

**PRIVACY NOTICE
(Policy)**

Last updated 01.01.2020.

Narke Jet Ltd (2, Kamaraerdei út 2040 Budaörs. Hungary) respects your concerns about privacy and recognizes the importance of being transparent regarding the personal information we collect about you.

This Privacy Policy is provided in a layered format. Click through to jump to a specific section.

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DATA CONTROLLER:

Company name	NARKE JET LTD.
Registered seat	2, Kamaraerdei út HU-2040 Budaörs
Registration number	13 09 195582
Registry Court	Budapest Environs Regional Court
Tax number	26533397213
Phone	+36 30 184 0916
E-mail	office@narke.com
Webpage	www.narke.com
Represented by	Péter Rádi general manager
Representative's contact information	<u>office@narke.com</u> ; +36 30 184 0916

This Privacy Notice applies to personal information we collect in connection with our products and services, for example when you visit our website (www.narke.com), when you engage with us through social media platforms or when you contact our Customer Assistance.

Narke Jet Ltd. is the data controller and is responsible for the processing of this information in order to improve your customer experience.

As a data controller, our company processes your personal data in accordance with the principles of consent, data protection, data security and confidentiality, the relevant legislation – in particular the General Data Protection Regulation, which is mandatory from 25 May 2018 (European Parliament and Council (EU) 2016). / 679, hereinafter referred to as the “General Data Protection Regulation” (hereinafter the “GDPR”). –

WHO ARE THE DATA SUBJECTS?

Data Subject is any natural person identified or identifiable, directly or indirectly, on the basis of any specific personal data, who visits the Data Controller's website or who contacts the Data Controller on its social media pages.

RIGHTS OF THE DATA SUBJECTS

We inform you that the Based on the Info Act 2011 No. CXII. and the GDPR, you may exercise the following rights in connection with the data management performed by our Company

(i). **Information and access to personal data,**

(ii). **Right of access by the data subject**

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the processing
- the categories of personal data concerned
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing
- the right to lodge a complaint with a supervisory authority
- where the personal data are not collected from the data subject, any available information as to their source
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject

- (iii). Rectification and erasure
- (iv). Right to restriction of processing
- (v). Right to data portability
- (vi). Right to object and automated individual decision-making
- (vii). in the case of data processing based on consent, the right to withdraw the consent
- (viii). the right to initiate official data protection proceedings,
- (ix). the right to go to court,
- (x). claim for damages

The Data Controller draws the attention of the data subjects to the fact that the data subjects may exercise their rights by sending a statement to the e-mail address office@narke.com or to the Data Controller's registered seat. Upon receipt of the statement, the Data Controller shall examine and respond to the request in accordance with the procedure set forth in this Privacy Notice, and shall take the necessary steps in accordance with the Data Controller's regulations, other internal regulations and legislation.

WHERE CAN YOU TURN IN THE EVENT OF A BREACH OF YOUR RIGHTS

- (i). Submitting a complaint to our Company by sending it to the e-mail address office@narke.com or to 2040 Budaörs, Kamaraerdei út.
- (ii). The data subject is entitled to lodge a complaint with the National Data Protection and Freedom of Information Authority:

Name	Hungarian National Authority for Data Protection and Freedom of Information
Registered seat	1125 Budapest, Szilágyi Erzsébet fasor 22/C.
Address	1530 Budapest, Pf.: 5.
E-mail	ugyfelszolgalat@naih.hu
Webpage	http://naih.hu
Phone	+36(1) 391-1400
Fax	+36(1) 391 14 10

In addition, in the event of a violation of the rights of minors, hate speech, exclusionary content, reparation, the rights of the deceased, or the violation of reputation:

Name	National Media and Infocommunications Authority
Registered seat	1015 Budapest, Ostrom u. 23-25.
Address	1525. Pf. 75
E-mail	info@nmhh.hu
Webpage	http://nmhh.hu/
Phone	(06 1) 457 7100
Fax	(06 1) 356 5520

- (iii). In the event of a breach of your rights, you may bring an action against the Data Controller (at the choice of the Data Subject, the General Court having jurisdiction over the defendant's registered office or the Data Subject's place of residence). The court may hear the case without delay. Lawsuits related to the protection of personal data are free of charge.

