

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	<p>Providing access to the Content and Updates to which the User is entitled to, and providing a possibility to make a purchase by registering in the InControl Touch Pro Map Updater (or any other channel NNG may provide)</p> <p>Relevant section of the Policy: 4.1</p>	<p>Sending newsletters</p> <p>Relevant section of the Policy: 4.2</p>
Data controller	<ul style="list-style-type: none"> • NNG 	<ul style="list-style-type: none"> • NNG
Scope of processed Personal Information	<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; • Country; • User’s address/billing address; • User Activity; • Password. <p>b) Information processed related to the recognition of the Navigation Device:</p> <ul style="list-style-type: none"> • brand and model to identify the Navigation Device; • SWID (an ID created from the VIN using a one-way hash function); • Navigation Device ID (Unique Identifier of the Navigation Device); • Software version; • first use date (the time of the first GPS fix of the navigation head unit); • VIN. 	<ul style="list-style-type: none"> • User’s name; • User’s email address. • User’s language • Personal Information 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 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.
Duration of data processing	<ul style="list-style-type: none"> • The period during which the Update is available and supported by NNG, or until the User cancels his/her account. 	<ul style="list-style-type: none"> • The period during which the Update is available and supported by NNG, or until the User unsubscribes from the newsletter.
Data processor	<ul style="list-style-type: none"> • Atlassian • Microsoft Azure 	<ul style="list-style-type: none"> • Salesforce.com • Microsoft Azure

Privacy Policy

1. Purpose of this documents

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: 01-09-891838; Tax number: 13357845-2-44; Email address: privacy@nng.com) ("**NNG**") will strictly control any personal information received from registered visitors of the "**Site**" (meaning, 'jaguar-ngi.naviextras.com' and 'landrover-ngi.naviextras.com' and their respective subdomains) and/or the "**InControl Touch Pro Map Updater**" (meaning, a free software tool for PC and OS X, which is used to download Updates (defined below) and Products (defined below) from NNG's servers and upload them to the Navigation Device (defined below)) ("**User(s)**" or "**You**") held by us, in compliance with the Personal Information Protection Act of Japan (the "**PIPA**") and 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 (the "**General Data Protection Regulation**" or "**GDPR**"), as well as any relevant laws and ordinances, and will endeavour to handle personal information appropriately by setting forth our privacy policy as follows.

This Privacy Policy (hereinafter referred to as the „Policy”) has been published on and is effective as of [2020.10.26.]

2. Definition of Personal Information and Other Terms

"Personal Information" means information about a living individual which: (1) can identify the specific individual by name, date of birth or other written description, etc. (meaning records made up of documents, graphics, or electronic records) contained in such information (including such information as will allow easy reference to other information and will thereby enable the identification of the specific individual); or (2) contains an individual identification code as set forth under the PIPA. Personal Information processed by NNG can be found in the table above.

"Aftersales Period" means the period following the expiry of the Mapcare Period during which Update is provided for a fee.

"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 User's Navigation Device.

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

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

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

"Jaguar" means Jaguar Land Rover Limited, Abbey Road, Whitley, Coventry, CV3 4LF, United Kingdom.

"Mapcare Period" means the period while free Update is available and provided for the User.

"Navigation Device" means the in-car navigation system built into your Jaguar or Land Rover branded vehicle (including the SD card/USB stick, or other data carrier that contains the navigation data).

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

"Profiling" means automated processing of Personal Information, as listed in point 4.2 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.

"Software" means the navigation software that runs on the User's Navigation Device.

"Update(s)" mean Content and Software updates (available free of charge for a certain period, then for a fee), which are provided by User's Navigation Device manufacturer or Software developer, and which provide additional features, new Content versions, or fix known Software problems.

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

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

3. Collection of Personal Information

NNG will collect Personal Information by appropriate and fair methods, in compliance with the PIPA and the GDPR. In the event Personal Information is acquired directly, either in writing or via the web, we will clarify the purpose of use for such in advance.

Please be advised that, in the event the User does not consent or if User later withdraws its consent to provide its Personal Information to NNG, or request deletion of Personal Information, it is possible that a portion of the services provided by NNG may not be made available to the User.

4. Purpose of Use and the Scope of Personal Information

4.1. Processing of Personal Information collected from the User during the registration in the InControl Touch Pro Map Updater

4.1.1. Purpose of data processing

- a. Administering registration in the InControl Touch Pro Map Updater and User account maintenance.

If the User wishes to download or purchase a Product, he/she shall download the InControl Touch Pro Map Updater through the link available on the Site and register in the InControl Touch Pro Map Updater. User account maintenance includes but is not limited to the performance of NNG's duties in connection with your rights specified in section 10.

- b. Provision of Updates

The process of carrying out an Update is the following: the User can remove the SD card from the navigation head unit manually. The SD card contains all information which is necessary to carry out an Update. The User shall insert the SD card to the PC and launch the InControl Touch Pro Map Updater application. By using the InControl Touch Pro Map Updater application information listed in section 4.1.2 b) is sent from the InControl Touch Pro Map Updater 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 Updates during Mapcare Period, notification related to Mapcare expiration date, to release a new InControl Touch Pro Map Updater and changes in the Policy.

