

# IPGO Privacy Policy

## for Creator

Last Updated on April 1, 2025

We lawfully process and securely manage your personal information (“Personal Data”) pursuant to the Relevant Laws, including the Personal Information Protection Act (the “Act”), to safeguard your rights and freedoms as a data subject. In accordance with Article 30 of the Act, we have established and published this privacy policy (this “Privacy Policy”) to inform you of our procedures and standards for processing Personal Data and to ensure the prompt and appropriate handling of any related grievances.

Any capitalized terms used but not defined herein, shall have the meaning ascribed to such terms under the IPGO Terms of Use for Creator.

### ARTICLE 1. PURPOSE OF PROCESSING

We collect and use your Personal Data solely for the purposes listed below. For any processing beyond these purposes, we will take necessary measures stipulated under Article 18 of the Act, such as obtaining separate consent from you:

- (1) Creator Registration and Account Management. We process Personal Data to confirm a Creator’s intent to register, verify identity, prevent fraudulent use of the Services, and deliver Service-related notifications and announcements.
- (2) Provision of IPGO Creator Services. We process Personal Data for the purposes of providing IPGO Creator Services, sending contracts, delivering content, and verifying identity.
- (3) Creator Support. We process Personal Data to respond to Creator inquiries and complaints regarding our Services.

- (4) Marketing and Advertising. We process Personal Data to provide event and promotional information and opportunities to participate in such events.

## ARTICLE 2. PERSONAL DATA PROCESSED

We collect and use your Personal Data only to the extent necessary for the provision of our Services as follows:

(1) Personal Data Processed Without Separate Consent.

1 Creator Registration and Account Management:

- Legal Basis: Personal Data processing for contractual performance under Subparagraph 15①4 of the Act
- Personal Data Processed: Name, ID, password, DOB, email address, address

2 Provision of IPGO Creator Services:

- Legal Basis: Personal Data processing for contractual performance under Subparagraph 15.①.4 of the Act
- Personal Data Processed: ID, password

(2) Personal Data Processed With Separate Consent.

1 Creator Support:

- Legal Basis: Consent of data subject under Subparagraph 15①1 of the Act
- Personal Data Processed: ID, password, email address, contact information, content of inquiry or complaint

2 Marketing and Advertising:

- Legal Basis: Consent of data subject under Subparagraphs 15①1 and 22①7 of the Act

- Personal Data Processed: name, email address, contact information

### ARTICLE 3. RETENTION PERIOD

We retain your Personal Data only for the period to which you consented at the time of collection, unless a longer retention is required or permitted under Relevant Laws. To clarify, we may retain Personal Data beyond the original retention period where necessary to comply with legal obligations, to respond to investigations or inquiries related to violations of Relevant Laws, to resolve outstanding debts or claims related to your use of the Services, or for other legitimate purposes recognized under Relevant Laws. In such cases, Personal Data will be retained solely for the relevant purposes and only for as long as necessary. Once the applicable retention period has expired, we will securely destroy the Personal Data in accordance with this Privacy Policy.

### ARTICLE 4. PERSONAL DATA PROTECTION

- (1) We take the following measures to ensure the security and integrity of Personal Data in accordance with Article 29 of the Act:
  - 1 Administrative Measures. Establishment and implementation of internal management plans, supervision and training of personnel handling Personal Data, designation of a privacy officer, and regular employee training
  - 2 Technical Measures. Access control for Personal Data processing systems, secure storage of access logs, encryption of Personal Data, and regular installation and updates of security programs
  - 3 Physical Measures. Access control for server rooms, data storage rooms, and other restricted areas
- (2) Personal Data is securely stored and processed using an encrypted system. Creators may submit inquiries and feedback to the email address below and a response will be provided within seven (7) days: [contactusipgo@gmail.com](mailto:contactusipgo@gmail.com)

## ARTICLE 5. PERSONAL DATA DESTRUCTION

- (1) We promptly destroy Personal Data without delay when the retention period has expired or the purpose of processing has been achieved, and the Personal Data is no longer necessary.
- (2) If retention is required under Relevant Laws after the consented retention period expires or the processing purpose is fulfilled, the Personal Data will be stored and managed separately from other Personal Data.
- (3) The procedures and methods for the destruction of Personal Data are as follows:
  - 1 Destruction Procedure. We identify the Personal Data for which a reason for destruction has arisen and proceed with destruction upon approval from our Privacy Officer, as identified below.
  - 2 Destruction Method.
    - Personal Data recorded or stored in electronic format is permanently deleted using a method that renders the records unrestoreable.
    - Personal Data in paper format is destroyed by shredding or incineration.

## ARTICLE 6. THIRD-PARTY TRANSFER

- (1) We process your Personal Data only for the purposes of processing specified in this Privacy Policy and disclose it to third parties solely in the following cases, as permitted under Articles 17 and 18 of the Act:
  - 1 with your separate consent;
  - 2 where required by Relevant Laws; or
  - 3 where clearly necessary to protect you or a third party from imminent risk to life, body, or property.
- (2) For clarity, we do not currently engage in any third-party transfers of your Personal Data based on your separate consent.

