



# Anipen Service Privacy Policy

Anipen Co., Ltd. (hereinafter "Company") complies with relevant statutes that information communication service providers are required to follow, such as the Act on Promotion of Information and Communications Network Utilization and Information Protection, etc, (hereinafter "Information and Communications Network Act") and the Personal Information Protection Act, in collecting/using personal information to provide all of the Company's services for users (hereinafter "Anipen Services,"). In addition, the Company shall use users' personal information for the purposes regarding which users' approval is granted, and shall not provide such personal information for any third party without users' consent.

However, the Company may disclose users' personal information if such disclosure is required by laws, permitted by users upon the filing of an application for such disclosure, or demanded by public institutions, such as courts or police stations.

As the Company's Personal Information Handling Policy may be changed, subject to changes in laws or guidelines or the Company's internal policies, such changes are announced via the Company's homepage or the Personal Information Handling Policy within services to inform users.

## Article 1. Personal Information Items Collected or Used

The Company divides the information required for the rendering of Anipen's Services into mandatory/optional information for the following purposes and collects such information after obtaining users' consent.

The information collected for the following purpose is collected either automatically in the course of using those services and participating in events/marketing or in a way that users manually enter their information.

1. Signing up for membership (mandatory)
  - A. Anipen Account: e-mail address (ID), password, nickname
  - B. Facebook: Name, nickname, e-mail address
  - C. Line: Name, nickname, e-mail address
  - D. Google: Name, nickname, e-mail address
2. Events and marketing
  - A. Participating in events (optional): e-mail address, cellphone no. SNS ID
  - B. Delivery of gifts (mandatory): Name, cellphone no., address
  - C. Levying of all taxes and public imposts (mandatory): Name, resident registration no., address, bank account no., bank name, the name of the account holder
  - D. Guide to new services and newsletter (optional): E-mail address, cellphone no. SNS ID

3. Customer consulting
  - A. Identification of and contact with users (mandatory): E-mail address, contact no (cellphone no. general phone no.)
  - B. Checking the details of customer consulting (optional): E-mail address, name, nickname, other information required for consulting
4. Payment/refund
  - A. Payment (mandatory-collected information may vary depending on payment methods)
    - i. Credit card: credit card company's name, card no., valid period, CVC no.
    - ii. Cellphone: cellphone no, the mobile carrier's name
    - iii. Funds transfer: Bank name, account no.
    - iv. Transfer without a bank account: Bank name, the sender's name, cash receipt information, general phone no., payment phone no.
  - B. Cancellation or refund (mandatory)
    - i. Bank name, account no. account holder
      1. To verify payment status, you may be required to submit a credit card statement, a bank slip for funds transfer without a sender's bank account, a family relationship registration certificate, and a mobile phone subscription certificate.

## Article 2 Purposes of Using Personal Information Collected

1. Performance of a contract on the rendering of services and payment of fees for the rendering of services
2. Creating Anipen accounts and providing membership-based services for users using Anipen's Services as members
3. Identifying persons, and placing limitations on the use for members regarding the Terms of Use, copyright, operational policies of Anipen's Services,
4. Verifying whether the legal representative of a minor under 14 years of age agrees to the collection of the minor's personal information, and later verifying the identity of the legal representative
5. Retaining records for the arbitration of disputes, handling complaints, delivering notices, and checking members' intention to withdraw their membership
6. Developing new services and providing customized services, providing services and posting ads in a way that suits statistical characteristics, verifying the validity of services, and providing the information on events and the opportunity to participate.
7. Providing the information on ads, verifying access frequency, and obtaining statistics on the use of membership services

## Article 3 Periods of Retaining and Using Personal Information

The Company shall continue to retain users' personal information during the period of their use, and use such information for the rendering of its services.

In principle, the Company shall destroy users' personal information when they withdraw from

membership.

Users may delete their personal information by themselves or if they request the Company to terminate their membership, such users' personal information shall be destroyed. The personal information which is collected for temporary purposes (questionnaire surveys, events or self-authentication) shall be destroyed if such purposes have been fulfilled.

Users who have no records of use for one year after their last log-in may terminate a user agreement and take a necessary measure, such as destruction of their personal information, in order to protect their personal information in accordance with relevant statutes. In such a case, the Company shall notify users of the fact that a necessary measure shall be taken prior to 30 days, the expiration date of the retention period of personal information, and personal information items. If users wish to continue using Anipen's services, such users shall log in to the services within one year after their last log-in.

However, the following cases are exceptions to the above provision. The following information shall be retained for each period specified by "grounds for retention," and statutes.

1. Item collected: records on contracts and withdrawal of offers  
Relevant statute: Act on the Consumer Protection in Electronic Commerce, etc.  
Retention period: five years
2. Item collected: records on payments and supply of goods and others  
Relevant statute: Act on the Consumer Protection in Electronic Commerce, etc.  
Retention period: five years
3. Item collected: records on handling customer complaints or disputes  
Relevant statute: Act on the Consumer Protection in Electronic Commerce, etc.  
Retention period: three years
4. Item collected: records on marks and ads  
Relevant statute: Act on the Consumer Protection in Electronic Commerce, etc.  
Retention period: six months
5. Item collected: records on visits  
Relevant statute: Protection of Communications Secrets Act  
Retention period: three months
6. Item collected: records on electronic finance  
Relevant statute: Electronic Financial Transactions Act  
Retention period: five years
7. Item collected: books and supporting documents on all transactions stipulated in tax-related laws  
Relevant statute: Framework Act on National Taxes  
Retention period: five years

#### Article 4 Outsourcing of Personal Information

The Company may outsource some personal information handling for the smooth provision of Anipen's Services. If an outsourced company is added for delivery of products for events, the Company shall announce such a company via this Policy.

