AG Group, information is exchanged with the respective Group company of Dr. Ing. h.c. F. Porsche AG acting as the employer for the purpose of verifying eligibility to participate in the Porsche Card Program and the Porsche Card Program for partner cardholders, as well as for the handling of any recharging of costs and fees and related tax processing.

6.3 Further information regarding processing by our cooperation partners

We provide you with the Porsche Card Program together with our cooperation partners VISA, Nordiska and Enfuze. As part of the digital application process for applying for a Porsche Card and the subsequent use and administration of the Porsche Card, our cooperation partners also collect and process your personal data to the extent required or permitted.

The video identification procedure used for identification as part of the digital application process is carried out by Nordiska and its service provider Signicat S.L.U. With the exception of the result (i.e. whether the procedure was successful or not), PFS does not have access to this data. Nordiska is also responsible for the creditworthiness check for the Porsche Card and the associated data exchange with SCHUFA Holding AG as well as the other checks required for legal reasons (e.g. sanctions list check, PEP comparison). For the data collection required for this purpose (e.g. data on personal financial circumstances and vehicle-related data) as part of the digital application process, we act in part as a processor. In this respect, as well as for data processing by Nordiska in general (e.g. also in relation to card invoices), we refer to Nordiska's data protection and privacy information, available in Section "Downloads" here [\[link\]](#).

For the processing of your data by Enfuze as the issuer of the credit card and with regard to any transfer of data to Visa and other third parties, please refer to the data protection and privacy information of Enfuze, available in Section "Downloads" here [\[link\]](#) and VISA, available here [\[link\]](#).

In order to be able to offer you an insurance package as part of the Porsche Card Program, it is necessary to pass on your data to our cooperating insurance company, Europ Assistance SA. We refer you to the privacy notice of Europ Assistance SA as the separately responsible party, available at www.europ-assistance.com/web-privacy-notice/.

6.4 Data transfer to other processors

To support the provision of the services and purposes listed, PFS uses a number of other external service providers who act on behalf of PFS in accordance with the strict requirements of data protection law. Service providers used by us and acting on our behalf are, for example, IT service providers and other business partners and auxiliary persons (e.g. the Card-as-a-Service (CaaS) provider Enfuze Financial Services Ltd., credit card producers, logistics, call centers, marketing agencies). VISA is our processor in relation to the provision of services for access to airport lounges (so-called PriorityPass), including the determination of eligibility.

6.5 Other recipients of personal data

In addition, we may pass on your data to the following categories of recipients, who act as data controllers under data protection law, insofar as this is necessary to achieve the purposes described above:

- Cooperation and other business partners (e.g. consulting service providers, lawyers, tax consultants, public accountants and other external auditors, debt collection agencies, address research providers, appraisers, banks, event organizers),
- Authorities within their competent jurisdiction (e.g. tax office, police, public prosecutor's office, courts, financial supervisory authorities, fine authorities),
- Other responsible third parties.

The transfer then takes place on the basis of the fulfillment of legal obligations (Art. 6 (1) (c) GDPR) or a balancing of interests (Art. 6 (1) (f) GDPR).

7. **How is customer and prospective customer care implemented at Porsche?**

In the following, we would like to provide you with further data protection information on the implementation of customer and prospective customer care at Porsche. The measures serve to ensure customer and prospective customer support.

7.1 Joint customer and prospective customer care at Porsche

The measures within the scope of customer and prospective customer support (in particular service and support, implementation of legal requirements, needs analyses, individual support via the desired communication channels) are generally not carried out solely by the person responsible. In addition to the responsible Porsche Center, Porsche Deutschland GmbH as the importer and, in the context of international support, the respective local importers, Dr. Ing. h.c. F. Porsche AG as the manufacturer and its affiliated companies in the areas of financial and mobility services, digital services and lifestyle products. A current list of the companies involved with their contact details for support in Germany is available here: <https://www.porsche.com/germany/joint-customer-care>.

By using a central platform, we avoid a situation where information about your products, contact details and interests is not available from your Porsche contact person and you may therefore have to be referred to another participating company first. This also applies in the event that the operating company of your respective Porsche Center changes. By exchanging and comparing data, we ensure that you receive the best possible support and advice. It is essential to emphasize that only the involved companies have access to your data, which need these for operational purposes.

Joint customer and prospect care can lead to joint controlling in certain cases. For this reason, the companies involved have defined in an agreement in accordance with Article 26 GDPR how the respective tasks and responsibilities for the processing of personal data are structured and who fulfills which data protection obligations. In particular, it was determined how an appropriate level of security can be achieved and how your data subject rights and data protection information obligations can be guaranteed. Porsche Deutschland GmbH (Porschestr. 1, D-74321 Bietigheim-Bissingen, Germany, <https://www.porsche.com/germany/privacy/contact/>) is available to you as a central point of contact alongside the other companies involved.

