

Impactology AI Privacy Policy

[Governing Law and Language Precedence]

This Privacy Policy is formulated, executed, and interpreted in accordance with the Personal Information Protection Act (PIPA) and other relevant laws and regulations of the Republic of Korea. This English translation is provided solely for the convenience of non-Korean speaking users. In the event of any discrepancy, ambiguity, or conflict between the Korean original text and this English translation, the Korean version shall strictly prevail and take precedence in all respects.

IMPACT SQUARE Inc. (hereinafter referred to as the "Company") complies with the Personal Information Protection Act and relevant laws to protect the freedom and rights of data subjects, lawfully processing and safely managing personal information. In accordance with Article 30 of the Personal Information Protection Act, the Company establishes and discloses the following Privacy Policy to inform data subjects of the procedures and standards regarding the processing and protection of personal information, and to ensure that related grievances can be handled promptly and smoothly.

1. Purpose of Processing Personal Information

The Company processes personal information for the following purposes. Processed personal information will not be used for any purpose other than the following, and if the purpose of use changes, necessary measures such as obtaining separate consent under Article 18 of the Personal Information Protection Act will be implemented.

- **Membership Registration and Customer Counseling:** Confirming intent to join Impactology AI, identification and authentication for membership-based service provision, maintaining and managing membership status, preventing fraudulent use of the service, various notices and notifications, receiving inquiries via Notion and providing answers.
- **Service Provision and Payment Settlement:** Providing services according to the plan selected by the user, providing content, processing payments and settling accounts for paid services, issuing tax invoices.
- **Marketing and Service Announcements (Optional):** Providing information on new services and events, workshop/seminar information, sending newsletters.

2. Items of Personal Information Processed

The Company processes the following personal information items:

- Membership Registration and Customer Counseling
 - [Mandatory] Name, email (ID), password, organization type, organization name, inquiry content (When using social login, account information such as social account profile information and account email address is included)
 - [Optional] Contact information, consent to receive advertising information
- Service Provision and Payment Settlement
 - [Mandatory] Documents and corporate data uploaded for report generation, credit card/account information, payment records, name/department/email/direct contact number of the contracting/tax person in charge at the institution (in case of written contracts and tax invoice issuance).
 - Original documents uploaded by the user are not utilized for AI model training purposes, and are automatically destroyed 30 days after upload.
 - Payment information is collected and processed through a payment gateway (PG) and is not directly stored on the Company's servers.
- Marketing and Service Announcements (Optional)
 - [Collected/Utilized] Name, email, contact information (Limited to users who agreed to receive advertising information)
- Items Automatically Generated and Collected During Service Use
 - [Mandatory] Service usage records, access logs, cookies, access IP information

3. Processing Personal Information of Children Under 14

As this service is a B2B corporate service intended for members who comprehensively manage projects according to the Terms of Service (hereinafter referred to as "Admin Members") and participating corporate members (hereinafter referred to as "Participating Companies"), in

principle, the registration of children under 14 is restricted, and related personal information is not collected.

4. Processing and Retention Period of Personal Information

① The Company processes and retains personal information within the personal information retention and use period required by law, or within the period agreed upon when collecting personal information from the data subject.

② The respective processing and retention periods are as follows:

- Member account information, payment and service usage records, and completed report results: Until membership withdrawal.
- Information related to receiving marketing and advertising information: Until consent is withdrawn or membership is withdrawn.
- Original documents uploaded for service use: Automatically destroyed after 30 days of storage from the time of upload.

③ However, in the following cases, the information is retained until the end of the relevant reason:

- When preservation is required by relevant laws, until the period stipulated by the respective laws.
- If criminal investigations are ongoing due to violation of related laws, until the end of the investigation.
- If there are remaining debtor-creditor relationships due to service use, until the relevant relationship is settled.

5. Procedures and Methods for Destroying Personal Information

① The Company destroys the relevant personal information without delay when it becomes unnecessary, such as upon the expiration of the retention period or the achievement of the processing purpose.

② If personal information must be retained pursuant to other laws despite the expiration of the agreed retention period or achievement of the processing purpose, the information is moved to a separate database (DB) or stored in a different location.

③ The procedures and methods for destroying personal information are as follows:

- **Destruction Procedure:** The Company identifies the personal information requiring destruction and destroys it upon approval from the Company's Privacy Officer.
- **Destruction Method:** Personal information stored in electronic file formats is destroyed using technical methods that prevent data recovery. Information printed on paper is shredded or incinerated.