4.1.2. Scope of the User's processed Personal Information collected during the registration in and/or usage of the InControl Touch Pro Map Updater:

- a) The following information is processed related to the registration of the User:

- User's name;
- User's email address;
- Country;
- User's address/billing address;
- User Activity,
- Password.

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

- brand and model to identify the Navigation Device;
- SWID (an ID created from the VIN using a one-way hash function);
- Navigation Device ID (Unique Identifier of the Navigation Device);
- Software version;
- first use date (the time of the first GPS fix of the navigation head unit);
- VIN.

4.1.3. Legal basis of data processing

The Personal Information is processed in compliance with the PIPA, the GDPR and all relevant local laws.

The legal basis of data processing is the performance of contract pursuant to point b) of Article 6(1) of the GDPR. During the Mapcare Period NNG is providing Free Products to You as subcontractor of Jaguar and processing your Personal Information in order You can access and download the Free Products during the Mapcare Period. Following the expiry of the Mapcare Period You will be able to purchase Products directly from NNG for your Navigation Device and NNG is processing your Personal Information in order to enter into such purchase contract and perform said contract and administer your account, such as your Navigation Device history.

4.1.4. Duration of data processing

Your Personal Information uploaded via the InControl Touch Pro Map Updater is retained for the period during which any Update or Product is available and supported by NNG, or until You cancel your account.

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

4.2. Processing of Personal Information provided by the User for receiving newsletters

4.2.1. Purpose of data processing

The User can subscribe to NNG's newsletter either on the Site and/or in the InControl Touch Pro Map Updater 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.

4.2.2. Scope of the processed Personal Information of the User

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

Personal Information 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).

4.2.3. Legal basis of data processing

The Personal Information is processed in compliance with the PIPA, the 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,
- article 3(1) of the Act on Regulation of Transmission of Specified Electronic Mail in Japan, 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 ("Advertising Act").

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

4.2.4.1. Your Personal Information uploaded to the Site and/or InControl Touch Pro Map Updater is retained for the period during which the Update is available, and your Navigation Device is supported by NNG, or until You unsubscribe from the newsletter.

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 InControl Touch Pro Map Updater where You can deactivate the appropriate checkbox.
- By sending a request to NNG through <https://nng-npss.atlassian.net/servicedesk/customer/portals>.
- By sending a mail to NNG's postal address (the registered office) specified in section 1.

Please be advised that any expenses such as postage fee will be borne by the person making the request and that NNG is only able to process requests made in the English language.

Please kindly refrain from visiting us for inquiry purposes.

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 10.6). Please note that system notifications sent under section 4.1.1 c are not equal with newsletters, so unsubscribing from newsletters does not affect the lawfulness of sending system notifications.

4.3. Other purposes individually set forth and notified in advance in writing.

5. **Supervision of Employees/Consignees**

The data provided on the Site or in the InControl Touch Pro Map Updater is processed by NNG.

The provided data is accessible to the following persons:

- NNG’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 computer system as part of their role within NNG in connection with performing their duties associated with the purpose of this Policy.

In allowing NNG's employees to handle Personal Information, NNG will provide necessary and appropriate supervision of such employees so as to protect Personal Information.

Further, when NNG entrusts a third party with the handling of Personal Information (including but not limited to IT specialists who will perform a variety of IT tasks relating to the operation and maintenance of NNG's computer systems), NNG will make it a condition of such entrustment for the consignee to conduct necessary and appropriate security controls, and will limit the consignee's handling of Personal Information to the scope necessary for the achievement of the purpose of the entrustment, providing necessary and appropriate supervision so as to protect privacy.

6. Provision to Third Parties

NNG will not provide Personal Information to a third party without obtaining the individual's prior consent unless such provision falls under "7. Consignees/Data processors" or the cases set forth below:

- When done so pursuant to applicable laws or ordinances.
- When necessary for the protection of the life, body, or property of an individual and when it is difficult to obtain the consent of the person.
- When it is especially necessary for the enhancement of public safety or promoting the sound growth of children and when it is difficult to obtain the consent of the person.
- When it is necessary to cooperate with a national institution, a local public body, or an individual or entity entrusted thereby to execute operations prescribed by laws or ordinances and when obtaining the consent of the person might impede the execution of the operations concerned.
- When entrusting the handling of Personal Information within the scope necessary for the achievement of the purpose of use.
- When it is provided as a result of business transfer due to merger or other cause.

7. Consignees/Data processors

The following entities shall serve as data processors/consignees (“**Data Processor**”):

7.1. In order You can enforce your rights as a data subject specified in section 10 NNG cooperates with the following Data Processor:

Name:	Atlassian Corporation Plc
Address:	Exchange House Primrose Street, London EC2A 2EG, c/o Herbert Smith Freehills LLP
Website:	https://www.atlassian.com/
Contact information:	https://www.atlassian.com/company/contact

Atlassian provides NNG with an online system through which NNG can manage receipt of your requests sent through the online form specified in section 10.2 i. regarding enforcing your rights as a data subject and sending answers to your request.