- (iv). **However, before initiating any legal procedure, Data Subjects are kindly requested to contact the Company first, send your complaint to our Company at one of the contact details set out in this Privacy Notice, so that the infringing situation can be investigated and remedied as soon as possible.**

PROCEDURAL RULES

The Data Controller shall, without undue delay, but in any case within 15 days of receipt of the request, inform the Data Subject in accordance with Articles 15 to 22 of the GDPR. on the action taken on a request pursuant to Article.

If necessary, taking into account the complexity of the application and the number of applications, this deadline may be extended by a further 2 months. The Data Controller shall inform the Data Subject of the extension of the deadline, indicating the reasons for the delay, within 1 month from the receipt of the request. If the Data Subject has submitted the request electronically, the information shall be provided electronically, unless the data subject requests otherwise.

If the Data Controller fails to take action on the Data Subject's request, it shall inform the Data Subject without delay, but no later than within 1 month of receipt of the request, of the reasons for the non-action and of the Data Subject's complaint to a supervisory authority.

The Company shall provide the requested information and information free of charge.

If the Data Subject's request is manifestly unfounded or, in particular due to its repetitive nature, excessive, the Data Controller may charge a reasonable fee or refuse to act on the request, taking into account the administrative costs of providing the requested information or action or taking the requested action.

The Data Controller shall inform all recipients to whom he or she has communicated the personal data of any rectification, erasure or restriction of data processing, unless this proves impossible or requires a disproportionate effort. Upon request, the Data Controller shall inform the Data Subject of these recipients.

The Data Controller shall provide the Data Subject with a copy of the personal data subject to data processing. The Data Controller may charge a reasonable fee based on administrative costs for additional copies requested by the Data Subject. If the Data Subject has submitted the request electronically, the information shall be provided in electronic format, unless the Data Subject requests otherwise.

WHAT DATA PROCESSING ACTIVITIES DOES THE DATA CONTROLLER PERFORM ON AND IN CONNECTION WITH THE WEBSITE? WHO MANAGES THE DATA?

The Data Controller performs the following data management:

- Data management related to website visits;
- Data management related to registration on the website

- Newsletter data management (registration);
- Data management related to social sites;
- Technical tools and cookies related to website visits, data management related to plug-ins
- Online payment data management
- Data management related to contact by the Data Subject

The data management is performed by the authorized employees of the Data Controller to the extent strictly necessary for the performance of their job duties.

DECLARATION OF THE DATA SUBJECT

By using the website, you, the Data Subject declares that you gives your voluntary consent based on prior information to the Data Controller processing your personal data for the purpose and in the manner set forth in this Privacy Notice.

WHAT PERSONAL INFORMATION DO WE COLLECT?

This section explains, for each situation, what personal information we may collect directly from you (either on a voluntary basis or through automated means) and what personal information may be collected (or we may receive) from other sources.

Through the Services: We may collect information from or about you through our websites, software applications, social media pages, e-mail messages, or other digital services (the “Services”), e.g., when you sign up for a newsletter, make a purchase, or register your product with us.

From other sources: We also may receive information about you from other sources, such as public databases, joint marketing partners, certified installers, third-party vehicle repair or service centers, and social media platforms.

Offline: We may collect information from or about you offline, such as when you attend one of our events, sign up for a test drive, place an order over the phone, or contact our customer services or sales department.

When you reserve or purchase our products or use our services online:

- For reservation or purchase, we will collect your credit card numbers and other payment information. We will keep your shopping history (what you bought, when and where you bought it and how you paid for it).
- If you make an online purchase, we will also collect your contact information including your name, billing and shipping address, e-mail address, telephone number.
- We may collect additional information through your correspondence with us.

When you visit our Websites

- We obtain certain information by automated means when you visit our Websites, such as through cookies and web beacons. Cookies are bits of text that are placed on your computer’s hard drive when you visit certain websites. Cookies may enhance your online experience by saving your preferences while you are visiting a particular site. The information we collect in this manner may

include the IP address of the device you use to connect to the Internet, information regarding your browsing behavior (such as the date and time of your visit, the time you spend on each page, the ads you click on or the website you link from).

If you do not want information collected through the use of cookies when using the Narke The Electrojet website, there is a simple procedure in most browsers that allows you to automatically decline cookies or gives you the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site.

