# **Privacy Notice**

ChildFund Korea (hereinafter the "ChildFund") complies with personal information protection regulations in the relevant laws such as Prevention Information Protection Act, Protection of Communications Secrets Act and Telecommunications Business Act, etc. and does its best to protect the interests of users by establishing the privacy notice in accordance with the relevant laws.

- 1. The purpose of processing collected personal data
- 2. Collected personal data items and collection methods
- 3. Period of retaining and using personal data
- 4. Use of personal data and provision of personal data to third parties
- 5. Outsourcing of personal data processing
- 6. Personal data destruction procedures and methods
- 7. Rights and obligations of data subjects and how to exercise such rights
- 8. Installation/operation or refusal of devices automatically collecting personal data automatic
- 9. Measures to ensure the safety of personal data
- 10. Personal data protection officer
- 11. Personal data viewing request
- 12. Enforcement and revision of the privacy notice (duty to notify)

#### 1. The purpose of processing collected personal data

'Personal data' means any information relating to a living individual which can identify a particular individual by his or her full name, contact details and address, etc. ChildFund collects personal data of users to provide individual service to members of its website and sponsoring members, to manage sponsorship and to provide service to sponsored children. The Fund uses the collected personal data for the following purposes.

#### A. Membership management

-Management of participation details and membership information such as identification of individuals and donation, confirmation of the intention to subscribe to or withdraw from membership, restriction on the use of service by members in violation of the terms of use, prohibition on any actions interfering with smooth operation of service and any illegal use of service, confirming whether the consent of the legal representative of a child under the age of 14 has been obtained when collecting personal data of the child, Confirming the identification of the legal representative in the future, maintenance of records to mediate disputes, handling of complaints and delivery of notifications

# B. Provision and management of services relating to sponsorship

-The withdrawal of donation funds from accounts, issuance of donation receipts, management of sponsorship details, reporting on how donated funds are used and notification service such as event participation, etc., notifications to members, newsletter and provision of contents, etc.

#### C. Use of personal data for development of new service, marketing and advertisement

-Development of new service and provision of customized service, provision of service and posting of advertisements based on the statistical characteristics, confirmation of the validity of service, provision of event information and participation opportunities, provision of information intended as advertising, checking the frequency of access, statistics on the use of service by members, communication service and TM marketing service, etc.

# D. Management of sponsored children

-Delivery of individual donations to sponsored children, use of personal data for management of cases or compilation of statistics (service statistics and marketing in accordance with demographic characteristics and compilation of statistics on the use of service by individuals)

#### E. Management of volunteers

-Selection and management of volunteers and registration of volunteers' performance, etc.

However even in such cases, ChildFund, if possible, does not collect sensitive personal data whose collection might violate a user's basic human rights (e.g. race, ideology, belief, place of birth and permanent address, political inclination, criminal records and sexuality, etc.). If it is unavoidable to do so, ChildFund will request the prior consent from users without fail. ChildFund does not use provided personal data for any purpose other than those previously informed, and will try to enhance technical and administrative protective measures to prevent leakage of personal data.

# 2. Collected personal data items and collection methods

#### A. Collected personal data items

Firstly, ChildFund distinguishes and collects essential data required for the provision of basic services such as membership subscription, smooth customer service, sponsorship application, supporting sponsored children and various services and optional data for the provision of service customized for each customer as follows.

- <General membership subscription>
- -ID, password, name, date of birth, gender, mobile phone number and email address
- <Membership subscription for persons under the age of 14 >
- -ID, password, name, date of birth, gender, mobile phone number, email address and guardians (legal representatives)' verification data
- <Membership subscription for companies>

- -ID, password, name of personnel, mobile phone number of personnel and email address of personnel
- <Membership subscription for overseas residents>
- -Essential data: ID, password, name, date of birth, gender, mobile phone number and email address
- -Optional data: address
- <General sponsorship application>
- -Essential data: gender, date of birth and mobile phone number
- -Optional data: email address, resident registration number (when applying for donation receipts) and postal address
- <Sponsorship application by persons under the age of 14>
- -Essential data: name, date of birth, gender, mobile phone number and guardians (legal representatives)' verification data
- -Optional data: email address, resident registration number (when applying for donation receipts) and postal address
- <Payment for donations>
- -Automatic transfer payment: Bank name, account number, account holder's legal date of birth and account holder's contact details
- -Credit card payment: Credit card company, card number, expiry date, card holder, card holder's legal date of birth and card holder's contact details
- <Volunteer applications>
- -Essential data: Main activity zones
- -Optional data: VMS subscription data (if giving consent to link to VMS), skills or foreign languages
- <Application for child sponsorship>
- -Essential data: Name/gender/date of birth/school/grade/photo of the child, name of the guardian of the child, landline number, mobile phone number (child/guardian), address, bank account details, protection category, household type, health information of the child and the family
- -Optional data: Email address, name of family members, date of birth of family members and home environment