6. Provision of Personal Information to Third Parties

① The Company provides personal information only within the minimum necessary scope with the consent of the data subject, pursuant to Article 17, Paragraph 1, Item 1 of the Personal Information Protection Act.

Recipient	Purpose of Provision	Provided Items	Retention & Use Period
Admin Member (ENTERPRISE Plan Buyer)	Management of Participating Companies, viewing results (impact reports), and checking performance	Organization (Company) name, representative's name, person-in-charge's name, contact info (email), service usage status, published impact reports, and personal information	Until the purpose of consent is achieved or 1 year, or until the separately agreed period

		included therein	
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② The Company may provide personal information to relevant agencies without the data subject's consent in the following cases:

Recipient	Purpose of Provision	Provided Items	Legal Basis
National Tax Service	Issuance of documentary evidence for simplified year-end tax settlement (or proof of expenditure)	Name, payment details, etc.	Article 17 (1) 2, Article 15 (1) 2 of the Personal Information Protection Act, etc.
Competent Police Agency, Prosecutors' Office	Requests via search and seizure warrants	Requested information	Article 18 (2) (ii) of the Personal Information Protection Act, Article 215 of the Criminal Procedure Act

③ Cases regarding the overseas provision of personal information to third parties are guided in "8. Matters Concerning Overseas Collection and Transfer of Personal Information."

7. Entrustment of Personal Information Processing

① The Company currently does not entrust the processing of members' personal information to external parties domestically in connection with the provision of services.

② If the content of the entrusted work or the trustee is added or changed in the future, we will disclose it without delay through this Privacy Policy.

③ Cases regarding the overseas entrustment of personal information processing are guided in "8. Matters Concerning Overseas Collection and Transfer of Personal Information."

8. Overseas Collection and Transfer of Personal Information

The Company uses overseas clouds and platforms to safely store data and manage customer inquiries. In this process, personal information may be transferred to and processed on overseas servers.

(1) Google Cloud Platform

Item	Details
Legal basis for overseas transfer	Article 28-8 (1) 3 of the Personal Information Protection Act
Transferred country	Republic of Korea (Seoul Region, asia-northeast3)
Date and method of transfer	Transferred to and stored on Google Cloud servers located domestically (Seoul Region) at the time of service use and data upload
Recipient	Google LLC
Recipient's contact info	1455 3rd Street, San Francisco, CA 94158, USA / Website: https://cloud.google.com
Purpose of transfer	Safe data storage, backup, and service system operation using cloud server infrastructure
Items of personal info transferred	All collected personal information items and all data entered/uploaded by the member during service use
Retention & use period	Until membership withdrawal or a separately agreed period

(2) OpenAI

Item	Details
Legal basis for overseas transfer	Article 28-8 (1) 3 of the Personal Information Protection Act
Transferred country	United States (USA)
Date and method of transfer	Real-time transfer via API when the member requests AI impact report generation
Recipient	OpenAI, L.L.C.

Recipient's contact info	3180 18th St, San Francisco, CA 94110, USA / Website: https://openai.com
Purpose of transfer	Implementation of AI-based service functions and data text analysis processing
Items of personal info transferred	Documents uploaded for analysis and all data entered/uploaded by the member during service use
Retention & use period	Destroyed immediately upon completion of AI analysis request and return of results (Based on the API integration policy, it is not stored on OpenAI's servers nor used for AI model training purposes)

(3) Notion

Item	Details
Legal basis for overseas transfer	Article 28-8 (1) 3 of the Personal Information Protection Act
Transferred country	United States (USA)
Date and method of transfer	Real-time transfer over the network at the time of customer inquiry form submission
Recipient	Notion Labs, Inc.
Recipient's contact info	2300 Harrison St, San Francisco, CA 94110, USA / Website: https://www.notion.so
Purpose of transfer	Receiving customer inquiries, data collection, and management support
Items of personal info transferred	Mandatory and optional personal information entered during inquiry
Retention & use period	1 year after the purpose is achieved or until a separately agreed period

- Right to Refuse Consent and Limitations:** You have the right to refuse consent to the overseas transfer of personal information. However, if you refuse the overseas transfer, the normal use of AI features and services may be restricted.

