

# Privacy Policy

This Privacy Policy reflect the General Data Protection Regulations(GDPR) of the European Union(EU) effective May 25, 2018. The Privacy Policy for citizens and residents of Korea can be seen [here](#).

SOOP Co., Ltd. (Hereinafter referred to as "we", "us", "our", "SOOP") is committed in following the personal information protection regulations in the relevant laws and regulations that the information and communication service providers must comply with, such as General Data Protection Regulations(GDPR), Communication Networks Utilization, Information Protection, the Personal Information Protection Act, the Protection of Communications Secrets Act, the Telecommunications Business Act and any other laws and regulations applicable. We are committed in protecting the rights and interests of all our users by establishing a personal information processing policy.

Through this Privacy Policy, we will inform you about the purpose and the use of the personal information you provide and what measures are being taken to protect your personal information.

Date of enforcement : **Apr. 5, 2024 (Ver.40.0)**

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## **1. Introduction**

We offer a one-person media and community platform service that allows anyone to freely broadcast anytime, anywhere, and offers an interactive community.

The service includes the following elements:

- Services such as live streaming VOD, blog, main page, and other features that are available on the site and/or app

You can manage your personal information by using AfreecaTV services in various ways. For example, you can search and watch the video you want without creating an account or when signed out. If you would like to sponsor the streamer, and would like to use various features offered, you can do so by signing up to SOOP. Also, certain information can be controlled by modifying your personal information anytime.

To give you a clearer explanation about our Privacy Policy, we will explain what information we collect, and how we use and manage the collected information.

## 2. What and how personal information is collected

※ What is personal information?

Information such as your name, e-mail address, or any other data that can be used to personally identify you (such as information connected to your SOOP account) are personal information.

### A. Information we collect

We collect some basic information such as where you are, and collect information that you create or provide to us. This includes the content you create like live streams, videos uploaded as a file, profile picture, and live chats you participated in.

### B. Information you create or provide to us

When you create an SOOP Account, you provide us with personal information like your username, nickname and password. Specifically we collect the following:

- username, password, nickname, gender, date of birth, email address, IP address

If you are using our service in Korea, we also collect the following information:

- Unique identifiers (connecting information and duplication information), address, whether you have accepted to receive emails, and text messages from SOOP, and phone number.

If you are using the service in Korea and is a minor under 14 years old, the following information will be additionally collected:

- Name, authentication information, and email address of your legal representative

You will not be restricted in using our service when you do not provide optionally collected information.

In addition, you will provide the following information in different situations when using our services such as:

### 1) When purchasing our products

We collect information based on the method of payment you use as below:

- **When paying by credit card:** Name of credit card company, credit card number, and other information if applicable.
- **When paying by mobile phone:** Mobile phone number, carrier, payment authorization number, and other information if applicable.
- **When paying by wire transfer:** Name of bank, account number  
If you use our service outside of Korea, we also require the swift code, and payer information like name, address, phone number or email address.
- **When paying by voucher:** Voucher number

### 2) When we are verifying your identity

For Korean users, identity verification is required to provide our services in the following situations: (i) when the consent of a legal representative is required and (ii) when identity verification is required to comply with relevant laws and regulations. We will use the following information to verify your identity:

- Your name, date of birth, gender, nationality, mobile phone number or I-PIN information(optional), unique identifiers (connecting information and duplication information)

## C. Information that SOOP collects when you connect to our services

We collect information about the apps, browsers, and devices you use to access Afreeca TV services, this helps us to provide features like automatic product updates.

The information we collect includes apps, browsers, device information, and information generated while interacting within AfreecaTV services. The information includes the following:

- unique identifiers, advertisement identifiers, browser type and settings, device type and settings, language, operating system and its version, mobile network information including carrier, and application version number.
- IP address, crash reports, system activity, date and time of request, and referrer URL.

We collect this information when Afreeca TV service on your device contacts our servers. If you're using Afreeca TV service, your device contacts SOOP servers to provide information about your device and connection to our services. This information includes things like your device type, carrier name, crash reports, and which apps you have installed.

#### **D. Your activity**

We collect your activity information to recommend streams and videos that you might be interested. Information that we collect may include: Your activities includes searching, viewing videos, and listening to audios.

