

Privacy Policy

In accordance with the Personal Information Protection Act of the Republic of Korea and the General Data Protection Regulation of Europe (hereinafter referred to as the “GDPR”) of Europe, Nota Inc. (hereinafter referred to as “Company”) has established and discloses the following personal data processing policy to keep data subjects (hereinafter referred to as the “User(s)”) who are using all Services provided by Company (hereinafter referred to as the “Service (s)”) and personal data collected from websites operated by Company, informed about the procedures and standards for personal data processing and handle related grievances quickly and smoothly.

I. In relation to the Services provided by the Company

Article 1. (Purpose of Processing Personal Data)

The Company processes personal data for the following purposes.

1. Membership registration and management: confirmation of intention to sign up, identification, age verification, maintenance and management of membership, prevention of fraudulent use of Services, confirmation of consent of legal representatives when processing personal data of children under 14 years of age, all sorts of notification
2. Provision of goods or Services: provision of basic/customized Services, sending contracts and bills, identification, age verification, payment and settlement of charges, credit collection
3. Complaint handling: contact and notification for identification of Users, confirmation of complaints, contact/notice for the fact investigation, and notification of the results of handling complaints
4. Service improvement and development: Service performance enhancement, AI algorithm improvement, existing Service improvement and new Service development, customized Service development
5. Utilization of pseudonymous data [1]: Use of pseudonym processing and pseudonymous data for purposes in the public interest, scientific or historical research purposes or statistical purposes.

Article 2. (Personal Data to be Processed)

The Company collects and processes the following personal data of Service Users.

1. Basic collection when signing up for membership (mandatory): name, password, email, regional information (Asia/Europe/US), Company name
2. Personal data provided by the User in the process of using the Service (optional): image files provided by the User, metadata of the image file, model file, pre/process code file generated in the process of packaging

3. The following personal data are automatically collected while using the Service: IP address, cookies, Service use records (visit and use records, low quality use records, etc.), device information (cell phone model number, OS name and version information), advertisement identifier
4. When handling complaints: collecting and processing items necessary for handling complaints from Users among the above information and separate items necessary for handling complaints

Article 3. (Personal Data Processing and Retention Period)

① If the Service contract concluded with the User is terminated or if the User withdraws from the Service or loses his/her qualification, the Company deletes and destroys the collected User's data without delay, even if there is no separate request. However, despite the withdrawal of membership or loss of User qualification, the following data is preserved for the following reasons.

1. If an investigation and enquiry is in progress due to a violation of the relevant laws and regulations, by the end of the relevant investigation.
2. If the claim-obligation relationship remains due to the use of Services, until the relevant claim-obligation relationship is settled.

② Notwithstanding the preceding paragraph, the Company shall preserve it until the end of the relevant period in the following cases:

1. Personal data related to Service use (log record): 3 months, which is the retention period under the Protection of communications secrets Act of the Republic of Korea.
2. Records on the withdrawal of contracts or subscriptions, and records on payment and supply of goods: 5 years retention period under the Act on the Consumer Protection in Electronic Commerce, etc. of the Republic of Korea.
3. Records on the handling of complaints or disputes by consumers: 3 years retention period under the Act on the Consumer Protection in Electronic Commerce, etc. of the Republic of Korea.
4. Records on display advertising: 6 months retention period under the Act on the Consumer Protection in Electronic Commerce, etc. of the Republic of Korea.
5. Books and evidentiary documents concerning all transactions prescribed by the Tax Act: 5 years, which is the retention period under the Framework Act on National Taxes of the Republic of Korea.

③ The Company separately stores or deletes personal data of Users who have not used the Service for a year or a period separately determined by the User.

Article 4. (Provision of Personal Data to Third Party)

The Company provides personal data to third parties only with the consent of the User or when there is a special provisions in the Personal Information Protection Act of the Republic of Korea or other laws.

Article 5. (Entrustment of Personal Data Processing)

① The Company entrusts the processing of personal data for the smooth processing of personal data as follows:

Name of Entrustee	Entrusted Work
Amazon Web Services, Inc. (AWS Asia, US, Europe Region)	infrastructure management for data storage, Service provision and analysis, and email sending
Amazon Web Services, Inc.	User's usage behavior information
Google Inc. (GA)	User's usage behavior information(cookie, device/browser-related data, IP address, and activity information within the site/app)

Article 6. (Use and Provision of Personal Data within the Scope Reasonably Related to the Purpose of Collection)

The Company may use or provide personal data to third parties without the consent of the User, taking into account the following criteria within reasonable scope for the purpose of the original collection.

