



## PRIVACY POLICY OF 1NCE K.K.

Last updated October 2022

This Privacy Policy ("Policy") describes our policies and procedures on the collection, use and disclosure of your personal information on our websites and applies to the following websites operated by 1NCE K.K. ("1NCE") or any other 1NCE group company:

[IoT Flat Rate | Connectivity for M2M and IoT applications | 1NCE](#)  
[1NCE Shop | Purchase the 1NCE IoT Flat Rate | 1NCE - IoT SIM](#)  
[1NCE Portal | Manage your 1NCE IoT Flat Rate | 1NCE - IoT SIM](#)  
<https://downloads.1nce.com>  
[1NCE GmbH - Home | Facebook](#)  
[1NCE \(@1NCE\\_IoT\) / Twitter](#)  
[1NCE | LinkedIn](#)  
[1NCE - Youtube](#)  
[1NCE: Information and news | XING](#)

(hereinafter referred to as "Website")

Our Policy also applies to you and anyone who visits our Website, uses our products or services, unless we identify for you separate privacy policies or terms and conditions apply. Some of our affiliates outside Japan have their own privacy policies that apply to data they collect from products and services they provide as required by local laws.

### I. COLLECTING AND USING YOUR PERSONAL DATA

#### Types of data collected

##### Personal Data

While using our Website and our products or services, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you by combining other information as necessary ("Personal Data"). Personal Data may include, but is not limited to:

Email address  
First name and last name  
Phone number  
Address, State, Province, ZIP/Postal code, City  
Usage Data

We may also get Personal Data from other third parties, like social media platforms, and analytics providers. This information could include contact information, demographic information, geolocation information, and information about your interests, preferences, or behaviors. We may use this data for things like product and service improvement, marketing, and advertising.



## Usage Data

Usage Data is collected automatically when using the Website.

Usage Data may include information such as your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our service that you visit, the time and date of your visit, the time spent on those pages, geolocation data, unique device identifiers and other diagnostic data.

When you access the Website by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit our service or when you access the Website by or through a mobile device.

Usage Data also may constitute the Personal Data.

## Tracking Technologies and Cookies

We use tracking technologies like cookies, web beacons and third-party analytics tools to track the activity, collect behavioral and operational data when you interact with us through our Website or communicate by email or contact form. The technologies we use may include:

- **Cookies or Browser Cookies.** A cookie is a small data file that a website sends to and stores on your browser to allow the site to recognize your browser or store information and/or settings. We may use "persistent" and/or "session" cookies. Persistent cookies are stored on your computer and used for various purposes by your browser on subsequent Website visits (such as to avoid having to reenter your log-on credentials). Session cookies are temporarily held in your device's memory and erased after you end a browser session or shut off your device.  
You can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if you do not accept Cookies, you may not be able to use some parts of our service. Unless you have adjusted your browser setting so that it will refuse Cookies, our service may use Cookies.
- **Analytics tools.** Such tools allow us to measure and assess how users interact with our Website, apps, and digital communications. These services are typically provided by third parties with whom we contract—like Google Analytics. These providers may use many of the same technologies discussed above (such as cookies and web beacons) to collect data points associated with your visits to our Website and use of our apps
- **Web Beacons.** Certain sections of our service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit 1NCE, for example, to count users who have visited those pages or opened an email and for other related Website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when you go offline, while Session Cookies are deleted as soon as you close your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

### **Necessary / Essential Cookies**

Type: Session Cookies

Administered by: us

Purpose: These Cookies are essential to provide you with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that you have asked for cannot be provided, and We only use these Cookies to provide you with those services.

### **Functionality Cookies**

Type: Persistent Cookies

Administered by: Us



Purpose: These Cookies allow us to remember choices you make when you use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personal experience.

#### **Marketing Cookies**

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to analyze the use of the website by the website visitors in order to be able to play personalized and interest-based advertisements to the website visitors on the basis of the evaluations. For this purpose, marketing cookies store information about which pages of a website a website visitor has visited in order to infer his or her interests on the basis of this information.

#### **Measurement Cookies**

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to analyze the use of the website by website visitors in order to adapt the website to the needs and interests of website visitors on the basis of the evaluations. For this purpose, measurement cookies store, for example, information on the duration and frequency of page visits, sequences of page visits, scrolling and clicking movements with the mouse and location of access to the website.

