

## PRIVACY POLICY

This Privacy Policy (hereinafter referred to as the „**Policy**”) has been published on and is effective as of 18 May 2023.

### Data Controller and Contact Information:

Name of the company:	NNG Software Developing and Commercial Limited Liability Company
Registered office:	Szépivölgyi út 35-37., H-1037 Budapest, Hungary
Court of registration:	Budapest-Capital Regional Court (Fővárosi Törvényszék)
Company registration number:	01-09-891838
Tax number:	13357845-2-44
Email address:	privacy@nng.com
Support page:	<a href="https://www.naviextras.com/shop/portal/support">https://www.naviextras.com/shop/portal/support</a>

### 1. DEFINITIONS

**Application CID** identifies the exact navigation software version by device model, per region, per device variant.

**Content** means maps, points of interest, 3D content, voices, language files, and other navigation-related content, which can be uploaded on your Navigation Device and used with your Software.

**Connected Services** mean location-based services (local search, traffic information, fuel price, weather information, etc.), which require some form of online connectivity (data access via a SIM card or Bluetooth, wireless internet access, TMC receiver, etc.) on your Navigation Device.

**Communication** means any comment, feedback, information or document provided by the User for NNG via the channels of Customer Support.

**Customer Support** means the customer support service provided for Users. Users may request Customer Support – among other things - for their Product.

**Data Carrier** means SD card/USB stick, or other data carrier that contains the navigation data.

**Device** means the device You are using for browsing, registration or interacting with the newsletter (laptop, desktop, tablet, mobile or any other electronic device).

**Free Product** means the Updates, Content and Connected Services to which the User is entitled to free of charge during the [Latest Map Guarantee].

**GDPR** means the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

**Latest Map Guarantee or LMG** means a one-time Free Product that entitles the User to install the most up-to-date map data on the Navigation Device provided that (i) the User requests the Latest Map Guarantee within 30/45/60/90 days following the first use date of the Navigation Device (the time of the first GPS fix of the navigation head unit), and (ii) any map update is available for NNG at the time the User requests the Latest Map Guarantee. Furthermore, the map update available

as part of the Latest Map Guarantee shall always be limited to the same coverage and same features of the initial map installed on the Navigation Device.

**Navigation Device** means the in-car navigation system built into your vehicle (including the Data Carrier).

**NNG** means NNG Software Developing and Commercial Limited Liability Company

**Product** means Updates, Content and Connected Services.

**Site** means [www.naviextras.com](http://www.naviextras.com) and its subdomains.

**Software** means the navigation software that runs on your Navigation Device.

**Toolbox** means a free software tool for PC and MacOS, which is used to download Updates and Products from NNG's servers and upload them to the Navigation Device.

**Trouble Ticket** means the record of a complaint or problem submitted by the User to NNG for Customer Support.

**Updates** mean Content and Software updates, which are provided by your Navigation Device manufacturer or Software developer, and which provide additional features, new Content versions, or fix known Software problems.

**User** or **You** means a registered user of the Site and/or the Toolbox.

**User Activity** means location and behaviour data (e.g. language selection, products put in the User's cart), onsite browsing history, usage patterns (e.g. frequency/patterns of logging-in to investigate fraud,).

**VIN** (Vehicle Identification Number) means the unique serial number of the vehicle.

## 2. PRIVACY POLICY

### 2.1. *Purpose of this document*

This Policy sets out the terms and conditions of how Your (as data subject's) personal information is processed. Please read these terms and conditions carefully!

### 2.2. *Availability and updating of this document*

NNG reserves the right to amend this document unilaterally at any time. We suggest visiting the Site and the Toolbox from time to time for the latest information, however, You will also be informed of this Policy being amended in case of significant changes (e.g. legal basis of processing, scope of processed data, person of data processor) of the Policy.

### 2.3. *Data controller*

2.3.1. The data specified in this Policy is processed by NNG.

The provided data is accessible to the following persons:

- NNG's employees and managers involved in the data collection and data processing;
- IT specialists performing a variety of IT tasks related to the operation and maintenance of NNG's computer system as part of their role within NNG in connection with performing their duties associated with the purpose of this Policy.

