

SUMMARY OF THE PRIVACY POLICY

This is a short summary of the Privacy Policy (hereinafter referred to as the „Policy”) with regard to processing of personal data conducted by NNG Software Developing and Commercial Limited Liability Company (registered seat: H-1037 Budapest, Szépvölgyi út 35-37, Hungary; company registration number: Cg.01-09-891838; tax number: 13357845-2-44; e/mail address: info@naviextras.com (mailto:info@naviextras.com)) (hereinafter referred to as “NNG”). More detailed information on personal 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 to give a better understanding of the personal data processing conducted by NNG.

Purpose of data processing	Providing access to the Products and administering registration on the Site and for the InControlTouch Mapupdater (or any other channel NNG may provide)	Sending newsletters	Cooperation with the Partner in order to inform the User on the available Content and Updates to which the User is entitled to 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 personal data	<p>a.) Information processed related to the registration of the User:</p> <ul style="list-style-type: none"> User's name; User's email address; User's hashed password; User's address/invoice address; Country of permanent or temporary residence; User Activity. <p>b.) Information processed related to the recognition of the Device:</p> <ul style="list-style-type: none"> brand and model to identify the Device; SWID (an ID created from the VIN using a one-way hash function); IMEI (International Mobile Equipment Identity) number; Software version; first use (the time of the first GPS fix of the Device); VIN. 	<ul style="list-style-type: none"> User's name; User's email address; data processed with automated processing; 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 the entire email) and bounce rate of the emails; 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 a phone, screen resolution) IP address and geolocation data of Device (i.e. country/region information). 	<ul style="list-style-type: none"> VIN; date of the last Update; version of the Update; voucher code or prepaid code.
Legal basis	<ul style="list-style-type: none"> User's consent. 	<ul style="list-style-type: none"> User's consent. 	<ul style="list-style-type: none"> The period during which the Product is available and supported by NNG, or until the User cancels his/her account or revokes his/her consent.
Data processor	<ul style="list-style-type: none"> Microsoft Azure 	<ul style="list-style-type: none"> Microsoft Azure 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"> VIN; date of the last Update; version of the Update; voucher code or prepaid code. <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”) was posted on and is effective as of 24 May 2018.

1. DEFINITIONS

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 SIM card, Bluetooth, wireless internet access, or TMC receiver, etc.) on your Device.

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

Cookie means a small text file, which is placed on your hard disk by a web server, and is used by the Site and the InControlTouch Mapupdater as set forth in section Privacy below.

Device means the in-car navigation system built in into your vehicle.

Free Product means the Updates, Content and Connected Services to which the User is entitled to free of charge during the Mapcare Period.

General Data Protection Regulation or 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.

Mapcare Period means the three-year period while Free Product is available and provided for the User.

NNG means NNG Software Developing and Commercial Limited Liability Company, which provides the Software and the Product.

Registered office: H-1037 Budapest, Szépvölgyi út 35-37, Hungary
 Court of registration: Budapest-Capital Regional Court (Fővárosi Törvényszék)
 Company registration number: Cg.01-09-891838
 Tax number: 13357845-2-44
 E-mail address: info@naviextras.com
 Website: www.nng.com

Partner means the following entity:

Jaguar Land Rover Limited (Registered Office: Abbey Road, Whitley, Coventry, CV3 4LF.REGISTERED IN ENGLAND NO: 1672070)

Privacy Act means Act CXII of 2011 on the right of informational self-determination and on freedom of information.

Product means Updates, Contents, and Connected Services.

Profiling means automated processing of personal data, as listed in point 2.4.2.2 in order providing the User with personalized newsletters relevant for the User and for his/her Device in order to increase user experience and satisfaction;

Site means jaguar.welcome.naviextras.com and landrover.welcome.naviextras.com.

Software means the navigation software that runs on your Device.

InControlTouch Mapupdater means a free software tool for PC and OSX, which is used to download Updates and other Products from NNG's servers and upload them to the Device.

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

User or "you" means a registered or not registered visitor of the Site and/or the InControlTouch Mapupdater.

User Activity means location and behaviour data (language selection on the Site or in the InControlTouch Mapupdater, products put in the User's cart), onsite browsing history, and usage patterns (frequency/patterns of logging-in).

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 the User's (hereinafter referred to as the "User" or "you") personal data is processed. Please read these terms and conditions carefully!

2.2. Availability and updating of this document

NNG reserves the right to amend this Policy unilaterally at any time. We suggest visiting the Site and the InControlTouch Mapupdater 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, data transfer) of the Policy.

2.3. Data controller

2.3.1. The User's personal data provided or generated on the Site and in the InControlTouch Mapupdater is processed by NNG as data controller.

