# **ANIPEN**

# Anipen Service Privacy Policy

ANIPEN Inc. (hereafter "ANIPEN") collects and uses only the minimum amount of personal information of users in offering ANIPEN services (hereafter "ANIPEN Service"). ANIPEN complies with the related laws such as the Act on Promotion of Information and Communication Network Utilization and Information Protection, guidelines, and onlypersonal information protection policy is in compliance with the laws of the Republic of Korea and can be revised in accordance with changes to related laws or changes to ANIPEN's internal policies. (However, the CHANRIO PLUS service and its use shall be governed by the laws of Japan, pursuant to the principle of SANRIO Co., Ltd. (original licensor).)

#### 1. Personal information items collected

Email accounts (used as login ID), passwords, nicknames, and membership country information are collected in order to execute membership service agreements for users who created an ANIPEN account in order to use ANIPEN services as members and to contact users as well as to process civil complaints and grievances. Cell phone numbers and contact information (telephone numbers, email addresses and names of third parties) stored in the address book of terminals, including smartphones, are used including mobile messenger services. (The information is used for the purpose of sharing materials through social media, SMS and etc. with user consent and is not collected). As regards user options, information related to various transactions and personal preferences (terminal OS information, screen size, device type, IP, cookie information, connection log, history of service use) may be created and/or collected during the use of service or during business processing. The collected personal information is deleted upon cancellation of membership.

- 2. Purpose of Collecting Personal Information
- Execution of Service Agreement and Fee Calculation
  Content transmission or delivery/fee calculation for use of a specific customized service offered or pay-for-service; alarm service.
- b. ANIPEN Account Management Offer membership service to users who create an ANIPEN account, become a member, and use ANIPEN service; personal identification; limitations on use as a measure against members who violated the ANIPEN service agreement, copyrights, or operational policies; confirmation of consent by legal guardian for collection of personal information of those under the age of 14 and identification of legal guardian in the future; recordkeeping for dispute resolution; complaint processing and civil procedures; notifications; confirmation of membership cancellation.
- c. Utilizing New Service Development and Marketing/Advertisement

New service development and offer of customized service; offer of statistics-based service; running an advertisement campaign; service validity confirmation; offer of event information and participation opportunities; offer of advertising information; assessment of connection frequency; member statistics on service use.

#### 3. Period of Retention and Use

ANIPEN retains the personal information of a user as long as the user uses ANIPEN service, and uses that information to provide service, etc. If the user removes his or her personal information or requests membership cancellation, his or her personal information is destroyed. Personal information provided for a temporary purpose (survey, event, identification, etc.) is destroyed once the purpose has been fulfilled.

If personal information must be retained under regulations of related laws, ANIPEN may retain the personal information of a user for a certain period based on the following:

Collected item: record of agreement or subscription cancellation

Related law: Act on the Consumer Protection in Electronic Commerce, Etc.

Retention period: 5 years

Collected item: Payment records and supply records of goods, etc.

Related law: Act on the Consumer Protection in Electronic Commerce, Etc.

Retention period: 5 years

Collected item: Records of customer complaints or dispute resolutions

Related Law: Act on the Consumer Protection in Electronic Commerce, Etc.

Retention period: 3 years

Collected item: Records of Marks and Advertisements

Related Law: Act on the Consumer Protection in Electronic Commerce, Etc.

Retention period: 6 months

Related Law: Protection of Communications Secrets Act

Retention period: 3 months

Collected item: Records of Electronic Finance

Related Law: Electronic Financial Transactions Act

Retention period: 5 years

Collected item: Records of ledgers and supporting documents for all transactions specified by

tax laws

Related Law: Framework Act on National Taxes

Retention Period: 5 years

## 4. Consignment

To provide ANIPEN service in a smooth and effective manner, ANIPEN may consign some of the handling of personal information. If a consignment organization for event product delivery is added, this shall be notified under the personal information handling policy.

5. Issues concerning personal information management by the user (viewing, correction, deletion, etc.)

The user or the legal guardian may at any time view or correct the registered personal information of the user or the member under the age of 14 for the current year by using the company website and App, and may request cancellation of membership. To view or correct the personal information of the user or member under the age of 14, one can log in to ANIPEN service using an ID and password. All input items except for the ID can be corrected.

