



## 개인정보보호

Privacy Policy: Systems/Procedures

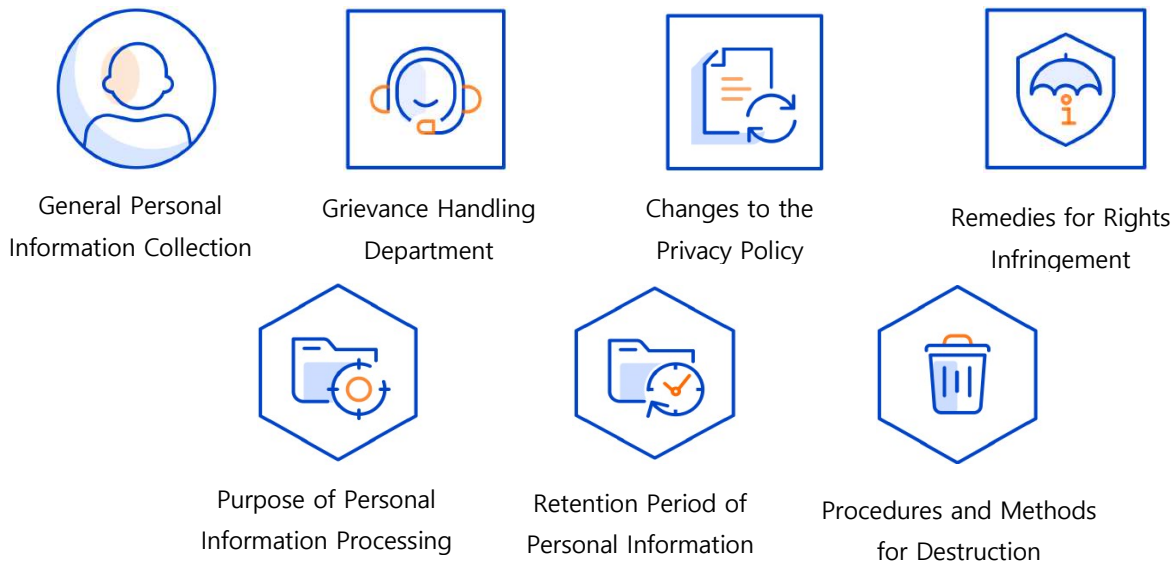
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| Last Revised              | 2023. 06. 14.                        |
| Responsible<br>Department | (Primary) CISO Team<br>(Secondary) - |



## Privacy Policy: Systems/Procedures

F&F Holdings Co., Ltd. (hereinafter referred to as the "Company") complies with the Personal Information Protection Act and other relevant laws to protect the rights and freedoms of data subjects. The Company ensures the lawful and secure handling of personal information. Pursuant to Article 30 of the Personal Information Protection Act, this policy has been established and made publicly available to inform data subjects about the procedures and standards for handling personal information and to facilitate the prompt and effective resolution of grievances related to personal information

### Key Indicators for Personal Information Processing (Labeling)



\* Refer to the full Privacy Policy for detailed information

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## 1. Purpose of Personal Information Processing

① The Company processes personal information within the minimum scope necessary for the following purposes:

② Details of Personal Information Processing Purposes

1. Membership Management: Verifying identity, providing membership-based services, suspending user access due to a violation of the terms and conditions, preventing the improper use of services, retaining records for dispute resolution, and securing smooth communication channels for handling complaints
2. Contract Fulfillment and Settlement for Service Provision: Providing services such as delivery and rental of goods, accumulating and utilizing reward points, processing payments, and handling settlements
3. Development and Marketing of New Services: Developing new services, providing customized services, sharing event and promotional information, offering participation opportunities, and generating service use statistics.



## 2. Status of Personal Information Collection and Processing

| Type (Service)  | Collection Method | Details  | Retention Period                               |
|---|-------------------|--|--|
| Investment Inquiry  | Website/<br>App   | [Required]: Name, Email,<br>Phone Number<br>[Optional]: Company Name | 3 months after<br>completion of the<br>inquiry |
| Customer Support<br>Center:<br>PR, MLB/MLB KIDS,<br>DISCOVERY<br>EXPEDITION,<br>STRETCH ANGELS,<br>DUVETICA |                   | [Required]: Name, Email,<br>Phone Number                             |  |

|   |  |  |  |
|---|--|--|--|
| Inquiry about<br>Opening a Retail<br>Store:<br>MLB/MLB KIDS,<br>DISCOVERY<br>EXPEDITION |  |  |  |
|---|--|--|--|

### 3. Processing of Personal Information for Children Under the Age of 14

The Company guarantees the legal rights of the legal representative of children under the age of 14. However, the Company does not collect personal information of children under the age of 14 if obtaining the consent of their legal representative is deemed practically difficult.

### 4. Procedures and Methods for Destruction of Personal Information



- 1) The Company identifies personal information to be destroyed and, with the approval of the department head, proceeds with its destruction.
- 2) If the retention period, as agreed with the data subject, expires or the purpose of processing has been attained, but the personal information still needs to be preserved in accordance with relevant laws and regulations, the Company keeps the information in a separate location.
- 3) Procedure and Method for Destruction:
  - ① Destruction Procedure:
    - The Company selects personal information to be destroyed and, after obtaining approval from the department head, destroys it.
  - ② Method of Destruction:
    - For personal information stored electronically, the Company ensures it is destroyed in a way that prevents any possibility of recovery. For paper-based records, personal information is either shredded or incinerated.

