

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 to give a better understanding of the Policy.

Purpose of data processing	Registration for the Map Updater	Subscription to newsletters
Data controller	<ul style="list-style-type: none"> • NNG • Partner (except for VIN and ESN data) 	<ul style="list-style-type: none"> • NNG • Partner
Scope of the processed data	<p>a.) Data provided by the User during the registration for and use of the Map Updater:</p> <ul style="list-style-type: none"> • User's name; • User's email address; • User's address; • Country; • User Activity. <p>b.) Data provided by the User, transferred by NNG to the Partner acting as data processor:</p> <ul style="list-style-type: none"> • VIN; • ESN data; • Information on whether the maps have already been updated. <p>c.) Data transferred by the Partner to NNG:</p> <ul style="list-style-type: none"> • Car models equipped with the Site Operator's navigation software; • Vehicle sale date; • Region; • Software version; • Factory-installed map version. 	<ul style="list-style-type: none"> • User's name • User's e-mail address
Legal basis	<ul style="list-style-type: none"> • User's consent. • As of 25th May 2018, the performance of a contract to which User is a party. 	<ul style="list-style-type: none"> • User's consent.
Duration of data processing	<ul style="list-style-type: none"> • The period during which the Update is available (expectedly 10 years), or until the User cancels his/her account. 	<ul style="list-style-type: none"> • The period during which the Update is available (expectedly 10 years), or until the User unsubscribes from the newsletter.
Data processor	The Partner, concerning VIN and ESN data.	Sales force, concerning NNG's newsletters.

PRIVACY POLICY

This Privacy Policy (hereinafter referred to as the „Policy“) was published on and is effective as of [...] April 2017.

1. DEFINITIONS

Connected Services mean location-based services, which require some form of online connectivity (data access via a SIM card or Bluetooth, wireless internet access, 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 on your Device and used with your Software.

Device means the in-car navigation system.

ESN (Electronic Serial Number) means the unique serial number of the Sync radio in the vehicle.

Map Updater means a free PC and OSX software tool used to download the Updates and Products from NNG's servers and upload them on the Device.

NNG or Site Operator means NNG Software Developing and Commercial Limited Liability Company

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: unsubscribe@nng.com

Partner means the following entities collectively:

- Ford Motor Company (1 American Rd., Dearborn, MI 48126);
- [...]
- [...]
- [...]

Product means Updates, Content, and Connected Services.

Site means ford.naviextras.com and its subdomains, and lincoln.naviextras.com and its subdomains.

Software means the navigation software that runs on your Device.

Updates mean the contents and software updates, which are provided by your device manufacturer or software developer, and which provide additional features, new Content versions, or fix known software problems.

User means the visitor of the Site.

User Activity means location and behaviour data (language selection in the Map Updater/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 Map Updater/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 the terms and conditions of how the data subject's (hereinafter referred to as the "User" or "you") personal or anonymous 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 Map Updater from time to time for the latest information.

2.3. Data controller

2.3.1. The data provided on the Site and in the Map Updater is processed by NNG and the Partner.

2.3.2. The provided data is accessible to the following persons:

- NNG's or the Partner's employees and managers involved in the data collection;
- IT specialists performing a variety of IT tasks related to the operation and maintenance of NNG's or the Partner's computer system.

2.3.3. Any personal information that you provide for NNG or the Partner must be true, complete, and accurate in all respects. You agree to notify us of any change in your personal information via the Customer Care interface without delay.

2.4. Data processing

2.4.1. *Processing of data provided by the User during the registration for the Map Updater*

2.4.1.1. *Purpose of data processing*

- a.) Contacting the User in order to provide update services, Updates, and information on the maps and services.
- b.) Provision of Updates

If the User wishes to use the service, he/she shall download the Map Updater through the link available on the Site, and provide the requested data. By registering for the Map Updater, the User expressly and voluntarily gives his/her consent to NNG and the Partner to process his/her personal data in compliance with the provisions of this Policy and the law on data protection.

When the User opens the Map Updater and downloads the Updates from NNG's servers in order to upload them to the Device, NNG has to decide whether the Device is compatible with any of the Updates. Therefore, NNG has developed a service that sends the data listed in point b) of section 2.4.1.2 to the Partner's servers for validation. The Partner's server shall return the data listed in point c) of section 2.4.1.2 to NNG to decide whether the Device is compatible with any Update.

