

PRIVACY POLICY

NNG Software Developing and Commercial LLC (registered seat: Szépvölgyi út 35–37., H-1037 Budapest, Hungary; hereinafter referred to as “**NNG**” or “**Company**”) is a technology company, specializing in the development of navigation software, digital mapping solutions and related services for the automotive and navigation industries. NNG provides software platforms and services that enable (in-vehicle) navigation, route planning, and location-based functionalities for various navigation devices and automotive systems.

In connection with such navigation systems, NNG also offers various Products to end users through the Naviextras website, the Toolbox application, and/or other branded subdomains or branded applications, and provides Customer Support in relation to these activities. NNG’s customer support platform is available at help.naviextras.com.

For the purpose of providing such Customer Support, NNG processes personal data in accordance with this Privacy Policy. The personal data defined in this Policy are processed in compliance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (the “**General Data Protection Regulation**” or “**GDPR**”), as well as all applicable national laws and regulations.

This Privacy Policy has been published on and is effective as of March 26, 2026.

Data Controller and Contact Information:

Name of the company:	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
Support page:	help.naviextras.com

1. DEFINITIONS

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.

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.

Communication means any comment, feedback, information or document provided by the User for NNG via the channels of Customer Support.

Customer Support means the customer support service provided for Users. Users may request Customer Support – among other things - for their Product.

Data Carrier means SD card/USB stick, or other data carrier that contains the navigation data.

Navigation Device means the in-car navigation system built into your vehicle (including the Data Carrier) and the portable navigation device you are using in your vehicle (including the Data Carrier), which is not permanently built into the vehicle.

NNG means NNG Software Developing and Commercial Limited Liability Company

Product means Updates, Content and Connected Services.

Site means <https://www.naviextras.com>, <https://www.m.naviextras.com> and its subdomains.

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

Toolbox means a free software tool for PC and MacOS, which is used to download Updates and Products from NNG's servers and upload them to the Navigation Device. Depending on the requirements of the manufacturer of the relevant Navigation Device, the Toolbox may be made available under a different name.

Trouble Ticket means the record of a complaint or problem submitted by the User to NNG for Customer Support.

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 or visitor of the Site and/or the Toolbox.

2. PRIVACY POLICY

2.1. Purpose of this document

This Policy sets out the terms and conditions of how Your (as data subject's) 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 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 data specified in this Policy is processed by NNG.

The provided data is accessible to the following persons:

- NNG’s employees and managers involved in the data collection and data processing;
- 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 data provided by the User for the provision of Customer Support

2.4.1.1. Purpose of data processing

- 2.4.1.1.1. NNG provides Customer Support for registered Users via the support page of NNG. Trouble Ticket can be opened via the support page. The link to the support page is available at the top of the Policy under the contact details of NNG.
- 2.4.1.1.2. No Customer Support is provided for hardware related issues. Limited support is possible for factory-installed Software or Content related problems of supported Navigation Devices as they may happen to be resolvable only by the device manufacturer or distributor. Customer Support services are available related to Products offered in the Toolbox. Customer support related to Data Carrier is not provided by NNG.
- 2.4.1.1.3. Customer Support services are only guaranteed for Products downloaded from the Toolbox, 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.
- 2.4.1.1.4. 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.
- 2.4.1.1.5. By submitting comments, feedback, information, 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.
- 2.4.1.1.6. 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.

2.4.1.2. Scope of the processed personal data of the User

- First Name
- Last Name
- Navigation Device Brand
- Navigation Device Model
- Email
- Communication
- Request type
- Request subcategory (update/download issue)
- Ticket subject
- Ticket description
- Attachment
- Transaction ID

In order to ensure efficient communication with the User and the proper handling of the request, the Customer Care team may also access certain personal data previously provided by the User in their Naviextras user account, including data provided at the time of account registration or in connection with the purchase and/or download of Products. Such personal data are processed in accordance with the applicable Privacy Policy accepted or acknowledged by the User at the time of account registration or during the purchase or Navigation Device updating process.

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

- 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.
- compliance with a legal obligation to which the controller is subject to as set forth in point c) of Article 6(1) of the GDPR. The legal obligation is set forth in section 17/A (5) and (7) of Act CLV of 1997 of Hungary regarding consumer protection ("**Consumer Protection Act**").

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 2.4.1.2., 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 2.4.1.1.

2.4.1.4. *Duration of data processing*

User's personal data specified in point 2.4.1.2 is processed for the period such data is necessary for the provision of Customer Support but maximum for a period of 2 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 3 years according to the Consumer Protection Act.

2.5. Data processor

2.5.1.Data processing related to provisioning Customer Support

2.5.1.1. HubSpot

Name:	HubSpot, Inc.
Address:	Two Canal Park Cambridge, MA 02141 USA
Website:	https://www.hubspot.com/
Contact information:	privacy@hubspot.com

Hubspot provides NNG with an online customer support system, through which NNG can manage the provision of Customer Support to the Users. The User's data listed in section 2.4.1.2 and the Communication are stored only in the customer support system operated by Hubspot.

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.

2.6.2.NNG informs the Users that personal data are stored on servers located within the European Union. Although the data processor specified in section 2.5 is domiciled in the United States and may access such personal data from the United States, such access is subject to appropriate safeguards designed to ensure the adequate protection of personal data. In particular, the data processor participates in the EU–U.S. Data Privacy Framework (DPF), which, in accordance with Article 45 of the GDPR, provides an adequate level of protection for the personal data concerned.

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 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;
- Request data portability;
- Request the rectification of your personal data;
- Request the deletion of your personal data or restriction of the processing of your personal data;
- Object to NNG's data processing.

For further information regarding your rights mentioned above please read the following sections.

In the event You wish to exercise any of your rights detailed above, please contact us by using one of the contact details of NNG specified at the top of the Policy.

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 month 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. 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: 1055 Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, Pf.: 9.; phone: +36-1-391-1400; email: 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 contact us by using one of the contact details of NNG specified at the top of the Policy. 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.