### **How we use your Personal Data**

We may use Personal Data for a lot of reasons, such as the following purposes:

- **To provide and maintain our Website and our service**, including to monitor the usage of our service.
- **To manage your Account**: to manage your registration as a user of the service. The Personal Data you provide can give you access to different functionalities of the service that are available to you as a registered user.
- **For the performance of our contractual obligations**: the development, compliance and undertaking of the purchase contract for the products, items or services you have purchased or of any other contract with us.
- **To contact you**: To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide you** with news and general information about other goods, services and events, including through targeted advertising and marketing communications unless you have opted not to receive such information.
- **To manage your requests**: To attend and manage your requests to us.
- **For other purposes**: We may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our service, products, services, marketing and your experience.

We may share and disclose personal data to others in the following situations:

- **With service providers**: We may share your personal data with service providers who may need access to your personal data to do work for us. They are contractually required to treat your personal data as confidential in accordance with the safety control measures as required by applicable laws and to use it only to provide such services as requested by us.
- **With INCE Companies**: We may share your personal data with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any other subsidiaries. We may share your personal data for marketing and advertising purposes as well as for providing our products and services to you as described in this privacy notice.



- **With our Partner Softbank Corp.:** We may share your information with our business partner Softbank Corp. to offer you certain products, services or promotions. Further information on data protection at Softbank may be found at [Privacy Center | SoftBank](#))
- **With other third parties:** We share data with third parties for uses described in this notice or for purposes you have requested. For example, we may share data with payment processors to help us provide you with the services you have requested. If you interact with third parties, like content providers who operate video channels or apps through our products and services, we may facilitate the transfer of your personal data for those services.
- **With your consent:** We may disclose personal data about you for any other purpose with your consent, which we may get in writing, online or orally, including consent on this Policy. We may also share your personal data with third parties when you tell us to or when you use our products and services to interact with third parties, whose separate privacy notices may apply to that data.
- **For Legal Process and Protection:** Under certain circumstances, we may disclose personal data to third parties, including government authorities, for legal processes or protection of life and safety where we believe that access, use, preservation, or disclosure of the information is reasonably necessary, including:
  - To comply with laws, regulations, legal process or to respond to lawful requests.
  - To enforce or apply agreements, or initiate, render, bill, and collect for products and services (including disclosure to collection agencies to obtain payment).
  - To protect the rights, interests, property, or safety of 1NCE, our customers, and others
  - In connection with claims, disputes, or litigation
  - To protect you or others from fraudulent, abusive, or unlawful use of these services, and other fraudulent activity
  - In an emergency

### **Retention of your Personal Data**

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. After that, we destroy it by making it unreadable or indecipherable. We will also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our service, or we are legally obligated to retain this data for longer time periods.

Data we collect may be processed and stored in Japan or in other countries where we or our affiliates or service providers process data. When we transfer personal data, we use a variety of legal mechanisms to help ensure all applicable laws, rights and regulations continue to protect your data.

### **Transfer of your Personal Data**

Your information, including Personal Data, is processed at the 1NCE's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

1NCE will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy as well as applicable laws, including understanding the data protection regimes in the foreign countries and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your Personal Data.



## **Protection of your Personal Data**

The security of your Personal Data is important to us. We use administrative, contractual, technical, and physical safeguards designed to protect your data, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. We cannot guarantee its absolute security. Be sure to use a strong password to access your information in our webshop and portal and not one you use for other services.

## **II. YOUR PRIVACY CHOICES AND CONTROLS**

You can manage your privacy choices about how we contact you and how to use or share your personal data. You also have different choices about how certain third parties use your personal data. This also includes how we use and share your personal data for advertising, marketing, and analyzing purposes. You can opt-out of marketing and advertising programs, but we still may contact you with service and other product related information.

## **III. LINKS TO OTHER WEBSITES**

Our Website and services may contain links to other websites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **IV. CHANGES TO THIS PRIVACY POLICY**

We may update our Privacy Policy from time to time. We will notify you of any changes by updating the new Privacy Policy on this page.

In addition, prior to making a material change to how we use or share your data, we'll also reach out to you (e.g., by text or email). If you keep using our products and services after we notify you, we'll take that to mean you're fine with the changes for any new data we collect and provide the consent on them. Those changes will not apply to previously collected personal data unless we get consent from you.

We will let you know via email and/or a prominent notice on our service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **V. HOW TO CONTACT US**

If you have any questions or comments about this Privacy Policy, you can contact us by email:

[privacy@1nce.com](mailto:privacy@1nce.com)