

## 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.

<b>Purpose of data processing</b>	<p style="text-align: center;"><b>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 Mazda Toolbox (or any other channel NNG may provide)</b></p> <p>Relevant section of the Policy: 2.4.1.</p>	<p style="text-align: center;"><b>Sending newsletters</b></p> <p>Relevant section of the Policy: 2.4.2</p>
<b>Data controller</b>	<ul style="list-style-type: none"> <li>• NNG</li> </ul>	<ul style="list-style-type: none"> <li>• NNG</li> </ul>
<b>Scope of processed data</b>	<p>a) Information processed related to the registration of the User:</p> <ul style="list-style-type: none"> <li>• User’s name;</li> <li>• User’s email address;</li> <li>• User’s address;</li> <li>• Country;</li> <li>• User Activity;</li> <li>• Password.</li> </ul> <p>b) Information processed related to the recognition of the Navigation Device:</p> <ul style="list-style-type: none"> <li>• brand and model to identify the Navigation Device;</li> <li>• SWID (an ID created from the VIN using a one-way hash function);</li> <li>• IMEI (International Mobile Equipment Identity) number;</li> <li>• Software version;</li> <li>• first use date (the time of the first GPS fix of the navigation head unit);</li> <li>• VIN.</li> </ul>	<ul style="list-style-type: none"> <li>• User’s name;</li> <li>• User’s email address;</li> <li>• User’s language.</li> <li>• Data processed with automated processing: <ul style="list-style-type: none"> <li>• 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;</li> <li>• OS and OS version of Device the newsletter has been opened with;</li> <li>• type and version of email client of User;</li> <li>• 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).</li> </ul> </li> </ul>
<b>Legal basis</b>	<ul style="list-style-type: none"> <li>• Performance of contract.</li> </ul>	<ul style="list-style-type: none"> <li>• User’s consent.</li> </ul>

<b>Duration of data processing</b>	<ul style="list-style-type: none"> <li>The period during which the Update is available and supported by NNG, or until the User cancels his/her account.</li> </ul>	<ul style="list-style-type: none"> <li>The period during which the Update is available and supported by NNG, or until the User unsubscribes from the newsletter.</li> </ul>
<b>Data processor</b>	<ul style="list-style-type: none"> <li>Atlassian</li> <li>Microsoft Azure</li> </ul>	<ul style="list-style-type: none"> <li>Salesforce.com</li> <li>Microsoft Azure</li> </ul>

## PRIVACY POLICY

This Privacy Policy (hereinafter referred to as the „Policy”) has been published on and is effective as of [26/10/2020].

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

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

**Device** means You are using for registration 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.

**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 period while Free Product is available and provided for the User (usually it is a three-year period).

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

**NNG** means NNG Software Developing and Commercial Limited Liability Company

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

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

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

**Software** means the navigation software that runs on your Navigation Device.

**Mazda Toolbox** means a free software tool for PC and OSX, which is used to download Updates and Products from NNG's servers and upload them to the Navigation Device.

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

**User or You** means a registered user of the Mazda Toolbox.

**User Activity** means location and behaviour data (language selection in the Mazda Toolbox, products put in the User's cart), onsite browsing history, usage patterns (frequency/patterns of logging-in to investigate fraud, misuse of the Mazda Toolbox).

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

### 2.2. Availability and updating of this document

NNG reserves the right to amend this document unilaterally at any time. We suggest visiting the Mazda Toolbox from time to time for the latest information, however, You will also be informed of this Policy being amended in case of significant changes (e.g. legal basis of processing, scope of processed data, person of data processor) of the Policy.

### 2.3. Data controller

2.3.1. The data provided in the Mazda Toolbox is processed by NNG.

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

- NNG's employees and managers involved in the data collection;
- IT specialists performing a variety of IT tasks related to the operation and maintenance of NNG's computer system as part of their role within NNG in connection with performing their duties associated with the purpose of this Policy.