Secondly, the following data may be automatically created and collected during the use of services or in the course of processing business.

-IP Address, cookie, visitation time/date, service usage record and fraudulent usage record

Thirdly, in the course of using additional service and participating in a campaign or an event with the ChildFund ID, the following data may be collected from users of such service only.

-ID, name, mobile phone number and email address, etc. (if giving consent to collection of additional personal data)

Fourthly, if a user's identity needs to be verified to use some of its service to comply with the applicable laws and regulations, the following data may be collected.

-Name, date of birth, gender, Duplication Information (DI), Connection Information (CI), mobile phone number (optional), i-PIN (if using an i-PIN) and data on Korean/foreigner

#### **B.** Personal data collection methods

ChildFund collects personal data through the following methods.

- -Provision of personal data from partner companies
- -Membership subscription via the website, written forms, telephone/fax, member information alteration and use of service
- -Sponsorship application

#### 3. Period of retaining and using personal data

In principle, ChildFund destroys the relevant personal data of users or sponsors without delay when the purpose of collecting and using the personal data is achieved. However, even after the purposes of collecting and using personal data are achieved, if it is necessary to retain personal data under the applicable laws and regulations such as Commercial Act and Act on the Consumer Protection in Electronic Commerce, etc. and if the retention period of the data was previously notified or clearly stated to users, etc., the personal data may be retained in accordance with the above. In case of retaining personal data, ChildFund shall obtain the consent of users by giving users individual and prior notice concerning the ground for retention or personal data items to be retained by email or in writing or by publishing them on the website.

#### A. Reason for retaining data under the ChildFund's internal policy

- -Fraudulent usage records (abnormal service usage records such as fraudulent membership subscription or penalty records, etc.)
- -Reason for retention: Prevention of fraudulent usage

-Retention period: 1 year

#### B. Reason for retaining data under the applicable laws and regulations

- -If it is necessary to retain personal data under the applicable laws and regulations such as Commercial Act and Act on the Consumer Protection in Electronic Commerce, etc., ChildFund retains the member's data for the period specified in the applicable laws and regulations. In this case, ChildFund shall use the retaining data for storage purpose only and its retention period is as follows.
- < Records regarding contracts or withdrawal of subscriptions, etc.>
- -Reason for retention: Act on the Consumer Protection in Electronic Commerce, etc.
- -Retention period: 5 years
- < Records relating to electronic financial transactions>
- -Reason for retention: Electronic Financial Transaction Act
- -Retention period: 5 years
- < Records relating to customer complaints or handling of disputes>
- -Reason for retention: Act on the Consumer Protection in Electronic Commerce, etc.
- -Retention period: 3 years
- <Website visit history>
- -Reason for retention: Retaining data verifying communications under Article 41 of Protection of Communications Secrets Act
- -Retention period: 3 months
- <Issuance of donation receipts>
- -Reason for retention: Obligations to prepare and keep donation receipt issuance statements under Income Tax Act
- -Retention period: 5 years

#### 4. Use of personal data and provision of personal data to third parties

ChildFund uses personal data of users within the scope notified in "2. The purpose of collecting and using personal data", and neither uses the data outside of the scope nor, in principle, discloses them to third parties without the prior consent of the users, except for the following cases.

### A. If users give the prior consent to it upon request of ChildFund

# B. If it is required by the law or required by a crime investigation agency pursuant to the procedure and method specified in law for crime investigation purposes

Also, ChildFund processes personal data of the data subject within the purposes specified in Article 1 (The purpose of processing collected personal data), and provides the data to third parties if it falls within Article 17 of Personal Information Protection Act such as if there are the consent of the data subject or special provisions of law, etc. This is only for the purpose of providing optimum and quantitative service to users, and in such case, ChildFund shall obtain the consent of users by giving individual notice concerning the party receiving the data (the receiver), his/her purpose of use, personal data items to be provided and the receiver's personal data retention/use period by email or in writing and by publishing them on the website.