## ARTICLE 7. ENTRUSTMENT

- (1) In accordance with Article 28 of the Enforcement Decree of the Act, we will disclose in this Privacy Policy any entrustment of Personal Data processing, including the entrusted party, assigned tasks, and any subsequent changes.
- (2) If and when we entrust Personal Data processing, we specify in writing the obligations of the entrusted party in accordance with Article 26 of the Act, including purpose limitation, security safeguards, sub-entrustment restrictions, supervision, and liability. We also monitor entrusted parties to ensure secure handling of Personal Data.
- (3) Entrustment involving the overseas transfer of Personal Data, if any, is not covered in this provision and will be addressed separately in another provision of this Privacy Policy.

## ARTICLE 8. OVERSEAS TRANSFER

To ensure seamless delivery of the Services, your Personal Data may be transferred outside of Korea under the following conditions:

- (1) Legal Basis: Personal Data processing for contractual performance under Subparagraph 15④ of the Act
- (2) Personal Data Transferred: ID, password, email address
- (3) Recipient Country: Japan
- (4) Time and Method of Transfer: Transferred online upon Creator registration and during use of the Services
- (5) Recipient (Transferee): SMG

## ARTICLE 9. RIGHTS OF DATA SUBJECTS

- (1) You can exercise your rights over your Personal Data at any time, including the rights to access, correct, delete, suspend processing, withdraw consent, and object to or request an explanation of any automated decision-making.
- (2) You can exercise the above rights by submitting a request in writing, by email, or by fax pursuant to Paragraph 41① of the Enforcement Decree of the Personal Information Protection Act, and we will respond without undue delay.
- (3) You can exercise the above rights through a legal representative or an authorized agent by submitting a power of attorney using Annex Form No. 11 of the Public Notice Concerning Methods of Personal Information Processing.
- (4) Your rights to access or suspend the processing of Personal Data may be restricted under Paragraphs 35④ and 37② of the Act. You may not request deletion of Personal Data if its collection is mandated by Relevant Laws.
- (5) We reserve the right to verify whether the person requesting exercise of the above rights is the data subject or a duly authorized representative or delegate.

## ARTICLE 10. AUTOMATIC COLLECTION AND OPT-OUT

- (1) Our Site uses cookies that automatically collect behavioral data from visitors. However, we do not use or retain this information for any purposes beyond essential Site performance.
- (2) You can disable cookies through your browser settings. For example, in Chrome (both web and mobile versions), you can follow these steps:
  - 1 Click the three-dot menu in the upper-right corner
  - 2 go to Settings
  - 3 go to Privacy and security
  - 4 select Delete browsing data and choose a cookie setting (e.g., Block third-party cookies)

Please note that the exact menu names and steps may vary depending on the device model and browser version. For the most accurate instructions, refer to the official support resources of your browser or device manufacturer.

## ARTICLE 11. PRIVACY OFFICER

The following person is appointed as our privacy officer (“Privacy Officer”), responsible for handling inquiries and complaints regarding personal information processing, as well as remedies and other associated matters:

- (1) Name: Ey Jae Kim
- (2) Title: Representative
- (3) Contact Information: **contactusipgo@gmail.com**

## ARTICLE 12. REMEDIES FOR PRIVACY INFRINGEMENT

If you need further assistance regarding personal information infringements, you can contact Korea Internet & Security Agency's Personal Information Infringement Reporting Center, Korean National Policy Agency Cyber Safety Bureau, and other relevant institutions. For calls originating from outside Korea, dial the international calling code and the country code of Korea (82) before the numbers below:

- (1) Personal Information Infringement Reporting Center: (without area code) 118 ( <https://privacy.kisa.or.kr> )
- (2) Personal Information Dispute Mediation Committee: (without area code) 183 3-6972 ( <https://kopico.go.kr> )
- (3) Supreme Public Prosecutors' Office Cyber CID: 1301 (without area code) ( <https://cybercid.spo.go.kr> )
- (4) National Police Agency Cyber Safety Bureau: (without area code) 182 ( <https://ecrm.cyber.go.kr> )

## ARTICLE 13. MISCELLANEOUS

- (1) Our Policies for Children. We do not process any Personal Data of children under the age of fourteen (14).
- (2) Our Policy on Special Categories of Personal Data. We do not process sensitive or pseudonymized Personal Data.
- (3) Changes to Privacy Policy. This Privacy Policy may be updated in accordance with changes in laws or our policies. Any revisions will be publicly announced on the Website, specifying the effective date and the reason for the change.
- (4) Governing Language. This Privacy Policy may be translated into other languages for reference and convenience. In the event of any conflict or inconsistency between the English version and any translated version, the English version shall prevail and govern.
- (5) Matters Not Addressed. Any matters not addressed in this Privacy Policy shall be governed by Relevant Laws and our policies.