## **2.4. Data processing**

### *2.4.1. Processing of data provided by the User during the registration in the Mazda Toolbox*

#### *2.4.1.1. Purpose of data processing*

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

If the User wishes to download or purchase a Product, he/she shall register in the Mazda Toolbox. User account maintenance includes but is not limited to the performance of NNG's duties in connection with your rights specified in section 2.7.

- b. Provision of Updates

The process of carrying out an Update is the following: the User 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 Mazda Toolbox application. By using the Mazda Toolbox application information listed in section 2.4.1.2 b) is sent from the Mazda Toolbox to the NNG server.

- c. Sending system notifications

NNG sends system notifications in connection with technical issues in relation to and during the access to Products, including, but not limited to technical issues during downloading the Content, notification related to Updates during Mapcare Period, notification related to Mapcare expiration date, to release of a new Mazda Toolbox and changes in the privacy policy.

#### *2.4.1.2. Scope of the User's processed personal data provided during the registration in and/or usage of the Mazda Toolbox:*

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

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

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

- brand and model to identify the Navigation Device;
- SWID (an ID created from the VIN using a one-way hash function);
- IMEI (International Mobile Equipment Identity) number;
- Software version;
- first use date (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 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 Mazda and processing your data 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 data in order to enter into such purchase contract and perform said contract and administer your account, such as your Navigation Device history.

#### 2.4.1.4. *Duration of data processing*

Your personal data uploaded via the Mazda Toolbox 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 data if You specifically request the deletion thereof and there is no valid legal ground for data processing.

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

#### 2.4.2.1. *Purpose of data processing*

The User can subscribe to NNG's newsletter in the Mazda Toolbox by ticking the appropriate checkbox.

NNG sends newsletters to inform the User about new Products (e.g. updates to Content available following the expiry of the Mapcare Period) and promotions, or other marketing activities. In order to provide You with

personalized newsletters relevant for You and your registered Navigation Device(s) and increase your user experience and satisfaction NNG uses Profiling techniques with the involvement of salesforce.com EMEA Limited, as data processor, to receive information of your Device and the geographical region your Device is located.

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

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

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

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").

#### 2.4.2.4. *Duration of data processing and subscription to newsletters*

- 2.4.2.4.1. Your personal data uploaded via the Mazda Toolbox 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.

2.4.2.4.2. The User may withdraw his/her consent at any time as follows:

- By following the instructions in the newsletter. Click on the unsubscribe link at the bottom of the newsletter.
- By logging in to your User account via the Mazda Toolbox 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.

2.4.2.4.3. Please note that unsubscribing from the newsletter does not affect the lawfulness of data processing based on your consent and conducted before such withdrawal and unsubscribing from newsletter is not equal with cancelling your account (see section 2.7.6). Please note that system notifications sent under section 2.4.1.1 c. are not equal with newsletters, so unsubscribing from newsletters does not affect the lawfulness of sending system notifications.

## **2.5. Data processor**

### *2.5.1. Data processing related to enforcing the User's rights specified in section 2.7*

2.5.1.1. In order You can enforce your rights as a data subject specified in section 2.7 NNG cooperates with the following data processor:

Name of NNG's data processor: Atlassian Corporation Plc  
Address of the data processor: 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 2.7.2 i regarding enforcing your rights as a data subject and sending answers to your request.

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

2.5.2.1. For sending newsletters to the Users, NNG cooperates with Salesforce.com as data processor, which provides email marketing services. The data processor 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.

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

- Storing the User’s personal data;
- Sending emails to the User;
- Analysing the User’s interaction with the delivered email (in particular whether the email was opened, how many times the addressee clicked on it, whether the addressee read the entire email);
- Analysing the bounce rate (e.g. cases in which the email address is invalid or the email is listed as spam)
- Collecting data of User’s registered Device and its geolocation (OS and OS version of Device; type and version of email client of User; type of Device (including manufacturer of the Device, whether the Device qualifies as phone or not, screen resolution); IP address and geolocation data (i.e. country/region information)).