- Terms you search for, streams and videos you watch, views and interactions with content and advertisements, voice and audio information when you use audio features, purchase activities
- We also collect the history (log) of your personal messages, or chats which include stream information, streamer information, chatting log, comment log, time, and your IP.

You can view and manage your activity information by visiting SOOP Account Info. [Go to AccountInfo](#)

## **E. Your location information**

When using AfreecaTV services, we collect your location such as IP address information to provide a service suitable for your area. For example, website language, sign-up page, and privacy policy are different depending where you are.

## **F. How personal information is collected**

We collect personal information in the following ways.

- Homepage, mobile
- written form, fax, phone, customer center inquiry, email, event application, delivery request
- Provision from partner companies

In addition to the personal information we collect, SOOP may also collect information about users from our partners such as marketing partners who provide information of our potential users of our services, and security partners who provide information to protect from abuse. We also receive information from our advertising partners to provide advertisement and search services.

We use various technologies to collect and store information, including cookies([more info](#)), pixel tags, local storage, such as browser web storage or application data caches, databases, and server logs.

## **G. Processing unique identifiers**

We collect unique identifiers like a copy of your ID or passport, when we would need to identify you in cases of Star Balloons exchange. We only collect unique identifiers when needed, and immediately discard the information after use.

For Korean citizens and residents, unique identification information refers to the Personal Information Protection Act Article 24 (1) and Article 19 of the Enforcement Decree of the Personal Information Protection Act "Information set by the Presidential Decree", and refers to resident registration number, passport number, driver's license number and alien registration number.

- Obligations to use transaction and payment service
- Imposing the duties incurred by the spot prize winner
- Complaint handling

For Korean citizens and residents, the collected unique identification information is not used or provided for purposes other than the purpose of collecting personal information except for the case specified in the Personal Information Protection Law and other laws, and it is encrypted and managed safely.

### **3. Purpose of collection and using personal information**

We use data to build better services. We use the information we collect from all our services for the following purposes:

#### **A. Provide AfreecaTV service**

We use your information to provide various services such as recommending videos that you might like, notify you when your favorite streamers starts streaming, and so on. In addition, personal information is used to provide you a variety of services including:

- To send prizes to event winners
- To confirm your identity when exchanging Star Balloons

- To collect fees, when you pay for premium services

## **B. Maintain & improve our services**

We also use your information to ensure our services are working as intended, such as tracking outages or troubleshooting issues that you report to us. And we use your information to make improvements to our services — for example we use video error reports created by you to identify the problem and to improve video playback features.

## **C. Develop new services**

We develop new services based on the information collected in the existing service. For example, we use the chat data from the live stream you watch, to create highlight videos from replay videos.

Also, we check the validity of the service and decided whether to update or keep the service by using data and indices such as how many times you visit and use the service.

## **D. Membership management**

We offer membership services. Therefore to operate the service, we manage member information and this includes the following:

- Identifying users
- Restricting users who have violated the Terms of Use
- Restricting behaviors and abuse within the service that can interfere with the smooth operation of services
- Confirming membership and limiting the number of membership sign ups
- For Korean nationals and residents, confirming that the legal guardian has accepted the use



of service for children under the age of 14

- For Korean nationals and residents, confirming that the legal guardian has accepted when a minor under the age of 19 makes payment
- Saving records for future dispute settlement, and to identify legal guardian
- Handling complaints and notifying users
- Confirming withdrawal of membership

## **E. Marketing and advertisement**

We conduct marketing or advertising based on the information collected. For example, we use your age or gender information to advertise about products and services that people with similar statistical characteristics like.

Personal information is also used to provide various marketing and advertising information, such as promotional event information and opportunities

## **4. Sharing and providing personal information**

We do not share personal information with other parties such as companies, organizations, and individuals other than SOOP except for the following cases:

### **A. If you have agreed in advance**

When we need to share or provide personal information separately with the third party for the purpose of providing the service, we will notify or get consent from you in advance in accordance with the "Act

on Promotion of Information Network Usage and Information Protection, etc." and the "SOOP Personal Information Processing Policy". However, if there is difficulty in revising the personal information processing policy due to service partnership and event proceeding which occur frequently, users can directly check service provision history and event provision history through external content providers by providing personal information.