2.3.2. The provided or generated personal data of the User is accessible to the following persons within NNG:

- NNG's employees involved in the data processing (including 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 activities

2.4.1. *Processing of User's personal data for providing access to the Products and administering registration on the Site and for the InControlTouch Mapupdater (or any other channel NNG may provide)*

2.4.1.1. Purposes of data processing

- a.) Provision of information for the User about Products.
- b.) Providing the User with the purchased Products.
- c.) Administering registration on the Site and User account maintenance.

If the User wishes to download or purchase a Product, he/she shall register on the Site and download the InControlTouch Mapupdater through the link available on the Site. By registering on the Site, the User also registers for the InControlTouch Mapupdater.

2.4.1.2. Scope of the User's processed personal data

- a.) The following information is processed related to the registration of the User:
 - User's name;
 - User's email address;
 - User's hashed password;
 - User's address and invoice address;
 - Country of permanent or temporary residence;
 - User Activity.
- b.) The following information is processed related to the recognition of the Device:
 - brand and model to identify the Device;
 - SWID (an ID created from the VIN using a one-way hash function);
 - IMEI (International Mobile Equipment Identity) number;
 - Software version;
 - first use (the time of the first GPS fix of the navigation head unit);
 - VIN.

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 User's express consent given pursuant to point a) of Article 6(1) of the GDPR.

2.4.1.4. Duration of data processing

User's personal data specified in point 2.4.1.2 is processed for the period during which any Product is available and supported by NNG or until User cancels his/her account on the Site or withdraws his/her consent. Notwithstanding the above, NNG shall immediately delete your personal data if you specifically request the deletion thereof or withdraws your consent and there is no valid legal ground for data processing. If the User withdraws his/her consent, this does not affect the lawfulness of data processing based on his/her consent and conducted before such withdrawal.

2.4.2. *Processing of User's personal data for receiving newsletters*

2.4.2.1. Purpose of data processing

NNG sends newsletters via email to inform the User about new Products and promotions, or other marketing activities. In order providing you with personalized newsletters relevant for you and your 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.

2.4.2.2. Scope of the processed personal data of the User

- User's name;
- User's email address;
- data related to User Activity;

Data processed for Profiling purposes:

- 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 on the basic requirements of and certain restrictions on commercial advertising activities ("Advertising Act").

The User can subscribe to NNG's newsletter on the Site or in the InControlTouch Mapupdater by ticking the appropriate checkbox. The User may withdraw his/her consent at any time by sending an email to NNG from the email account regarding which he/she does not wish to receive newsletters in the future, or by sending a mail to NNG's postal address (the registered office) specified in section 1. The User may also unsubscribe (opt-out) at any time by following the instructions in the newsletter.

Please note that unsubscribing from the newsletter does not affect the lawfulness of data processing based on your consent and conduct before such withdrawal and unsubscribing from newsletter is not equal with cancelling your account.

2.4.2.4. Duration of data processing and subscription to the newsletter

2.4.2.4.1. User's personal data specified in point 2.4.2.2 is processed for the period during which the Update to your Device is available and your Device is supported by NNG, or until you cancel your account on the Site or withdraw your consent. Notwithstanding the above, NNG shall immediately delete your personal data if you specifically request the deletion thereof or withdraw your consent and there is no valid legal ground for data processing. If the User withdraws his/her consent, this does not affect the lawfulness of data processing based on his/her consent and conducted before such withdrawal.

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

2.4.3. Cooperation with the Partner in order to inform the User on the available Content and Updates to which the User is entitled to

2.4.3.1. Purpose of data processing

NNG transfers data defined in section 2.4.3.2 to the Partner for the following purpose:

After the purchase of a vehicle, the User is entitled to download Updates and new Content (i) without any additional charge during the Mapcare Period and (ii) for a fee following the end of the Mapcare Period.

As NNG is the technical provider of the Update, certain information is only available to NNG (e.g. information on whether the User has already updated the Software or Content). Therefore, to provide the User with a good-quality service and to avoid sending notifications to a User who has already downloaded the new Content, NNG transfers the data described in section 2.4.3.2 to the Partner. Partner uses the transferred personal data for informing the User about the new Products during and after the Mapcare Period.

2.4.3.2. Scope of the processed personal data of the User

- VIN;
- date of the last Update;
- version of the Update;
- voucher code or prepaid code.

Both NNG and the Partner has a database containing all relevant VINs. The above pieces of information (date of the last Update, version of the Update, voucher or prepaid code) are data generated in the system of NNG and can be established by way of comparing the two databases of VINs.

