

## **Privacy Policy**

This Policy (the "Policy") explains the way of treatment of the information which is provided or collected in the web sites on which this Policy is posted. In addition the Policy also explains the information which is provided or collected in the course of using the applications of the Company which exist in the websites or platforms of other company.

The Company is the controller of the information provided or collected in the websites on which this Policy is posted and in the course of using the applications of the Company which exist in the websites or platforms of other company.

Through this Policy, the Company regards personal information of the users as important and inform them of the purpose and method of Company's using the personal information provided by the users and the measures taken by the Company for protection of those personal information.

This Policy will be effective on the 28th day of September, 2020 and, in case of modification thereof, the Company will make public notice of it through posting it on the bulletin board of Company's website or individual notice through sending mails, fax or e-mails).

### **1. Information to be collected and method of collection**

#### **(1) Personal information items to be collected**

Personal information items to be collected by the Company are as follows:

- Information provided by the users

The Company may collect the information directly provided by the users

Title of service	Items to be collected
Internet membership service	<ul style="list-style-type: none"> <li>◦ Name, email address, ID, national information, encoded identification information (CI), identification information of overlapped membership (DI)</li> <li>◦ For minors, information of legal representatives (name, birth date, CI and DI of legal representatives)</li> </ul>
Online payment service	<ul style="list-style-type: none"> <li>◦ Name, address, telephone number, and email address</li> <li>◦ Payment information including account number and card number</li> </ul>
Social network service	<ul style="list-style-type: none"> <li>◦ Name, email address, ID, telephone number, address, national information, address list (acquaintance)</li> <li>◦ Information of place of taking pictures and date of creation of files</li> <li>◦ Information of service use of members such as the type of contents watched or used by members, the persons interacting or sharing contents with members, frequencies and period of activities of members</li> </ul>

- Information collected while the users use services

Besides of information directly provided by the users, the Company may collect information in the course that the users use the service provided by the Company.

Lists	Items to be collected
Equipment information	<ul style="list-style-type: none"> <li>◦ Equipment identifier, operation system, hardware version, equipment set-up, type and set-up of browser, use information of website or application and telephone number</li> </ul>
Log information	<ul style="list-style-type: none"> <li>◦ IP address, log data, use time, search word input by users, internet protocol address, cookie and web beacon</li> </ul>
Location information	<ul style="list-style-type: none"> <li>◦ Information of device location including specific geographical location detected through GPS , Bluetooth or Wifi (limited to the region permissible under the laws)</li> </ul>

Other information	◦ Preference, advertisement environment, visited pages regarding service use of users
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## **(2) Method of collection**

The Company collects the information of users in a way of the followings:

- webpage, written form, fax, telephone calling, e-mailing, tools for collection of created information
- provided by partner companies

## **2. Use of collected information**

The Company uses the collected information of users for the following purposes:

- Member management and identification
- To detect and deter unauthorized or fraudulent use of or abuse of the Service
- Performance of contract, service fee payment and service fee settlement regarding provision of services demanded by the users
- Improvement of existing services and development of new services
- Making notice of function of company sites or applications or matters on policy change
- To make statistics on member's service usage, to provide services and place advertisements based on statistical characteristics
- To provide information on promotional events as well as opportunity to participate
- To comply with applicable laws or legal obligation
- Use of information with prior consent of the users (for example, utilization of marketing advertisement)

The Company agrees that it will obtain a consent from the users, if the Company desires to use the information other than those expressly stated in this Policy.

Processing personal information by the Company shall be lawful only if and to the extent that at least one of the following applies:

- A user has given consent to the processing of his or her personal information.
- Processing is necessary for the performance of a contract to which a user is party or in order to take steps at the request of a user prior to entering into a contract:
  - Member management, identification, etc.
  - Performance of a contract in relation to providing the services required by users, payment and settlement of fees, etc.
- Processing is necessary for compliance with a legal obligation to which the Company is subject
  - Compliance with relevant law, regulations, legal proceedings, requests by the government
- Processing is necessary in order to protect the vital interests of users, or other natural persons
  - Detection of, prevention of, and response to fraud, abuse, security risks, and technical issues that may harm users or other natural persons
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company
- Processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party (except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child).

### **3. Disclosure of collected information**

Except for the following cases, the Company will not disclose personal information with a 3rd party:

- when the Company disclosing the information with its affiliates, partners and service providers;
  - When the Company's affiliates, partners and service providers carry out services such as bill payment, execution of orders, products delivery and dispute resolution (including disputes on payment and delivery) for and on behalf of the Company

- when the users consent to disclose in advance;
  - when the user selects to be provided by the information of products and services of certain companies by sharing his or her personal information with those companies
  - when the user selects to allow his or her personal information to be shared with the sites or platform of other companies such as social networking sites
  - other cases where the user gives prior consent for sharing his or her personal information
- when disclosure is required by the laws:
  - if required to be disclosed by the laws and regulations; or
  - if required to be disclosed by the investigative agencies for detecting crimes in accordance with the procedure and method as prescribed in the laws and regulations

#### **4. Cookies, Beacons and Similar Technologies**

The Company may collect collective and impersonal information through 'cookies' or 'web beacons'.

Cookies are very small text files to be sent to the browser of the users by the server used for operation of the websites of the Company and will be stored in hard-disks of the users' computer.

Web beacon is a small quantity of code which exists on the websites and e-mails. By using web beacons, we may know whether an user has interacted with certain webs or the contents of email.

