

Chatbot Service Privacy Policy

TUNiB Inc. (the “**Company**”) complies with the Personal Information Protection Act, Protection of Communications Secrets Act, Telecommunications Business Act, and Act on Promotion of Information and Communications Network Utilization and Information Protection, and any other relevant laws and regulations stipulating the protection of personal information, which shall be abided by information and telecommunications service providers. The Company uses its best effort to protect users’ rights and interests by establishing a privacy policy in accordance with applicable laws.

1. Purpose of Collection and Use of Personal Information

Personal information of a user refers to any information relating to a user, who is a living individual, which can identify a particular user of the service (including any information that may be easily combined with other information to identify such a user even if the information alone does not identify a particular individual). Personal information collected by the Company is used for the following purposes and no other purpose:

- For providing the basic functions of the service: The Chatbot service operates conversations with users through messenger services. In order to process the contents that users enter on the messenger service and provide appropriate responses that are customized for each user, the Chatbot service utilizes users’ personal information.
- For improving the service performance and conversation algorithms: Personal information within the text collected is pseudonymized or anonymized and then used to improve the conversation algorithms. In addition, the history of wrongful uses is identified to improve the service.
- For managing members: Personal information is utilized for user identification and authentication as well as management and maintenance of membership status of users.
- For linking accounts: For users using the Company’s other services in connection with the Chatbot service, personal information is used for linking the Chatbot service and other related services of the Company.
- For development, marketing/advertising of new services: Personal information is utilized for development of new services and providing customized services through research and development of language-based artificial intelligence (the “**AI**”) technology, including development of chatbot algorithms; providing services and publishing advertisements based on the statistical properties; verifying validity of services; providing event and promotional information and opportunities for participation; identifying frequency of access; producing statistics about members’ use of service.

2. Personal Information to be Collected and Method of Collection

A. Personal information to be collected

The Company collects the following information to process conversations with users and provide basic conversation and functions. The Company also uses the information collected to identify the history of wrongful uses and to improve the AI conversational algorithms.

- Account information for messenger service (name, profile photograph, unique ID assigned by the messenger service, email, etc.)
- Information on the profile created in the service (name, nickname, gender, date of birth, email, occupation, address, registration date, interest)

- Message information (Date and time of sending messages, contents of messages (including files, URLs, images, videos, etc.), analysis data of messages)
- Usage record(users' tendency, user status, history of using service, history of wrongful use)

B. Method of collecting personal information

The Company may collect personal information through the following methods:

- Collection of personal information provided by the messenger service in order to provide the service;
- Collection of personal information during the process of membership sign-up, which is entered by a user such as name, date of birth, email and gender;
- Collection of personal information voluntarily provided by users while using the service; and
- Collection of personal information provided by other services of the Company linked with the Chatbot service.

3. Transfer and Provision of Personal Information

The Company uses personal information of users within the scope notified under Paragraph 1 (Purpose of Collection and Use of Personal Information) and does not use personal information outside the abovementioned scope or disclose users' personal information to a third party without users' prior consent. However, notwithstanding the foregoing, the Company may use and provide personal information, with care, in any of the following cases:

A. If a user provided prior consent to disclosure: Prior to the collection or provision of information, the Company will notify users regarding the Company's business partners and the period and method of protection/control of the personal information and will request their consent thereto. Without users' consent, the Company will not collect additional information or share such information with its business partners.

B. If provision of personal information is required by law or by any investigative agency for investigation purposes in accordance with the procedures and methods set forth in law.

C. If relevant information is deemed pseudonym information or anonymous information after completion of pseudonymization or anonymization and adequacy assessment under the Guidelines on Processing Pseudonym Information published by the Korean Personal Information Protection Commission in October 2021.

