
Personal Information Processing Policy

Broj Co., Ltd., (Hereinafter referred to as "Company"), which operates 'BROJ', has following processing policies in order to protect the personal information and rights of users, and handle user's complaint smoothly in accordance with relevant laws such as the European Union's "GENERAL DATA PROTECTION REGULATION", "ACT ON PROMOTION OF INFORMATION AND COMMUNICATIONS NETWORK UTILIZATION AND INFORMATION PROTECTION, ETC." (Hereinafter referred to as "Act on Information and Communications Network"), "PERSONAL INFORMATION PROTECTION ACT", etc.

- As a controller that determines the purpose and means of handling personal information on the BROJ service, the company makes every effort to comply with and implement the responsibilities and obligations set forth in the related laws.
- The company will notify the personal information processing policy through its website in case that it is revised.
- This policy will be effective from 6(Month). 30(Date), 2020.

The company's personal information processing policy contains following contents.

1. Purpose of collecting personal information, items, period of retention and use
2. Consignment of personal information processing
3. Matters about providing personal information to third parties
4. User rights and duties, and how to exercise them
5. Destruction of personal information
6. Matters about installation, operation and rejection of automatic collection tool of personal information
7. Information about the person in charge of personal information security
8. Measures to ensure the personal information security
9. Remedies against infringement on rights of the subject of information
10. Matters about changes of the policy of processing personal information

1. Purpose of collecting personal information, items, period of retention and use

- The company processes personal information for the following purposes.

Classification	Purpose		Compulsory Item	Optional Item	Retention Period
Providing Broj's service	Signing up, identifying a user for service provision, contacting for contract implementation		ID, Password, Name, Date of birth, Gender, Mobile phone number, E-mail address		Until membership withdrawal
	Managing member's profile			Profile image, Address	
	Handling an inquiry		Name, Phone number, Mobile phone number, E-mail address, Content of inquiry		
	Payment	Credit card	Credit card company, Part of the credit card number, Payment record		
		Wire transfer	Bank, Account number, Account holder, Payment record		
	Issuing a cash receipt		Mobile phone number, Cash receipt number		
	Processing refund		Bank, Account number, Account holder		
	Checking exercise statistics		Height, Weight, Waist circumference, Body fat, Muscle mass	Lowest blood pressure, Highest blood pressure, Fasting blood sugar	
	Improving service quality and developing customized products		Exercise history, Weight, Height, Waist circumference, Muscle mass, Body fat, Fasting blood sugar, Blood pressure		
Sending advertising information		Name, Mobile phone number, Date of birth, Gender		Until consent withdrawal or membership withdrawal	
Managing a fitness center	Managing members and class students, identifying a user for service provision, contacting for	Non-members of Broj(collecting based on consignment relationship with a fitness center)	Name of the member, Gender of the member, Mobile phone number, Address, E-mail address, Registered class	Name of the assigned trainer, Date of birth, Address, E-mail address	Until membership withdrawal

	contract implementation	Members of Broj	Name, ID, Date of birth, Gender, Address, Mobile phone number, Registered class	
	Registering trainers	Non-members of Broj(collecting based on consignment relationship with a fitness center)	ID, Password, Name, Date of birth, Gender, Mobile phone number, E-mail address, Admin ID of the fitness center	
		Members of Broj	Name, ID, Date of birth, Gender, Address, Mobile phone number	
	Managing a member's/trainer's attendance		Name, Mobile phone number, Profile image, Status of the attendance	
	Managing a trainer's career/history/salary		Career information(date of joining the company, position, company name), School information(date of admission, date of graduation, school name, department name, completion status), Award history(date of award, name of award, host), Certificate/license(name of certificate, date of issue, place of issue), Salary	Date of resignation
	Issuing a contract		Name, Contact, Date of birth, Gender, Address, History of purchase	
	Sending an announcement		Mobile phone number, Device token	
	Handling an inquiry		Name, Contents of inquiry	
	Sending advertising information		Name, E-mail address, Mobile phone number	Until consent withdrawal or membership withdrawal

- If the purpose and items of the member information which processed by the company are changed, the company will ask for prior consent of the member in accordance with the relevant laws and regulations.
- In order to process customer information of the fitness center in BROJ, a separate consent by the customer is required.
- The company does not collect personal information of children under the age of 14(under the age of 16 in case of the European Union resident).
- The company prohibits to process resident registration number in principle; however, the company processes only if it is specifically requested by the law, Presidential decree, National Assembly Regulations, Supreme Court Regulations, Constitutional Court Regulations, Central Election Management Commission Regulations, and the Board of Audit and Inspection Regulations.