1. Whether it is related to the original collection purpose: determining whether the original collection purpose and the purpose of additional use and provision are related to the nature or tendency.
2. Whether additional use or provision of personal data is predictable under circumstances or processing practices collecting personal data: consideration of the relationship between the personal data processor and the User, technology level and speed of technical development, and general reason (practices) established over a considerable period of time.
3. Whether the User's interests are unjustly infringed: determining whether the User's interests are substantially violated in relation to the purpose of additional use and whether the infringement of the relevant interests is unjust, etc.
4. Whether measures necessary for securing safety, such as pseudonymization or encryption, have been taken: determining whether safety measures are taken in consideration of the possibility of infringement, etc.

Article 7. (Rights and Obligations of User, Its Statutory Agent and Method of Exercising Them)

- ① The User's personal data is notified that it is being transferred to the Republic of Korea, where the Company is located, and accordingly, the Company is obligated to implement technical and administrative protective measures for legitimate transfer.
- ② Users can request the Company to access, correct, delete, and stop processing personal data at any time, and exercise rights such as the right to data portability, object, and reject automated individual decision-making including profiling [2].
- ③ When providing information to Users, the Company should provide information in a concise, transparent, easy-to-understand, and accessible format.
- ④ When providing information to Users, the Company may provide information in writing, by electronic means, or verbally.
- ⑤ The rights under paragraph ② can be exercised in writing, e-mail, etc., and the Company must provide information to the User within one month from the date of request, and may extend it to two months if necessary, considering the complexity and number of requests. However, the Company is obligated to notify the User of the extension and the reason for delay.
- ⑥ If the Company does not comply with the User's request, the personal data processor under the Korean law and the personal data controller under the GDPR must file a complaint with the supervisory authority and notify the User that they can receive judicial relief within a month.
- ⑦ The Company should provide information to Users for free.
- ⑧ The exercise of rights under paragraph ② may be conducted through a legal representative of the User or a person who has been delegated. In this case, the User must submit a power of attorney to confirm the delegation to the trustee.
- ⑨ As stipulated by relevant laws and regulations, such as the Personal Information Protection Act of Republic of Korea and GDPR of EU, the exercise of rights such as Users' requests to access, correct, delete, and stop processing personal data, and the right to data portability, object, and reject automated individual decision-making including profiling may be restricted.
- ⑩ Requests for correction and deletion of personal data cannot be requested if the personal data is specified as a collection target in other laws.

⑪ The Company verifies whether the person who requested access, correction, deletion or suspension of processing according to User rights is the person or a legitimate agent.

⑫ Users must be informed that they may withdraw their consent at any time and that they can exercise their rights before providing consent.

⑬ The rights under paragraph ② shall be as easily exercised as the provision of consent, and withdrawal of consent shall not affect the legality of information processing based on consent prior to withdrawal.

⑭ The User has the right to file a complaint with the supervisory authority of the country where he/she is located, especially where he/she resides, works, or is suspected of infringement, if the processing of personal data violates this regulation.

Article 8. (Destruction of Personal Data)

① Where personal data becomes unnecessary because of expiration of the personal data retention period, achievement of the purpose of processing, etc., the Company shall immediately destroy the relevant personal data.

② In the event that the Company must continue to preserve the personal data in accordance with Article 3, Paragraph ② even when the personal data retention period agreed by the data subject has elapsed or the purpose of processing has been achieved, the Company may move the personal data to a separate database or store it in a different storage location.

③ The procedure and method of destroying personal data are as follows.

1. Destruction procedure: the Company selects personal data for which the cause for destruction occurs, and destroys personal data with the approval of the Company's Chief Privacy Officer.
2. Destruction method: the Company destroys personal data recorded and kept in the form of an electronic file so that records cannot be reproduced, and the personal data recorded and kept in paper documents is shredded by a shredder or incinerated and destroyed.

④ The Company converts Users who do not use the Service for a year or a period of time that the User has separately agreed to, into a dormant account, and stores personal data separately. The Company destroys the personal data stored separately without delay after 4 years of storage.