4. Entrustment of Handling of Personal Information and Pseudonym Information

The Company entrusts personal information and pseudonym information to the following agencies to process:

1) When entrusting to domestic agencies to process personal information for the use of the service:

| Trustee Entities | Description of the Entrusted Service | Personal Information Retention Period and Use |
|------------------------------------|--|---|
| Amazon Web Services Inc. | Management of infrastructure to provide and analyze services | Until membership cancellation or termination of the entrustment agreement |
| Google LLC (Google Cloud Platform) | Management of infrastructure to provide and analyze services | Until membership cancellation or termination of the entrustment agreement |

2) When entrusting the processing of pseudonym information

| Trustee Entities | Description of the Entrusted Service | Pseudonym Information Retention Period and Use |
|------------------------------------|---|--|
| Amazon Web Services Inc. | Management of infrastructure to process pseudonym information | Until attainment of the purpose of using pseudonym information or termination of the entrustment agreement |
| Google LLC (Google Cloud Platform) | Management of infrastructure to process pseudonym information | Until attainment of the purpose of using pseudonym information or termination of the entrustment agreement |

The purpose of entrusting the processing of pseudonym information and detailed information regarding the trustee entities are available on the website for the Company's Privacy Policy (https://bloony.ai/privacy/en_US/pp.pdf).

5. Retention Period and Use of Personal Information and Pseudonym Information

Users' personal information and pseudonym information will be, in principle, destroyed without delay once the purpose of collecting and using personal information and pseudonym information is achieved. However, the following information will be preserved for the respective specified period for reasons stated below:

A. Preservation of information in accordance with the Company's internal policy

- Records of wrongful use

Reason for preservation: To prevent wrongful use

Period of preservation: 1 year

- Records of using the service

Reason for preservation: To improve the AI conversation algorithms

Period of preservation: 5 years

B. Preservation of information as required by applicable laws

If preservation of personal information is required by the Commercial Act, Act on the Consumer Protection in Electronic Commerce, or other applicable laws, the Company will preserve members' information for a certain period set forth in applicable laws. In such cases, the Company will preserve information only for its purposes for the respective period below:

Records of contract or cancellation of purchase

Reason for preservation: Pursuant to the Act on the Consumer Protection in Electronic Commerce

Period of preservation: 5 years

Records of payment and supply of goods, etc.

Reason for preservation: Pursuant to the Act on the Consumer Protection in Electronic Commerce

Period of preservation: 5 years

Records of handling consumers' complaints or disputes

Reason for preservation: Pursuant to the Act on the Consumer Protection in Electronic Commerce

Period of preservation: 3 years

Records of visits

Reason for preservation: Pursuant to the Protection of Communications Secrets Act

Period of preservation: 3 months

6. Procedures and Method of Destroying Personal Information

Users' personal information will be, in principle, destroyed without delay once the purpose of collecting and using personal information is achieved.

The Company will destroy personal information in accordance with the following procedures and methods:

A. Procedures for destruction

- Any information entered by users for joining membership, etc. will be transferred to a separate database (or a separate filing cabinet in the case of paper) after the purpose is achieved. It will be destroyed after being stored for a certain period of time in accordance with the internal policy and other reasons for the preservation of information under applicable laws (see the period for retaining and using personal information).
- Such personal information will not be used for any other purpose than the preservation, unless otherwise required by law.

B. Methods of destruction

- Papers containing personal information will be shredded or incinerated.
- Personal information stored in electronic files will be deleted using the technical method that prevents reproduction of the records.

7. Technical/Managerial Measures to Protect Personal Information

In handling users' personal information, the Company is introducing the following technical/managerial measures in order to ensure security so that personal information is not lost, stolen, divulged, falsified or damaged:

A. Countermeasures against hacking, etc.

The Company is using its best effort to prevent members' personal information from being divulged or damaged by hacking, computer viruses, etc. The Company frequently uses back-up personal information to prevent it from being damaged, uses the latest vaccine programs to keep users' personal information or other data from being divulged or damaged, and ensures safe transmission of personal information within the network by using encrypted communication, etc.

The Company also controls unauthorized access from outside using the invasion prevention system and endeavors to have all technical devices as much as possible to ensure the security of its systems.

B. Minimum number of handlers and provision of training

The Company allows only the responsible employees to handle personal information and assigns and regularly renews a password for such purpose. The Company emphasizes compliance with this Privacy Policy at all times by providing frequent training to the responsible employees.

C. Operation of an organization exclusively responsible for protection of the personal information

Through the internal organization exclusively responsible for the protection of personal information, the Company verifies its performance under, and responsible employees' compliance with, this Privacy Policy. If any issue is identified, the Company makes an effort to correct it immediately.

However, the Company is not liable for any issue caused by divulgence of personal information due to a user's own negligence or any other reason not attributable to the Company's willful act or gross negligence.