Pixel tags and other similar technologies: Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Services to, among other things, track the actions of users of the Services (including e-mail recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Services and response rates.

Analytics tools: We use website and application analytics services provided by third parties that use cookies and other similar technologies to collect information about website or application use and to report trends, without identifying individual visitors. The third parties that provide us with these services may also collect information about your use of third-party websites.

You can learn about Google's practices in connection with this information collection and how to opt out of it by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

- We may also collect information about your online activities from third-party websites on which our ads are served.
- Our Websites may contain links to other websites or offer third party services applying their own privacy policies to the collection of other personal information. We strongly recommend you to read their privacy policies if you visit any of these websites or use any of these third-party services. We are not responsible for the content of any website or third-party service not affiliated with Narke Jet Ltd.

When you contact us or we contact you

- When you contact or are contacted by our Customer Assistance, we may collect information such as your name, address, e-mail address, telephone number, date of birth, payment information, shopping history and records of correspondence.
- When we contact you by e-mail, we may use cookies and web beacons to know when you have clicked and opened our e-mail
- If you contact us or we contact you on our social media pages, we may collect your social media username, your comments, questions or feedback.

HOW DO WE USE YOUR PERSONAL INFORMATION?

We will use and process your personal information for the purposes described in this section. Please note that one or more purposes may apply simultaneously to the same personal information.

To provide our products and services

- We will process the relevant personal information described in the previous section to provide you the products and services you have requested.

- We rely on the contract we have with you as the lawful basis to process your personal information for such purpose. If you choose not to provide the information, we have requested from you, we may not be able to perform properly our contractual obligations.

To communicate and interact with you

- We will use your contact information to send you offers, news and updates about our products, services and events via the channel you have chosen (such as e-mail or mobile phone).
- You can choose at any time to unsubscribe from marketing e-mails by contacting our Customer Assistance.
- We may also contact you about our services, for example to ask you to provide feedback about your experience with our dealers, customer service or to participate in a survey.
- We may send you communications required by law or which are necessary to inform you about our changes to the services we provide you (for example, updates to this Privacy Notice, product recall notices and legally required information relating to your orders). These messages will not include any promotional content and do not require your prior consent when sent by email or text message. If we do not use your personal information for these purposes, we will be unable to comply with our legal obligations.

To improve our products and services and personalize your experience with Narke Jet Ltd.

- show you interest-based advertising on third party websites after you have shown interest in our products or services (through third party advertising cookies). The objective is to make our online offers even more interesting for you.
- determine advertising effectiveness, for example that you have visited our Websites after clicking on Narke ads displayed by third party advertising companies (through analytics cookies) on certain websites you visit.
- Based on our legitimate interest, we may also share limited personal information about you (such as your e-mail address) in an encrypted format with strategic partners (such as Facebook) to allow you to receive targeted advertising when you are visiting other websites.

To provide customer support

We may process your personal information if you contact our Customer Assistance (or we contact you through our Customer Assistance). We will collect and process your personal information to perform our contractual obligations in relation with the products or services you have requested and to provide you the best service we can or to comply with our legal obligations.

WHEN YOU MAKE A PURCHASE USING AN ONLINE PAYMENT SERVICE CALLED STRIPE

We process the following data: name, phone number, e-mail, address, country, shipping address which you give to us. As well the google analytics records the place of you browsing, the language you use during the browsing and how long you are on each page. The data management is performed by the general manager of the Data Controller and the marketing and sales director. We share your data with dealers, service companies, banks (we must share your name, address, telephone number, email and the financial details of your order for consultation with the Bank regarding the payment). The goal of data handling is performance of customer service, financial administration.

Please find the link below of Stripe's Privacy Policy:

<https://stripe.com/en-hu/privacy>

LEGAL BASE OF DATA CONTROLLING:

We process your personal data on the following legal base:

- Point a) Section 1. Article 6 of the GDPR (the data subject has given consent to the processing of his or her personal data for one or more specific purposes)

and

- Point b) Section 1. Article 6 of the GDPR (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract)

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We do not sell or otherwise disclose your personal information except as described in this section.

With dealers

Our dealer network present in the country or region you live or where you intend to use your Electrojet.

