

## 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 \_\_\_th day of \_\_\_\_, 2015 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(examples)
Internet membership service	<ul style="list-style-type: none"> <li>◦ Name, email address, ID, telephone number, address, 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> <li>◦ Delivery information including delivery address, name and contact information of recipient</li> <li>◦ Information of bid, purchase and sales</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(examples)
<b>Equipment information</b>	<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>
<b>Log information</b>	<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>

<b>Location information</b>	◦ Information of device location including specific geographical location detected through GPS , Bluetooth or Wifi (limited to the region permissible under the laws)
<b>Other information</b>	◦ Preference, advertisement environment, visited pages regarding service use of users

## **(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 help you connect with other users you already know and, with your permission, allow other users to connect with you
- 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.

[\[Option to select 'Lawful Processing of Personal Information under GDPR' in Appendix <1> of Personal Privacy Policy\]](#)

### 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
<b>strictly necessary cookies</b>	<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></ul>

	<ul style="list-style-type: none"> <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>
<p><b>performance cookies</b></p>	<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>
<p><b>functionality cookies</b></p>	<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>

<p><b>targeting cookies or advertising cookies</b></p>	<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

the request of you only to the extent that there exists either proper cause as prescribed in the laws or equivalent cause.

[\[Option to select 'User's right when applying GDPR' in Appendix <2>of Personal Privacy Policy\]](#)

## **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. Protection of personal information of children**

In principle, the Company does not collect any information from the children under 13 or equivalent minimum age as prescribed in the laws in relevant jurisdiction. The website, products and services of the Company are the ones to be provided to ordinary people, in principle. The website or application of the Company has function to do age limit so that children cannot use it and the Company does not intentionally collect any personal information from children through that function.



**(Additional procedure for collecting personal information from children)** However, if the Company collects any personal information from children under 13 or equivalent minimum age as prescribed in the laws in relevant jurisdiction for the services for unavoidable reason, the Company will go through the additional procedure of the followings for protecting that personal information of children: • verify, to the extent that efforts are reasonably made, whether they are children of the age at which consent from their guardian is required and the consenting person is an authorized one.

- obtain consent from the parents or guardian of children so as to collect personal information of children or directly send the information of products and services of the Company
- give the parents or guardian of children a notice of Company's policy of privacy protection for children including the items, purpose and sharing of personal information collected
- grant to legal representatives of children a right to access to personal information of that children/correction or deletion of personal information/temporary suspension of treatment of personal information/ and request for withdrawal of their consent provided before
- limit the amount of personal information exceeding those necessary for participation in online activities

## **8. 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 website (or through individual notice such as written document, fax or e-mail) and obtain consent from the users if required by relevant laws.

## **9. Others**

[\[Option to select 'data transfer to other countries ' in Appendix <3> of Personal Privacy Policy\]](#)

[\[Option to select 'sites and service of 3rd party' in Appendix <4> of Personal Privacy Policy\]](#)

[\[Option to select 'guidelines for residents in California' in Appendix <5> of Personal Privacy Policy\]](#)

[\[Option to select 'guidelines for residents in Korea' in Appendix <6> of Personal Privacy Policy\]](#)

## 10. 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 : Partridge Systems

Address : 6F, 570, Samsung-ro, Gangnam-gu, Seoul, Korea

Tel. : 070-8233-0750

E-mail : Contact@partridgesystems.com

(Add the following if designated of data protection officer) The Company designates the following Data Protection Officer (DPO) in order to protect personal information of customers and deal with complaints from customers.

DPO of the Company

Adress: 6F, 570, Samsung-ro, Gangnam-gu, Seoul, Korea

Tel.: 070-8233-0750

E-mail: Contact@partridgesystems.com

(Add the following if the controller operating outside of the EU designates its deputy in the EU) The Company designates a deputy in the EU in order to protect personal information of customers and deal with complaints from customers.

Deputy of the Company

Adress:

Tel.:

E-mail:

The latest update date: November\_\_\_\_, 2018.

## Appendix of Privacy Protection Policy

### <1> Lawful processing of personal information under GDPR

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).