⑤ If the User doesn't want to switch to a dormant account, he/she can log in to the Service before switching to a dormant account. In addition, even if it is converted to a dormant

account, if the User log in, he/she can use the normal Service by restoring the dormant account according to the User's consent.

Article 9. (Personal Data Security Securement Measures)

The Company is taking the following measures to ensure the safety of personal data.

1. Managerial measures: establishing an internal management plan, regular employee training, immediate correction if it is not complied with the Company's policy etc.
2. Technical measures: technical measures against hacking, encryption of personal data, access authority management of personal data processing systems, storage of access records and prevention of forgery, etc.
3. Physical measures: Control access to server rooms, archive rooms, control of USB containing personal data, destruction of personal data, etc.

Article 10. (Matters concerning Installation, Operation, and Refusal of Automatic Personal Data Collection Devices)

In order to provide individual customized Services to Users, the Company uses a "cookie" that stores usage information and loads it frequently as follows. Cookies are a small amount of information that the server used to run the website sends to the User's computer browser, and they are also stored on the hard disk of the User's PC.

1. Purpose of using cookies: Analyze User's access frequency and visit time, identify User Service usage pattern, track User's traces, secure connection status, number of Users, etc. to improve security management and Service development, customized Service and advertisement.
2. Installation, operation and refusal of cookies: Service Users have the right to select of installing cookies. Therefore, the User can refuse to save the cookie by changing the settings of the option in a web browser as shown below.
 - Internet Explorer: Tools → Internet Options → Privacy → Advanced → select the options to block the cookies
 - Microsoft Edge: ... (click the settings and more icon ...) → Settings → Cookies and site permissions → select the options to block the cookies
 - Chrome: → Settings → Privacy and Security → Cookies and other site data → select the options to block the cookies
 3. Refusing to save cookies can cause difficulties with some Services.

Article 11. (Person in charge of Personal Data Protection)

- ① The Company designates a person in charge of personal data protection for the Korea Personal Information Protection Act to handle complaints and remedy damages from Users as follows:

Chief Privacy Officer

- Name: Myungsu Chae
- Position: Chief Executive Officer
- Contact: +82 2-555-8659 (Representative), privacy@nota.ai

② Users can inquire about all personal data protection inquiries, complaints, and damage relief that occurred while using the Company's Service (or business) to the Chief Privacy Officer and the department in charge below.

- Department: Compliance Team
- Contact: +82 2-555-8659 (Representative), privacy@nota.ai

③ In accordance with EU General Data Protection Regulation, the Company separately designates the Data Protection Officer.

Data Protection Office

- Rechtsanwaltskanzlei Jae-Yoon Lee
- Contact: hello@ra-lee.de
- Address: Albestraße 21, 12159, Berlin, Germany

Article 12. (Change of Personal Data Processing Policy)

The Company may revise its personal data processing policy for the purpose of reflecting changes in laws or Services. If the personal data processing policy is changed, the Company will post the change at least 7 days before the effective date, and it will be notified separately by e-mail. The revised personal data processing policy will take effect on the date of entry. However, if a significant change in User rights occurs, such as changes in the items of personal data to be collected and the purpose of use, the Company will notify the User at least 30 days in advance.

II. In relation to the website operated by the company

Article 13. (General Information on Data Processing on the Website)

You can visit this Website without telling us who you are or revealing any information about yourself. The Company will not collect any personal data about you (e.g., name, country, e-mail address) unless you voluntarily choose to provide us with it. There are portions of this Website where we may need to collect personal information from you for a specific purpose, such as to provide you with certain information you request.

Our web servers collect domain names and not the e-mail addresses. This information may

be aggregated on a "no names" basis just to measure the number of visits, average time spent on the site, or pages viewed.

Our web servers also seek (as many Websites do) to place a "cookie" (a small data file) on your computer's hard drive which allows the server to recognize the computer when it visits again. This helps track statistical information about navigation through our site. This cookie is not used to obtain your name or any personal data, and the information that is tracked is used only for internal purposes, such as to improve site navigation. The Company uses these data to measure the usage of, and improve the content of our sites.

Domain name information that we collect is only used to measure the number of visits, average time spent on the site, pages viewed, etc. We use this information to measure the use of our site and to improve the content of our site. Information provided from you, such as your name, e-mail address and etc, is used by us only to respond to your inquiry or to process your request. We will not provide your personal data to third parties, but only if necessary to fulfill your request or for related purposes. The collected information will be discarded if the related purpose is completed. If you choose not to have your personal data used, we will respect your choice.