- The company collects user’s personal information using following methods.
 - The way that the user inputs personal information directly on the website and application which the company operates
 - The way that the information such as use record, access log, etc. is automatically generated and collected in the process of using the service
- The collected personal information is retained and used within the period of retention and use in accordance with relevant laws and regulations or the consented period by the information subject when the personal information is collected.
- The legal ground for the personal information processing policy that the company uses for the purposes specified in “1. Purpose of collecting personal information, items, period of retention and use” is follows.

Purpose	Legal Ground
Signing up, identifying a user for service provision, contacting for contract implementation	Necessary for the consent by the user and contract implementation with the user
Managing member’s profile	Necessary for the consent by the user and user convenience
Handling an inquiry	Necessary for contract implementation with the user
Payment	Necessary for contract implementation with the user
Issuing a cash receipt	Necessary for contract implementation with the user
Processing refund	Necessary for contract implementation with the user
Sending advertising information	Necessary for the consent by the user and legitimate interests of the company
Checking exercise statistics	Necessary for the consent by the user and user convenience
Improving service quality and developing customized products	Necessary for the consent by the user and legitimate interests of the company
Registering members/trainers, managing class students, identifying a user for service provision, contacting for contract implementation	Necessary for the consent by the user and contract implementation with the user
Managing a member’s/trainer’s attendance	Necessary for the consent by the user and contract implementation with the user
Managing a trainer’s career/history/salary	Necessary for contract implementation with the user
Issuing a contract	Necessary for contract implementation with the user
Sending an announcement	Necessary for contract implementation with the user
(Managing a fitness center) handling an inquiry	Necessary for contract implementation with the user
(Managing a fitness center) sending advertising information	Necessary for legitimate interests of the fitness center

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- The mandatory period of retention and use of personal information in accordance with relative laws and regulations is following even if the purpose of collecting personal information consented by the user is achieved or the period of retention and use has arrived.

Purpose of Retention	Period	Legal Grounds of Retention
Information related to transaction history and supporting documents	5 years	Basic Act for National Taxes, Corporate Tax Act
Record on sign/advertisement	6 months	The Act on Consumer Protection in Electronic Commerce
Record regarding contract or withdrawal of subscription	5 years	The Act on Consumer Protection in Electronic Commerce
Record of payment and supply of goods	5 years	The Act on Consumer Protection in Electronic Commerce
Record of consumer complaints or disputes	3 years	The Act on Consumer Protection in Electronic Commerce
Record-keeping about access	3 months	Protection of Communications Secrets Act
Where it is needed to be preserved in accordance with relevant laws such as the Commercial Law, etc.	10 years	Commercial Law

2. Consignment of personal information processing

- The company consigns following personal information processing task for smooth work process.

Consignee	Consigned Task	Contact
Amazon Web Service(Seoul region)	System operation and data storage using cloud service	aws-korea-privacy@amazon.com
KG Inicis Co., Ltd	Credit card payment service	1588-4954

- The company supervises the handling of personal information securely by the consignee in accordance with the relevant laws when signing the agreement of consignment.
- If the consignee or content of consignment task is added or changed, the company will ask for prior consent in accordance with the relevant laws and regulations or announce it through this personal information processing policy without delay.

3. Matters about providing personal information to third parties

- The company processes personal information of the information subject only with the range specified in '1. Purpose of collecting personal information, retention and use period of personal information', and the company provides personal information to third parties only if the case applies such as the consent of the information subject, special provision of the laws and regulations, etc.
- The company provides personal information to the third party as follows.