## **2.4. Data processing**

### *2.4.1. Processing of data regarding registration and/or usage of the Toolbox and purchasing Product*

#### *2.4.1.1. Purpose of data processing*

- a. Administering registration and User account maintenance.

If the User wishes to update his/her Navigation Device with Products offered by NNG, he/she shall download the Toolbox and register in the Toolbox. Registration on the Site is also available before downloading the Toolbox, in this case the User also registers for the Toolbox. Please note, that with the registration a user account is created. User account maintenance furthermore includes but is not limited to the performance of NNG's duties in connection with your rights specified in section 2.7.

- b. Provision of Updates

The process of carrying out an Update is the following: the User shall synchronize the data of the Navigation Device to a Data Carrier manually. The Data Carrier in this way will contain all information which is necessary to carry out an Update. The User shall insert the Data Carrier to a PC and launch the Toolbox application. By using the Toolbox application, information listed in section 2.4.1.2 b) is sent from the Toolbox to the NNG server.

- c. Sending system notifications

NNG sends system notifications in connection with technical issues in relation to and during the access to Products, including, but not limited to technical issues during downloading the Content, notification related to release of a new Toolbox, notification related to changes in the Policy.

- d. Payment and billing

Should a User decide to purchase a Product, NNG processes the necessary data for payment and billing purposes.

#### *2.4.1.2. Scope of the User's processed personal data in connection with the registration and/or usage of the Toolbox:*

a) The following information is processed related to the registration of the User and related to the downloaded Products via the user account:

- User's name;
- User's email address;
- User's encrypted, non-deciphered password;
- User's address/invoice address;
- Country of permanent or temporary residence;
- User Activity (e.g first and last login date, registration date);
- Activated prepaid code or voucher code;
- Purchase/update history (e.g transaction date, transaction ID, sales package related information).
- Subscribed to newsletter (yes/no)

b) The following information is processed related to the recognition of Navigation Device:

- brand and model to identify the Navigation Device;
- SWID (an ID created from the vehicle identification number using a one-way hash function);
- Software version;
- first use date (the time of the first GPS fix of the Navigation Device);
- Application CID;
- First login date in Toolbox
- VIN
- Navigation Device code;
- Navigation Device ID (Unique identifier of the navigation head unit);
- Device channel
- IP address of the Device
- OS and OS version of the Device

c) The following information is processed related to payment and billing:

- User's name;
- User's address/invoice address;
- Transaction/Payment details (IP address, cardholder name, card issuer country)
- Purchase/update history (e.g transaction date, transaction ID, sales package-related information).
- electronic invoice

#### 2.4.1.3. *Legal basis of data processing*

The data is processed in compliance with GDPR and all relevant local laws.

The legal basis of data processing is the performance of contract pursuant to point b) of Article 6(1) of the GDPR.

During the LMG or by redeeming a prepaid code or voucher received from the manufacturer of the Navigation Device or its dealers, NNG is providing (Free) Products to You as subcontractor of the manufacturer of the Navigation Device and processing your data in order You can access and download the (Free) Products.

You will be able to purchase Products or receive prepaid code or voucher directly from NNG for your Navigation Device and NNG is processing your data in order to enter into such purchase contract and perform said contract and administer your account, such as your Navigation Device history.

In connection with payment and billing-related processing, the legal basis of data processing is the performance of legal obligations pursuant to point c) of Article 6(1) of the GDPR and the applicable Hungarian laws.

#### *2.4.1.4. Duration of data processing*

Your personal data is retained for the period during which any Product related to Your Navigation Device is available and supported by NNG, or until You cancel your account whichever happens earlier.

Notwithstanding the above, NNG shall immediately delete your personal data if You specifically request the deletion thereof and there is no valid legal ground for data processing.

Invoices and all the data that shall be indicated on the invoices according to Hungarian law (currently name, address, and purchased items) shall be stored for the minimum period of time specified by the applicable Hungarian laws (currently 8 years).

### *2.4.2. Processing of data provided by the User for receiving newsletters*

#### *2.4.2.1. Purpose of data processing*

The User can subscribe to NNG's newsletter on the Site or in the Toolbox by ticking the appropriate checkbox.