### <Third party companies receiving personal data>

Recipient	Purpose of use	Items provided	Retention/Use period	Disadvantages following refusal to consent
Korea National Council on Social Welfare/ Social Welfare Volunteer VMS (www.vms.or.kr)	For using a volunteer performance data connection system	name, unique serial number, volunteer performance	from the date of giving the consent to the provision of data to the date of withdrawing memberships (provided, except for cases where it is necessary to retain under other applicable laws)	Unable to view volunteer performance data

#### 5. Outsourcing of personal data processing

ChildFund outsources personal data processing for its stable provision of service, and specifies matters concerning the outsourcee's responsibilities such as prevention of processing personal information for any purpose other than conducting outsourced service, technical/managerial safeguards, restriction on sub-outsourcing, management/supervision on outsources and compensation for damages, etc. in a document such as a contract, etc. pursuant to Article 25 of Personal Information Protection Act and supervises the outsourcees to check if personal data are processed safely. ChildFund outsources personal data processing to the following institutions and the details of outsourced work are as follows.

# <Outsourcees processing personal data>

Outsourcee	Outsourced work				
	Printing/delivery of mails, handling return mails,				
	sending parcels by courier,				
Youngjin Direcom Inc., Nextia Inc., M&N Wise Inc.	SMS, MMS, Sending notifications, receiving text				
Toungin Direcom nie., Nexua nie., Meet wise nie.	messages				
	(Until the withdrawal of memberships or the				
	termination of the outsourcing agreement)				
	Translating overseas correspondence				
Translation volunteers	(Until the withdrawal of memberships or the				
	termination of the outsourcing agreement)				
	Operation, maintenance & repair and establishment of				
KT Corporation, Douzone Bizon Inc., Logisys Inc.,	systems				
ECS Telecom Inc., BizIsolution Inc.	(Until the withdrawal of memberships or the				
	termination of the outsourcing agreement)  ARS Verification Service				
COOCON	(Until the withdrawal of memberships or the				
COOCON	termination of the outsourcing agreement)				
	Personal account verification, identity verification, i-				
	PIN verification				
Nice Investors Service Co., Ltd.	(Until the withdrawal of memberships or the				
	termination of the outsourcing agreement)				
	Providing payment methods for donation bill				
Korea Financial Telecommunications & Clearings	(Until the withdrawal of memberships or the				
Institute, NHN KCP	termination of the outsourcing agreement)				
	Telephone calls to recruit sponsorship members and to				
	manage the sponsorship association and entering				
CSI Systems Inc.	sponsorship information				
	(Until the withdrawal of memberships or the				
	termination of the outsourcing agreement)				
	Applying for thank-you letters, managing applicants,				
RSAD Inc.	providing service				
Roll Inc.	(Until the withdrawal of memberships or the				
	termination of the outsourcing agreement)				
	Providing data for research and investigation				
Impact Square Inc.	(Until the withdrawal of memberships or the				
	termination of the outsourcing agreement)				

#### 6. Personal data destruction procedures and methods

ChildFund destroys the relevant personal data without delay when the period of retaining personal data lapses or when they become no longer necessary due to the achievement of the processing purposes, etc. If it is necessary to continue to retain personal data consented by the data subject pursuant to other laws even after the expiration of the retention period or the achievement of the processing purposes, such personal data are relocated to a separate database (DB) or retained in a different storage area. ChildFund uses the following procedures and methods for destruction of personal data.

#### A. Destruction Procedures

-ChildFund selects personal data where a ground for destruction has arisen and destroys such personal data upon obtaining the approval from Chief Privacy Officer.

#### **B.** Destruction Methods

- ChildFund destroys personal data recorded and stored in electronic files through means such as Low Level Format so that the records cannot be recovered and personal data recorded and stored in paper documents are shredded using a shredder or incinerated for destruction.

# 7. Rights and obligations of data subjects and how to exercise such rights

**A.** Users and their legal representatives may at any time view or correct the registered personal data of the users themselves or a child under the age of 14, and may refuse to give consent or request to terminate subscriptions (withdrawal of membership) if they do not agree to the ChildFund's personal data processing. However, use of the ChildFund's services may be restricted in whole or in part in such cases.