7.2 Individual customer and prospective customer care

If you have given your voluntary consent to individual customer and prospective customer care, contact data, support and contract data (e.g. on purchase, leasing or financing), service information and data on interests, vehicles and services and products used will be used by the companies involved in joint customer and prospective customer care in order to send you personally tailored information and offers on vehicles, services and other Porsche products, invitations to events and surveys on satisfaction and expectations via the desired communication channels.

We create a customer profile for you in order to personalize customer and prospect care.

The specific data used for this purpose depends on the data collected or provided by you on the basis of contracts, orders and consultations (e.g. during a consultation at the Porsche Center or as part of your activities under your Porsche ID on My Porsche). The data may also originate from contracts or orders that are processed in collaboration with cooperation partners (e.g. insurance companies) and from whom we may then receive the information. If appropriate consent has been given, other data sources may also be included. This may include data on usage behavior or vehicle status in relation to the vehicles assigned to you (e.g. identification, basic, usage, analysis, environmental and traffic data, as well as location and movement data) or on the use of digital media (e.g. website usage). You will receive more detailed information on the merging of the data with the corresponding consent.

In order to offer an inspiring brand and customer care experience with Porsche and to make communication and interaction as personal and relevant as possible, the aforementioned data is used for needs analyses and customer segmentation. On this basis, affinities, preferences and potentials, for example, can be determined by the companies involved as part of individual customer and prospective customer support. Examples of such measures to individualize customer care are key figures on your probable product interests and satisfaction. The corresponding information and analysis results are stored in your customer profile and are then available for the individual design of customer and prospect customer care. The personal evaluation and assignment in a customer profile only takes place, if this serves your individual customer and prospect customer care. Individual customer and prospect customer care without these optimization and personalization measures is not offered.

Beyond the individual measures in relation to direct communication with you, we only use the aforementioned data as part of general measures for the design of customer and prospective customer care to carry out general evaluations based on the aggregated data of customers and prospective customers in order to optimize our offers and systems and to align them with overarching interests. Please note that data on usage behavior or vehicle condition in relation to the vehicles assigned to you or the use of digital media may also be used for this purpose, if you have given the corresponding consent. Please also note that your data may also be analyzed beyond the scope of customer and prospective customer care; this is done on the basis of your specific consent or another legal basis.

When we send e-mails for individual customer and prospect customer care, we may use standard market technologies such as tracking pixels or click-through links. This allows us to analyze which or how many emails are delivered and/or rejected and/or opened. The latter is done in particular using tracking pixels. It is not possible to fully measure the opening rate of our emails using tracking pixels, if you have deactivated the display of images in your email program. In this case, the email will not be displayed in full. However, it is still possible for us to track, whether an email has been opened, if you click on text or graphic links in the email. By using click-through links, we can analyze which links in our emails are clicked on and deduce what interest there is in certain topics. When you click on the relevant link, you are forwarded to our separate analysis server before the target page is called up. Based on the analysis results, we can make emails more relevant, send them in a more targeted manner or prevent them from being sent as part of our individual customer and prospect customer care. Emails are only sent and their use analyzed, if you have given your voluntary consent to individual customer and prospect customer care. Individual customer and prospective customer care without the described evaluation for optimization is not offered.

8. **Will your data be transferred to a third country or to an international organization?**

If data is transferred to bodies whose registered office or place of data processing is not located in a member state of the European Union, another signatory state to the Agreement on the European Economic Area or a state for which an adequate level of data protection has been established by a decision of the European Commission, we will ensure before the transfer that the data transfer is either covered by a legal authorization, guarantees for an adequate level of data protection exist in relation to the data transfer (e.g. by agreement of contractual guarantees, officially recognized regulations or binding internal data protection regulations at the recipient) or you have given your consent to the data transfer.

If the data transfer takes place on the basis of Article 46, 47 or 49 (1) (2) GDPR, you can obtain a copy of the guarantees for the existence of an adequate level of data protection in relation to the data transfer from us. Please use the contact information above for this purpose.

9. **To what extent is there profiling and automated decision-making?**

PFS does not use automated decision-making in accordance with Article 22 GDPR to prepare, establish and conduct business relationships in the Porsche Card Program. We create a customer profile for you in order to personalize customer and prospect customer support. This takes place within the scope of the purposes stated in Section 7.2 and on the basis of the legal bases stated there.

The credit check carried out as part of the digital application process is the responsibility of Nordiska. In this respect, as well as for data processing by Nordiska, we refer to the data protection and privacy information of Nordiska, available in Section "Downloads" here [\[link\]](#).

10. **How long will your data be stored?**

We store your data for as long as this is necessary for the respective purpose for which we have collected your data. This means that we regularly store your data for the duration of our business relationship with you, unless it has to be deleted beforehand.