2.4.1.4. *Scope of the processed personal data of the User:*

a.) Data provided by the User during the registration for and use of the Map Updater:

- User's name;
- User's e-mail address;
- User's address;
- Country of permanent or temporary residence;
- User Activity.

b.) Data provided by the User, transferred by NNG to the Partner acting as data processor:

- VIN;
- ESN data;
- Information on whether the map has already been updated.

c.) Data transferred by the Partner to NNG:

- Car models equipped with the Site Operator's navigation software;
- Vehicle sale date;
- Region;
- Software version;
- Factory-installed map version.

2.4.1.8. *Legal basis of data processing*

a.) The data is processed in compliance with Act CXII of 2011 on the right of informational self-determination and on freedom of information ("Privacy Act"). The legal basis of data processing is the User's consent given pursuant to point a) of section 5(1) of the Privacy Act.

b.) As of 25th May 2018, 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 ("General Data Protection Regulation" or "GDPR") shall apply. As of this date, 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.

2.4.1.11. *Duration of data processing*

Your personal data uploaded to the Site or the Map Updater is retained for the period during which the Update is available (expectedly 10 years), or until you cancel your account.

Notwithstanding the above, NNG shall immediately delete your personal data if you specifically request the deletion thereof.

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

2.4.2.1. *Purpose of data processing*

NNG or the Partner sends newsletters to inform the User about new Products and promotions, or other marketing activities.

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

- User's name;
- User's email address.

2.4.2.3. *Legal basis of data processing*

a.) The data is processed in compliance with Act CXII of 2011 on the right of informational self-determination and on freedom of information ("Privacy Act") and Act XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activities ("Advertising Act").

The legal basis of data processing is

- the User's consent given pursuant to point a) of section 5(1) of the Privacy Act and
- the User's consent given pursuant to sections 6(1) and (2) of the Advertising Act.

b.) As of 25th May 2018, the GDPR shall apply. As of this date, the legal basis of data processing will be the consent of the

data subject, as set forth in point a) in Article 6(1) of the GDPR.

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

- 2.4.2.6.1. Your personal data uploaded to the Site or the Map Updater is retained for the period during which the Update is available (expectedly 10 years), or until you unsubscribe from the newsletter.
- 2.4.2.6.2. The User can subscribe to NNG's or the Partner's newsletter on this Site or in the Map Updater. By ticking the appropriate checkbox(es), the User voluntarily gives his/her consent that NNG or the Partner sends the User a newsletter from time to time. NNG or the Partner may send personalized newsletters to the User based on the data processed in compliance with this Policy.
- 2.4.2.6.3. The User may withdraw his/her consent at any time by sending an email to NNG from the email account in which he/she does not wish to receive newsletters in the future, or by sending mail to NNG's address specified in section 1. Should the User unsubscribe from NNG's newsletter, NNG shall request that the Partner immediately ceases to process the User's data. The User may also unsubscribe (opt-out) at any time by following the instructions in the newsletter.
- 2.4.2.6.4. Please note that either NNG or the Partner may at any time decide to stop sending newsletters without prior notice, further liability or obligation of any kind.
- 2.4.2.6.5. Registration number of such data controlling: NAIH-115545/2017.

2.5. **Data processor**

2.5.1. *Data processing related to the registration for the Map Updater*

For the purpose of data processing set forth in point b) of section 2.4.1.2, the Partner qualifies as a data processor.

The contact information of the Partner acting as data processor is provided in section 2.3.1.

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

2.5.2.1. The data is processed on behalf of NNG and the Partner by a data processor, which provides email marketing services.

2.5.2.2. To improve user experience, the data is processed for the following purposes:

- Sending emails to the email addresses provided by NNG or the Partner;
- Analysing the activities in 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), and sending feedback to NNG or the Partner;
- Analysing the bounce rate (e.g. cases in which the email address is invalid or the email is listed as spam).