### <2> User's right when applying GDPR

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:

- The right to access to personal information;

The users or their legal representatives may access the information and check the records of the collection, use and sharing of the information under the applicable law. • The right to rectification;

- The users or their legal representatives may request to correct inaccurate or incomplete information.

- The right to erasure;

- The users or their legal representatives may request the deletion of the information after the achievement of their purpose and the withdrawal of their consent.

- The right to restriction of processing;

- The users or their legal representatives may make temporary suspension of treatment of personal information in case of the disputes over the accuracy of information and the legality of information treatment, or if necessary to retain the information.

- The right to data portability

- The users or their legal representatives may request to provide or transfer the information.

- The right to object

- The users or their legal representatives may suspend the treatment of personal information if the information is used for the purpose of direct marketing, reasonable interests, the exercise of official duties and authority, and research and statistics.

- The right to automated individual decision-making, including profiling

- The users or their legal representatives may request to cease the automated treatment of personal information, including profiling, which has critical impact or cause legal effect on them.

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 ( person in charge of management of personal information or a deputy), the Company will take measures without delay: Provided that the Company may reject the request of you only to the extent that there exists either proper cause as prescribed in the laws or equivalent cause.

### <3> 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.

**(If used in the US, additional security measures may be available)** In addition, when the personal information obtained from the European Union or Switzerland is used or disclosed, the Company may have to comply with the US-EU Privacy Shield and Swiss-US Privacy Shield, take other measures or obtain consent from users so far as those complies with the regulations of EU so as to use a standardized agreement provision approved by executing organizations of EU or securing proper safe measures.

### <4> 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.

## <5> 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.

## <6> Guide for users residing in Korea

The Company guides several additional matters to be disclosed as required by the information network laws and personal information protection laws in the Republic of Korea as follows:

### (1) Information collected

The items collected by the Company are as follows:

- **Examples of required information**

Title of service	Items to be collected(examples)
<b>Internet membership service</b>	<ul style="list-style-type: none"><li>◦ Name, email address, ID, telephone number, address, 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>

<p><b>Online payment service</b></p>	<ul style="list-style-type: none"> <li>◦ Name, address, telephone number, and email address</li> <li>◦ For payment with credit card : name of card company, number and expiration of card</li> <li>◦ For small sum payment charged on the mobile phone: mobile phone number, payment approval number</li> <li>◦ For payment by remittance: name of bank, account number and password of account</li> <li>◦ For deposit without a bankbook: name of remitter, contact information</li> <li>◦ Delivery information including delivery address, name and contact information of recipient</li> <li>◦ Information of bid, purchase and sales</li> </ul>
<p><b>Social network service</b></p>	<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, frequencies and period of activities of members</li> </ul>
<p>In the course of using services, the information as described below may be created and collected:</p> <ul style="list-style-type: none"> <li>◦ Information of devices (equipment/device identifier, operation system, hardware version, equipment set-up and telephone number)</li> <li>◦ Log information (Log data, use time, search word input by users, internet protocol address, cookie and web beacon)</li> <li>◦ Location information (Information of device location including specific geographical location detected through GPS, Bluetooth or Wifi)</li> <li>◦ Other created information</li> </ul>	

• **Examples of optional items**

The user may reject the collection and use of optional items and, even in case of rejection, there is no limit on use of services

Purpose of collection	Items to be collected(examples)
User analysis	◦ The reason for membership, occupation, marriage status, wedding anniversary, interest category and SNS account information
Provision of customized ad	◦ Contents and result of marketing activities and event participation
Delivery of urgent notice	◦ Information provided by the users regarding execution, maintenance, execution, management of other agreements and event participation
Marketing	◦ Preference, advertisement environment, visited pages regarding service use of users

• **Additional procedure for collection of sensitive information**

If collection of sensitive information is indispensable, the Company may collect it by going through lawful procedure in accordance with relevant laws and regulations. The sensitive information which may be collected by the Company is as follows:

- Thoughts and belief
- Membership of and withdrawal from labor union or political party
- Political opinions
- Information of health and sexual life
- Genetic information obtained from the result of gene test
- Information of criminal record including announcement, exemption and suspension of sentences, care and custody, protective custody, treatment and custody, probation, lapse of suspension of sentence and cancellation of suspension of execution.