Irrespective of the purpose for which we have collected your data, we store it to the extent necessary to fulfill our retention and documentation obligations. These may arise from the German Commercial Code (HGB) and the German Fiscal Code (AO), among others. The retention and documentation periods specified there are up to 15 years, taking into account assessment periods and internal company requirements. Finally, the storage period may also be assessed according to the statutory periods for contesting and limitation periods, i.e. according to the period for which the data could be required to fulfill or defend against claims that have not yet expired (such as for the collection of claims and preservation of evidence). These periods can be up to 30 years, for example, in accordance with Sec. 195 ff. of the German Civil Code (BGB). Under certain circumstances, your data must also be stored for longer, e.g. in connection with official or court proceedings.

We will then remove your data from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from this data.

11. Which rights do you have?

As a data subject, you are entitled to the following data protection rights within the framework of the statutory provisions:

Right of access: You have the right to request information as to whether PFS is processing personal data relating to you. You also have the right to request information about the personal data stored by PFS about you and the scope of the data processing and disclosure carried out by us and to receive a copy of the personal data stored about you.

Right to rectification: You have the right to request the rectification of inaccurate personal data concerning you and the completion of incomplete data stored by PFS.

Right to erasure: You have the right to demand that we erase your personal data, provided that the legal requirements are met.

Restriction of processing: You have the right – provided the legal requirements are met – to request that the processing of your personal data be restricted. In this case, the relevant data will be marked and may only be processed by us for certain purposes.

Data portability: If you have provided us with personal data on the basis of a contract or consent, you can request that you receive the personal data you have provided in a structured, commonly used and machine-readable format or that we transfer it to another controller if the legal requirements are met.

Right to object: You have the right to object to data processing by us at any time for reasons arising from your particular situation, insofar as this is based on the protection of "legitimate interests". If you exercise your right to object, we will stop processing your data unless we can demonstrate compelling legitimate grounds for further processing that override your rights and interests in accordance with the statutory provisions.

Objection to direct marketing: If we process your personal data for the purpose of direct marketing, you have the right to object to data processing by us for this purpose at any time. If you exercise your right to object, we will stop processing your data for this purpose..

Withdrawal of consent: If you have given your consent for specific purposes, the purposes are determined by the respective content of this consent. You can withdraw your consent to the processing of your data at any time free of charge and with effect for the future. The revocation of a declaration of consent can be addressed to the contact details stated in Section 2.1. Please refer to the following designated contacts for matters relating to consent, the withdrawal of consent, and any related inquiries concerning:

- **Consent for individual customer and prospective customer care**
Central point of contact is Porsche Deutschland GmbH, Porschestr. 1, D-74321 Bietigheim-Bissingen, Germany – a short message by post or via the contact form <https://www.porsche.com/germany/privacy/contact/> is sufficient. Please ensure that we are able to clearly identify you.
- **Consent for profile enrichment**
Porsche Financial Services GmbH serves as the central contact point for these matters. You may contact us by email at pfs-datenschutz@porsche.de or using the contact details set out in Section 2.1. Alternatively, you may independently modify your preferences in the My Porsche App. Further information is available in the Porsche Card FAQs at <https://ask.porsche.com/de/de-DE/porsche-card/>.

Alternatively, when withdrawing your consent, you can also use the contact method you used when giving your consent. Please note that the revocation only takes effect for the future. Processing that took place before the withdrawal is not affected. If you withdraw your consent, we may no longer be able to provide all or part of our services without processing this data. We will erase the data if you have withdrawn your consent and there is no other legal basis for the data processing. If the latter is the case, we will delete the data once the other legal basis no longer applies.

Right to lodge a complaint with the supervisory authority: You can also lodge a complaint with the competent data protection supervisory authority, if you believe that the processing of your data violates applicable law. The right to lodge a complaint is without prejudice to any other administrative or judicial remedy. You can contact the data protection authority responsible for your place of residence or country or the data protection authority responsible for us:

The State Commissioner for Data Protection and Freedom of Information Baden-Württemberg
Lautenschlagerstraße 20, D-70173 Stuttgart, Germany
Phone: (+49) 07 11/61 55 41-0, Fax: (+49) 07 11/61 55 41- 15
Email: poststelle@lfdi.bwl.de

12. Your contact with us and the exercise of your rights

Furthermore, you can contact us free of charge, if you have any questions about the processing of your personal data, your rights as a data subject and any consent you may have given. To exercise any of your aforementioned rights, please contact us by email at PFS-Datenschutz@porsche.de or by post at the address given in Section 2 above. Please ensure that we are able to clearly identify you.

PFS is available to you as a contact partner with regard to the processing of your data in relation to the use of the Porsche Card Portal and the associated functions as well as the application, administration and use of the Porsche Card and the associated card services and benefits. If we are not responsible for data processing, we will forward your request to our cooperation partners accordingly.

13. Status and updating of the data protection and privacy information

We reserve the right to regularly review and update our data protection and privacy information. The latest version of this data protection and privacy information applies. We will publish any changes in the Porsche Card Portal in the My Porsche app and in Section "Downloads" here: <https://www.porsche.com/international/accessoriesandservice/porschefinancialservices/porsche-card/>.

Status: 01.08.2026