2.5.2.3. The data processor has access to the User data specified in section 2.4.2.2, uploaded by NNG or the Partner.

Such information is used to send emails on behalf of NNG or the Partner. The data processor has access to this information for a period set by NNG or the Partner from time to time, and it shall delete such data upon NNG's or the Partner's request. NNG and the Partner reserve the right to change the data processor at any time.

Name of NNG's data processor: salesforce.com EMEA Limited

Address of the data processor: Floor 26 Salesforce Tower, 110 Bishopsgate EC2N 4AY London, UK

2.6. **Anonymous data**

2.6.1. The Site and the Map Updater also collect anonymous data (including your internet protocol address, browser type, operating system, browser language, screen resolution, etc.) with automated logging mechanisms running on our servers. The purpose of such logging is:

- system security and data protection;
- usage statistics;
- optimization and improvement of the Site and the Map Updater.

2.6.2. This anonymous data is not associated with any of the User's personal data, thus it is not used for identifying the User.

2.7. **Cookies**

2.7.1. NNG hereby informs you that if you download certain parts of the Site or the Map Updater, 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 Hungarian law on privacy. These data files are necessary for the proper operation of the Site and the Map Updater, and are used to collect anonymous information on the User's visits to the Site and to the Map Updater.

2.7.2. 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, the access to some of the Site pages will be limited.

Types of cookie	Purpose of the cookies	Legal basis of data processing	Cookie retention period
Google Analytics	The Site and the Map Updater use the Google Analytics tool to collect and analyse information on how the User uses the Site and the Map Updater. We use the information to compile reports and improve the Site and the Map Updater. The data is collected in an anonymous form, including the number of Users to the Site and the Map Updater, where the Users have come to the Site or the Map Updater from, and the pages they visited within the Site or the Map Updater. The collected data cannot be tracked back to the User. For further information on Google's privacy policy, please click here.	User's consent.	The 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.
Google AdWords (Google Remarketing)	Third-party service providers, including Google, store previous visits made by a User to the Site or the Map Updater, 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 Map Updater, 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 Website, as well as the subpages viewed by the User when browsing the Site or the Map Updater. The recorded data is stored anonymously. The User can block Google's remarketing Cookies on the opt-out page of Google's Ads Settings , and can also block third-party Cookies on the Network Advertising Initiative opt-out page.	User's consent.	The AdWords Cookies expire 90 days after the User visited the Site or the Map Updater. For further information please click here .
Session ID	Session Cookies allow the User to be recognized within the Site or the Map Updater. The most common example of this functionality is the shopping cart feature of the Site and the Map Updater. 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.

2.8. Links

Please note that the Site and the Map Updater contain several links, which lead to other websites. Their respective data protection rules shall apply to the use of such external websites, therefore after you click on the link or the provided button, NNG will no longer have any influence over the collection, storage, or processing of any personal data transmitted by your click.

2.9. Data security

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

2.10. Rights and enforcement

2.10.1. The User may request the following from NNG acting as data controller:

- Information on the processing of his/her personal data;
- Rectification of his/her personal data; and
- Deletion or blocking of his/her personal data (unless the processing of the personal data is mandatory).

2.10.2. You are entitled to request information on the data processing carried out by NNG, 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 specified in section 1. NNG shall provide written information on the processing of your personal data within 25 days after receipt of the request. You may also request the correction or blocking of your personal data.

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

2.10.4. Your data shall be deleted upon your request. Your request for data deletion may be submitted to NNG by using the email or postal address specified below. NNG shall also delete all stored personal data the knowledge of which is no longer necessary for the achievement of the purpose, or if the storage of the personal data is inadmissible for legal reasons. Personal data which must be preserved by law is not affected.

2.10.5. The personal data shall be blocked instead of being deleted if so requested by the User as a data subject, or if there are reasonable grounds to believe that the deletion could affect the legitimate interest of the User.

2.10.6. Please be informed that your data will not be deleted if the processing thereof is required by law.

2.10.7. 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; phone: +36-1-391-1400; facsimile: +36-1-391-1410; email: ugyfelszolgalat@naih.hu).

2.10.8. 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.

2.10.9. Your detailed rights and remedies are set out in subsections 14–18 and 21–23 of the Privacy Act.

2.11. Contacting NNG

We value your opinion. If you have any comments or 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.