- **B.** You can directly view or correct personal data or withdraw from membership after going through identify verification procedures by clicking 'Personal Data Correction' (or 'Member Data Correction', etc.) for viewing or revising personal data of users or a child under the age of 14, and by clicking 'Membership Withdrawal' for termination of subscriptions (withdrawal of consent).
- **C.** Or ChildFund shall take actions without delay when such request is made by users to Chief Privacy Officer in writing or by phone or email.
- **D.** When the user requests for the correction of errors in his/her personal data, ChildFund shall neither use nor provide the personal data to a third party before the correction is finished. The ChildFund shall notify the third party of the correction details if any incorrect personal data has already been provided to any third party.

**E.** ChildFund handles a user's personal data that have been discontinued or deleted upon request of the user or his/her legal representative as set forth under "5. Period of retaining and using personal data", and ensures that the deleted data may not be viewed or used for any other purpose.

# 8. Installation/operation and refusal of devices automatically collecting personal data A. What is a Cookie?

- -ChildFund uses 'cookies' which stores and retrieves user data from time to time to provide personalized service.
- -A cookie is a small text file that the server used to operate the website sends to the user's browser and is stored on the user's computer hard disk. When the user visits the same website again, the website server recognizes the content of cookies which are used to maintain the user's environment and to provide personalized service.
- -Cookies do not automatically/actively collect data that can identify individuals, and users may refuse or erase storage of any cookies at any time.

#### **B.** Purpose of using cookies

- Cookies are used to offer personalized optimum service to users by analyzing each service of ChildFund visited by users and the website visits and using patterns, etc.

#### C. Installation/operation and refusal of cookies

- -A user can choose whether to install cookies. Therefore, a user, by setting options in the web browser, may permit all cookies, require confirmation whenever a cookie is stored, or refuse storage of any cookies. However, if a user refuses storage of cookies, the user may experience difficulties in using some of its service that require login.
- -How to designate whether cookie installation is permitted (in the case of Internet Explorer).
  - ① In the [Tools] menu, choose [Internet options].
  - (2) Click the [personal data tab].
  - 3 Set the [personal data protection level].

#### 9. Measures to ensure the safety of personal data

ChildFund takes technical, administrative and physical measures necessary to ensure the safety of personal data as follows in accordance with Article 29 of Personal Data Protection Act.

#### A. Establishment and Implementation of the Internal Management Plan

-ChildFund establishes and implements the internal management plan pursuant to the 'standard of measures to ensure the safety of personal data' (Notification by the Ministry of Public Administration and Security).

# B. Keeping the number of personal data handlers to the minimum and providing training

-ChildFund keeps the number of personal data handlers to the minimum and conduct training on a regular basis.

#### C. Restriction on access to personal data

- ChildFund controls access to personal data through granting, modifying and cancelling access right to the database system processing personal data, and prohibits unauthorized external access using the intrusion protection system. ChildFund uses Virtual Private Network (VPN) when personal data handlers access the personal data processing system externally. Also, ChildFund records the history of granting, modification and cancellation of access authority and retains it at least for 3 years.

#### D. Retention of access logs and prevention of forgery/tampering of access records

- ChildFund retains the logs of access to the personal data processing system at least for 6 months, and manages the logs of access to prevent forgery, tampering and theft.

#### E. Encryption of personal data

-Users' personal data are encrypted, stored and managed. Also, ChildFund uses separate security functions such as using important data encrypted when being saved or transmitted, etc.

## F. Technical measures against hacking, etc.

- ChildFund has installed a security program renewed and inspected on a regular basis to prevent personal data from being leaked or damaged due to hacking or computer viruses, and has installed a system in an area where external access is restricted, and monitors and blocks access using physical and technical means.

# G. Prohibition on access by unauthorized persons

-ChildFund has a separate physical storage place for the personal data processing system retaining personal data, and has established and implemented the access control procedures regarding the place.

#### H. Operation of Personal Data Protection Center

- ChildFund monitors the obligations under the Privacy Notice and compliance therewith by the relevant personnel, and tries to immediately correct and rectify any identified problems. However, ChildFund shall not take any responsibility for problems resulting from leakage of personal data such as ID or password, etc. due to the negligence of the user him/herself or problems with the internet.