6. Cancellation of consent to the collection, use, and provision of personal information

The user may at any time cancel consent given for the collection, use, and provision of personal information when signing up for membership. Consent cancellation may be completed by using the membership cancellation menu offered by ANIPEN service or by contacting the personal information manager by telephone (031-261-0057) or email (support@anipen.com). Upon

request of cancellation, all processes related to the immediate deletion of personal information will be carried out.

## 7. Details of cookie operation

To provide unique, customized services to a user, ANIPEN uses "cookie," which saves and regularly accesses a user's personal information. A cookie is a small amount of information that the sends to the user's computer browser and is saved on the hard disk of the user's computer. To provide more appropriate and useful service to the user, ANIPEN uses the cookie to find information about an ID. A cookie can identify a user's computer but not a user individually. A cookie can be used to assess the services of the companies visited by users, provide more convenient services, and offer optimal information to users. Users can select whether to use the cookie. By selecting an option in the web browser, a user can allow all cookies, confirm every time a cookie is saved, or deny all cookies from being saved. However, if a user denies the cookie from being saved, some services that require the may not be used.

## 8. Details of advertisement information delivery

ANIPEN does not send for-profit advertisement information in accordance with the user's explicit expression of rejection. If the user has consented to receiving emails containing advertisement information, ANIPEN enables the user to recognize this type of email in the title and main text.

Name of Sender: ANIPEN Inc.

Email address: support@anipen.com

Address: 517, Business Growth Support Center (LH), 54, Changeop-ro,

Sujeong-gu, Seongnam-si,

Gyeoggi-do, Republic of Korea, 13449

## 9. Process and Method of Destruction of Personal Information -

Once the purpose of collecting and using a user's personal information has been met or the period of retention and use has passed, ANIPEN destroys information without delay. The information entered by the user to create an ANIPEN account (i.e., sign-up for membership) is, upon fulfilling its purpose, destroyed after a fixed period of retention in accordance with the company's internal policies and other related laws on personal information protection (refer to Period of Retention and Use). Personal information is not used for any purpose other than for retention, with the exception of legal instances. Personal information printed on paper is either

shredded by a paper shredder or destroyed by incineration. Personal information on an electronic file is destroyed by a technical method that prevents recovery of the records.

### 10. Personal Information Protection Measures

ANIPEN pursues technical and management methods to ensure the safety of user's personal information from loss, theft, leakage, falsification or damage. An ANIPEN account password is saved and managed using one-way encryption. The user must not disclose his or her password to anyone and must log out after using the service. ANIPEN claims no responsibility for problems arising from leaked personal information such as ID, password, etc. because of either negligence by the user or Internet problems. ANIPEN does its utmost to prevent leakage of or damage to a member's personal information as a result of hacking, computer viruses, etc. ANIPEN backs up data regularly and uses the latest vaccine programs to prevent leakage or damage of user's personal information or data, and ensures that personal information can be sent safely over the network through encrypted communication. Unauthorized external access is controlled by using an intrusion prevention system and necessary technical equipment to ensure system security has been installed and updated regularly. Only handles ANIPEN's personal information using a separate password, which must be renewed regularly. Regular training programs are offered to the manager to emphasize compliance with personal information management policies.

### 11. Personal Information Manager

ANIPEN has a designated personal information manager to process any complaints related to personal information protection that may arise while the user is using ANIPEN service.

Personal Information Manager:

Name: Hyunho Jang

Position: Executive Director

Department: Technology Research Center

Fax: +82-31-261-0058

Email: support@anipen.com

Inquiries about reporting or consulting on privacy violation may be directed to the following organizations.

- Korea Internet & Security Agency (privacy.kisa.or.kr / phone number 118 without area code)

- Supreme Prosecutors Office, Internet Crime Investigation Center (www.spo.go.kr / 02-3480-3600, without area code 1301)
- Prosecutors Office, Korea National Police Agency Cyber Bureau (www.ctrc.go.kr / 02-392-0330)

## 12. Revision

Any revision to ANIPEN's personal information management policy will be revealed through announcements in ANIPEN service or by individual emails at least seven days before the revision takes effect. However, in case a revision has a considerable effect on user rights, it will be announced 30 days prior.

Date of Announcement: March 21, 2016

Effective Date: April 1, 2016