

# **Privacy Policy**

Like lots of other countries it's not allowed to use anonymous sim cards in Korea. Regarding the Korean law we need to identify each customer to prevent any kind of fraud and illegal usage.

If you just would like to inform yourself about our products and services you can visit our website without providing any personal information. Each time a webpage is accessed, the web server automatically stores a server log file that contains, for example, the name of the requested file, your IP address, the date and time of access, and the transferred data volume, and logs the access. These access data are evaluated solely for the purpose of ensuring a smooth operation of the site and improving our services. This serves to safeguard our legitimate interests in presenting our website properly. All website access data is deleted no later than 4 weeks after the end of your website visit.

If you place an order, pre-activate, or manage your SIM card or eSIM, additional information will be collected and processed, as explained below-

#### **Consent for Collection and Use of Personal Information**

Customers provide consent to the collection and use of personal data by signing or indicating agreement via forms (offline/online), phone or email.

Exceptions to requiring consent:

- When it's necessary for fulfilling a service contract and it's practically difficult to obtain consent
- For billing and payment purposes
- If required by laws

We may entrust handling of personal information to third parties without customer consent when the details of the entrusted party and the scope of work are disclosed.

### Categories of Data Processed and Purposes of Processing

SIMCARD.kr informs users about the scope and purpose of collected data in advance. We do not collect sensitive data that could seriously violate fundamental human rights (e.g., race, beliefs, political views, health status, etc.).

# We collect:

- Passport information, foreigner registration number: for identity verification
- Address, phone number, email, ordered products: for billing, shipping, notices, support, marketing
- Bank account or card number: for billing
- Call logs, usage records:: for billing and support
- Device info, value-added services, contract details: for service provision
- Arrival/Departure Date, Flight ticket (in some cases), IPs, access logs: Fraud prevention

# **Use and Sharing of Personal Information**

Personal information is used only within the scope described in the consent form or relevant agreements.

# Exceptions to consent:

- When required by law or during criminal investigations
- When previously agreed upon by the customer

### Third-party disclosures:

- To NICE Information Service: For identity verification (Name, ID, Mobile number) in case ID-Service is used (managed by MVNO)
- Korean MVNO (mobile carrier services)



### **Delegation of Personal Information Handling**

We may outsource the handling of personal data to specialized agencies under contracts that ensure legal compliance, confidentiality, liability, and proper disposal.

Outsourced Companies & Tasks:

- Korea Post, German Post, Amazon Multichannel Fulfillment and other shipping companies: Shipping for physical sim cards (providing delivery address; in Singapore and Korea additional phone number)
- Banks and card companies: Payment processing
- Webhosting: Amazon Webservices (located in Frankfurt, Europe)

#### **Data Retention Period**

Personal data is destroyed 90 days after achieving its intended use, termination of the customer agreement - unless otherwise required by law.

#### Retention by law:

- Billing disputes: 6 months (or until resolved)
- Communications info: 12 months (Korean Communications Secrecy Protection Act)
- Tax/accounting records: 10 years

#### **Data Destruction Procedures and Methods**

Personal data is destroyed promptly when no longer needed.

- Paper documents: Shredded or incinerated
- Electronic data: Deleted using irreversible technical methods

#### **Customer Rights and How to Exercise Them**

If your personal data is being processed, you have the right to obtain information about the data stored about you. If incorrect personal data is processed, you have the right to request rectification. If the legal requirements are met, you may also request the erasure or restriction of processing, and object to the processing of your data.

Minors (under 14): Legal guardians can exercise these rights on the child's behalf.

Please contact the Data Protection Officer for any inquirer. You also have the right to lodge a complaint with the Data Protection Authority of North Rhine-Westphalia: https://www.ldi.nrw.de/

### **Protection of Children's Data**

SIMCARD.kr obtains guardian consent when collecting or using personal data from children under 14. Data use or sharing beyond the initially stated scope also requires guardian approval. Guardians can request access, correction, or withdrawal of consent at any time.

# **Technical and Managerial Protection Measures**

Technical safeguards:

- Password-protected data, encryption, file locking
- Antivirus software, regularly updated
- SSL for safe data transfer (TLS 1.3)
- Intrusion detection systems, access control

# Administrative safeguards:

- Role-based access controls
- Staff training and internal audits
- Confidentiality agreements for employees
- Strict onboarding/offboarding procedures

### **Legal Basis for Processing**

The data is processed in accordance with Section 9(1) of the German Infection Protection Act (IfSG) in conjunction with Article 9(2)(a) of the GDPR (Regulation (EU) 2016/679).



We also comply with the "Act on Promotion of Information and Communications Network Utilization and Information Protection" (the "Network Act") and other relevant Korean laws, as well as the privacy guidelines set by the Korea Communications Commission.

# **Advertising and Marketing Communications**

SIMCARD.kr does not send profit-driven promotional emails or messages without prior consent.

# Name and Contact Details of the Data Controller and the Data Protection Officer

The controller responsible for processing your data is:
GRANCORA GmbH, Van-der-Upwich-Str. 12, 41334 Nettetal, Germany
Our Data Protection Officer is: Kai Langheim, Van-der-Upwich-Str. 12, 41334 Nettetal, Germany, kl@simcard.kr

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