In an effort to make your visit both efficient and safe, all transfers of personal information via this site meet the Company's rigorous Internet security standards.

Occasionally, our site may contain electronic links to other sites. In case you choose to go to those sites, their own privacy policy and privacy preferences will apply.

Article 14. (Provision of Website and Creation of Log Files)

① Description and scope of data processing

In principle, we only process the personal data of our Users to the extent necessary in order to provide a functioning website with our content and Services. The processing of personal data takes place regularly, and only with the consent of the User in question.

Each time our website is accessed, our system automatically collects data and relevant information from the computer system of the calling computer. The following data is collected without prior consent, permitted by law as provided in Section III below. :

1. Browser type and version used
2. The User's operating system
3. The User's internet Service provider
4. The IP address of the User
5. Date and time of access
6. Web pages from which the User's system accesses our website
7. Web pages accessed by the User's system through our website

The data is also stored in the log files of our system. The data is not stored with the User's other personal data.

② Legal basis for data processing

The legal basis for the temporary storage of data and log files is Article 6, Section 1, Point (f) of GDPR.

③ Purpose of data processing

1. The temporary storage of the IP address by the system is necessary for the delivery of the website to the computer of the User. For this purpose, the User's IP address must be kept for the duration of the session.
2. Storage in log files is done to ensure the functionality of the website. In addition, the data is used to optimize the website and to ensure the security of our information technology (IT) systems. In this case, the evaluation of the respective data for marketing purposes does not take place. For the aforementioned purposes, our legitimate interest lies in the processing of data in compliance with Article 6, Section 1, Point (f) of GDPR.

④ Duration of storage

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. The session is complete when the collection of data for the provision of the website is accomplished. The data stored in log files will only be stored for a period of up to seven days. Prolonged storage is possible when the IP addresses of the Users are deleted or alienated, and that the assignment of the calling client is no longer possible.

⑤ Objections and removal option

The collection of data for the provision of the website as well as the storage of data in log files are essential for the operation of the website. Therefore, the User may not object to the aforementioned processes

Article 15. (Use of Cookies)

① Description and scope of data processing

Our website uses cookies. Cookies are text files that are stored in the internet browser or the internet browser on the user's computer system. If a user calls up a website, a cookie can be stored on the user's operating system. These cookies contain a string of characters that allows the browser to be uniquely identified when the website is reopened. We use cookies to make our website more user-friendly. Some elements of our website require the calling browser to be identified even after a page break. The following data is stored and transmitted in the cookies:

- Session-Key

② Legal basis for data processing

The legal basis for the processing of personal data using cookies is Article 6, Section 1, Point (f) of GDPR.

③ Purpose of data processing

The purpose of using technically necessary cookies is to simplify the use of websites for users. Some features on our website cannot be offered without the use of cookies. For these features, it is necessary that the browser is recognized even after a page break.

We require cookies for the following features:

- Seminar-Sign In, Frontend-Login

The data collected through the technically necessary cookies will not be used to create profiles of the users.

④ Duration of storage, objections and removal option

Cookies are stored on the computer of the user and are transmitted to us. Therefore, as a user, you have full control over the use of cookies. By changing the settings in your internet browser, you can disable or restrict the transmission of cookies. Cookies that have been saved can be deleted at any time. This may also occur automatically. If cookies are disabled for our website, it may not be possible to use all the features on the website to its full potential. The transmission of Flash cookies cannot be prevented by the settings on the internet browser, but by changing the setting on the Flash Player instead.

Article 16. (Newsletter)

① Description and scope of data processing

You can subscribe to a free newsletter on our website. The following data from the input mask are transmitted to us when the user subscribes for the newsletter.

1. email address;
2. name;
3. date and time of the calling computer; and
4. salutation

To process your data, your consent will be obtained, and you will be referred to this Policy.

If you purchase goods or services on our website and provide your email address during the process, your email address may subsequently be used for us to send you newsletters. In such an event, the newsletter will only send you mail that are relevant or similar to the goods and/services that you purchased.

When personal data is processed for the purpose of sending newsletters, there will be no disclosure of the said data to third party operators. The data will hence be used solely for the purpose of sending newsletters.

② Legal basis for data processing

The legal basis for the processing of data after the user has subscribed for the newsletter, and given their consent, is Article 6, Section 1, Point (a) of GDPR.