Provided company	Purpose of provision	Item of provision	Period of retention and use
Registered fitness centers (List of related fitness centers)	Managing members of registered fitness centers	ID, Name, E-mail address, Date of birth, Gender, Mobile phone number, Device token, History of class taking, Exercise history, History of inquiry, Weight, Height, Muscle mass, Body fat, Fasting blood sugar, Blood pressure	Upon termination of the contract with the fitness center, membership withdrawal or consent withdrawal by the user
	Managing contracts of registered fitness centers	Name, Contact, Date of birth, Gender, Address, Details of purchase history	

	Managing attendance of the fitness center	Name, Mobile phone number, Status of the attendance, Profile image	
	Managing trainers	ID, Name, Date of birth, Gender, Mobile phone number, E-mail address, Address, Height, Weight, Waist circumference, Body fat, Muscle mass, Lowest blood pressure, Highest blood pressure, Fasting blood sugar, Salary, Career information(date of joining the company, position, company name), School information(date of admission, date of graduation, school name, department name, completion status), Award history(date of award, name of award, host), Certificate/license(name of certificate, date of issue, place of issue)	
	Sending advertising information of the fitness center	Name, E-mail address, Mobile phone number	

- The company cannot provide user's personal information to third parties without prior consent.
- However, following cases are exceptions.
 - Where the information of certain individuals is provided in an unidentifiable form as necessary for statistical writing, academic research or market research
 - Where there is a request pursuant to the relevant laws and regulations by the national agency
 - Where there is purpose of a criminal investigation or there is a request by the supervisory authority
 - Where there is a request pursuant to the procedures set forth in other relevant laws

4. User rights and duties, and how to exercise them

- Users and legal representatives may exercise the following rights with respect to the personal information of registered users or the users who are under 14 years old (under 16 years old in case of EU residents) in this year.
 - Users and legal representatives may request to read, stop, delete or transfer personal information to another controller through written, e-mail, homepage, etc., and may request to discontinue automated information processing including profiling that has a legal effect or significant impact on themselves.
 - If an user and legal representative requests correction or deletion for an error of the personal information, the company will not use or provide until the completion of correction or deletion.
- Users have the right to file a complaint regarding personal information processing with the competent supervisory authority in their residential country.
- The request for correction and deletion of personal information cannot be requested if that information is a subject of collection in accordance with other relative laws.
- Exercise of user rights (reading, correction, stop the processing, or deletion) can be made through legal representative or delegatee of the user. In this case, the legal representative or delegatee of the user must submit a power of attorney in accordance with Form 11 of the Appendix of the Enforcement Rules of Personal Information Protection Act.

- When a user requests the reading, correction or deletion, or stop processing of personal information, the company confirms whether the user is himself/herself or a legitimate agent in accordance with the right of the subject of personal information.
- Users have the following duties as subjects of personal information.
 - Users must keep their personal information up-to date, and it is up to the users to take responsibility for any problems caused by inputting incorrect personal information.
 - Users are responsible for maintaining the security of accounts, etc. and they cannot transfer or lease them to third parties.
 - If a person applies for the service using other person's information, the eligibility of the service will be lost and he/she may be the subject of penalties under the relevant laws.

5. Destruction of personal information

- In principle, the company destroys personal information without delay if the purpose of processing personal information is fully accomplished. The procedure and method of destruction are as follows.
 - Procedure of destruction
 - The information inputted by the user will be destroyed immediately after accomplishing the purpose. However, members who have not used the service for a year will be notified them beforehand, and if there are no separate requests from the users, their personal information is stored separately(converted to dormant accounts). If the personal information is required to retain for the period in accordance with the provision of related laws and regulations, such as the law set forth in Article 1, it is stored for the period prescribed by the relevant laws and regulations.
 - Method of destruction
 - Information in the form of electronic files is destroyed by technical methods so that the record cannot be reproduced.
 - Personal information printed on the paper is destroyed by the shredder.

6. Matters about installation, operation and rejection of automatic collection tool of personal information

- The following information is automatically generated / collected in the process of using the service or processing of personal information and may be used for the following purposes.
- Automatically generated information: date and time of visit, record of service use, information of access IP, access log, cookies(Cookies are small amounts of information sent to a user's computer browser by server used to operate a website, and may be stored on the hard disk of the user's PC.)
- The company uses Google Analytics which is a web log analysis tool provided by Google, and collects the main behaviors(behavior information) of the service users using cookies.
 - Purpose of using automatically generated information
 - To provide optimized information to users
 - To enhance service quality and develop new products
 - To comply with record obligations in accordance with the Act on Information and Communications Network