2.4.3.3. Legal basis of data processing

The legal basis of data processing will be the legitimate interest pursued by NNG and the Partner, as set forth in point f) of Article 6(1) of the GDPR. NNG conducted a balancing test on legitimate interest. The conclusion of the balancing test was that NNG's legitimate interest (interest in providing a good-quality service for the Users) is a lawful legal basis of the data processing. The legitimate interest of NNG overrides the rights and interest of the data subjects as there is no disproportionate negative impact on the data subjects' rights and interest since

- it is undoubtedly in the interest of the User to get notified about new available Updates;
- the User may reasonably expect such processing of their personal data;
- only limited amount of personal data would be transferred which cannot be obtained by the Partner from any other channel as it is technically generated in NNG's system and
- NNG implemented appropriate safeguards to minimize the risk of negative consequences.

2.4.3.4. Duration of data processing

User's personal data specified in point 2.4.3.2 is processed for the period during which the Update to your Device is available and your Device is supported by NNG, or until you cancel your account on the Site. Notwithstanding the above, NNG shall immediately delete your personal data if you specifically request the deletion thereof.

2.4.3.5. Partner acting as controller

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

2.4.3.5.2. Partner qualify 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.

2.4.3.5.3. 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.

2.5. Data processor

In order to fulfil its purposes as a data controller NNG cooperates with the data processors listed below. NNG reserves the right to change the data processors at any time.

Name of the data processor	Data processing activity carried out on behalf of NNG and list of the personal data the data processor has access to
Microsoft Azure Company name: Microsoft Ireland Operations, Ltd. Address: Carmenhall Road Sandyford, Dublin 18, Ireland Website: https://azure.microsoft.com/hu-hu/ (https://azure.microsoft.com/hu-hu/) Contact: https://azure.microsoft.com/hu-hu/overview/sales-number/ (https://azure.microsoft.com/hu-hu/overview/sales-number/)	Microsoft Azure provides cloud computing services to NNG. Microsoft has access to all personal data of the Users listed in the present Document.

<p>Salesforce.com</p> <p>Company name: salesforce.com EMEA Limited Address: Floor 26 Salesforce Tower, 110 Bishopsgate EC2N 4AY London, UK Website: https://www.salesforce.com/eu/?ir=1 (https://www.salesforce.com/eu/?ir=1) Contact: https://pages.mail.salesforce.com/contact-privacy/ (https://pages.mail.salesforce.com/contact-privacy/)</p>	<p>Salesforce.com carries out data processing activity for the following purposes:</p> <p>Sending newsletters</p> <p>Salesforce.com provides NNG with an online system ("System"), through which NNG can manage the sending of newsletter to Users. The data processor does not have access to the content uploaded by NNG to the System.</p> <p>The System is used for the following purposes:</p> <ul style="list-style-type: none"> Storing the User's personal data described in section 2.4.2.2. above; Sending newsletters to Users; <p>Data processed with automated processing techniques</p> <ul style="list-style-type: none"> Analysing Users' interaction with the delivered newsletter (in particular whether the newsletter was opened, how many times the addressee clicked on it, whether the addressee have read the entire newsletter); Analysing the bounce rate (e.g., cases in which the email address is invalid or the newsletter 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)). <p>The User data listed in section 2.4.2.2 is stored both in the System and in NNG's servers.</p> <p>Provision of Customer Support</p> <p>Salesforce.com provides NNG with an online system ("Customer Support System"), through which NNG can manage the provision of Customer Support to the Users. The data processor does not have access to the content uploaded by NNG to the Customer Support System.</p> <p>The Customer Support System is used for operating built-in, online, and live chat-based Customer Support service.</p> <p>The User's data listed in section 2.4.3.2 is stored both in the Customer Support System and on NNG's servers.</p>
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2.6. Cookies

2.6.1. NNG hereby informs you that if you download certain parts of the Site or the InControlTouch Mapupdater, small data files ("Cookies") will be automatically sent by the web server to your Device. In certain cases, these data files may be considered as personal data under the applicable data protection laws. These data files are necessary for the proper operation of the Site and the InControlTouch Mapupdater, and are used to collect information on the User's visits to the Site or in the InControlTouch Mapupdater.

2.6.2. The User can accept or refuse Cookies on a case-by-case basis, or refuse all Cookies by adjusting his/her browser settings. To find out how to do this and learn more on Cookies, please visit: <https://www.youronlinechoices.eu/>. If the User chooses to refuse all Cookies, access to some of the Site pages or InControlTouch Mapupdater features will be limited.