The legal basis for sending newsletters as a result of the sale of goods or services is Article 7, Paragraph 3 of the German Act Against Unfair Competition (UWG).

③ Purpose of data processing

The collection of the user's email address is to deliver the newsletter.

The collection of other personal data during the subscription process serves to prevent the misuse of services or the misuse of the email address provided.

④ Duration of storage

The data will be deleted as soon as they have completed their use for the survey. The user's email address will be saved for the period at which the newsletter is active.

Other personal data collected during the subscription process are typically deleted after seven days.

⑤ Objections and removal option

Users may terminate his or her subscription to the newsletter any time by opting out. Each newsletter will include a link that offers this option. The user may also revoke their consent to the storage of their personal data collected during the subscription process.

Article 17. (Contact Form and Email Contact)

① Description and scope of data processing

A contact form is available on our website, which may be used for electronic communication. If the user chooses this method of communication, the data entered in the input mask will be transmitted to us and saved.

When the message is being sent, the following data will be stored:

1. email address
2. name

3. surname
4. IP address of the calling computer
5. date and time of registration
6. thematic assignment

For the purpose of dispatch operations, you are referred to this Policy and your consent is obtained for the processing of your personal data.

Alternatively, contact via email can also be made, in which case, the user's personal data transmitted via email will be stored. For this purpose, your personal data will not be disclosed to third parties. The data will be used exclusively for the purpose of processing the conversation.

② Legal basis for data processing

With the consent of the user, the legal basis for the processing of their data is pursuant to Article 6, Section 1, Point (a) of GDPR. The legal basis for the processing of data transmitted in the course of sending an email is Article 6, Section 1, Point (f) of GDPR. If the contact via email is made for the conclusion of a contract, Article 6, Section 1, Point (b) of GDPR also applies.

③ Purpose of data processing

The processing of personal data obtained from the input mask serves only to process the contact that has been established. If contact is made via email, the legitimate interest of processing the data will be considered.

Other personal data transmitted during the dispatch process is only processed to prevent the misuse of the contact form and to ensure the security of our information technology (IT) systems.

④ Duration of storage

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. As for the data collected from the input mask or contact form, as well as those retrieved via email, the data will be deleted when the conversation with the user has ended. The conversation is considered done when it can be inferred from the content of the conversation that the relevant topics discussed have been clarified.

The additional personal data collected during the dispatch process will be deleted after a period of seven (7) days at the latest .

⑤ Objections and removal possibility

The user may, at any time, revoke their consent to the processing of their personal data. If the user contacts us via email, they may object to the storage of their personal data at any time. In this case, the conversation cannot continue. All personal data stored in the course of communication with the user will hence be deleted.

Article 18. (Entrustment of Personal Data Processing)

① The Company entrusts the processing of personal data for the smooth processing of personal data as follows:

Name of Entrustee	Entrusted Work
Mailchimp	Transmission of newsletter subscriber's name and email address
Squarespace	The name, email, and company information submitted via the contact form on the website will be sent through Squarespace.

Article 19. (Mutatis Mutandis)

Regulations such as processing and retention period of personal data, measures to ensure the safety, destruction of personal data, and the person in charge of personal data protection shall apply mutatis mutandis as stipulated in section I .

III. GDPR in Europe

Article 20. (Legal basis for data processing)

Section 1 of Article 6 under GDPR serves as the legal basis to process their data. Such legal basis is as follows:

1. Under point (a) of Section 1 under Article 6 of GDPR, we may obtain consent from the data subject to process their personal data.
2. Point (b) of Section 1 under Article 6 of GDPR allows processing of personal data required for the performance of a contract of which the data subject is a party. This also applies to processing operations required to carry out pre-contractual activities.
3. Point (c) of Section 1 under Article 6 of GDPR serves as the legal basis when it is necessary to process personal data in order to fulfil a legal obligation to which our company is subject.

4. Point (d) of Section 1 under Article 6 of GDPR serves as the legal basis in the event that the interest or well-being of the data subject or any relevant natural person(s) require the processing of personal data.
5. Point (f) of Section 1 under Article 6 of GDPR serves as the legal basis if the processing of data is necessary to safeguard the legitimate interests of our company or that of a third-party operator, and the fundamental rights and freedoms of the person(s) concerned do not outweigh the interest of the former.

