

IoT Software Solutions Privacy Policy

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You are welcome to use our products and services!

The Privacy Policy (hereinafter referred to as the "Policy") applies to the services of IoT Software Solutions (hereinafter referred to as "service") provided by Acceleronix B.V. and its affiliates (hereinafter referred to as "Acceleronix" or "we"). This Policy aims to provide you with a comprehensive understanding of the data collected, the purpose of the collection, how we utilize such data, and how we protect such data when you use our products and services.

Your trust is of the utmost importance to us, and we understand the significance of your personal data to you. Therefore, we will collect your personal data only to the extent necessary and required by law. We make every effort to safeguard your data from leakage, destruction or loss using reasonable and effective information security technology and management processes, as well as appropriate security measures.

Please read this Policy carefully and thoroughly understand it before using our products and services, especially the bold and underlined terms. By agreeing to this Privacy Policy, you acknowledge that you are familiar with the features provided by the website and the necessary personal data required for its operation. Moreover, you authorize the collection and use of your personal data. If you have any questions about this Policy, please contact us as specified in Article 9. We do not provide products or services to minors. If you are under the legal age of majority of your country or region, please stop using the services or providing us with your personal data.

The Policy covers the following topics related to your personal data:

1. How we collect and use your personal data
2. How we use Cookies and similar technologies
3. How we share and disclose your personal data
4. How we store your personal data
5. How we protect your personal data
6. Your rights regarding your personal data
7. Cross-border transfer of personal data
8. How we protect personal data of minors
9. How to contact us

1. How We Collect and Use Your Personal Data

The legal basis for collecting and using your personal data will vary depending on the specific data and the context in which it is collected. Generally, we will only collect data with your consent, when necessary to fulfill our contractual obligations towards you, or where the processing is in our legitimate interests.

We rely on our legitimate interests to analyze, improve and optimize our sites, products and services, and to maintain the security of our networks and systems; We base the processing of your data on our legitimate interests in operating and administering our websites and to provide you with the content you access and request; we process your personal data by monitoring the use of our websites/services, verifying accounts and activity, and analyzing suspicious activity fraud prevention, to the extent this is necessary for our legitimate interest in promoting the safety and security of the technology systems use for our services, and in protecting our rights and the rights of others.

Please note that separate device information or service log information cannot be used to identify a specific individual. If we combine such non-personal data with other information to identify a particular individual or use the non-personal data in combination with personal data, such non-personal data will be considered personal data during the data linkage period and we will anonymize and de-identify such information unless otherwise authorized by you or required by law.

If you have questions about or need further information concerning the grounds for collecting and using your data, please contact us as specified in Article 9 of this Policy.

1.1 Personal data you provide

We will ask you to provide certain personal data necessary for the delivery of our services. Please note that if you choose not to provide the required personal data, we may be prevented from delivering our products or services.

1.1.1. When you register an account, we will collect your **email address, phone number, password**, name and profile photo.

1.1.2. When you ask for after-sales service, we will also collect your **phone number** and **address**.

1.1.3. Other information provided to us with your explicit consent.

1.2 Information collected automatically

To provide our products and services, we automatically collect certain data to ensure their proper functioning and performance.

1.2.1 To enhance your user experience when using the product, the system and

exception logs may be uploaded, including your IP address, language preference setting, operating system version, date or time of access, so that we can promptly and accurately identify and resolve any issue you may encounter.

1.2.2 When you manage the SIM card, we will collect your **top-up transaction records**.

1.3. From time to time, we may send you service-related announcements when we consider it necessary (e.g., during temporary service suspension for maintenance, or security, privacy or administrative-related communications). Please note that these service-related announcements are not promotional and you may not opt out of receiving them.

1.4. If the information you provide contains personal data of other users, you must ensure that you have obtained their legal consent before providing such data to us. In case of personal data about a minor, you must obtain the consent of the minor's guardian prior to dissemination, in which case the guardian has the right to contact us, as specified in Article 9 of this Policy, to request correction or deletion of such data.

We will obtain your prior consent if we intend to use the data for purposes other than those specified in this Policy, or if we intend to use the collected data for purposes beyond its original intention, or if we actively obtain your data from third parties.