D. Secure management of pseudonym information

In order to securely manage pseudonym information, the Company has adopted technical, managerial and physical measures necessary to establish and implement internal control plans under the laws and regulations relating to the protection of personal information, separately store pseudonym information and additional information, allowing divided authorities, and ensure security for preparation and storage of processing records.

8. Users' Rights and Method of Exercising of Rights

Users have the right to inspect, modify or delete their registered personal information at any time and may request cancellation of their consent to collection and use of personal information or cancellation of membership. However, upon cancellation of consent or deletion of personal information, the use of the service may be entirely or partially restricted.

A user may request for an inspection, modification or deletion of personal information or cancellation of consent or membership by contacting the Privacy Officer in writing, by telephone or by email, and the Company will promptly respond.

The Company handles the personal information terminated or deleted at the request of users in the manner specified in Paragraph 6 (Period for Retaining and Using Personal Information and Pseudonym Information) and ensures that it is not inspected or used for any other purposes.

9. Installation/Operation of Automatic Personal Information Collection Tools and Rejection thereto

For providing PC-based service, the Company may use cookies. Cookies refer to tiny text files sent from the server used for a website to users' browser and are stored on users' computer.

A. Purpose of using cookies

To provide personalized and customized services, the Company uses cookies to store and occasionally retrieve users' information. When a user visits a website, the server of the website reads the cookies stored in the user's device to maintain the user's settings and provide customized services. Cookies help users access and conveniently use the website based on the previous settings. Cookies are also used to provide optimized advertisements and other customized information on the basis of a user's history of visiting the website and patterns of using the website.

B. Refusal to cookies

Cookies do not store information such as names and email addresses which can identify a user, and users have an option to decide whether to install the cookies. Thus, users may set their web browser options to permit all cookies, give their consent whenever cookies are stored, or refuse all cookies. However, users who refuse cookies may be limited in using the web browser which could be inconvenient and may have difficulty using some services which requires log-in.

Setting examples:

- Internet Explorer: Tools > Internet Options > Privacy > Settings
- Chrome: Settings > Advanced Settings > Privacy > Content Settings > Cookies

10. Privacy Officer and Contact Information

A user may report all complaints related to the protection of personal information arising in the course of using the Company's service to the Privacy Officer or the responsible department. The Company will promptly provide sufficient response to users' reports.

- Name: Kyubyong Park
- Telephone: 82)70-8691-0177 / Title: Representative director

- Email: bloony@tunib.ai

11. For South Korean Residents

A. Personal information and pseudonym information of the Company will be transferred overseas as follows:

1) When the processing of personal information is entrusted overseas:

| Trustee Entities | Transferred Countries | Date and Method of Transfer | Personal Information to be Transferred | Entrusted Services | Personal Information Retention Period and Use |
|--|-----------------------|---|--|--|---|
| Amazon Web Services Inc. (aws-korea-privacy@amazon.com) | United States | Online transfer in the event of using the Service | Account information for messenger service, Information on the profile created in the Service, Message information, Usage record (Please refer to Art. 2(A) 'Personal information to be collected' for details) | Management of infrastructure to provide and analyze the Services | Until membership cancellation or termination of the entrustment agreement |
| Google LLC (Google Cloud Platform) (080-822-1422) | United States | Online transfer in the event of using the Service | Account information for messenger service, Information on the profile created in the Service, Message information, Usage record (Please refer to Art. 2(A) 'Personal information to be collected' for details) | Management of infrastructure to provide and analyze the Services | Until membership cancellation or termination of the entrustment agreement |

2) When the processing of pseudonym information is entrusted overseas:

| Trustee Entities | Transferred Countries | Date and Method of | Pseudonym Information to | Entrusted Services | Pseudonym Information |
|------------------|-----------------------|--------------------|--------------------------|--------------------|-----------------------|
|------------------|-----------------------|--------------------|--------------------------|--------------------|-----------------------|

| | | Transfer | be Transferred | | Retention Period and Use |
|--|---------------|---|---|---|--|
| Amazon Web Services Inc. (aws-korea-privacy@amazon.com) | United States | Online transfer in the event of AI model learning | Categorized age groups of users and the other party in the communication, gender, relationship, conversation messages with their contents pseudonymized | Management of the infrastructure to process pseudonym information | Until attainment of the purpose of using pseudonym information or termination of the entrustment agreement |
| Google LLC (Google Cloud Platform) (080-822-1422) | United States | Online transfer in the event of AI model learning | Categorized age groups of users and the other party in the communication, gender, relationship, conversation messages with their contents pseudonymized | Management of the infrastructure to process pseudonym information | Until attainment of the purpose of using pseudonym information or termination of the entrustment agreement |