Article 21. (Rights of the Person Concerned)

When your personal data is processed, you are subsequently a “person concerned” and have the following rights vis-à-vis the Company.

① Right of Access

You may ask the Company to confirm whether your personal data is processed by us. If such processing is available, you can request the following information from the Company:

1. the purpose for which the personal data is processed;
2. the categories of personal data being processed;
3. the recipients or categories of recipients to whom the personal data relating to you have been disclosed or are still being disclosed;
4. the planned duration of the storage of your personal data or, if specific information is not available, criteria for determining the duration of storage;
5. the existence of a right to rectification or erasure of personal data concerning you, a right to restriction of processing by the data controller or a right to object to such processing;
6. the existence of a right of appeal to a supervisory authority;
7. all available information on the source of the data if the personal data is not collected from the data subject; or
8. the existence of automated decision-making including profiling under Articles 22 (1) and (4) of GDPR and, in certain cases, meaningful information about the data processing system involved, and the scope and intended result of such processing on the data subject.

You have the right to request information on whether your personal data will be transmitted to a third-party country or an international organization. Given that this applies, you can then request for the appropriate guarantees in accordance with Article 46 of GDPR in connection with the transfer. Whenever the Company transfers User's personal data out of the

European Economic Area (“EEA”), the Company will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

1. The Company will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
2. Where the Company uses certain service providers, the Company may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA or Korea.

② Right to rectification

You have a right to rectification and/or completion to the Company, if the personal data we process is incorrect or incomplete. The Company must make the correction without delay.

③ Right to the restriction of processing

You may request the restriction of the processing of your personal data under the following conditions:

1. if you challenge the accuracy of your personal data within a period of time that enables the data controller to verify the accuracy of your personal data;
2. the processing is unlawful, and you refuse the deletion of the personal data and instead demand the restriction of the use of the personal data;
3. the representative no longer needs the personal data for the purpose of processing, but you need it to assert, exercise or defend legal claims; or
4. if you have objected to the processing pursuant to Article 21, Section 1 of GDPR and it is not yet certain whether the legitimate reasons of the Company outweigh your reasons.

If the processing of personal data concerning you has been restricted, such personal data may, with the execution of data storage, only be used with your consent or for the purpose of asserting, exercising or defending legal claims or protecting the rights of another natural or legal person or for reasons of important public interest, interest to the Union, or a Member State.

If the limitation of the processing after the above-mentioned conditions are restricted, you will be informed by the Company before the restriction is lifted.

④ Right to Erasure

1. Obligation to delete

If you request the Company to delete your personal data with immediate effect, the Company is required to do so immediately given that one of the following applies:

- Your personal data is no longer necessary for the purposes for which it was collected or processed.
- You revoke your consent, to which the processing is allowed pursuant to Article 6, Section 1 or Article 9, Section 2, Point (a) of GDPR, and there is no other legal basis for processing the data.
- You object to the processing of the personal data pursuant to Article 21, Section 1 of GDPR, unless the Company demonstrates compelling legitimate grounds for the processing which override your interests, rights, and freedom or for the establishment, exercise or defend of legal claims, or you object pursuant to Article 21, Section 2 of GDPR.
- Your personal data have been processed unlawfully.
- The act of deleting your personal data will invoke a legal obligation under the Union law or the laws of the Member States to which the Company is subject.
- Your personal data were collected in relation to information society services being offered pursuant to Article 8, Section 1 of GDPR.

2. Information to third parties

If the Company has made your personal data public and has to delete the data pursuant to Article 17 Section 1 of GDPR, the Company shall take appropriate measures, including technical means, to inform data controllers who process the personal data that you have been identified as being affected, that a request has been made to delete all links to such personal data or copies or replications of the personal data, taking into account available technology and implementation costs to execute the process.

3. Exceptions

Your personal data may not be deleted if the processing is necessary

- to exercise the right to freedom of speech and information;
- to fulfill a legal obligation required by the law of the Union or of the Member States to which the representative is subject, or to perform a task of public interest or in the exercise of public authority delegated to the representative;
- for reasons of public interest in the field of public health pursuant to Article 9 Section 2, Point (h) and Article 9 Section 3 of GDPR;

, or

- to enforce, exercise or defend legal claims.

⑤ Right to information

If you exercise the right of rectification, deletion or restriction of processing over the Company, the Company will notify all recipients to whom your personal data have been disclosed of the correction or deletion of the data or restriction of processing, unless this proves to be impossible or involves a disproportionate effort.

