

# Privacy Policy

## General

MyCreditChain Pte. Ltd.(hereinafter referred to as the “Company”) considers protecting your privacy as the Company’s top priority. The Company respects the privacy of all users, processes and manages it with confidentiality. This privacy policy applies to all personal information you provide and explains how your personal information is collected, used, disclosed, processed, and managed. If you do not agree with this policy, please do not provide any personal information.

## Purpose of collection and use of personal information

The Company processes the minimum amount of personal information required for the following purposes. Personal information that is processed is not used for purposes other than the following purposes, and if the purpose of use is changed, we plan to implement necessary measures such as receiving separate consent.

### ① Registration and management of membership

- Purposes include confirming the intention of membership registration, maintenance,

and administration of membership qualification, prevention of fraudulent use of service, delivery of various notices, etc.

② Service provision

- Service provisions

③ Use for marketing and advertising

- Purposes include developing new services and providing customized services, providing information of events and advertising information as well as opportunity to participate, providing personalized advertising information, etc.

④ Adjustment of grievance

- Purposes include confirming the identity of the complainant, identifying the complaint, contact and notification for the investigation, notifying the result of adjustment, etc.

**Personal information items to be collected and method of collection**

① The personal information items the Company collects for the registration and management of membership, self-authentication (KYC), token purchase, and marketing is as follows.

Purpose of Collection	Items of Collection
Registration and management of membership	<b>Required: Email, password, country, city, mobile phone number</b>
Use of services	<b>Required: Service usage history (log data, usage time, etc.)</b> Optional: Name, profile / photo, community photo, KYC information (national photo identification card (photo, name, date of birth) / photo of holder, date of birth, gender, nationality) uploaded contents, simplified password, public address of ERC-20 token, mobile phone contacts, location data (country where service is used)
Use of marketing and advertising	Optional: The country from where you use the Service, name, email, mobile phone number, date of birth
Adjustment of grievance	Optional: The country from where you use the Service, name, photo identification card (photo, name, date of birth)/photo of the holder, email, mobile phone number, date of birth, items of consultation

② The following items may be automatically generated and collected as you use the service.

- IP address, cookie, MAC address, service usage history, visit history, fraudulent usage

history, etc.

③ The Company must notify you in advance and ask for your consent when collecting personal information, and use the following methods to collect personal information.

1. Collection through information provided directly from you when you agree to the collecting of personal information during registration of service membership or use of service, or during the self-certification process

2. Automatically collect in the course of using services provided by the company

④ The Company does not collect sensitive personal information (race and ethnicity, ideology and beliefs, political preference, criminal records, etc.) that may be of concern to your basic human rights violations.

### **Provision of personal information to a 3rd party**

In principle, the Company will not provide or sell your personal information to 3rd parties.

However, except for the following cases.

① Cases with your explicit consent

- ② Cases ordered by a court or requested by a government agency to disclose personal data and information that the Company holds in relation to you
- ③ Cases to comply with the law or if it is deemed necessary or desirable to protect or defend the Company's rights or assets

### **Transfer of personal information to overseas and commissioned works**

For carrying out services, the Company commissions external professional companies to carry out tasks of processing personal information as follows. This commissioned works for processing personal information is carried out by each commissioned company only if necessary for providing each individual service.

In order to secure safety of personal information in commissioning the process of personal information, the Company explicitly stipulates strict compliance with directions regarding personal information protection, keeping personal information secret, not disclosing it to a 3rd party and being liable for accidents, the period of commission, returning or destructing personal information upon termination of the commission or process, etc., and supervises the commissioned company to process personal information securely.

In cases of change in commissioned companies and the contents of commissioned work, the Company will notify you through website announcement (or individual notices by letter, email, phone, SMS, etc.).

1. Details regarding transfer to other countries

Name of business	Items to be transferred	Transferring country, date and time, and method	Purpose of use of recipient	Period of retention/use
AWS(Korea)	All items corresponding to membership registration and service use	Transferring country : Korea AWS Cloud Date and time, and method : Transfer via network every time you use the service	Operation and management of overseas data center where personal information collected by the company is stored	Until the purpose of use is achieved

2. Commissioning for processing personal information

Name of the Trustee	Description of commissioned works
MyCreditChain Corporation (Korea)	System Development and operation for carrying out service such as member management, notification delivery, customer inquiry processing, DM sending, system monitoring, event agency, non-member customer inquiry, delivery of gifts, personal information processing, management, SMS / PUSH sending, sending email, etc.

## Period of retention and use of personal information

The Company processes and retains personal information within the laws and regulations for use and retention of personal information or the personal information processing and retention period that is agreed upon when collecting personal information from you. The details are as follows.

- ① In principle, the Company will use the collected personal information of the members until the termination of the member's contract, and will be kept for 30 days after termination for the handling of member's requests, including but not limited to, after service and disposition of disputes regarding the transfer of the fruits.
- ② The Company will destroy personal information of the terminated member without delay after the end of the personal information retention period, and if the personal information has been entrusted to a third party, the Company will instruct the third party to destroy all personal information regarding the terminated member.
- ③ Notwithstanding paragraphs ① and ② above, in accordance with the provisions of relevant laws and regulations, if for reasons shown as follows, the member may request to retain the membership information for the following period of time.
  1. If you are in the process such as of investigation in violation of applicable laws and regulations: Until the end of an investigation
  2. If there is a bond / debt relationship remaining between the Company and you: Until

settlement of the relevant bonds and debt

3. In additional cases where it is necessary to preserve it in accordance with the provisions of applicable laws and regulations: A certain period of time as stipulated by the applicable laws and regulations

### **Procedure and method of destruction of personal information**

In principle, the Company destructs the applicable personal information without delay after the purposes of its collection and use have been achieved. However, this does not apply if any information is to be retained as required by applicable laws and regulations.