NNG sends newsletters to inform the User about new Products (e.g. updates to Content are available) and promotions, or other marketing activities. In order to provide You with personalized newsletters relevant for You and your registered Navigation Device(s) and increase your user experience and satisfaction NNG involves salesforce.com EMEA Limited, as data processor, to

receive information of your Device and the geographical region your Device is located.

Please note that NNG may at any time decide to stop sending newsletters without prior notice, or further liability or obligation of any kind.

2.4.2.2. *Scope of the processed personal data of the User*

- User's name;
- User's email address;
- User's language
- User's country
- Channel ID
- User related codes

2.4.2.3. *Legal basis of data processing*

The data is processed in compliance with GDPR and all relevant local laws.

The legal basis of data processing is

- the User's express consent given pursuant to point a) in Article 6(1) of the GDPR and
- sections 6(1) and (2) of Act XLVIII of 2008 of Hungary on the basic requirements of and certain restrictions on commercial advertising activities.

2.4.2.4. *Duration of data processing and subscription to newsletters*

2.4.2.4.1. Your personal data is retained for the period during which any Product related to Your Navigation Device is available and supported by NNG, or until You unsubscribe from the newsletter or until You cancel your account, whichever happens earlier.

2.4.2.4.2. The User may withdraw his/her consent at any time as follows:

- By following the instructions in the newsletter. Click on the unsubscribe link at the bottom of the newsletter.
- By logging in to your User account via the Toolbox where You can deactivate the appropriate checkbox.
- By contacting us using one of the contact details of NNG provided at the top of the Policy.

2.4.2.4.3. Please note that unsubscribing from the newsletter does not affect the lawfulness of data processing based on your consent and conducted before

such withdrawal and unsubscribing from newsletter is not equal with cancelling your account (see section 2.7.6). Please note that system notifications sent under section 2.4.1.1 c. are not equal with newsletters, so unsubscribing from newsletters does not affect the lawfulness of sending system notifications.

#### *2.4.3. Processing data provided by the User for the provision of Customer Support*

##### *2.4.3.1. Purpose of data processing*

- 2.4.3.1.1. NNG provides Customer Support for registered Users via the support page of NNG. Trouble Ticket can be opened via the support page. The link to the support page is available at the top of the Policy under the contact details of NNG.
- 2.4.3.1.2. No Customer Support is provided for hardware related issues. Limited support is possible for factory-installed Software or Content related problems of supported Navigation Devices as they may happen to be resolvable only by the device manufacturer or distributor. Customer Support services are available related to Products offered in the Toolbox. Customer support related to Data Carrier is not provided by NNG.
- 2.4.3.1.3. Customer Support services are only guaranteed for Products downloaded from the Toolbox, including troubleshooting for e-payment, e-billing, licensing, downloading and installing the Products for compatible devices. During the provision of the Customer Support, priority shall be given to problems related to Products provided for consideration over free services.
- 2.4.3.1.4. NNG may change the Customer Support at any time and at its sole discretion. NNG may at any time terminate or suspend your access to the Customer Support.
- 2.4.3.1.5. By submitting comments, feedback, information, or materials to our Customer Support, you agree to provide a free of charge licence of all worldwide rights, title, and interest in copyrights and other intellectual property rights regarding the comments, feedback, information, or materials sent to our Customer Support.
- 2.4.3.1.6. All Trouble Tickets are stored together with the User's personal data. The problem and the proposed answer may also be added to the FAQ or knowledge base after removing all personal data.

##### *2.4.3.2. Scope of the processed personal data of the User*

- User's email address;

- Communication sent to NNG via Trouble Ticket;
- Data listed in section 2.4.1.2 and 2.4.2.2.

#### 2.4.3.3. *Legal basis of data processing*

The data is processed in compliance with GDPR and all relevant local laws. The legal basis of data processing is

- performance of a contract to which the data subject is a party, as set forth in point b) of Article 6(1) of the GDPR.
- compliance with a legal obligation to which the controller is subject to as set forth in point c) of Article 6(1) of the GDPR. The legal obligation is set forth in section 17/A (7) of Act CLV of 1997 of Hungary regarding consumer protection (“Consumer Protection Act”).

