

SUMMARY OF THE PRIVACY POLICY

This document is a short summary of the Privacy Policy (hereinafter referred to as the „Policy“). More detailed information on data processing is available in the full version of the Policy accessible below. Please note that only the full version of the Policy is considered as complete and adequate information. The purpose of this summary is only to give a better understanding of the Policy.

Purpose of data processing	Providing access to the Content and Updates to which the User is entitled to, and providing a possibility to (i) make a purchase and/or (ii) redeem a purchased prepaid code or voucher by registering in the Toolbox (or any other channel NNG may provide) Relevant section of the Policy: 2.4.1.	Sending newsletters Relevant section of the Policy: 2.4.2	Cooperation with the Partner in order to help the provision of Customer Support by the Partner Relevant section of the Policy: 2.4.3
Data controller	<ul style="list-style-type: none"> • NNG 	<ul style="list-style-type: none"> • NNG 	<ul style="list-style-type: none"> • NNG • Partner
Scope of processed data	a) Information processed related to the registration of the User and related to the downloaded Products via the user account <ul style="list-style-type: none"> • 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; • Activated prepaid code or voucher code; • Purchase/update history. • Subscribed to newsletter (yes/no). b) Information processed related to the recognition of the Navigation Device: <ul style="list-style-type: none"> • brand and model to identify the Navigation Device; 	a) data processed related to the subscription to the newsletters: <ul style="list-style-type: none"> • User’s name; • User’s email address; • User’s language. • User’s country b) data processed with automated processing: <ul style="list-style-type: none"> • User’s interaction with the delivered newsletters (i.e. whether the email was opened, how many times the addressee clicked on it, whether the addressee read 	<ul style="list-style-type: none"> • User’s name used on the Site or in the Toolbox; • type and number of the registered Navigation Device as specified in 2.4.1.2 b); • services to which User is entitled to free of charge related to the Navigation Device; • purchase/update history related to the Navigation Device; • company name (completion is optional); • invoice address (completion is optional).

	<ul style="list-style-type: none"> • SWID (an ID created from the VIN using a one-way hash function); • Software version; • first use date (the time of the first GPS fix of the navigation head unit); • Application CID; • First login date in Toolbox. 	<ul style="list-style-type: none"> • the entire email and bounce rate of the emails; • OS and OS version of Device the newsletter has been opened with; • type and version of email client of User; • type of Device (including manufacturer of the Device, whether the Device qualifies as a phone, screen resolution) • IP address and geolocation data of Device (i.e. country/region information). 	
Legal basis	<ul style="list-style-type: none"> • Performance of contract. 	<ul style="list-style-type: none"> • User’s consent. 	<ul style="list-style-type: none"> • Performance of contract.
Duration of data processing	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • The period during which any Product related to Your Navigation Device is available and supported by NNG, or until the User unsubscribes from the newsletter, or until the User cancels his/her account, 	<ul style="list-style-type: none"> • 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.

		whichever happens earlier.	
Data processor	<ul style="list-style-type: none"> • Salesforce.com • Microsoft Azure • United Call Centers 	<ul style="list-style-type: none"> • Salesforce.com 	
Data transfer			<p>NNG may transfer the following data of the User to the Partner inside the EEA:</p> <ul style="list-style-type: none"> • User’s name used on the Site or in the Toolbox; • type and number of the registered Navigation Device as specified in 2.4.1.2 b); • services to which User is entitled to free of charge related to the Navigation Device; • purchase/update history related to the Navigation Device; • company name (completion is optional); • invoice address (completion is optional). <p>See detailed description of such data transfer under section 2.4.3 of this Policy.</p>

PRIVACY POLICY

This Privacy Policy (hereinafter referred to as the „Policy”) has been published on and is effective as of 11.11.2021.

1. DEFINITIONS

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

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.

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.

Device means You are using for registration, browsing 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 as part of 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 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 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 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 SD card/USB stick, or other data carrier that contains the navigation data).

NNG means NNG Software Developing and Commercial Limited Liability Company

Registered office:	Szépölggyi 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

Partner means the following entity: **Renault s.a.s**, (13/15Quai Le Gallo 92100, Boulogne-Billancourt, Commercial register of Nanterre, number 780 129 987)

Product means Updates, Content, and Connected Services.

Profiling means automated processing of personal data, as listed in point 2.4.2.2 in order to provide the User with personalized newsletters relevant for the User and for his/her registered Navigation Device(s) in order to increase user experience and satisfaction.

Site means renault.welcome.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 OSX, which is used to download Updates and Products from NNG's servers and upload them to the Navigation Device.

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 (language selection in the Toolbox/on the Site, products put in the User's cart), onsite browsing history, usage patterns (frequency/patterns of logging-in to investigate fraud, misuse of the Toolbox/Site).

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 provided in the Toolbox is processed by NNG.

2.3.2. 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 provided by the User during the registration in and/or usage of the Toolbox

2.4.1.1. Purpose of data processing

- a. Administering registration in the Toolbox and User account maintenance.

