

Privacy Policy

NEC Capital Solutions Limited and Group companies of NEC Capital Solutions Limited (hereinafter, "the Company") shall handle personal data within the Company as described in this Policy.

1. Controller of Personal Data

Company name: NEC Capital Solutions Limited

2. Purposes of Processing

The purposes of processing your Personal Data are:

- (1) to internally share information, collaborate, authenticate users, and manage access permissions, as well as to record and examine the availability, use situation, and its contents, including the content of chats and other communications;
- (2) to manage all matters concerning information security;
- (3) to manage projects, communication, cooperation, contract fulfillment, facilities, equipment, and other aspects of the Company's business;
- (4) to identify and search for individuals in communications between users of this service;
- (5) to respond to inquiries and requests;
- (6) to provide better solutions through activities, including analysis of user needs and development of services; and/or
- (7) to grasp the situations for using our service and analyze use trends.

The legal basis for processing your personal data is your freely granted consent to do so through your acceptance of this policy, and if necessary, the Company's legitimate interest in responding to your requests or in entering a contractual relationship for commercial purposes in the future.

3. Items of Personal Data the Company Obtains

Items of Personal Data the Company obtains are as follows.

- (1) Account information
- (2) Name
- (3) Email address, profile
- (4) Image (facial photo, etc.)

4. Parental Consent

If you are under 16 years old, please provide your personal data only after obtaining consent given or authorized by your parent or legal guardian.

5. Encrypted Communication

This service uses TLS-based encrypted communication to protect personal data.

6. Security of Processing Personal Data

Personal data acquirers will implement appropriate technical and organizational measures to ensure that the level of protection is commensurate with the risk.

7. Overseas Transfer of Personal Data

- (1) Third country transfers

Your registered personal data will be transferred to Japan or other third country. ([See here for details](#))

- (2) Adequacy decision

Japan has been given an adequacy decision by the European Commission and the United Kingdom that indicates an adequate level of data protection for personal data.

8. Recipients or Categories of Recipients of the Personal Data

Within the scope of the purpose of use, the handling of your personal data may be outsourced to the Company, our partners, cloud service providers, and other organizations who have entered into contract with the Company.

The Company implements security measures to ensure that your personal data is always protected in accordance with applicable laws and regulations.

9. Data Subject Rights

Data subjects may contact the controller at the above-mentioned email address to exercise the following rights with regards to their personal data:

- (1) the right to access, rectify, and erase personal data, and restrict processing;
- (2) the right to lodge a complaint about the processing of personal data;
- (3) the right to data portability, which allows the data subject to obtain their personal data in readable format and reuse it for their own purposes across different services;
- (4) the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal; and/or
- (5) the right to lodge a complaint with a supervisory authority, if it exists, in the country or region where the data subject resides.

10. Statutory or Contractual Requirement Concerning the Provision of Personal Data

The provision of personal data is neither a legal nor contractual requirement, nor is it a requirement for the conclusion of a contract. You have no obligation to provide personal data. However, if you choose not to provide the data, the Company may not be able to respond to your inquiries.

11. International Transfers

(1) Third country transfers

Your personal data obtained by the Company will be transferred to Japan or another third country.

(2) Adequacy decision

Japan has been given an adequacy decision by the European Commission and the United Kingdom that indicates an adequate level of data protection for personal data.

12. Right to Withdraw Consent

Where the processing is based on the data subject's consent, you have the right to withdraw consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.

13. Retention Period

Personal data will be stored for no longer than is necessary for the purposes for which it was intended.

14. Contact Details

- (1) Contact: IT Support Desk, NEC Capital Solutions Limited
- (2) Means of contact (email): it-support@dm.necap.co.jp

15. The Right to Submit a Complaint at the Relevant Data Protection Authority

You have the right to lodge a complaint with the supervisory authority, if it exists, in the country or region in which the data subject resides.

16. The Right to Object if Processed for Marketing Purposes

You have the right to object (free of charge and at first request) against the intended processing of your personal data, if the processing is undertaken for direct marketing purposes.

17. Non-existence of Decision-making Based Solely on Automated Processing

The Company may analyze access logs related to the service, but it will not use personal data for automated decision-making or profiling to analyze personal preferences, behavior, or other aspects of an individual to make predictions or decisions that can have substantial impact on that individual.

18. The Right to Limit the Use of Sensitive Personal Data

We do not collect or process sensitive personal data. Therefore, we do not provide an opt-out.

19. The Right to Opt Out of Sales and Sharing of Your Personal Data

We do not sell or share your personal data to third parties. Therefore, we do not provide an opt-out.

20. The Right to Non-discrimination

You have the right against “retaliation” for asserting the data subject rights, such as denying services, charging different prices or rates, or suggesting data subject may receive a different price or rate, providing a different quality of goods or services.

21. Opt-in Right for Minors

If under 16 years old, the data subject can consent to the controller’s sales or sharing of their personal information for behavioral advertising. If the data subject declines to provide this information, the controller is required to wait at least 12 months before approaching the data subject again for consent to sell or share their personal information.

22. Acquisition of Personal Data in a Method That Is Not Easy to Identify

The Company uses “cookies” technology to make it convenient for you to access this service again. Cookies can identify your computer, but they cannot identify yourself unless you enter your personal information. Depending on your browser or application, you can disable cookie functionality by changing the appropriate settings. However, please note that, as a result, some or all the services may not be available.

List of countries and regions subject to data transfer

APAC	EMEA	Greater China/EastAsia	Latin America	North America
Australia	Denmark	Japan	Argentina	USA
India	France	Hong Kong S.A.R.	Chile	Canada
Indonesia	Germany	Korea	Colombia	
Malaysia	Hungary	China	Peru	
New Zealand	Italy	Taiwan	Brazil	
Philippines	Namibia		Mexico	
Singapore	Netherlands			
Thailand	Norway			
Viet Nam	Portugal			
	Saudi Arabia			
	South Africa			
	Spain			
	Sweden			
	Switzerland			
	U.A.E.			
	United Kingdom			
	Israel			
	Turkey			