2.5.2.3. The User data listed in section 2.4.2.2 is stored both in the System and on NNG’s server.

### 2.5.3. *Data processing related to providing the User with the Updates*

2.5.3.1. In order NNG can provide You with the Updates, NNG uses cloud computing services provided by Microsoft Azure.

Company name:	Microsoft Ireland Operations, Ltd.
Address:	Carmenhall Road Sandyford, Dublin 18, Ireland
Website:	<a href="https://azure.microsoft.com/hu-hu/">https://azure.microsoft.com/hu-hu/</a>
Contact:	<a href="https://azure.microsoft.com/hu-hu/overview/sales-number/">https://azure.microsoft.com/hu-hu/overview/sales-number/</a>

Microsoft has access to all personal data of the Users listed in the present Policy.

## **2.6. Data security**

2.6.1. NNG observes all applicable regulations regarding the security of personal data, therefore both NNG and its authorized data processors implement appropriate technical and organizational measures to protect personal data and establish



adequate procedural rules to enforce the provisions of the GDPR concerning confidentiality and the security of data processing.

## **2.7. Rights and remedies**

- 2.7.1. Any personal information which You provide for NNG must be true, complete, and accurate in all respects. You can modify your personal data at any time by logging in to your User account through the Mazda Toolbox.
- 2.7.2. You are entitled to exercise the following rights in relation to NNG's data processing activities:
- Request information on the processing of your personal data (see section 2.7.3);
  - Request data portability (2.7.4).
  - Request the rectification of your personal data (see section 2.7.5);
  - Request the deletion of your personal data or restriction of the processing of your personal data (see section 2.7.6 and 2.7.7);
  - Object to NNG's data processing (see section 2.7.8).

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

- i. By sending a request to NNG through <https://nng-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.
- 2.7.3. You are entitled to request information on data related to You and processing carried out by NNG thereof, especially information as to what personal data relating to You is stored; the sources from which they were obtained; the purpose, grounds, and duration of processing; if your personal data is made available to others, the legal basis and the recipients; and any data protection incident in relation to your personal data. NNG shall provide written information on the processing of your personal data within 1 months after receipt of the request. You may also request the correction of your personal data.
- 2.7.4. You are also entitled to request a structured, commonly used and machine-readable formatted copy of your personal data that NNG is processing subject to conditions set out in Article 20 of the GDPR.

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

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

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

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

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

- a) You think that your processed personal data is not accurate, for a period enabling NNG to verify the accuracy of your personal data;
- b) the processing is unlawful, and You opposes the erasure of your personal data, You are entitled to request restriction of their use instead;
- c) NNG no longer needs your personal data for the purposes of processing, but You require NNG to continue the processing for the establishment, exercise or defence of your legal claims;
- d) You have objected to processing, for a period pending the verification whether the legitimate grounds of NNG override those of yours.

2.7.8. At any time, You have the right to object to processing your personal data subject to certain conditions under applicable laws, You may separately object against processing your personal data for direct marketing purposes, including Profiling, as set out herein. In this case, NNG will no longer process your personal data unless if NNG demonstrates compelling legitimate grounds for the processing which override your interests, rights and data protection related freedoms or if the processing is necessary for the establishment, exercise or defence of legal claims.

2.7.9. You may lodge a complaint about the processing of your personal data to the National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság – "NAIH"; address: 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](mailto:ugyfelszolgalat@naih.hu)) or to the data protection authority of your home country or country of your residency.

2.7.10. Independently from lodging a complaint to NAIH, You may turn to court pursuant to the provisions set forth in the GDPR if your rights are infringed. Upon your decision, the procedure may be launched before the tribunal in whose jurisdiction You are domiciled or You have a temporary address. Prior to initiating a legal procedure, it may be useful to discuss the complaint with NNG.

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

## **2.8. Contacting NNG**

We value your opinion. If You have any comments, questions, or wish to obtain more information on data processing at NNG, please send your request as specified in section 2.7.2. We will handle the submitted information confidentially. Our representative will contact You within a reasonable time.

The data protection officer (DPO) of NNG can be contacted under [DPO@nng.com](mailto:DPO@nng.com) email address.