2. How We Use Cookies and Similar Technologies

To ensure the proper functioning of our website, we may occasionally place cookies on your computer or mobile device.

To ensure our website works correctly, we may at times place cookies on your computer or mobile device. The website uses security and session cookies that are strictly necessary to provide you with the services you have requested. The legal basis for the subsequent processing of the data collected with strictly necessary cookies is the provision of the service you have requested (according to the local data protection law and regulation and if in EU, Article 6 para. 1 sentence 1 lit. b GDPR).

You may view our [Cookies Notice](#) to know more about how we use Cookies.

3. How We Share and Disclose Your Personal Data

We do not sell any personal data to third parties. We may sometimes share your personal data with third parties (as described below) to provide or improve our services, including offering services based on your requirements.

3.1. Sharing with your consent or request: We will share your personal data with specific third parties designated by you, within the scope of your explicit consent or direct request.

3.2. Sharing with third-party service providers and business partners: We may share your personal data with our third-party service providers and business partners to enable the services described in this Privacy Policy. This includes delivery service providers, data centers, data storage facilities, customer service providers, marketing service providers, and other business partners. **Rest assured, the sharing of personal data is strictly for legitimate, legal, necessary, specific, and explicit purposes related to providing the services to you.**

3.3. Sharing with our affiliates: To enhance our services and ensure the safety of Acceleronix affiliates, other users, or the public, we may share your personal data with Acceleronix affiliates for specific, explicit and lawful purposes stated in this Policy. Only the data necessary for service delivery will be shared. We require the affiliates to implement at least as stringent protective measures as those in this policy, as well as their strict compliance with applicable laws and regulations. If our affiliates intend to change the purpose of personal data processing, they must obtain your prior consent.

3.4. Disclosure to law enforcement agencies, public or judicial authorities and organizations. We will disclose the data if required by law or if we believe in good faith that such disclosure is reasonable and necessary to:

- Comply with a statutory obligation, process, or requirement;
- Enforce the terms of service and other agreements, policies, and standards, as well as to investigate any potential violations of these documents;
- Identify, prevent, or resolve security, fraud, or technological issues;
- Protect the rights, property, or safety of Acceleronix, our users, third parties, or the public (which may include exchanging information with other enterprises and institutions for the purpose of preventing fraud and reducing credit risk), as required or permitted by law.

3.5. Sharing with third parties in business transactions. If we are acquired, merged or cooperate with other companies, or sell assets, we may disclose information to third parties. This may involve disclosing your data to potential buyers or including user information in the transferred assets.

4. How We Store Your Personal Data

We retain personal data for as long as it is necessary for the purposes described in this Privacy Policy or as required by applicable laws. We will delete or anonymize your personal data once the purpose of personal data collection is fulfilled, upon your request for information deletion and account cancellation, or termination of a product or service. However, we will retain the data collected for public interest, scientific, historical research

or statistical purposes, in accordance with the applicable law, even if further processing is not related to the original purpose of collection.

5. How We Protect Your Personal Data

5.1. We employ industry-standard security measures to protect your personal data from unauthorized access, disclosure, use, modification, damage or loss. These measures include SSL encryption technology for data exchange, secure browsing over HTTPS, encryption technology for personal data, trusted protection mechanisms against malicious attacks, access control for authorized personnel, and regular security and privacy training for our employees.

5.2. The Internet is not absolutely secure, so we strongly advise against using the communication methods other than those recommended by Acceleronix while using our products or services. Through our products or services, you can connect and share data with others. When you create communications, conduct transactions or share data through our products or services, you have the option to choose who you communicate, trade, or share the data with as a third party, and they may have access to data such as contact details, exchanged information, or shared content.

5.3. We will promptly notify you of a user information security incident, in accordance with applicable laws and regulations, and provide essential details about the incident, its potential impact, the measures taken or planned, advice on risk prevention and mitigation, and available remedies, etc. We will use various communication methods, such as emails, letters, phone calls, push notifications or other means. In the event it is challenging to notify each individual data subject, we will utilize reasonable and effective means to make public announcements. Additionally, we will report the handling of user information security incidents in accordance with the requirements of the relevant data protection or regulatory authorities.

6. Your Rights Regarding Your Personal Data

In accordance with applicable national or regional laws and regulations, you are entitled to request access, correction and deletion of your personal data held by us (hereinafter referred to as the "Request"). Further information is provided below.