## Article 5 Matters on Users' Management (Access, Modification, Deletion) of Their Personal Information

Users or legal representatives may check or modify their personal information or the personal information of members under fourteen (14) years of age, which is registered at the Company, the internet or apps at any time or request for termination of their subscription (to Anipen's Services).

To check or modify their personal information or the personal information of members under fourteen (14) years of age, other than their e-mail address (ID), users or legal representation may do so after logging in to Anipen's Services with e-mail address (ID) or SNS account and password.

## Article 6 Withdrawal of Consent to the Collection, Use and Provision of Personal Information

Users may, at any time, withdraw their consent to the collection, use, and provision of personal information, which they have granted in signing up for membership.

You may withdraw your consent on the Menu for Withdrawal of Membership within Anipen's Services. Or if you contact the Company's privacy officer by phone (+82-31-753-0121), or e-mail ([support@anipen.com](mailto:support@anipen.com)), the Company shall take an immediate action, such as deletion of personal information.

## Article 7 Procedure and Method for Destroying Personal Information

The Company shall immediately destroy users' personal information if and when the purposes of collecting and using their personal information have been fulfilled or the period of retaining and using the information has lapsed. The information entered by users to create their member account (sign up for membership) shall be retained for a certain period of time in accordance with the Company's internal guideline or due to events for protecting them under other related laws (Refer to Periods of Retaining and Using Personal Information), and then be destroyed.

The personal information shall not be used for any purpose other than the purpose of retaining the information, unless stipulated under laws.

Any personal information printed out on paper shall be destroyed by being shredded through shredders or burnt. And any personal information stored in electronic files shall be deleted through technological methods that render such files unusable.

## Article 8 Matters on Installation, Operation and Refusal of Cookies.

The Company may use cookies to provide customized services for users or to promote their convenience.

1. A cookie means  
a small amount of information that the Company's server (HTTP) sends to users' computer browsers and that can be stored at hard disks of users' computers.  
Users may choose whether to use cookies. They may accept or reject all cookies, or receive notices whenever cookies are installed, by setting options on a web browser. However, if users refuse to store cookies, they may not use some services that require the setting on the use of cookies.
2. Method of making a setting for the rejection of cookies
  - A. For Internet Explorer  
Click 'Tool Menu' on the upper bar of the web browser > Internet Option menu>Personal Information tab > directly make a setting
  - B. For Chrome  
Click 'Customize and Control' icon on the right upper menu of a web browser > Select "Settings" > Click "Advanced" > Click the "Content settings" button under the "Privacy and security" section > Under the cookies section, make a more detailed setting.

#### Article 9 Matters on the Transmission of Advertisements

The Company shall not send advertisements for profitable purposes against users' explicit objection to receive such advertisements. If users agree to receive advertisements via e-mail or apps, the Company shall make its name easy for users to notice in the e-mails or apps.

Sender's name: Anipen Co., Ltd. Or Anipen's services

sender's e-mail address: [support@anipen.com](mailto:support@anipen.com)

Address: Room no.515,516, 517, Business Growth Support Center, Second Techno Valley, LH Pangyo, 54 Changeop-ro , Sujeong-gu, Seongnam-si, Gyeonggi-do, the Republic of Korea

#### Article 10 Analysis of Records on Use of Services

The Company uses the software for analyzing users to provide suitable and more useful services for users.

The software is used to analyze the information that is automatically created when users use mobile services, and users may reject the use of the software.

#### Article 11 Measures to Protect Personal Information

The Company seeks technological and administrative measures to ensure that users' personal information is not lost, stolen, leaked, forged or damaged.

Member account's password is one-way encrypted, stored and managed in an encrypted condition. Users shall not let their passwords be known to others and are recommended to log out of services when completing using the services. The Company shall not be liable for any problem which arises from the leakage of users' ID or passwords due to their carelessness or any problem on the Internet.

The Company shall do its best to prevent users' personal information from being leaked or damaged due to data breaches or computer viruses.

The Company prevents users' personal information or materials from being leaked or damaged by frequently backing up such materials or using the latest anti-virus programs, and ensures that such information is securely transmitted through networks via encrypted communications. The Company controls unauthorized access from the outside by using an intrusion blocking system, and makes efforts to be equipped with all possible technological devices to have systemic security.

The Company limits handling users' personal information to the privacy officer and grants a separate password to the officer and regularly updates the password. The Company always emphasizes the compliance with the Personal Information Handling Policy by conducting frequent training for the officer.

#### Article 12 Privacy Officer

The Company designates the privacy officer to swiftly deal with privacy-related complaints which arise from users' use of Anipen's Services.

##### Privacy Officer

1. Name: Hyeonho Chang
2. Position: Senior Managing Director
3. Fax: +82-31-261-0058
4. E-mail: [support@anipen.com](mailto:support@anipen.com)

You can inquire to the institutions below if you need to report or need consulting on other privacy infringement:

- Privacy Infringement Report Center ([privacy.kisa.or.kr](http://privacy.kisa.or.kr)/118 without national code) - Prosecutor's Office, Forensic Science Investigation Department ([www.spo.go.kr](http://www.spo.go.kr) / +82-2-3480-3600, 1301 without national code)
- National Policy Agency, Cyber Terror Response Center ([www.ctr.go.kr](http://www.ctr.go.kr) / +82-2-392-0330)

#### Article 13. Amendment and Notification

The Company shall announce the amendment of this Policy via notices within Anipen's Services or by sending individual users e-mails at least seven (7) days prior to when such amended policy takes effect.

However, if such amendment affects users' rights materially, it shall be announced thirty (30) days.

<Addendum>

The policy shall take effect on January 15, 2019.