Type of Cookie	Purpose of Cookies	Legal basis of data processing	Cookie retention period
Google Analytics	The Site and the InControlTouch Mapupdater use the Google Analytics tool to collect and analyse information on how the User uses the Site and the InControlTouch Mapupdater. We use the information to compile reports and improve the Site and the InControlTouch Mapupdater. The data is collected in an anonymous form, including the number of Users visiting the Site and the InControlTouch Mapupdater, where Users have come to the Site or the InControlTouch Mapupdater from, and the pages they visited within the Site or the InControlTouch Mapupdater. The collected data cannot be tracked back to the User. For further information on Google's privacy policy, click here.	User's consent.	Google Analytics Cookies are created as soon as the User visits a website on which a valid Google Analytics tracking code is installed. The Cookies will be held in the User's browser for a maximum period of 2 years from the above date. For further information, please click here (https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage).
Google AdWords (Google Remarketing)	Third-party service providers, including Google, store previous visits made by a User to the Site and the InControlTouch Mapupdater, and use this information to display NNG's advertisements to the User on the websites of Google's partners. When the User visits the Site or the InControlTouch Mapupdater, we send one or more Cookies provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) to your computer, which uniquely identify your browser. Google's remarketing Cookies are used in Google AdWords. The Cookies provided by Google remember the number and times of visits to the Site or the InControlTouch Mapupdater, as well as the sub-pages viewed by the User when browsing the Site or the InControlTouch Mapupdater. The recorded data is stored anonymously. The User can block Google's remarketing Cookies on the opt-out page of Google's Ads Settings (http://www.google.hu/policies/technologies/ads/), and can also block third-party Cookies on the Network Advertising Initiative (http://www.networkadvertising.org/managing/opt_out.asp) opt-out page.	User's consent.	The AdWords Cookies expire 90 days after the User visited the Site or the InControlTouch Mapupdater. For further information, please click here (https://support.google.com/adwords/answer/2375435?hl=en).
Session ID	Session Cookies allow the User to be recognized within the Site or the InControlTouch Mapupdater. The most common example of this functionality is the shopping cart feature of the InControlTouch Mapupdater. When the User visits a page of a catalogue and selects some items, the session Cookie remembers the selection, so the shopping cart will contain the selected items when the User is ready to check out.	User's consent.	The information is saved until the end of the current session. After that, the collected information will no longer be available.
Device	These Cookies remember the User's Device choice, so that the InControlTouch Mapupdater can navigate to that particular device when the User logs into the InControlTouch Mapupdater next time.	User's consent.	The Cookies will be held in the User's browser for a maximum period of 3 years.
Auto login	These Cookies remember the User's login information and automatically fill out the login form for the User when the User starts the login process next time.	User's consent.	The Cookies will be held in the User's browser for a maximum period of 6 months.

2.7. Data security

- 2.7.1. 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 and all relevant local laws concerning confidentiality and the security of data processing.
- 2.7.2. Salesforce.com is compliant with the requirements of an information security management system (ISMS) specified by the ISO 27001 international standard, and meets the criteria of ISO 27018. Salesforce.com has achieved ISO 27001/27018 certification for its ISMS from an independent third party.

2.8. Rights and enforcement

- 2.8.1. Any personal information which you provide for NNG must be true, complete, and accurate in all respects. You agree to notify us of any change in your personal information via NNG's email address specified in section 1 without delay.
- 2.8.2. The User may exercise the following rights in relation to NNG's data processing activities:
- Request information on the processing of his/her personal data;
 - Request the rectification of his/her personal data;
 - Request the deletion of his/her personal data or restriction of the processing of his/her personal data;
 - Object to NNG's data processing;
 - Request data portability.
- 2.8.3. 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 by sending an email or mail to the email or postal address (registered office) specified in section 1. 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.
- 2.8.4. 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.
- 2.8.5. If your personal data is inaccurate, you may request NNG to rectify such data, provided that the correct data is at NNG's disposal.
- 2.8.6. Your personal data shall be deleted upon your request in accordance with applicable laws. Your request for data deletion may be submitted to NNG by using the email or postal address (registered office) specified in section 1. 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.
- 2.8.7. 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.
- 2.8.8. You have the right to obtain restriction of processing from NNG in the following cases:
- 2.8.8.1. you think that your processed personal data is not accurate, for a period enabling NNG to verify the accuracy of your personal data;
- 2.8.8.2. the processing is unlawful and you oppose the erasure of your personal data, you are entitled to request restriction of their use instead;
- 2.8.8.3. 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;
- 2.8.8.4. you have objected to processing, for a period pending the verification whether the legitimate grounds of NNG override those of yours.
- 2.8.9. 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.
- 2.8.10. 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: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.; postal address: 1530 Budapest, Pf. 5; 5 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.
- 2.8.11. Independently from lodging a complaint to NAIH, you may turn to court pursuant to the provisions set forth in the Privacy Act 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.
- 2.8.12. Your detailed rights and remedies are set out in subsections 14–18 and 21–23 of the Privacy Act and in Articles 15-21 of the GDPR.

2.9. 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 an email or mail to the email or postal address specified in section 1. We will handle the submitted information confidentially. Our representative will contact you within a reasonable time.