With our Service Providers

We may also share personal information with our Service Providers processing your data on our behalf for the purposes described in this Privacy Notice.

Examples of service providers we may share your data with

- Transportation companies delivering products purchased on our Websites to our customers.
- Companies providing technical support and infrastructure for our Websites.
- Yellow Consulting Kft. (registration number: 01 09 955415; registered seat: HU-1191 Budapest, Kosárfonó utca 24. XI. em. 41.; www.yc.hu) our IT supporter.

Where our service providers need to have access to your personal information, we will (1) select providers who respect your privacy and comply with data protection laws at any time ; (2) only give them access to the information they need to perform their services; (3) ensure that they will only use the information for the purposes agreed in our contract with them; (4) ask them to delete or return any personal information when we stop using their services.

You can find our Service Providers' data during the steps of purchase.

If you would like further information, please contact us by e-mail (office@narke.com).

Other reasons for sharing personal information:

We may also disclose personal information about you (1) if we are required to do so by law or legal process (such as court order), (2) in response to a request by law enforcement authorities, or (3) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or suspected or actual illegal activity.

We also reserve the right to transfer personal information we have about you in the event we sell or transfer all or portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use the personal information you have provided to us in a manner consistent with this Privacy Notice. Following such sale or transfer, you may contact the entity to which we transferred your personal information with any inquiries concerning the processing of that personal information.

Our hosting provider as a Data Processor:

Name	YELLOW CONSULTING KFT.
Registration number	01 09 955415
address	1191. Kosárfonó u. 24. XI./41.
tax number	23152593243
e-mail	info@yc.hu
Services provided to the Data Controller	provision of hosting services

COUNTRY

The Services are controlled and operated from Hungary. Information from or about you or your use of our products or the Services may be stored and processed in any country where we have facilities or in which we engage service providers. Those countries may not have the same data protection laws as the country in which you initially provided that information. When we transfer information from or about you or your use of our products or the Services to other countries, we will protect it as described in this Privacy Policy. By using our products, services, or otherwise providing information to us, you consent to the transfer of information from or about you or your use of our products or services to countries outside of your country of residence, including Hungary.

SECURITY SAFEGUARDS

We maintain appropriate administrative, technical and physical safeguards to protect the personal information you provide on this website against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use and other unlawful forms of processing.

HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION?

We keep the personal information we collect for the duration of our relationship with you, plus a reasonable period in order to take into account the applicable legal retention requirement or statute of limitation period, or otherwise as required for our business purposes described above.

MINORS

The Services are not directed to individuals under the age of eighteen (18), and we request that these individuals do not provide any information to Narke jet Ltd.

LINKS

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates, nor does it imply an affiliation with the third party.

Please note that we are not responsible for the collection, use, or disclosure policies and practices (including the data security practices) of other organizations, such as any other app developer,

app provider, social media platform provider, operating system provider, or wireless service provider, including any information you disclose to other organizations through or in connection with our software applications or social media pages.

DEFINITIONS

‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

‘processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

‘restriction of processing’ means the marking of stored personal data with the aim of limiting their processing in the future;

‘controller’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

‘processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

‘recipient’ means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

‘third party’ means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

‘consent’ of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

‘cross-border processing’ means either:

- (a) processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or
- (b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.

UPDATES TO THIS PRIVACY NOTICE

We may change this Privacy Policy. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Services. By using our products, the Services, or otherwise providing information to us following these changes, you accept the revised Privacy Policy.

We would like to draw the attention of you to the fact that data transmission via the Internet is not a completely secure process, and we inform you that you, the Data Subject are fully responsible for your data transmission. You may use the Website at your own risk. The Website may contain links to third party sites, for which our Company is not responsible or liable for any damages caused by them, these sites are visited by those concerned at their own risk. Our company does not accept any responsibility or guarantee for the security of data transmission on the Website. You may only use the Website and its services if you accept these provisions, and we inform you that by using the website, you, the Data Subject acknowledges and accepts these provisions.

CONTACT US

To contact us with a question or comment or to opt out from certain services, please contact us:

- via e-mail at office@narke.com

Please note that e-mail communications are not always secure, so please do not include credit card information or sensitive information in your e-mails to us.

If you continue to use our services and use the Website, you confirm that you have read and understood the provisions of the latest version of our Privacy Notice.