6.1. Right of access

6.1.1 Account information: If you want to access or edit your profile information, update your password and more, log in to your account and visit the settings section.

6.1.2 Personal data: To access the personal data generated during your use of our products or services, please contact us as specified in Article 9.

6.2. Right to rectification

You are entitled to request us to correct inaccurate or incomplete personal data. Simply visit the Personal Data Settings page or contact us directly, and we will promptly address your request to ensure the accuracy of your data.

6.3. Right to erasure

You are entitled to request us to delete your personal data. If we respond to your deletion request, we will stop providing you with products or services and will delete your personal data in accordance with the requirements of applicable laws.

6.4. Right to data portability

The right to data portability entitles you to receive a copy of your personal data in a structured, commonly used, and machine-readable format, and, where possible, we will forward it directly to the data controller. If you need assistance, contact us as specified in Article 9.

6.5. Right to cancel/delete your account

The account cancellation is a permanent action, so please proceed with caution.

6.5.1 Please contact the creator of your enterprise account to delete it in [Organization Management] - [User Management].

6.5.2 If you need our assistance with account cancelation, contact us as provided in Article 9.

After cancelling/deleting your account, we will stop providing products or services, and delete your personal data as per your request.

6.6. Right to withdraw consent

If our processing is based on your consent, you have the right to withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of the processing that occurred before the withdrawal. To exercise this right, you can contact us as specified in Article 9.

6.7. Right to object to processing

You are entitled to object to the processing of your personal data based on legitimate interest, direct marketing, or for statistical or research purposes. To exercise this right please contact us as specified in Article 9.

6.8. Right to restriction of processing

You have the right to request that we temporarily or permanently stop processing all or some of your personal data. To exercise this right, please contact us as specified in Article 9.

7. Cross-border Transfer of Personal Data

Acceleronix is a global organization with legal entities, business processes and technical systems that operate across national borders. We store and process your information on cloud servers located in Europe and other regions.

To facilitate our operations, we may transfer, store and process your personal data in jurisdictions other than where you live. Laws in these countries may differ from the laws applicable to your country of residence.

For instance, if you are a European Economic Area (EEA) data subject and your personal data is shared with our affiliates, partners, or third-party service providers acting on our behalf outside of the EEA, then it is done pursuant to necessary means to ensure an adequate level of protection. This includes an adequate decision of the European Commission confirming an adequate level of data protection in the respective non-EEA country per GDPR Article 45, or an agreement on the basis of approved EU standard contractual clauses per GDPR Article 46.

Upon request by contacting us as described in this Privacy Policy, we will provide you further information on the means of ensuring an adequate level of data protection.

8. How We Protect Personal Data of Minors

We do not provide services to minors. We treat minors under the age of 14 (or the age specified by local law) as children. When collecting children's personal data with parental consent, we will only use or disclose it if permitted by law, or with explicit consent of the parents or legal guardian, or if necessary for protecting the minors. If we unintentionally collect personal data from children without parental consent, legal authorization, or the necessary protection of children, we will try to remove the content as soon as possible. As parents or legal guardians, you may also contact us as specified in Article 9 to delete related content.

9. How to Contact Us

9.1 If you have any questions, comments or suggestions about this Privacy Policy, or if you want to exercise your rights, or discuss any requests with us, please feel free to contact us at:

Email: dpo@acceleronix.io

For users in the European Economic Area (EEA), please contact:

Acceleronix B.V.

Haaksbergweg 75, 1101 BR Amsterdam, Netherlands

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>. Users in the EU also have the right to file a complaint relating to the handling of our personal data with a supervisory authority.

9.2 To ensure security, you may need to provide a written request or prove your identity. We aim to respond within 15 days. However, depending on the complexity and volume of requests, this period may be extended for an additional 45 days, if necessary. If there is a delay in providing information, we will notify the data subject of the circumstances and the reason for the delay. If the time limit set in this paragraph conflicts with your local law, your local law prevails. If you disagree with how we handle your personal data, you can contact your local data protection authority.

We may update this Privacy Policy by updating our website. We recommend regularly checking our current Privacy Policy on the website.

Thank you for taking the time to read our Privacy Policy!