If the User wishes to (i) download or purchase a Product and/or (ii) redeem a prepaid code or voucher for a Product, he/she shall download the Toolbox through the link available on the Site and register in the Toolbox. Please note, that with the registration an 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 USB flash drive manually. The USB flash drive in this way will contain all information which is necessary to carry out an Update. The User shall insert the USB flash drive to the PC and launch the Toolbox application. By using the Toolbox application information listed in section 2.4.1.2 **Error! Reference source not found.** 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 privacy policy.

2.4.1.2. Scope of the User's processed personal data provided during the registration in 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;
 - Activated prepaid code or voucher code;
 - Purchase/update history
 - 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 VIN using a one-way hash function);
 - Software version;
 - first use date (the time of the first GPS fix of the navigation head unit);
 - Application CID;
 - First login date in Toolbox.

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. As part of the Latest Map Guarantee, NNG is providing Free Products to You as subcontractor of the Partner and processing your data in order You can access and download the Free Products as part of the Latest Map Guarantee. Furthermore, You will be able to purchase Products 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. Furthermore, NNG is processing your data in order You can access and download Products to which You are entitled to based on the redeemed prepaid code or voucher code.

2.4.1.4. *Duration of data processing*

Your personal data uploaded via the Toolbox 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.

2.4.2. *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 and/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 uses Profiling techniques with the involvement of 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.

Data processed for Profiling purposes ("**Profiling Related Data**"):

- User's interaction with the delivered email (i.e. whether the email was opened, how many times the addressee clicked on it, whether the addressee read the entire email);
- Bounce rate of the newsletters sent to the User;
- 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).

2.4.2.3. *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 uploaded via the Site and/or Toolbox 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 sending a request to NNG through <https://nng.force.com/naviextrasknowledgebase/s/support>.
- By sending a mail to NNG's postal address (the registered office) specified in section 1.

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. *Cooperation with the Partner in order to help the provision of Customer Support by the Partner*

2.4.3.1. *Purpose of data processing*

NNG transfers data typically generated in NNG's system during the use of the Toolbox to the Partner so that the Partner can provide Customer Support to the Users. NNG provides access for the Partner to a surface where the Partner can see the data defined in section 2.4.3.2 of those Users who are registered in Partner's system as well.

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

- User's name used on the Site or in the Toolbox;

- type and number of the registered Navigation Device as specified in 2.4.1.2 b);
- services to which User is entitled to free of charge related to the Navigation Device;
- purchase/update history related to the Navigation Device;
- company name (completion is optional);
- invoice address (completion is optional).

2.4.3.3. *Legal basis of data processing*

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

Processing User's personal data is essential for helping the provision of Customer Support by the Partner and performing NNG's contractual obligations regarding thereof.

2.4.3.4. *Duration of data processing*

Your personal data uploaded via the Toolbox 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.

2.4.3.5. *Partner acting as controller*

The personal data are transferred to Partner acting as data controller. Partner processes and stores the personal data in EEA.

Partner qualifies as data controller and such data is processed by Partner in accordance with the provisions of the privacy policy of Partner. Such data processing is not covered by this Policy.

Following the transfer of the personal data described in section 2.4.3.2, Partner is directly liable for the processing of such data. Should any claim occur related to the data processing, as from this date, the User shall address such claim directly to the Partner.

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:	https://www.salesforce.com
Contact information:	https://www.salesforce.com/form/contact/contact-privacy.jsp

Salesforce.com provides NNG with an online system through which NNG can manage receipt of your requests sent through the online form specified in section 2.7.22.7.1 i regarding enforcing your rights as a data subject and sending answers to your request.

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:	https://unitedcallcenters.hu/
Contact information:	https://unitedcallcenters.hu/#project-footer

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 via the Site / Toolbox (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:	https://www.salesforce.com
Contact information:	https://www.salesforce.com/form/contact/contact-privacy.jsp

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 system mentioned above and on NNG’s server, except for the Profiling Relata Data which are stored in the online system only.

2.5.3. Data processing related to providing the User with the Products and related to enforcing the User’s rights specified in section 2.7

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

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

Microsoft has access to all personal data of the Users listed in the present Policy except for the Profiling Related Data.

2.5.4.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 2.4in order to perform the tasks specified by NNG.

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 (see section 2.7.3);
- Request data portability (2.7.4).
- Request the rectification of your personal data (see section 2.7.5);
- Request the deletion of your personal data or restriction of the processing of your personal data (see section 2.7.6 and 2.7.7);
- Object to NNG's data processing (see section 2.7.8);

In the event You wish to exercise any of your rights detailed above, please send your request by using one of the following means:

- i. By sending a request to NNG through <https://nng.force.com/naviextrasknowledgebase/s/support>.
- ii. By sending an email to NNG's email address specified in section 1.
- iii. By sending a mail to NNG's postal address (the registered office) specified in section 1.

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 month 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, including Profiling, as set out herein. 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.; 5 phone: +36-1-391-1400; facsimile: +36-1-391-1410; email: 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 send your request as specified in section 2.7.2. 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 email address.