Processing User's personal data is essential for providing Customer Support and performing NNG's contractual obligations regarding thereof. It is not mandatory to provide NNG with your personal data set out in section 2.4.3.2., although in case you would not provide NNG with the aforementioned personal data, NNG would not be able to provide you with Customer Support as it is described in section 2.4.3.1.

#### 2.4.3.4. *Duration of data processing*

User's personal data specified in point 2.4.3.2 is processed for the period such data is necessary for the provision of Customer Support but maximum for a period of 3 years following the last Communication.

In case of consumer complaint, the minutes of the complaint and the copy of the response shall be retained for 3 years according to the Consumer Protection Act.

### 2.4.4. *Data science*

#### 2.4.4.1. *Purpose of data processing*

From time to time, NNG or its subcontractors (data processors) may analyze, process, and model data collected and processed under this Policy and interpret the results to create actionable plans for NNG (e.g. how to detect and solve IP piracy issues, database audit, etc).

#### 2.4.4.2. *Scope of the processed data*

Data listed under section 2.4.



#### 2.4.4.3. *Legal basis of data processing*

The data is processed in compliance with GDPR and all relevant local laws.

The legal basis of data processing is the legitimate interest pursuant to point f) of Article 6(1) of the GDPR.

#### 2.4.4.4. *Duration of the data processing*

Your personal data is retained for the period during which any Product related to Your Navigation Device is available and supported by NNG, or until You cancel your account whichever happens earlier.

Notwithstanding the above, NNG shall immediately delete your personal data if You specifically request the deletion thereof and there is no valid legal ground for data processing.

### **2.5. Data processor**

#### 2.5.1. *Data processing related to enforcing the User's rights specified in section 2.7*

In order You can enforce your rights as a data subject specified in section 2.7, NNG cooperates with the following data processors:

##### 2.5.1.1. Salesforce.com

Name:	salesforce.com EMEA Limited
Address:	Floor 26 Salesforce Tower, 110 Bishopsgate EC2N 4AY London, UK
Website:	<a href="https://www.salesforce.com">https://www.salesforce.com</a>
Contact information:	<a href="https://www.salesforce.com/form/contact/contact-privacy.jsp">https://www.salesforce.com/form/contact/contact-privacy.jsp</a>

Salesforce.com provides NNG with an online system through which NNG can manage receipt of your requests sent through the support page of NNG.

##### 2.5.1.2. United Call Centers

Name:	UNITED CALL CENTERS Tanácsadó Kereskedelmi és Szolgáltató Kft.
Address:	Kis-Hunyad utca 9. II floor, H-3525 Miskolc, Hungary
Website:	<a href="https://unitedcallcenters.hu/">https://unitedcallcenters.hu/</a>
Contact information:	<a href="https://unitedcallcenters.hu/#project-footer">https://unitedcallcenters.hu/#project-footer</a>

United Call Centers provides multilingual 1st level customer care and technical support service to NNG's end-users.

United Call Centers has access to those personal data which were given by Users during the registration (e.g. name, e-mail address, country) and/or which were generated automatically during the Updates and during the communication between the User and NNG in the system provided by Salesforce.com related to the enforcement of the data subject's rights.

United Call Centers does not store any personal data of the User on its own servers.

### 2.5.2. Data processing related to the sending of newsletters

2.5.2.1. For sending newsletters to the Users, NNG cooperates with Salesforce.com as data processor, which provides email marketing services.

Name:	salesforce.com EMEA Limited
Address:	Floor 26 Salesforce Tower, 110 Bishopsgate EC2N 4AY London, UK
Website:	<a href="https://www.salesforce.com">https://www.salesforce.com</a>
Contact information:	<a href="https://www.salesforce.com/form/contact/contact-privacy.jsp">https://www.salesforce.com/form/contact/contact-privacy.jsp</a>

The data processor provides NNG with an online system through which NNG can manage the sending of newsletter to the Users.

2.5.2.2. To improve user experience, the system is used for the following purposes:

- Storing the User's personal data;
- Sending emails to the User;
- Analysing the User's interaction with the delivered email (in particular whether the email was opened, how many times the addressee clicked on it, whether the addressee read the entire email);
- Analysing the bounce rate (e.g. cases in which the email address is invalid or the email is listed as spam)
- Collecting data of User's registered Device and its geolocation (OS and OS version of Device; type and version of email client of User; type of Device (including manufacturer of the Device, whether the Device qualifies as phone or not, screen resolution); IP address and geolocation data (i.e. country/region information)).