B. Should a user need to report or consult any infringement of the user’s personal information, a user can contact the following institutions:

- Personal Information Infringement Report Center (www.118.or.kr / 82-118)
- Information Protection Mark Certification Committee (www.eprivacy.or.kr / 82-2-580-0533~4)
- High-tech Crime Investigation Unit of Supreme Prosecutors’ Office (<http://www.spo.go.kr> / 82-2-3480-2000)
- Cyber Terror Response Center of National Policy Agency (www.ctrc.go.kr / 82-2-392-0330)

12. For California Residents

This section supplements [the Company’s Privacy Policy](#) and applies solely to residents of the state of California. For any user who is protected by the California Consumer Privacy Act (the “CCPA”), the below section will apply. In case there is any conflict between the above general terms of the Company’s Privacy Policy and this section, this section will prevail for users who are protected by the CCPA.

During the 12-month period prior to the effective date of this Privacy Policy, the Company may have:

A. Collected the following categories of personal information:

- Identifiers such as a real name, profile photograph, and other unique personal identifier (such as a device identifier, cookies, beacons, pixel tags, mobile ad identifiers and similar technology that can identify a user; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, Internet Protocol address, email address, account name, and other similar identifiers;

- Commercial information, including records of products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies;
- Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a user's interaction with websites, applications or advertisements;
- Geolocation data;
- Electronic, visual, or similar information; and
- Inferences drawn from any of the information identified above to create a user profile reflecting a user's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

B. Collected personal information from the following categories of sources:

- From a user or user's devices, for example, through a user's use of the services.

C. Collected personal information for the following business or commercial purposes (in addition to the purposes listed above in [the Company's Privacy Policy](#)):

- Operating services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services;
- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance;
- Short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- Debugging to identify and repair errors that impair existing intended functionality;
- Undertaking internal research for technological development and demonstration; and
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the Company, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the Company.

D. Disclosed the following categories of personal information for a business purpose:

- Identifiers such as a real name, profile photograph, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology that can identify a user; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, Internet Protocol address, email address, account name, and other similar identifiers;
- Commercial information, including records of products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies;

- Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements;
- Geolocation data;
- Electronic, visual, or similar information; and
- Inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

E. Disclosed personal information for a business purpose to the following categories of the third parties:

- The Company's business partners;
- Vendors who provide services on its behalf;
- Professional services organizations, such as auditors and law firms;
- A third party as part of an actual or planned merger or transfer, acquisition or sale, or in the event of a bankruptcy;
- Other third parties when you separately consent to or request such sharing; and
- Government entities, including law enforcement.

Californian Residents' Privacy Rights

As a resident of the state of California, a user may request, twice in a 12-month period, the following information about the personal information the Company has collected about the user for the past 12 months:

- Categories and specific items of personal information the Company has collected about the user;
- Categories of sources from which the Company collected the personal information;
- Business or commercial purpose for which the Company collected or sold the personal information;
- Categories of third parties with whom the Company shared the personal information; and
- Categories of personal information about the user that the Company disclosed for a business purpose, and the categories of third parties to whom the Company disclosed that information for a business purpose.

A user may have the right to request the Company to provide with (1) a list of certain categories of personal information the Company have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and (2) the identity of each of such third parties. In addition, a user has the right to request the Company to delete the personal information the Company has collected from the user.

The Company will not deny, charge different prices for, or provide a different level or quality of goods or services if a user chooses to exercise these rights. To submit an access or deletion request, [click here](#) or contact us as specified in the Privacy Officer and Contact Information section of this Privacy Policy. To help protect user's privacy and maintain security, the Company take steps to verify user's identity before granting any access to the user's personal information or complying with the user's request. To the extent permitted by applicable law, the

Company may charge a reasonable fee to comply with a user's request.

<Addendum>

This Privacy Policy shall take effect from January 20, 2022.