The list of services provided by external content providers and events are as the following. Users who do not use the following services will not receive personal information. This is the case where the user voluntarily provides his / her personal information to a third party in order to use the service. In such cases, SOOP shall notify the user (i) the receiving party of the personal information, (ii) the purpose for sharing the information, (iii) what information will be shared, (iv) the period of use and shall obtain explicit and individual consent from the user.

**Services that external content providers provide and the personal information processed**

Event Name	Receiving party	Purpose	Personal Information	Period of Use
Movie Ticket Event	K&Group Co., Ltd.	Movie Ticket Event (Sending Movie Ticket Vouchers)	Mobile No	Destroy within 1 month after event (For customer service)
Play Ticket Event	Show Factory Co., Ltd.	Play Ticket Event (Giving ticket on-site)	Username/ Mobile No.	Destroy within 1 month after event (For customer service)
Chocolate Shop Event (Chocolate Slot)	Omnitel Co., Ltd.	Chocolate Shop Event (Send gifticon)	Mobile No.	Destroy within 1 month after event (For customer service)
Ad popcom Free charge	IGAWorks Co., Ltd.	Using Free Charge Service (Free Gold, Quick View)	Username	Destroy within 1 month after event (For customer service)

※ If you want to withdraw your consent, contact the person in charge of personal information management in writing, by phone, and/or e-mail. We will take necessary measures such as discarding your personal information provided to the third party immediately.

※ Events are conducted mostly for Korean nationals and residents, and does not include overseas residents such as EU residents.

Also, when you want to use games provided by SOOP, personal information will be provided to game developers or operators. In other words, users who do not use the game will not receive

personal information. In the event that the user voluntarily provides his / her personal information to a third party for use of the game, we will also inform the user that the receiver of the personal information, the purpose of providing, what information will be provided, period of use and will inform the user in advance, and obtain individual consent.

**Parties we share personal information and processed information when using SOOPGames**

Service Name	Receiving Party	Purpose	Personal Information	Period of Use
Slugger Channeling	Neowiz Co., Ltd.	Using Slugger Service	Username, Gender Date of Birth, Name, Personal ID verification number (CI)	Destroy within one month after termination of service

**B. When required by law**

We may provide personal information when required by applicable laws and regulations in accordance with procedures and methods set forth in laws and ordinances for the purpose of investigation.

**5. Consignment of processing personal information**

In order to improve the service, we consign personal information to other parties as below.

When making contract of consignment, we provide necessary information to ensure that personal information can be safely managed according to the relevant laws and regulations

**Our personal information consignment processing agency and consigned business contents**

are as follows.

Consignment company	Consignment work	Period of saved & use of Personal information
SCI Credit Co	personal identification check when subscribing	it is not saved because it is already owned by the agency
Pay Letter Co	Mobile, credit card, account transfer, KTphone bill, culture gift certificate, happy money, book gift certificate, OK cashback, T-money, Teen cash, PAYCO payment agent	Saved during 5 years including payment date
Cake Tree Co	event item production, shipping agency	saved for 1 month after delivery for win confirmation and customer service for delivery
Ari Communication Co	Nickname, Mobile No., email address, Yard address, separate offered image(exception photo)	Immediate destruction after Making & sending
Viva Republica	Toss Payment Service	Saved for 5 years since payment date

※ Some services can be consulted by external content providers (CP) for payment and refunds.

## 6. Period of storage and usage of personal information

In principle, the personal information of the user is destroyed without delay when the purpose of collecting and using the personal information is achieved. However, the following information will be preserved based on saving clause of Article 29 of the Act on Promotion of Information and Communication Network Promotion and Information Protection, etc. for the preservation period specified by the following reasons for storage. In order to comply with Article 21, Paragraph 3 of the Personal Information Protection Act, It is stored in separate safe storage space.