These functions are used for evaluating, improving services and setting-up users' experiences so that much improved services can be provided by the Company to the users

The items of cookies to be collected by the Company and the purpose of such collection are as follows:

Category	Reasons for using cookies and additional information
Strictly necessary cookies	<p>This cookie is a kind of indispensable cookie for the users to use the functions of website of the Company. Unless the users allow this cookie, the services such as shopping cart or electronic bill payment cannot be provided. This cookie does not collect any information which may be used for marketing or memorizing the sites visited by the users</p> <p>(Examples of necessary cookies)</p> <ul style="list-style-type: none"> <li>◦ Memorize the information entered in an order form while searching other pages during web browser session</li> <li>◦ For the page of products and check-out, memorize ordered services</li> <li>◦ Check whether login is made on website</li> <li>◦ Check whether the users are connected with correct services of the website of the Company while the Company changes the way of operating its website</li> <li>◦ Connect the users with certain application or server of the services</li> </ul>
performance cookies	<p>This cookie collects information how the users use the website of the Company such as the information of the pages which are visited by the users most. This data helps the Company to optimize its website so that the users can search that website more comfortably. This cookie does not collect any information who are the users. Any and all the information collected by this cookie will be processed collectively and the anonymity will be guaranteed.</p> <p>(Examples of performance cookies)</p> <ul style="list-style-type: none"> <li>◦ Web analysis: provide statistical data on the ways of using website</li> <li>◦ Advertisement response fee: check the effect of advertisement of the Company</li> <li>◦ Tracing affiliated companies; one of visitors of the Company provides anonymously feedback to the affiliated companies</li> <li>◦ Management of error: measure an error which may occur so as to give a help for improving website</li> <li>◦ Design testing: test other design of the website of Company</li> </ul>
functionality cookies	<p>This cookie is used for memorizing the set-ups so that the Company provides services and improves visit of users. Any information collected by this cookie do not identify the users individually.</p> <p>(Examples of functionality cookies)</p> <ul style="list-style-type: none"> <li>◦ Memorize set-ups applied such as layout, text size, basic set-up and colors</li> <li>◦ Memorize when the customer respond to a survey conducted by the Company</li> </ul>

targeting cookies or advertising cookies	<p>This cookie is connected with the services provided by a 3rd party such as the buttons of 'good' and 'share'. The 3rd party provides these services by recognizing that the users visits the website of the Company.</p> <p>(Examples of targeting cookies or advertising cookies)</p> <ul style="list-style-type: none"> <li>◦ carry out PR to the users as targets in other websites by connecting through social networks and these networks use the information of users' visit</li> <li>◦ provide the information of users' visit to ad agencies so that they can suggest an ad which may attract the interest of the users</li> </ul>
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The users have an option for cookie installation. So, they may either allow all cookies by setting option in web browser, make each cookie checked whenever it is saved, or refuses all cookies to be saved: Provided that, if the user rejects the installation of cookies, it may be difficult for that user to use the parts of services provided by the Company.

## 5. User's right

The users or their legal representatives, as main agents of the information, may exercise the following rights regarding the collection, use and sharing of personal information by the Company:

- exercise right to access to personal information;
- make corrections or deletion;
- make temporary suspension of treatment of personal information; or
- request the withdrawal of their consent provided before

If, in order to exercise the above rights, you, as an user, use the menu of 'amendment of member information of webpage or contact the Company by sending a document or e-mails, or using telephone to the company (or person in charge of management of personal information or a deputy), the Company will take measures without delay: Provided that the Company may reject

## 6. Security

The Company regard the security of personal information of uses as very important. The company constructs the following security measures to protect the users' personal information from any unauthorized access, release, use or modification

- Encryption of personal information
  - Transmit users' personal information by using encrypted communication zone
  - Store important information such as passwords after encrypting it
- Countermeasures against hacking
  - Install a system in the zone the external access to which is controlled so as to prevent leakage or damage of users' personal information by hacking or computer virus
- Establish and execute internal management plan
- Install and operate access control system
- Take measures to prevent forging or alteration of access record

## **7. Modification of Privacy Protection Policy**

The Company has the right to amend or modify this Policy from time to time and, in such case, the Company will make a public notice of it through bulletin board of its mobile application (or through individual notice such as written document, fax or e-mail) and obtain consent from the users if required by relevant laws.

## **8. Others**

### **(1) Data transfer to other countries**

Considering it engages in global businesses, the Company may provide the users' personal information to the companies located in other countries for the purpose as expressly stated in this Policy. For the places where the personal information is transmitted, retained or processed, the Company takes reasonable measures for protecting those personal information.

### **(2) 3rd party's sites and services**

The website, product or service of the Company may include the links to the ones of a 3rd party and the privacy protection policy of the site of 3rd party may be different. Thus, it is required for the users to check additionally that policy of a 3rd party site linked to the site of the Company.



### **(3) Guide for users residing in California**

If the user resides in California, certain rights may be given. The Company prepare preventive measures necessary for protecting personal information of members so that the Company can comply with online privacy protection laws of California.

In case of leakage of personal information, an user may request the Company to check the leakage. In addition, all the users in the website of the Company, can modify their information at any time by using the menu for changing information by connecting their personal account.

Moreover, the Company does not trace the visitors of its website nor use any signals for 'tracing prevent'. The Company will not collect and provide any personal identification information through ad services without consent of users.

## **9. Contact information of Company**

Please use one of the following methods to contact the Company should you have any queries in respect to this policy or wish to update your information:

Company name: iComer Co., Ltd

Address: 1-1106, Ace Hitech City, 775 Gyeongin-ro, Yeongdeungpo-Gu, Seoul, 07299, Korea

Tel.: 82-2-466-3706

E-mail: dev.support@icomer.com