**(2) Commission for collected personal information**



For carrying out services, the Company commissions external professional companies (subcontractors) to process personal information as follows. This commissioned works for processing personal information is carried out by each subcontractor and service only if necessary for providing that service.

In commissioning process of personal information, in order to secure safety of personal information , the Company supervises and ensure to expressly state in the agreement with subcontractors so that those subcontractors will safely process personal information by strictly complying with directions regarding personal information protection, keeping personal information secret, not disclosing it to a 3rd party and being liable for accidents and returning or destructing personal information upon termination of the commission or process.

Name of subcontractors	Description of commissioned works (services)
AAA	Customer service

### (3) Details of provision of personal information to 3rd party

Except for the following cases, the Company does not disclose or provide personal information of the users to a 3rd party:

Recipients of information	Purpose of use of recipient	Items to be provided	Period of retention and use of recipient
BBB	Provision of service tie-up	ID, Name and age	Until the date when the purpose of use is achieved or period as required by the laws

### (4) Period for retention and use of personal information

In principle, the Company destructs personal information of users without delay when: the purpose of its collection and use has been achieved; the legal or management needs are satisfied; or users request: Provided that, if it is required to retain the information by relevant laws and

regulations, the Company will retain member information for certain period as designated by relevant laws and regulations. The information to be retained as required by relevant laws and regulations are as follows:

- Record regarding contract or withdrawal of subscription: 5 years (The Act on Consumer Protection in Electronic Commerce )
- Record on payment and supply of goods:5 years (The Act on Consumer Protection in Electronic Commerce )
- Record on consumer complaint or dispute treatment: 3 years (The Act on Consumer Protection in Electronic Commerce )
- Record on collection/process, and use of credit information: 3 years (The Act on Use and Protection of Credit Information )
- Record on sign/advertisement: 6 months(The Act on Consumer Protection in Electronic Commerce )
- Log record of users such as internet/data detecting the place of user connection: 3 months(The Protection of Communications Secrets Act )
- Other data for checking communication facts: 12 months (The Protection of Communications Secrets Act )

#### **(5) Procedure and method of destruction of personal information**

In principle, the Company destructs the information immediately after the purposes of its collection and use have been achieved without delay: Provided that, if any information is to be retained as required by relevant laws and regulations, the Company retain it for the period as required by those laws and regulations before destruction and, in such event, the personal information which is stored and managed separately will never be used for other purposes. The Company destructs: hard copies of personal information by shredding with a pulverizer or incinerating it; and delete personal information stored in the form of electric file by using technological method making that information not restored.

#### **(6) Technical, managerial and physical measures for protection of personal information**

In order to prevent the loss, theft, leakage, alteration or damage of personal information of the users, the Company takes technical, managerial and physical measures for securing safety as follows:

Items	Examples
<p><b>Technical measures</b></p>	<ul style="list-style-type: none"> <li>◦ Utilize security servers for transmitting encryption of personal information</li> <li>◦ Take measures of encryption for confidential information</li> <li>◦ Install and operate access control devices and equipments</li> <li>◦ Establish and execute internal management plan</li> </ul>
<p><b>Managerial measures</b></p>	<ul style="list-style-type: none"> <li>◦ Appoint a staff responsible for protecting personal information</li> <li>◦ Provide education and training for staffs treating personal information</li> <li>◦ Establish and execute internal management plan</li> <li>◦ Establish rules for writing passwords which is hard to be estimated</li> <li>◦ Ensure safe storage of record of access to personal information processing system</li> <li>◦ Classify the level of authority to access to personal information processing system</li> </ul>
<p><b>Physical measures</b></p>	<ul style="list-style-type: none"> <li>◦ Establish and operate the procedure for access control for the facilities for storing personal information</li> <li>◦ Store documents and backing storage containing personal information in safe places which have locking device</li> </ul>

**(7) Staff responsible for managing personal information**

The staff of the Company responsible for managing personal information is as follows:

- Name of staff responsible for managing personal information: Junha Lee

Dept. :

Tel. : 070-8233-0750

Contact : [Contact@partridgesystems.com](mailto:Contact@partridgesystems.com)

The latest update date: \_\_\_\_\_, december, 2018.

Source: NAVER Corp.