2.5.2.3. The User data listed in section 2.4.2.2 is stored both in the online system mentioned above and on NNG's server.

2.5.3. *Data processing related to (i) providing the User with the Products, (ii) enforcing the User's rights specified in section 2.7 and (iii) providing the Customer Support.*

In order NNG can provide You with the above services, NNG uses cloud computing services provided by Microsoft Azure.

Name:	Microsoft Ireland Operations, Ltd.
Address:	Carmenhall Road Sandyford, Dublin 18, Ireland
Website:	<a href="https://azure.microsoft.com/hu-hu/">https://azure.microsoft.com/hu-hu/</a>
Contact information:	<a href="https://azure.microsoft.com/hu-hu/overview/sales-number/">https://azure.microsoft.com/hu-hu/overview/sales-number/</a>

Microsoft has access to all personal data of the Users listed in the present Policy.

2.5.4. *Data processing related to provisioning Customer Support*

2.5.4.1. Salesforce.com

Name:	salesforce.com EMEA Limited
Address:	Floor 26 Salesforce Tower, 110 Bishopsgate EC2N 4AY London, UK
Website:	<a href="https://www.salesforce.com">https://www.salesforce.com</a>
Contact information:	<a href="https://www.salesforce.com/form/contact/contact-privacy.jsp">https://www.salesforce.com/form/contact/contact-privacy.jsp</a>

Salesforce.com provides NNG with an online customer support system, through which NNG can manage the provision of Customer Support to the Users. The User's data listed in section 2.4.3.2 is stored both in the customer support system and on NNG's servers except for the Communication which is stored in the customer support system only.

2.5.4.2. United Call Centers

Name:	UNITED CALL CENTERS Tanácsadó Kereskedelmi és Szolgáltató Kft.
Address:	Kis-Hunyad utca 9. II floor, H-3525 Miskolc, Hungary
Website:	<a href="https://unitedcallcenters.hu/">https://unitedcallcenters.hu/</a>
Contact information:	<a href="https://unitedcallcenters.hu/#project-footer">https://unitedcallcenters.hu/#project-footer</a>

United Call Centers provides multilingual 1st level customer care and technical support service to NNG's end-users.

United Call Centers has access to those personal data which were given by Users

during the registration (e.g. name, e-mail address, country) and/or to the Communication generated in the system provided by Salesforce.com related to the provisioning of Customer Support.

United Call Centers does not store any personal data of the User on its own servers.

#### *2.5.5.Data processing related to data science*

From time to time, on project base, NNG may involve third party data processors to perform data science related tasks. In such case the third party data scientist shall have access to the data specified in section 2.4 in order to perform the tasks specified by NNG.

#### *2.5.6.Data processing related to billing*

NNG involves the following third-party data processors to provide billing services (e.g storing and generating invoices). The provider stores and processes the following data: name and address of the User, ordered item and the invoice in order to generate and store invoices.

According to the applicable Hungarian legislation, the provider shall automatically transfer the invoices (together with the data available on the invoices) to the Hungarian Tax Authority.

Name:	Bilingo Technologies Zártkörűen Működő Részvénytársaság
Address:	1133 Budapest, Árbóc utca 6
Website:	<a href="http://www.bilingo.hu">www.bilingo.hu</a>
Contact information:	<a href="https://www.bilingo.hu/kapcsolat">https://www.bilingo.hu/kapcsolat</a>

#### *2.5.7.Data processing related to the operation of the online system of salesforce.com*

NNG involves the following third-party data processors to provide IT services. The provider develops, operates, and maintains the online system of salesforce.com. The provider has access to all the data stored in the online system of salesforce.com.