- Cookies in use

Cookie name	Provider	Purpose	Validity period	Type
_ga	google	Used to distinguish users in Google Analytics	Two years	HTTP Cookie
_gid	google	Used to distinguish users in Google Analytics	One day	HTTP Cookie
access_token	broj	Used as a security token for login	Seven days	HTTP Cookie
broj-theme	broj	Used to classify a design theme	Seven days	HTTP Cookie
jgroup_key	broj	Used to import the center's information for a certain period	Seven days	HTTP Cookie
username	broj	Used to store login information of the user	Seven days	HTTP Cookie

- Methods of installation, operation and refusal of cookies : Users can refuse to store cookies by following methods
 - Internet Explorer : Users can change their cookies settings at the following path "Tools > Internet options > Privacy > Advanced".
 - Microsoft Edge : Users can change their cookies settings at the following path "Menu > Settings > Advanced > Privacy & security > Cookies".
 - Chrome : Users can change their cookies settings at the following path "Menu > Settings > Advanced > Site settings > Cookies and site data".
 - If users refuse to store cookies, there is no problem in using the service; however, customized service is not available.

7. Information about the person in charge of personal information security

- The company has designated the person in charge of personal information security as follows in order to take responsibility for overall personal information related business and handle complaints and relieve damage of users related to personal information.
 - The person in charge of personal information security (DPO)
 - Name: Kyungwon Lee
 - Position: Director
 - Contact: +82-10-7135-1811
- Users may ask for all of inquiries related to personal information security, complaint, damage relief etc. to the person in charge of personal information security while they are using the company's service. The company will reply and process user inquiries without any delay.

8. Measures to ensure the personal information security

- The company has the following technical, managerial and physical measures to ensure security in accordance with laws and regulations related to personal information.
 - Minimization and training of personal information handling employees
 - The company minimizes the number of employees who handle personal information, and regularly conduct training program for personal information security in order to manage personal information.
 - Establishment and enforcement the internal management plan

- The company has established and implemented the internal management plan for the secure processing of personal information.
- Keeping access records and preventing forgery and falsification
 - The company keeps and manages logs(web log, summarized information, etc.) accessed to the personal information processing system for at least six months in order to cope with easily when the personal information infringement incident occurs, and uses security features to prevent forgery, falsification, theft or loss of access logs.
- Encryption of personal information
 - User's personal information has been stored and managed in encrypted form. In addition, the company uses separate security features such as encrypting important data during storage and transmission, etc.
- Technical measures such as hacking, etc.
 - The company installs security programs and updates/inspects them periodically in order to prevent leakage and damage of personal information caused by hacking or computer viruses. And also, the system is installed in an area where access from outside is controlled, and it is technically/physically monitored and blocked.
- Restriction of access to personal information
 - The company takes necessary measures to control access to the personal information by authorization, modification, and cancellation of access to the personal information processing system.

9. Remedies against infringement on rights of the subject of information

- If you need more detailed information about the infringement on rights of the subject of information, please contact the following organizations.
 - Privacy Infringement Report Center(Operated by Korea Internet & Security Agency)
 - Responsibilities: Reporting the fact of personal information infringement and applying for consultation
 - Homepage: privacy.kisa.or.kr
 - Phone: (Without an area code) 118
 - Address: Privacy Infringement Report Center , 3F, 9 Jinheung-gil, Naju, Jeollanam-do, Republic of Korea, 58324
 - Personal Information Dispute Mediation Committee
 - Responsibilities: Applying for mediation of disputes on personal information and mediation of collective disputes(civil resolution)
 - Homepage: www.kopico.go.kr
 - Phone: (Without an area code) 1833-6972
 - Address: 4F, Government Complex-Seoul, 209, Sejong-daero, Jongno-gu, Seoul, Republic of Korea, 03171
 - Cyber Investigation Division of Supreme Prosecutors' Office: 02-3480-3573 (www.spo.go.kr)
 - Cyber Bureau of National Police Agency: 182 (<http://cyberbureau.police.go.kr>)

10. Matters about changes of the policy of processing personal information

- This personal information processing policy will be applied from the effective date. If there is any addition, deletion or correction in accordance with relative laws, regulations and policies, the company will announce it through the homepage without delay.