

# GDPR privacy policy

ACE, a non-profit organisation, is committed to protecting the privacy of our users. Please read this Privacy Policy carefully to the end before using the corporation's website (<https://acejapan.org/>).

## 1. definition.

Terms used in this Privacy Policy are defined as follows.

Applicable privacy legislation	General Data Protection Regulations (EU General Data Protection Regulation, GDPR); UK Data Protection Act (Data Protection Act); Japanese Act on the Protection of Personal Data.
GDPR	General Data Protection Regulations (EU General Data Protection Regulations)
EU	Means the European Union, including the Member States of the European Union and, under the European Economic Area (EEA) Agreement, Iceland, Liechtenstein and Norway.
manager	Any natural or legal person, government authority, agency or other person who, alone or in conjunction with others, determines the purposes and means of processing personal data. In this Privacy Policy, this means the Corporation.
personal data	Means information about an identified or identifiable natural person ('data subject'). Identifiable natural person means a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data or online identifier, or by reference to one or more elements of the physical, physiological, biographical, psychological, economic, cultural or social identity of that natural person. A person who can be identified by reference to.
data subject	An identified or identifiable natural person whose personal data is processed by the controller who processes it.

processor	Natural or legal persons, public authorities, departments or other organisations that handle personal data on behalf of the controller.
acquirer	Means any natural or legal person, public authority, department or other organisation to whom personal data is disclosed, whether or not it is a third party. However, public authorities that can acquire personal data within the framework of a special investigation in accordance with EU law or the national law of a Member State shall not be considered acquirers. The treatment of such data by public authorities shall comply with the applicable data protection provisions in accordance with the purpose of the treatment.
third party	A natural or legal person, public authority, department or other organisation other than the data subject, controller, processor and any person authorised to handle the personal data under the direct authorisation of the controller or processor.
processing limitation	Marking personal data stored in records in order to limit their processing in the future.
processing	any collection, recording, compilation, composition, recordkeeping, modification or alteration, retrieval, reference, use, disclosure by transmission, distribution or otherwise making available, aligning or combining, restriction, erasure or destruction, whether by automatic means or otherwise, of personal data or of a group of personal data, such as The performance of a task or group of tasks carried out on personal data or a group of personal data, such as
profiling	Automatic processing of personal data, in any form, comprising the use of personal data to assess certain personal aspects associated with natural persons, in particular to analyse or predict aspects relating to the business performance, economic status, health, personal preferences, interests, reliability, behaviour, location and mobility of such natural persons

## 2. name and address of the administrator

2nd Floor, Suzuwa Building, 5-2-3 Asakusabashi, Taito-ku, Tokyo 111-0053, Japan

Telephone number: 03-3835-7555

Enquiry form: <https://acejapan.org/contact>

Website: <https://acejapan.org/>

## 3. cookies.

Our internet pages use cookies. Cookies are text files that are stored on your computer system via your internet browser. Many internet sites and servers use cookies. A cookie consists of a string of characters that allows internet pages and servers to be assigned to the particular internet browser in which it is stored. This enables the viewed internet site or server to identify the individual browser of the data subject from other internet browsers containing other cookies. The one and only cookie ID can be used to recognise and identify a specific internet browser. By using cookies, the organisation can provide the users of this website with user-friendly services that would not be possible without the cookie setting.

By using cookies, the information and advertising on the corporation's website can be optimised with the user in mind. The purpose of this is to make it easier for users to use our websites. For example, website users who use cookies do not have to enter access data each time they visit the website. This is because cookies are stored on the user's computer system via the website. At any time, the data subject can prevent the setting of cookies through the website of the corporation by means of the corresponding settings of the internet browser used, and can permanently negate the setting of cookies. Furthermore, cookies that have already been set can be deleted at any time via your internet browser or other software programme. This is possible with all common internet browsers. If the data subject deactivates the cookie setting of the internet browser used, not all functions of our website may be fully available.

### Cookies.

#### (1) Classification by duration

- ① Session cookies : Cookies that are deleted when the user closes the browser.
- ② Persistent cookies: Cookies that remain on the user's computer/device for a predefined period of time.

#### (2) Classification by attribution

- ① First type cookies: cookies that are set by the web server and share the same domain.
- ② Third party cookies: cookies stored by a domain different from the domain

of the visited page; these cookies occur when a web page refers to a file, such as JavaScript, located outside its domain.

#### 4. purposes of processing personal data

##### (1) Purpose of the process

The organisation processes personal data only for the following purposes (a) Personal information about the user.