The procedures, deadlines, and methods of destruction are as follows.

- ① Procedure of destruction: Unnecessary personal information and personal information files are handled by a person in charge of personal information protection according to the internal policy procedure as follows.

1. Destruction of personal information: Personal information that has passed the retention period will be destroyed without delay from the end date.

2. Destruction of personal information file: When the applicable personal information file becomes unnecessary due to achieving the purpose of processing of personal information file, the abolition of corresponding services, termination of business, etc.,



the personal information file is deleted without delay from the day when the processing of personal information is deemed unnecessary.

- ② Method of destruction: Personal information printed on paper is destroyed by a shredder or incineration, and personal information stored in the form of an electronic file is destroyed using technical or physical methods so the recorded items cannot be reproduced.

#### **Your rights, obligations and how to exercise them**

- ① You may exercise any of the following privacy rights with respect to the Company at any time.

1. Request viewing of personal information
2. Request correction in cases such as error
3. Request to delete
4. Request to stop processing

- ② The exercise of the rights pursuant to clause ① above may be made in writing, email, fax, etc. to the Company. The Company will follow your legitimately exercised rights within 30 days and if it cannot be followed within 30 days you will be notified of the

period necessary in writing.

- ③ If you request correction or deletion of personal information, the company will not use or provide the personal information of concern until the correction or deletion is completed.
- ④ Exercise of rights in accordance with clause ① above can be made through your representative. In this case, you must submit a power of attorney to the company.
- ⑤ Requests to view and stop the processing of personal information may be subject to restrictions under applicable laws and regulations.
- ⑥ When requesting to view, correct or delete, or stop processing according to your rights, the Company will verify whether the request of viewing, etc., is your own actual will by being presented with a proof of identification such as a copy of the ID of the requestor for identification.
- ⑦ In derogation of the previous clause, the request for correction and deletion of personal information cannot be requested if that personal information is specified in other legislations as a subject for collection.
- ⑧ You shall not infringe the applicable laws and regulations to violate your or other's

personal information and privacy that the Company is handling.

## **Details regarding installation and operation of devices for automatic collection of personal information and rejection**

### ① Purpose of use of cookies

In the future, in order to provide customized services, the Company may use 'cookies' that store and constantly load your information. Cookies are very small text files to be sent to your web browser by the server used for the operation of the website of the Company and will be stored in hard-disks of your computer.

To provide personalized and customized services, the Company uses cookies that store and constantly load your information. When you visit a website, the website server reads the contents of the cookie stored on your device to maintain your preferences and provide customized services. Cookies help you access and conveniently use websites as you set it up when you visit it. Also, it is used to provide personalized information such as optimized ads, etc., through your website history and usage patterns.

### ② Installation/operation of cookies and rejection

You have the right of choice regarding cookie installation. Therefore, you may either allow/reject all cookies or check each cookie every time it is saved by adjusting options in

your web browser. However, if you refuse to store cookies, some services provided by the Company may be difficult to use, such as personalized services.

### **Technological and administrative protection measures of personal information**

The Company takes the following measures to ensure the safety of personal information.

- ① Managerial measures: Establish and implement an internal management plan, regular staff training, etc.
- ② Technical measures: Management of access rights such as personal information processing systems, installation of access control systems, encrypting information such as unique identification information, and installing security programs
- ③ Physical measures: Control access to computer room, data storage room, etc.

### **Person in charge of personal information protection, etc.**

The Company has designated the person in charge of personal information protection as follows for the purpose of handling personal information. You can contact the person in charge of personal information protection about all personal information protection inquiries, complaints handling, damage relief, etc., that occurred while using the company

homepage. The Company will respond to your inquiries without delay and process them.

Name	JongYoung Moon
Department	Development
Title	CTO
Phone number	+82 2 2138 0307
Email	support@mycreditchain.io

### Request to view personal information

You may request to view the personal information to the person in charge below, and the Company will endeavor to promptly process your request to view your personal information.

Name	Sangho Kim
Department	Development
Title	Principal Research Engineer

Phone number	+82 2 2138 0307
Email	support@mycreditchain.io

### Exclusion of application

The Company's privacy policy does not apply to collecting of personal information from other websites linked to the company website.

### Changes to the privacy policy, etc.

- ① This privacy policy will take effect on March 21, 2019.
- ② This privacy policy may be changed according to the government policy or the Company's needs. If any changes are made, we will notify you by using the notice board on the company homepage or a separate window.
- ③ In matters requiring a separate consent, such as collection and utilization of personal information, provision of third parties, etc., and if relevant contents are added or changed, the Company will notify you in advance in writing, email, telephone, etc. to receive separate consent.

Date of Enactment: January 07, 2019

Last Revision Date: March 21, 2019

Company MyCreditChain PTE. LTD.

Representative JongYoung MOON