PRIVACY POLICY

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) (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 Toolbox (or any other channel NNG may provide)**	**Sending newsletters**	**Provision of Customer Support**
Data controller	• NNG	• NNG	• NNG
Scope of processed data	• User's title; • User's name; • User's email address; • User's hashed password; • User's address/invoice address; • Country of permanent or temporary residence; • User Activity.	• 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).	• User's email address; • Communication sent to NNG by the User through any channel of Customer Support.
Legal basis	• User's consent.	• User's consent.	• the performance of a contract to which the User is a party
Duration of data processing	• 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.	• The period during which the Product is available and supported by NNG, or until the User unsubscribes from the newsletter.	• Until the processing is necessary for the provision of Customer Support but maximum for 3 years following the last Communication.
Data processor	• Microsoft Azure	• Microsoft Azure • Salesforce.com	• Microsoft Azure • Salesforce.com • Cloud Agents

PRIVACY POLICY

This Privacy Policy (hereinafter referred to as the „Policy") was posted on and is effective as of 25 May 2018.

Previous version (/opencms/opencms/shop/portal/../../web/show/Policy?version=20161221)

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 Toolbox as set forth in section Privacy below.
Communication means any comment, feedback, information or document provided by User for NNG via the channels of Customer Support.
Customer Support means a service provided by NNG or its subcontractor for Users via web interfaces. Users may request Customer Support – among other things - for their Product purchases made on the Site.
Device means a device with GPS capability, such as
• Personal navigation devices (also called PND or PNA);
• Smartphones/personal digital assistants (also called PDAs), including SD cards and other storage media (if Software or Content is stored on them);
• Mobile phones with GPS capability;
• In-car navigation systems;

• PCs, notebooks, and tablet PCs with GPS capability;
• Personal media players (PMPs) with GPS capability.

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.
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
Email address: info@naviextras.com (mailto:info@naviextras.com)
Website: www.nng.com
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 registered Device(s) in order to increase user experience and satisfaction;
Site means naviextras.com (/opencms/opencms/shop/content/page/naviextras.com) and its subdomains.
Software means the navigation software that runs on your Device.
Toolbox 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.
Trouble Ticket means an email based record of a complaint or problem submitted by the User to NNG.
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 Toolbox.
User Activity means location and behaviour data (language selection on the Site or in the Toolbox, products put in the User's cart), onsite browsing history, and usage patterns (frequency/patterns of logging-in).

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 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 User's personal data provided or generated on the Site and in the Toolbox 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 Toolbox (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 Toolbox through the link available on the Site. By registering on the Site, the User also registers for the Toolbox.

2.4.1.2. Scope of the User's processed personal data

• User's title;
• 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.

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 registered 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 Toolbox 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 conducted 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 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 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.

2.4.2.4.2. 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. 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 and Users without registration via the following channels:

- email;
- chat;
- Trouble Ticket via the Toolbox.

2.4.3.1.2. All Users without registration or login may access the information made available on FAQ pages or the Site's knowledge base or they may contact directly the Customer Support team (http://idekellvalamilink.hu/).

2.4.3.1.3. No Customer Support is provided for hardware related issues. Limited support is possible for factory-installed Software or Content related problems of supported Devices as they may happen to be resolvable only by the device manufacturer or distributor. Customer Support services are available related to Products offered on the Site.

2.4.3.1.4. Customer Support services are only guaranteed for purchased Products and free Updates downloaded from the Site, 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.

2.4.3.1.5. NNG operates built-in, online live chat-based Customer Support service with the involvement of Cloud Agents, as data processor on certain pages and on certain language versions of the Site. Chat support is available on an 'as is' basis, NNG does not guarantee that it is available at all times. In case of an issue cannot be solved via chat, you may be required to open a Trouble Ticket. Chat support availability is not guaranteed on all sites or on all languages of the Site.

2.4.3.1.6. 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.

2.4.3.1.7. By submitting comments, feedback, information, chat conversation 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.

2.4.3.1.8. 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 any of the channels listed in section 2.4.3.1.1.

2.4.3.3. Legal basis of data processing

The legal basis of data processing will be the 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.

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 5 years.

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.

Salesforce.com 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/)	Salesforce.com carries out data processing activity for the following purposes: **Sending newsletters** 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. The System is used for the following purposes: • Storing the User's personal data described in section 2.4.2.2. above; • Sending newsletters to Users; Data processed with automated processing techniques • 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)). The User data listed in section 2.4.2.2 is stored both in the System and in NNG's servers. **Provision of Customer Support** 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. The Customer Support System is used for operating built-in, online, and live chat-based Customer Support service. The User's data listed in section 2.4.3.2 is stored both in the Customer Support System and on NNG's servers.

Cloud Agents Company name: Comforce Zrt. Address: H-2500 Esztergom, Jókai út 8. Website: https://cloudagents.com/ (https://cloudagents.com/) Contact: https://cloudagents.com/contact-us (https://cloudagents.com/contact-us)	Cloud Agent carries out data processing activity for the following purpose: **Provision of Customer Support** Cloud Agents provides multilingual 1st level customer care and technical support service to NNG's end-users via e-mail, chat and telephone. Cloud Agents has access to those personal data which were given by Users (e.g. name, e-mail address, country) or which were generated automatically during the Updates (communication between the User and NNG). Cloud Agents does not store any personal data of the User on its own servers.

2.6. Cookies

2.6.1. NNG hereby informs you that if you download certain parts of the Site or the Toolbox, 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 Toolbox, and are used to collect information on the User's visits to the Site or in the Toolbox.

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 Toolbox features will be limited.

Type of Cookie	Purpose of Cookies	Legal basis of data processing	Cookie retention period
Google Analytics	The Site and the Toolbox use the Google Analytics tool to collect and analyse information on how the User uses the Site and the Toolbox. We use the information to compile reports and improve the Site and the Toolbox. The data is collected in an anonymous form, including the number of Users to the Site and the Toolbox, where Users have come to the Site or the Toolbox from, and the pages they visited within the Site or the Toolbox. The collected data cannot be tracked back to the User. For further information on Google's privacy policy, click here (https://www.google.hu/intl/en/policies/privacy/) .	User's consent.	Google Analytics Cookies are created as soon as the User v which a valid Google Analytics tracking code is installed. The C in the User's browser for a maximum period of 2 years from t further information, please cli (https://developers.google.com/analytics/devguides/collection/ usage) .
Google AdWords (Google Remarketing)	Third-party service providers, including Google, store previous visits made by a User to the Site and the Toolbox, 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 Toolbox, 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 Toolbox, as well as the sub-pages viewed by the User when browsing the Site or the Toolbox. 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 visite Toolbox . For further information, please (https://support.google.com/adwords/answer/2375435?hl=en)
Session ID	Session Cookies allow the User to be recognized within the Site or the Toolbox. The most common example of this functionality is the shopping cart feature of the Toolbox. 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 sessic collected information will no longer be available.
Device	These Cookies remember the User's Device choice, so that the Toolbox can navigate to that particular device when the User logs into the Toolbox next time.	User's consent.	The Cookies will be held in the User's browser for a maximum p
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 p

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 months 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 opposes 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.