Name:	Attention CRM Consulting Kft.
Address:	1075 Budapest, Madách Imre út 13-14. T. ép. 4. em.
Website:	<a href="https://attentioncrm.com/">https://attentioncrm.com/</a>
Contact information:	<a href="https://attentioncrm.com/about-us/">https://attentioncrm.com/about-us/</a>

## **2.6. Data security**

2.6.1.NNG observes all applicable regulations regarding the security of personal data, therefore both NNG and its authorized data processors implement appropriate technical and organizational measures to protect personal data and establish adequate procedural rules to enforce the provisions of the GDPR concerning confidentiality and the security of data processing.

## **2.7. Rights and remedies**

2.7.1.Any personal information which You provide for NNG must be true, complete, and accurate in all respects. You can modify your personal data at any time by logging in to your User account through the Toolbox.

2.7.2.You are entitled to exercise the following rights in relation to NNG's data processing activities:

- Request information on the processing of your personal data;
- Request data portability;
- Request the rectification of your personal data;
- Request the deletion of your personal data or restriction of the processing of your personal data;
- Object to NNG's data processing.

For further information regarding your rights mentioned above please read the following sections.

In the event You wish to exercise any of your rights detailed above, please contact us by using one of the contact details of NNG specified at the top of the Policy.

2.7.3.You are entitled to request information on data related to You and processing carried out by NNG thereof, especially information as to what personal data relating to You is stored; the sources from which they were obtained; the purpose, grounds, and duration of processing; if your personal data is made available to others, the legal basis and the recipients; and any data protection incident in relation to your personal data. NNG shall provide written information on the processing of your personal data within 1 months after receipt of the request. You may also request the correction of your personal data.

2.7.4.You are also entitled to request a structured, commonly used and machine-readable formatted copy of your personal data that NNG is processing subject to conditions set out in Article 20 of the GDPR.

You have the right to transmit your personal data to another controller or, where it is technically feasible, You can request NNG to transfer your personal data directly to another controller as specified in Article 20 of the GDPR.

2.7.5.If your personal data is inaccurate, You may request NNG to rectify such data, provided that the correct data is at NNG's disposal.

2.7.6. Your personal data shall be deleted upon your request in accordance with applicable laws. NNG shall delete all stored personal data in compliance with this Policy by obfuscating your personal data, by making it anonym in a permanent and non-reversible manner.

Please be informed that your data will not be deleted if the processing thereof is required by law or other exceptions apply under applicable law.

2.7.7. You have the right to obtain restriction of processing from NNG in the following cases:

- a) You think that your processed personal data is not accurate, for a period enabling NNG to verify the accuracy of your personal data;
- b) the processing is unlawful, and You opposes the erasure of your personal data, You are entitled to request restriction of their use instead;
- c) NNG no longer needs your personal data for the purposes of processing, but You require NNG to continue the processing for the establishment, exercise or defence of your legal claims;
- d) You have objected to processing, for a period pending the verification whether the legitimate grounds of NNG override those of yours.

2.7.8. At any time, You have the right to object to processing your personal data subject to certain conditions under applicable laws, You may separately object against processing your personal data for direct marketing purposes. In this case, NNG will no longer process your personal data unless if NNG demonstrates compelling legitimate grounds for the processing which override your interests, rights and data protection related freedoms or if the processing is necessary for the establishment, exercise or defence of legal claims.

2.7.9. You may lodge a complaint about the processing of your personal data to the National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság – “NAIH”; address: 1055 Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, Pf.: 9.; phone: +36-1-391-1400; facsimile: +36-1-391-1410; email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) or to the data protection authority of your home country or country of your residency.

2.7.10. Independently from lodging a complaint to NAIH, You may turn to court pursuant to the provisions set forth in the GDPR if your rights are infringed. Upon your decision, the procedure may be launched before the tribunal in whose jurisdiction You are domiciled or You have a temporary address. Prior to initiating a legal procedure, it may be useful to discuss the complaint with NNG.

2.7.11. Your detailed rights and remedies are set out in Articles 15-21 of the GDPR.

## **2.8. Contacting NNG**

We value your opinion. If You have any comments, questions, or wish to obtain more information on data processing at NNG, please contact us by using one of the contact details of NNG specified at the top of the Policy. We will handle the submitted information confidentially. Our representative will contact You within a reasonable time.

The data protection officer (DPO) of NNG can be contacted under [DPO@nng.com](mailto:DPO@nng.com) email address.