### A. Why we preserve information by AfreecaTV policy

Reason for preservation: Prevention of confusion and misuse (unauthorized subscription, unusual use

of services) in using services such as dissatisfaction and dispute settlement of consumers at the time of membership withdrawal

**Preserved items:** username, identification code (Connection information, Duplication information)

**Preservation period:** 6 months

## **B. Why we preserve information by relevant laws**

If it is necessary to preserve the information in accordance with the relevant laws and regulations, such as the Commercial Act, the Consumer Protection Act in Electronic Commerce, etc., we will keep the member information for a certain period as stipulated by related laws and regulations. In this case, we will only use the information according to the purpose of keeping it, and keep it for the period of preservation according to the grounds stated in the reason for preservation. If the period of preservation is terminated, the personal information of the user will be deleted without delay.

- Reasons of record preservation regarding contracts or membership withdrawal: Act on Consumer Protection in Electronic Commerce etc. Preservation period: 5 years
- Reasons of record preservation regarding payment and goods supply: Act on Consumer Protection in Electronic Commerce etc. Preservation period: 5 years
- Reasons of record preservation regarding e-banking transaction: Act on e-banking transaction: 5years
- Reasons of record preservation regarding consumer's complaint or resolution of dispute: Act on e-banking transaction of consumer protection: 3years
- Reasons of record preservation regarding visiting of website: Protection act on communication secret: 3 months

## **7. Procedures and methods of personal information deletion**

In principle, the personal information of the user is deleted without delay when the purpose of collecting and using the personal information is achieved. However, the information that should be kept by other laws and regulations will be deleted immediately after separate separation and storage for a period set by the statute.

### **A. Deletion procedure**

If the purpose of collecting and using personal information of the user is accomplished, it will be deleted without delay and if it should be stored according to other laws and regulations, it will be transferred to a separate DB and will be deleted without delay after being safely kept for a certain period in compliance with relevant laws and regulations.

This personal information will not be used for any purpose other than the purpose for which it is being held, except as provided in laws and regulations.

### **B. Deletion methods**

Personal information printed on paper is destroyed by a grinder or by incineration.

Personal information stored as an electronic file is deleted using a technical method so it cannot be restored.

### **C. Personal information expiration system (inactive account policy)**

The personal information of the service user who is in a dormant state without a service use record for one year is separately stored and managed separately from the user's personal information. However, if there is a request from the dormant service user, the personal information will be provided again when the service is resumed.

We will notify the users by e-mail etc. before 30 days before transition into an inactive account.

Separated and stored personal information will not be used or provided unless otherwise specified in other laws and regulations. In addition, personal information that has been separated and archived will be deleted without delay at the time specified in the related laws and will be notified to users by e-mail or other means before 30 days from the time of deletion.

## **8. Rights of users and legal representatives and how to exercise them**

Users who are Korean or live in Korea and legal representatives may access or modify the personal information of the registered person or his / her children under the age of 14 at any time. If the user does not consent to the processing of personal information by us, he / she can refuse his / her consent or request to unsubscribe (secession). However, in such cases it may be difficult to use some or all of the services.

To access or modify the personal information of a user or a child under the age of 14 years, click 'Change membership information' (or 'Edit membership information'), and to cancel the subscription (withdraw the consent), click the "unsubscribe" button for a verification process and then correct or withdraw the subscriber.

Or, in writing to the personal information manager, please contact us by phone or email and action will be taken without delay.

If the user requests correction of the error of personal information, we will not use or provide the personal information until the correction is completed. Also, if wrong personal information is already provided to a third party, we will notify the third party without delay and make correction.

we will process personal information that has been terminated or deleted at the request of the user or legal representative as described in "5. Retention and Use Period of Personal Information" and is prohibited from being viewed or accessed for other purposes.

## **9. Installation, operation and rejection of automatic collection of personal information**

## **A. What are cookies?**

We use cookies to frequently store and retrieve information of users in order to provide personalized and customized services.

Cookies are very small text files sent to the user's browser by the server used to run the website and stored on the user's hard disk. When a user visits a website, the website server is used to maintain the user's preferences and provide customized services by reading the contents of cookies stored on the user's hard disk.

Cookies do not automatically and / or actively collect personally identifiable information, and you can deny or delete these cookies at any time.

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

It is used to provide optimized and customized information including advertisement to users by understanding the types of visits, usage of services, websites visited by users, popularity queries, security access, news editing, and user volume.

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

You have the option of installing cookies. Therefore, you can allow all cookies by setting options in your web browser, check each time a cookie is saved, or refuse to save all cookies.

However, if you refuse to store cookies, some services that require login may be difficult to use.