You reserve the right to be informed about the recipients of your data by the Company.

⑥ Right to Data Portability

You have the right to receive your personal data given to the Company in a structured, standard and machine-readable format. In addition, you have the right to transfer this data to another person without hindrance by the Company who was initially given the data, given that

1. the processing is based on a consent in accordance with Article 6, Section 1, Point (a) or Article 9, Section 2, Point (a) of GDPR, or based on a contract in accordance with Article 6, Section 1, Point (b) of GDPR; and
2. the processing is done by automated means.

In exercising this right, you also have the right to maintain that your personal data are transmitted directly from one person to another, insofar as this is technically feasible. Freedoms and rights of other persons shall not be affected.

The right to data portability does not apply to the processing of personal data necessary for the performance of a task in the public interest or in the exercise of official authority delegated to the Company.

⑦ Right to object

1. Subjective to your situation, you have, at any time, the right to object against the processing of your personal data pursuant to Article 6, Section 1, Point (e) or (f) of GDPR; this also applies to profiling based on these provisions.
2. The Company will no longer process the personal data concerning you unless we can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the processing is for the purpose of enforcing, exercising or defending legal claims.
3. If your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data in regard to such advertising; this also applies to profiling insofar as it is associated with direct mail.
4. If you object to processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

5. Regardless of Directive 2002/58/EC, you have the option, in the context of the use of information society services, to exercise your right to object to automated procedures that use technical specifications.

⑧ Right to revoke the data protection consent declaration

You have the right to withdraw your data protection declaration at any time. The revocation of consent does not affect the legality of the processing carried out on the basis of the consent until the revocation.

⑨ Automated decision on a case-by-case basis, including profiling

You have the right not to subject to a decision based solely on automated processing - including profiling - that will have legal effect or affect you in a similar manner. This does not apply if the decision

1. is required for the conclusion or execution of a contract between you and the data controller,
2. is permitted by the Union or Member State legislation to which the data controller is subject, and where such legislation contains appropriate measures to safeguard your rights and freedoms and legitimate interests, or
3. with your expressed consent.

However, these decisions must not be based on special categories of personal data under Article 9, Section 1 of GDPR, unless Article 9, Section 2, Point (a) or (g) of GDPR applies and reasonable measures have been taken to protect the rights and freedoms as well as your legitimate interests.

With regard to the cases referred to in 1. and 3. above, the Company shall take appropriate measures to uphold your rights and freedoms as well as your legitimate interests, including the right to obtain assistance from the data controller or their representative, to express your opinion on the matter, and to contest the decision.

⑩ Right to complain to a supervisory authority

Without prejudice to any other administrative or judicial remedy, you shall have the right to complain to a supervisory authority, in the Member State of their residence, place of work or place of alleged infringement, if you believe that the processing of the personal data concerning you violates the GDPR.

The supervisory authority to which the complaint has been submitted shall inform the complainant of the status and results of the complaint, including the possibility of a judicial remedy pursuant to Article 78 of GDPR.¹¹ Exceptions to Archival Purposes.

Notwithstanding the foregoing, for archival purposes of public interest, scientific or historical research purposes or for statistical purposes pursuant to Article 89, Section 1 of GDPR, your rights referred to in Article 21 under this Policy may be derogated to the extent such rights are likely to render impossible or seriously affect the achievement of the objectives of that processing under this paragraph, provided that the Company uses appropriate safeguards as described in this policy to ensure respect for the principle of data minimization.

Article 22. (Miscellaneous)

① The Company must harmoniously interpret the contents of the Personal Information Protection Act of the Republic of Korea and the GDPR of Europe, and in case of conflict between the two laws, it must be comprehensively interpreted in consideration of the interests of the Company and the interests of the Users.

② Regarding the interpretation of ①, the precedents of the courts of the Republic of Korea may be the standard for interpretation.

③ This Policy shall take effect on 2023.01.01

[1] pseudonymous data is the data that cannot identify a specific individual without additional information, such as deleting part of personal information or replacing part or all of it, and corresponds to personal data.

[2] Profiling refers to the processing of all forms of automated personal data using personal information to analyze or predict aspects of work performance, economic conditions, health, personal preferences, interests, reliability, behavior, location, or movement of natural persons.

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