9. Measures for Ensuring the Security of Personal Information

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

- **Administrative measures:** Establishment and implementation of an internal management plan, regular employee training, operation of a dedicated organization.
- **Technical measures:** Management of access rights to the personal information processing system, installation of an access control system and other relevant protective measures, network blocking measures, encryption of personal information, storage and inspection of access logs, installation and update of security programs, vulnerability checks and supplementation of the processing system.
- **Physical measures:** Access control if separate physical storage locations such as computer rooms and data storage rooms exist, storage of documents and auxiliary storage media in secure locations with locks, safety measures against disasters, control over bringing in/out auxiliary storage media.

10. Installation, Operation, and Refusal of Automatic Data Collection Devices

① The Company uses 'cookies' that store and frequently retrieve user information to provide individualized services and convenience to data subjects.

② Cookies are small amounts of information sent by the server (http) used to operate the website to the data subject's browser. They are stored on the data subject's computer or mobile device and automatically transmitted to the server when accessing the website.

③ Data subjects can set options in their browser to allow, block, or manage cookies.

- Allowing/Blocking Cookies in Web Browsers:
 - Chrome: Select the ':' icon at the top right > New Incognito window
 - Edge: Select the '...' icon at the top right > New InPrivate window
- Allowing/Blocking Cookies in Mobile Browsers:
 - Chrome: Select the ':' icon at the top right > New Incognito tab
 - Safari: Mobile device Settings > Safari > Advanced > Block All Cookies

- Samsung Internet: Select the 'Tabs' icon at the bottom > Turn on Secret Mode > Start

11. Rights and Obligations of Data Subjects and Legal Representatives, and How to Exercise Them

① Data subjects may exercise their rights against the Company at any time, such as requesting to view, transmit, correct, delete, suspend processing, or withdraw consent regarding their personal information (hereinafter referred to as "Exercising Rights"). (※ For minors aged 14 or older, the minor themselves or their legal representative may exercise these rights regarding the minor's personal information.)

② Rights may be exercised in writing, by phone, email, fax, or internet pursuant to Article 41(1) of the Enforcement Decree of the Personal Information Protection Act. The Company will take action without delay. (Data subjects may withdraw consent or request to exercise rights at any time via the 'Contact Us' page on the website.)

③ Rights may also be exercised through an agent, such as a legal representative or a delegated person. In this case, a power of attorney according to the form prescribed in the "Notification on Personal Information Processing Methods" must be submitted.

④ The right to view personal information and request suspension of processing may be restricted under Article 35(4) and Article 37(2) of the Personal Information Protection Act.

⑤ Requests for deletion of personal information cannot be made if the information is specified as a collection target in other laws.

⑥ The Company verifies whether the person exercising the right is the data subject or a legitimate representative.

⑦ Data subjects may submit requests to exercise rights to the department below. The Company will reply within 10 days (without delay in the case of transmission requests) from the date of receiving the request.

- **Department Receiving and Processing Privacy Rights Requests:**

- Department Name: Research Module

- Address: 2nd Fl, 54 Seoulsup-gil, Seongdong-gu, Seoul
- Contact: (+82) 070-4256-0916, info@impactologyai.com

12. Privacy Officer and Department in Charge of Privacy and Grievances

① The Company is responsible for overall personal information processing tasks and has designated the following Privacy Officer to handle data subjects' complaints and damage relief related to personal information processing.

- Privacy Officer:
 - Name: Soyeon Lee
 - Position: Manager
 - Contact: (+82) 070-4256-0916, info@impactologyai.com

② Data subjects may direct all inquiries, complaints, and damage relief requests related to personal information protection arising from the use of the Company's services (or business) to the Privacy Officer and the designated department. The Company will answer and process the inquiries without delay.

13. Remedies for Infringement of Data Subjects' Rights

To receive relief from personal information infringement, data subjects may apply for dispute resolution or consultation with the Personal Information Dispute Mediation Committee, KISA Personal Information Infringement Report Center, etc. For other reports and consultations regarding personal information infringement, please contact the institutions below.

- Personal Information Dispute Mediation Committee: (Without area code) 1833-6972 (www.kopico.go.kr)
- Personal Information Infringement Report Center: (Without area code) 118 (privacy.kisa.or.kr)
- National Police Agency: (Without area code) 182 (ecrm.police.go.kr)

14. Changes to the Privacy Policy

If there are any additions, deletions, or modifications to the contents of this Privacy Policy, we will notify you through notices on the website at least 7 days prior to the revision. However, in the event of a significant change to user rights, such as a change in the collected personal information items or provision to a third party, notice will be given at least 30 days in advance.