Here's how to specify whether to allow cookies to be installed (for Internet Explorer):

- ① From the [Tools] menu, select [Internet Options].
- ② Click the [Privacy] tab.
- ③ You can set [Privacy Level].



## **10. Technical and administrative measures to protect personal information**

We strive to ensure the safety of users' personal information to prevent them from being lost, stolen, leaked, altered or damaged. These efforts include the following technical and administrative measures:

### **A. Password encryption**

The password of the username registered in SOOP is stored and managed with secure encryption. Only the user will know the password. Also, checking and modifying personal information can be done only by the user.

### **B. Security feature**

We provide a 2-step verification function that checks passwords when you change your personal information to protect your account.

### **C. Export or delete copy of personal information**

You can export a copy of content in your SOOP Account if you want to back it up or use it with a service outside of Google.

**To export your data, you can:**

- You can download your VODs on Blog > Recent Stream.
- Personal information can be downloaded as an excel file on the Manage Account page.

**To delete your information, you can:**

- You can delete your personal information by clicking on 'Delete Personal Info' button on the Privacy Policy page or Manage Account page.

**D. Measures against hacking**

We are doing our best to prevent leakage or damage of personal information of our users caused by hacking or computer viruses. In order to prevent personal information from being damaged, we are backing up the data on a regular basis. The latest vaccine program is used to prevent personal information or data from being leaked or damaged, and to securely transmit personal information on the network with encryption. We use intrusion prevention system to control unauthorized access from outside, and try to have all possible technical devices to secure it systematically.

**E. Minimize use of personal information and training our data processors**

Personal information is only processed and handled by the person we appoint. Also, a separate password is given to them and updated regularly. We train our data processors through regular trainings and emphasize to comply with personal information processing policies.

**F. Operation of personal information protection department**

In addition, through the internal personal information protection department, we check the implementation of the personal information processing policy and compliance with the person in charge, and are working to correct and rectify any problems that are found. However, we shall not be held responsible for damages that are not attributable to us, even though we have fulfilled its obligation to protect personal information, such as carelessness of users or accidents in areas not controlled by us.

## G. Data transfers

Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protection as described in this policy. We also comply with certain legal frameworks related to the transfer of data, such as the EU-US and Swiss-US Privacy Shield Frameworks.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

## 11. Personal information manager and contact information

You may report all personal information protection complaints arising from your use of our services to the person or department in charge of privacy protection. We will respond promptly and adequately to your reports.

<b>Manager responsible for personal information/juvenile protection</b>	<b>Person in charge for personal information/juvenile protection</b>
Name: Jang dong jun (Managing director) Dept. : Headquarters of Strategic support Contact: 1688-7022 E-mail : AfreecaTV@afreecatv.com	Name: Lee won jeong(Senior Manager) Dept. : Headquarters of Strategic support Contact: 1688-7022 E-mail : AfreecaTV@afreecatv.com

If you need to report or consult about other privacy infringement, please contact the following organizations.

- Personal Information Dispute Resolution Committee (<http://www.kopico.or.kr>, Telephone 1336)
- Personal Information Infringement Notification Center (<http://privacy.kisa.or.kr> / Without area code)

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- Supreme Prosecutors' Office Cyber-criminal investigation(<http://www.spo.go.kr> / 02-3480-3571)
- National Police Agency Cyber Security Bureau(<http://www.ctrc.go.kr> / Without area code 182)
- Illegal Juvenile Harmful Information (<http://www.singo.or.kr> / Without area code 1377)

## 12. Others

We may provide users with links to other companies' websites or materials. In this case, we have no control over external sites and materials, so we cannot be responsible for and cannot guarantee the usefulness of the services or materials provided. If you click the link that we provide and move to the page of another site, please check the policy of the new site because the policy of the site is not affiliated with us.

## 13. Obligation of notification

In case of addition, deletion and modification of the content in accordance with the modification of the security policy or security technology, this Personal Information Processing Guidelines shall be announced at least 7 days before the implementation of the changed personal information policy through the "notification".

Personal Information disposal directive version No v40.0

Personal Information disposal directive (enforcement date): Apr. 5, 2024

Personal Information disposal directive (date of change notice): Mar. 29, 2024