- ① Provision of services in the corporation.
- ② Planning, research, development, testing and demonstration in the corporation
- ③ Supplier information management, payments and income processing
- ④ Various business contacts, business negotiations, conclusion of contracts, etc.
- ⑤ Responding to various types of enquiries

##### (a) Personal data of applicants for employment.

- ① Provision and communication of recruitment information and other information to applicants for employment.
- ② Management of recruitment operations in the corporation

##### c. Personal information relating to employees and others.

- ① Human resources and labour management
- ② Payment of remuneration, salaries and bonuses
- ③ Social insurance, taxation and other procedures
- ④ Contact and provision of information to affiliated companies, seconded companies, etc.
- ⑤ Procedures upon retirement
- ⑥ Emergency and other communications.
- ⑦ Notifications and reports to public authorities
- ⑧ Notification to customers and business partners in the work for which they are responsible - reporting and communication.
- ⑨ For other procedures and communications necessary in the course of business.

##### (2) Source of personal data.

For the purposes of the processing referred to in (1) above, the corporation acquires personal data from the following sources

- (i) Acquired directly from the data subject (e.g. personal data on application forms, etc.)

- (ii) Obtained indirectly from the data subject (e.g. IP address obtained when visiting the organisation's website)
  - (iii) Public information (information on the internet).
  - 4) Social media (e.g. Twitter, LinkedIn, Facebook) -.
  - (v) Survey forms provided by third parties.
- (3) Type of personal data to be obtained.
- (i) Personal attribute information.
  - (ii) the purchase history of individuals in relation to the personal data processed by the legal entity.
  - (iii) Products and services provided.
  - (iv) Financial information.
  - (v) Educational background (vi) Employee information.

(4) Provision and sharing of personal data

The Corporation may need to share personal data with the following third parties for the day-to-day purposes of the processing referred to in (1) above. Where this is necessary, the corporation will comply with applicable privacy legislation.

...vocational experts such as lawyers, tax accountants, chartered accountants, etc.

Financial institutions

Employees

Service providers and suppliers

5. the legal basis for processing personal data.

The legal basis for processing is as follows.

- (i) where the data subject has given consent to the processing of his or her personal data for one or more specific purposes.
  - \*If the processing is based on the consent of the data subject under (i) above, the data subject concerned has the right to withdraw this consent.
- (ii) the processing is necessary for the performance of a contract to which the data subject is a party or for the performance of a procedure at the request of the data subject prior to the conclusion of the contract.
- (iii) the processing is necessary to comply with a legal obligation to which the controller is subject.
- (iv) the processing is necessary to protect the vital interests of the data subject or another natural person.
- (v) where the processing is necessary in the performance of tasks carried out in the public interest or in the exercise of official powers vested in the controller.

(vi) The processing is necessary for legitimate interests pursued by the controller or a third party. However, of the data subject, in particular where a child is the data subject. (viii) Where the processing is necessary for the protection of the personal data of the data subject, in particular where a child is the data subject, unless the fundamental rights and freedoms which the data subject seeks to protect override such interests.

\*6) Where legitimate interests are the lawful basis for processing include the following cases.

Marketing to customers (direct marketing).

Customer service for customers.

... Application for employment with the corporation.

## 6. the rights of the data subject

Under applicable privacy legislation, including the GDPR, data subjects have the right to

### (1) the right to information

When collecting personal data from a data subject, the controller must provide certain information to the data subject at the time of obtaining the personal data.

### (2) access right

The controller must provide a copy of the data subject's request for access to the personal data being processed.

### (3) right of correction

The data subject can request the controller to correct inaccurate personal data.

### (4) Right to erasure (right to be forgotten)

In certain cases, the data subject has the right to obtain the deletion of personal data concerning him or her from the controller without delay.

### (5) limited processing right

The data subject has the right to have the controller restrict the processing in certain cases.

### (6) Right to notice on correction, overnight stay and restriction of processing of personal data.

In the case of (3) - (5) above, the controller will inform the data subject of this process and, if the data subject so requests, will inform the data subject about the data controller.

### (7) data portability right

Data subjects have the right to receive personal data concerning them in a structured, commonly used and machine-readable form. They also have the right to

transfer such data to another controller without interference from the controller to whom the personal data were provided.

(8) right to object

The data subject has the right to object to processing of his or her personal data on the basis of necessity of the processing for purposes of legitimate interests pursued by the controller or a third party.

(9) Right not to be subjected to automated processes, including profiling.

A data subject has the right not to be subjected to a decision solely on the basis of automated processing, such as profiling, which has legal effect in relation to him or her or which has similar serious consequences for the data subject concerned. Please note that the corporation does not carry out any automated processing, including profiling, with regard to a data subject's personal data.

7. safety management measures

As the controller, the corporation has implemented adequate technical and organisational safeguards with regard to the protection of personal data. If a data subject has concerns with regard to certain data transfer methods, for example, the corporation will take adequate alternative measures.

8. the period of storage of personal data

Personal data is stored for the legal retention period in each EU Member State and Japan, and personal data is securely deleted as soon as possible after the end of the legal retention period, unless it is necessary in relation to the purpose of the contract or other processing.

9. general provisions.

This Privacy Policy was last revised on 1 July 2022. The Corporation may change this Privacy Policy from time to time in accordance with the law or in accordance with the Corporation's policies. However, the Corporation will not use the personal data of data subjects in new ways without their consent.