

Dear Mr. Gundersen,

We have evaluated your data subject request from 12th July 2020 under various applicable provisions of the GDPR. Please find attached secured files with your personal data in compressed ZIP format we were able to extract based on the identification you provided. This is data falling under both access to copies (Art. 15 (3) GDPR) and portability (Art. 20 GDPR). Password will be send via SMS. Please provide us with mobile telephone number we can send password to.

Description of files:

- **user.xml** – exported user detail form our licensing servers
- **customer-5e48229cdf034a0c004aa26.json, customer-5e482246efd3c6f0170858df.json** – exported personal data from our marketing analytical tools
- directory **find-advid** – files in CSV an NDJSON format with floating car data and phone cellular metadata

It seems you are well acquainted with our [Privacy Policy](#). Therefore, we provide individualized confirmations in relation to information you requested in line with Article 15 GDPR below only to the extent such information does not already step from our privacy policy.

Purposes of processing	Legal basis	Categories of data	Legitimate interests	Storage periods
Provision of services	Information in <a href="#">Privacy Policy</a> fully applies. As regards direct marketing communication, we rely primarily on your consent granted to us on 15.2.2020.	User identification, Device identification, information about installed licenses	None	Information in <a href="#">Privacy Policy</a> fully applies, see section titled “How long we store your personal data?”  Please note that our storage periods apply to the purposes as such and not necessarily to each category of data individually. This is in line with storage limitation principle, which also refers to the purpose of processing.
Development, improvement and testing		User identification where applicable, Device identification, application crash reports	Explained in the <a href="#">Privacy Policy</a>	
Direct marketing communication		User identification, device identification, history of e-mail and notifications campaigns, Floating car data, phone cell metadata	None	
Maintaining social media profiles		Information about your interaction with our social media profiles that any operator processes including likes, visits, comments, shares, content of messages and similar.	Explained in the <a href="#">Privacy Policy</a>	
Marketing Analytics		User identification if applicable, custom app events	Explained in the <a href="#">Privacy Policy</a>	
Statistics		other personal data not related to provision of services, development, improvement and testing or direct marketing communication purposes	None	
Billing, tax & accounting		User identification, invoices, payment informations	None	
Handling user requests		History and contents of our communication regarding this or similar requests	None	
Security of personal data		System logs, IP address, electronic communication metadata	None	

As regards your additional requests, please find below our responses:

<b>Our position</b>	Sygy processes your personal data solely in a capacity of a controller. We do not process personal data your behalf as your processor.
<b>Joint controllers</b>	The only joint controllers involved in processing of your data are:  Facebook – <a href="#">see joint controller addendum</a> – but only in relation “Page Insights / Statistics”.

<b>Third party (i.e. disclosures to other controllers)</b>	<p><b>eContext.ai dba Complementics</b>, with its registered seat at 180 North Michigan Ave Suite 1400 Chicago IL 60601, <b>USA</b>, identification No.: 98-0485410</p> <p><b>Predicio</b>, with its registered seat at 99 rue de Sèvres, 75006 Paris, France, identification No.: 83819092400012, registered in Tribunal de Commerce de Paris, France</p> <p><b>[COMPANY REMOVED BY NRK]</b>  <b>[COMPANY REMOVED BY NRK]</b></p>
<b>Transfer to 3<sup>rd</sup> parties</b>	<p>Our Privacy Policy informs that although we primarily store all data in the EU (our main production servers are in the EU), some user data are also transferred outside the EEA/EA to third countries. This relates to two of the above third parties as well as our processors located in the USA (including Facebook and Google). We only transfer data to US based on standard contractual clauses. Where we relied on now abolished US Privacy Shield, we are in the process of concluding standard contractual clauses and adopting additional safeguards, if necessary.</p>
<b>Sources of your data</b>	<p>You as the data subject and Sygic user are the single source of processed personal data. Not all personal data are provided directly by you, part of them are generated by our systems when you are using of our Apps and services. During processing your personal data, we don't enrich them from any external databases.</p>

For completeness, we have not evaluated your request as an objection or deletion request yet.

We believe that we handled your request duly in time and in full compliance with GDPR.

Please let us know if this information is sufficient for you.

Kind Regards,