### 5. Rights and Obligations of Data Subjects and Legal Representatives, and

#### How to Exercise Them



- 1) Data subjects have the right to request access, correction, deletion, or suspension of processing of their personal information at any time.
- 2) These rights may be exercised by submitting a request in writing, via email, fax, or other means of communications in accordance with Article 41, paragraph 1 of the Enforcement Decree for the Personal Information Protection Act, and the Company processes any related request without delay.



- 3) Data subjects may exercise their rights through a legal representative or an authorized agent. In this case, a power of attorney is required conforming the Appendix form 11 on the Public Notice on the methods to process personal information (No. 2020-7).
- 4) The rights of data subjects to access or suspend processing of their personal information may be restricted in accordance with Article 35, paragraph 4 and Article 37, paragraph 2 of the Personal Information Protection Act.
- 5) Requests for correction or deletion of personal information cannot be made if the information is explicitly required by other applicable laws.
- 6) The Company verifies that individuals making a request to access, correct, delete, or suspend their personal information is the data subject themselves or a valid representative.

## **6. Measures to Ensure the Security of Personal Information**

The Company implements the following measures to ensure the security of personal information:

- ① Administrative measures: Development and implementation of internal management plans, operation of dedicated departments, and regular training for employees
- ② Technical measures: Management of access rights to personal information processing systems, installation of access control systems, encryption of personal information, and installation and updates of security programs
- ③ Physical measures: Implementation of access controls for sensitive areas such as the server room and data storage facilities

## **7. Installation and Operation of Automatic Personal Information Collection Devices and Options for Denial**

- 1) The Company uses cookies to store user information and frequently retrieve it, offering users personalized services.
- 2) Cookies are small pieces of data sent by a website's server (http) to users' browser, which may be stored on the user's computer hard drive.
  - ① Purpose of using cookies: Cookies are used to provide information optimized for users by obtaining their browsing history and usage patterns, popular search terms, use of secure connections, and others.
  - ② Installation and operation of cookies, and denial: Users may deny cookie storage by adjusting their web browser settings (Tools > Internet Options > Privacy).
  - ③ Rejecting cookies may result in difficulties in using personalized services.

## 8. Chief Privacy Officer (CPO) and Request for Personal Information

### Access

1) The Company designates the Chief Privacy Officer (CPO) to oversee personal information processing, address the complaints of data subjects, and provide remedies related to personal information processing:

[Chief Privacy Officer]

Name: Young-Seok Ryu

Position: Chief Privacy Officer (CPO)

[Department Responsible for Personal Information Protection]

2) Data subjects may submit requests for access to their personal information under Article 35 of the Personal Information Protection Act to the following department.

The Company will make every effort to process these requests without delay.

[Department Responsible for Receiving and Processing Personal Information Access Requests]

Department Name: Information Security Team

Representative: Hwa-Rang Kim

Contact: [privacy@fnfcorp.com](mailto:privacy@fnfcorp.com)

## 9. Remedies for the Infringement of Rights



1) Data subjects may seek remedies for personal information infringement by applying for dispute resolution or consultation with the Personal Information Dispute Mediation Committee or the Personal Information Infringement Report Center at the Korea Internet & Security Agency. For further reporting or consultation regarding personal information infringement, data subjects may contact the following organizations:

① Personal Information Dispute Mediation Committee: (Without area code) 1833-6972 ([www.kopico.go.kr](http://www.kopico.go.kr))

② Personal Information Infringement Report Center: (Without area code) 118 ([privacy.kisa.or.kr](http://privacy.kisa.or.kr))

③ Supreme Prosecutors' Office: (Without area code) 1301 ([www.spo.go.kr](http://www.spo.go.kr))

④ Korean National Police Agency: (Without area code) 182 ([ecrm.cyber.go.kr](http://ecrm.cyber.go.kr))

2) If an individual's rights or interests are violated due to a decision or omission by the head of a public institution regarding requests under Articles 35 (Access to Personal Information), 36 (Rectification or Erasure of Personal Information), or 37 (Suspension of Processing of Personal Information) of the Personal Information Protection Act, they may file an administrative appeal under the Administrative Appeals Act.

- Central Administrative Appeals Commission: (Without area code) 110 ([www.simpan.go.kr](http://www.simpan.go.kr))



## **10. Changes to the Privacy Policy**

- 1) This privacy policy is effective as of May 8, 2023.
- 2) Previous versions of the privacy policy can be found below.

## **11. Risk and Compliance Management in Personal Information Processing**

The Company integrates risks related to personal information protection into its company-wide risk and compliance process and manages them accordingly. The Company conducts self-assessments to identify potential risks, collects and monitors key risk indicators, loss data, and other factors, and regularly inspects personal information processing practices.

## **12. Disciplinary Actions**

The Company regularly reviews violations of personal information protection policies. In the event of information security incidents or breaches of security-related regulations, disciplinary actions are taken in accordance with applicable laws and internal policies.

## **13. Auditing Compliance with the Personal Information Protection Policy**

The Company conducts annual audits to ensure compliance with its personal information protection policy. The Company also undergoes ISMS audits by the Korea Internet & Security Agency to assess the adequacy of its management system, including those related to personal information processing.