7.2. For sending newsletters to the Users, NNG cooperates with the following Data Processor:

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 (hereinafter referred to as the “System”), through which NNG can manage the sending of newsletter to the Users. The Data Processor does not have access to the content uploaded by NNG to the System.

To improve user experience, the System is used for the following purposes:

- Storing the User’s Personal Information;
- 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)).

The User’s Personal Information listed in section 4.2.2 is stored both in the System and on NNG’s server.

7.3. In order NNG can provide You with the Updates, 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 Information of the Users listed in the present Policy.

7.4. Name of Responsible Business Operator

Name of the entity responsible for management of Personal Information:

NNG Software Developing and Commercial Limited Liability Company

8. Transfer of Personal Information to Other Countries/Provision to Third Parties in Other Countries

NNG may transfer Personal Information to countries other than the country in which User originally provided it, subject to any necessary consent from the User under the PIPA. These countries may not have the same data protection laws as the country in which User provided the information. In the event NNG transfers Personal Information to other countries, Personal Information shall be protected to a standard substantially similar to that set out by this Policy.

Additionally, in the event that the consignee or the joint user handling the Personal Information qualifies as a 'Foreign Third Party' as specified in Article 24 of the PIPA, NNG shall adopt systems to ensure that the applicable consignee or joint user takes measures that continuously and substantively approximate those measures required to be taken in accordance with the PIPA and any relevant laws and ordinances.

9. Data Security

NNG will take reasonable security measures to prevent any unauthorized access to, and loss, destruction, tampering, and disclosure of Personal Information held by NNG. NNG observes all applicable regulations regarding the security of Personal Information, therefore both NNG and its authorized Data Processors implement appropriate technical and organizational measures to protect Personal Information and establish adequate procedural rules to enforce the provisions of the PIPA and the GDPR concerning confidentiality and the security of data processing.

10. Rights and remedies

10.1. Any personal information which You provide for NNG must be true, complete, and accurate in all respects. You can modify your Personal Information at any time by logging in to your User account through the InControl Touch Pro Map Updater.

10.2. You are entitled to exercise the following rights in relation to NNG's data processing activities to the extent required under applicable law:

- Request information on the processing of your Personal Information (see section 10.3);
- Request data portability (10.4).
- Request the rectification of your Personal Information (see section 10.5);
- Request the deletion of your Personal Information or restriction of the processing of your Personal Information (see section 10.6 and 10.7);
- Object to NNG's data processing (see section 10.8).

In the event You wish to exercise any of your rights detailed above, please send your request by stating the name, address, and email address of the person making the inquiry and content of the inquiry by using one of the following means:

- i. By sending a request to NNG through <https://nng-npss.atlassian.net/servicedesk/customer/portals>
- 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.

Please be advised that any expenses such as postage fee will be borne by the person making the request and that NNG is only able to process requests made in the English language.

Please kindly refrain from visiting us for inquiry purposes.

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

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

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

10.5. If your Personal Information is inaccurate, You may request NNG to rectify such Personal Information, provided that the correct Personal Information is at NNG's disposal.

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

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

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

- a) You think that your processed Personal Information is not accurate, for a period enabling NNG to verify the accuracy of your Personal Information;
- b) the processing is unlawful, and You opposes the erasure of your Personal Information, You are entitled to request restriction of their use instead;
- c) NNG no longer needs your Personal Information 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.

10.8. At any time, You have the right to object to processing your Personal Information subject to certain conditions under applicable laws, You may separately object against processing your Personal Information for direct marketing purposes, including Profiling, as set out herein. In this case, NNG will no longer process your Personal Information 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.

10.9. You may lodge a complaint about the processing of your Personal Information to the National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság – “NAIH”; address: H-1055 Budapest, Falk Miksa utca 9-11.; postal address: H-1374 Budapest, Pf. 603.; 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.

10.10. 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.

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

10.12. *Verification procedure*

- Requests made by the User:

NNG will verify User's identity by examining a copy of a public identification document such as a driver's license, passport, or health insurance card.

- Requests made by the User's agent:

NNG will verify that the individual is User's legitimate agent by examining the agent's letter of authorization and seal certificate for User's registered seal, or a copy of a public identification document such as both User's and User's agent's driver's license, passport, or health insurance card, in addition to telephone communication made by the User.

NNG will respond to inquiries sent by User via registered mail or email. If User would prefer the response be sent to User's agent, please make an express statement to that effect in User's request document.

11. Review of the Privacy Policy

NNG reserves the right to amend this document unilaterally at any time. We suggest visiting the Site and the InControl Touch Pro Map Updater 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 Personal Information, person of Data Processor) of the Policy.

12. 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 10.2. 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.