# 10. Personal data protection officer

ChildFund has designated Chief Privacy Officer as below, with overall responsibility for processing personal data, to handle complaints and damage relief sought by data subjects in relation to personal data processing, etc.

Chief Privacy Officer									
Name: Sookyeong Lee									
Department/Title: Secretary General									
Service for Sponsors	Online Service		Digital Management						
Name: Shinhyuk Lim	Name: Jinwol Kim		Name: Seungjong Oh						
Department/Title:	Department/Title:		Department/Title:						
Sponsorship Service	Sharing	Marketing	Digital	Management					
Department /Department	Department	/Department	Team/Team N	Manager					
Manager	Manager								
Telephone No.: 1588-1940 / E-mail: help@childfund.or.kr									
* The above contact details, etc. shall be connected to 'Personal Data Protection Center'.									

A data subject may make any inquiries about personal data protection, complaint handling or damage relief, etc. that arise while using the ChildFund's services through Chief Privacy Officer and the relevant department. ChildFund will respond to and address the data subject's inquiries without delay. For any other inquiries regarding personal data, please contact the following agencies. (These agencies are independent of ChildFund, and, if you are not satisfied with ChildFund's own personal data complaint handling and damage relief outcomes, or if you need more assistance, please contact the following agencies.)

# ► Personal Information Infringement Report Center (Operated by Korea Internet & Security Agency)

-Duties: Personal information infringement report, consultation request

-Website: privacy.kisa.or.kr

-Telephone: (No area code) 118

-Address: (58324) Personal Information Infringement Report, 3<sup>rd</sup> Floor, 9, Jinheung-gil, Naju-

si, Jeollanam-do (301-2, Bitgaram-dong)

# ► Personal Information Dispute Mediation Committee (Operated by Korea Internet & Security Agency)

-Duties: Personal information dispute mediation application, class action mediation (civil resolutions)

-Website: privacy.kisa.or.kr

-Telephone: 1833-6972

-Address: (03171) Government Complex-Seoul, 4th Floor, 209, Sejong-daero, Jongo-gu, Seoul

# ► Cybercrime Investigation Division, Supreme Public Prosecutor's Office: 02-3480-3573 (www.spo.go.kr)

▶ Safety Bureau, National Police Agency: 182 (cyber.go.kr)

#### 11. Personal data viewing request

A data subject may request access to personal data from the following department in accordance with Article 35 of Personal Information Protection Act. ChildFund shall endeavor to promptly process the data subject's request for access to personal data.

## A. Service for Sponsors

-Department: Sponsorship Service Department

-Name: Shinhyuk Lim

-Title: Department Manager -Contact details: 1588-1940

#### **B.** Online Service

-Department: Sharing Marketing Department

-Name: Jinwol Kim

-Title: Department Manager -Contact details: 1588-1940

### 12. Enforcement and revision of the privacy notice (duty to notify)

ChildFund complies with the applicable personal data protection laws and regulations such as Personal Information Protection Act, Credit Information Use and Protection Act and Framework Act on Electronic Documents and Transactions, etc. Therefore, in cases of addition, deletion and modification of the Privacy Notice of ChildFund, it shall be notified in the 'Notifications' on the website of ChildFund at least 7 days prior to its revision, and in case of significant changes in the rights of users such as collection/use of personal data or provision of personal data to third parties, etc., it shall be notified at least 30 days prior to such changes.

### The revised privacy notice shall take effect as of July 21, 2020.

See the previous privacy notice (from September 6, 2018 to July 20, 2020) http://www.childfund.or.kr/pages/join/popPrivacyPolicies2018.jsp

See the previous privacy notice (from August 1, 2016 to September 5,2018) http://www.childfund.or.kr/pages/join/popPrivacyPolicies2016.jsp

See the previous privacy notice (from August 7, 2014 to July 31, 2016) http://www.childfund.or.kr/pages/join/popPrivacyPolicies.jsp

See the previous privacy notice (from July 1, 2013 to August 6, 2014) http://www.childfund.or.kr/pages/join/individualAgreement.jsp

See the previous privacy notice (from January 1, 2011 to June, 30 2013) http://www.childfund.or.kr/pages/join/individualAgreement\_old.jsp