

# Privacy Policy

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## 1. General Provisions

Hyundai IFC developed and disclosed following Privacy Policy to protect the personal information of customers and rapidly and smoothly handle related complaints in accordance with Article 30 of the Personal Information Protection Act.

### 1.1 Scope of Application

This Privacy Policy of Hyundai IFC applies to HYUNDAI IFC's all business sites in and outside of Korea, subsidiaries, joint ventures, affiliates, personal information processors and their contractor.

## 2. Purpose, Items, and Period of Retention of Personal Information

2.1 HYUNDAI IFC processes following personal information for purposes described below.

HYUNDAI IFC processes and retains personal information within the period set by relevant laws and regulations, or the period agreed with customers at the time of collecting their personal information. Personal information shall not be used for purposes other than those described below. If the purpose of use or items are changed, we will take necessary measures such as obtaining separate consent according to the Article 18 of the Personal Information Protection Act.

2.2 HYUNDAI IFC stores customers' personal information if such retention is mandatory as per related laws and regulations, including the Commercial Act.

In this case, HYUNDAI IFC will use the retained information only for the purpose of such retention, and the period of retention is as follows:

- ① Important documents related to HYUNDAI IFC's commercial books and sales, and information about statements: 10 years – important documents/5 years – statements (Commercial Law)
- ② Information related to ledgers and documentary evidence about all transactions: 5 years (Framework Act on National Taxes, Corporate Tax Act)
- ③ Records about contracts or withdrawing subscriptions, or records about payment and provision of goods, etc.: 5 years (Guidelines for Consumer Protection in Electronic Commerce, etc.).
- ④ Records about handling consumer complaints or disputes: 3 years (Guidelines for Consumer Protection in Electronic Commerce, etc.)
- ⑤ Ledgers, tax invoices issued, or receipts: 5 years (Value-added Tax Act)
- ⑥ Service use history, access logs, access IP information as required by Protection of Communications Secrets Act: 3 months.

※ According to the policy about the term of the validity of personal information, personal information of members who have not used the service for one year is stored separately.

### 3. Procedure and Method of Destroying Personal Information

3.1 Hyundai IFC immediately destroys personal information if it becomes unnecessary due to the expiry of the period of retaining personal information or by achieving the purpose of processing the personal information unless it should be preserved according to laws and regulations.

3.2 In cases where personal information should be preserved due to laws and regulations, internal policy, or for protection of information (refer to the period of retaining and using personal information) even after the period of retaining personal information expires or the purpose of processing personal information is achieved,

HYUNDAI IFC moves the said personal information to a separate database or store it at a different location (a separate filing cabinet in the case of paper). The personal information moved to a separate database will not be used for purposes other than the purpose of retaining the information.

3.3 Followings are the procedures and methods to dispose of personal information.

- ① Procedures of disposal: HYUNDAI IFC selects personal information that should be disposed of, receives approval by the person in charge of personal information protection, and then dispose of the personal information.
- ② Method of disposal: In the case of personal information recorded and stored in an electronic file format, HYUNDAI IFC disposes of the information in an irreversible way so that it cannot be reproduced. Printed copies of personal information should be incinerated or shredded by a paper shredder.

### 4. Outsourcing of Personal information to a Third Party

4.1 HYUNDAI IFC outsources part of activities related to personal information processing for smooth personal information processing.

4.2 When signing an outsourcing contract, HYUNDAI IFC specifies matters related to responsibilities, such as prevention of personal information processing for purposes other than the purpose of outsourcing, technical and managerial safeguards of personal information, prohibition of sub-outsourcing, management and supervision of the entity who provides outsourcing services, and damage compensations, etc., to supervise whether the outsourcing service provider safely processes personal information, According to Article 26 of Personal Information Protection Act.

4.3 When the details of outsourcing services or the entity that provides the outsourcing services is changed, related details will be disclosed in accordance with this Privacy Policy.

## 5. Providing Personal Information Processing

5.1 HYUNDAI IFC processes personal information of data subject only within the scope defined by Article 1 (Purpose of Processing Personal Information) and provide personal information to a third party only in the cases that fall under Article 17 and Article 18 of the Personal Information Protection Act, including the cases where additional consent is obtained from the data subject and special provisions exist in other laws.

5.2 HYUNDAI IFC does not use personal information outside of the scope described above or does not provide customers' personal information to other organizations, including other companies.

## 6. Measures to Secure the Safety of Personal Information

### 6.1 Management Measures

- ① Development of personal information management system: HYUNDAI IFC internally developed and operates a personal information management system to manage personal information safely.
- ② Management of personal information controller: HYUNDAI IFC requires personal information controllers to sign and submit a privacy pledge and provides them with privacy protection training twice or more a year to raise their awareness of the importance of customer information as well as to manage customer information. In addition, HYUNDAI IFC controls the authority level of personal information controllers to minimize unnecessary access to and exposure of the personal information of customers.

### 6.2 Corporate-wide Risk Management

HYUNDAI IFC leads and complies with the privacy policy. Based on this, HYUNDAI IFC established its own privacy rules for HYUNDAI IFC's business activities and stakeholders, including customers and affiliated companies.

### 6.3 Disciplinary Measures in the Case of Violation

Any accidents that violate laws and regulations related to personal information protection and this Policy are reported in public, and HYUNDAI IFC takes disciplinary measures regarding responsible employees and organizations pursuant to company regulations. HYUNDAI IFC determines the degree of discipline such as dismissal or suspension of the relevant contract in the worst case, depending on the type of violations, the gravity of the issue and other matters.

### 6.4 Internal Audit

HYUNDAI IFC implements regular internal investigations to check compliance with this Policy. HYUNDAI IFC identifies areas that require improvement through the internal investigations to improve business and confirm whether improvements were made.

## 7. Rights and Obligations of Customers and Their Legal Representatives, and Method of Exercising the Rights

7.1 Customers or their legal representatives (for children under 14) can withdraw their consent (cancel their membership) on the collection, use and provision of personal information to HYUNDAI IFC. They can exercise their rights to access, correct, delete, and stop processing their personal information.

7.2 Customers can exercise the above said rights either online or offline: they can visit the company website, verify their identification, and click the personal information setting menu or they can contact HYUNDAI IFC's customer center or the head or the responsible employee in the personal information protection team by mail, phone, or email. HYUNDAI IFC will take immediate actions regarding such requests.

7.3 Customers can exercise their rights described in above paragraphs 1 and 2 via their legal representative or a delegated person, etc. In this case, a letter of delegation should be submitted using the form no. 11 of the "Announcement of the Methods of Processing Personal Information (No. 2020-7).

7.4 According to Paragraph 4 of Article 35 and Paragraph 2 of Article 37 of the personal information Protection Act, customer's rights to request access to personal information or suspending personal information. processing can be limited.

7.5 Regarding the request to correct and delete personal information, customers cannot request deleting their personal information if collecting the information is legally required by other laws and regulations.

7.6 In the case of receiving requests to access, correct, delete, or suspend processing personal information as per the rights of information subjects, HYUNDAI will verify whether such requests were made by the information subject or a legitimate representative.

7.7 When requested by customers to correct errors with their personal information, HYUNDAI does not use or provide the said personal information until correction is completed. In cases where the personal information was already provided to a third party, HYUNDAI will immediately send a notice to the third party to correct the error.

7.8 If customers or their legal representatives withdraw consent (cancel membership), HYUNDAI should destroy the information without delay in principle. However, if it is mandatory to retain such information according to related laws and regulations, HYUNDAI should process the information as per the 'Period of Retention of Personal Information under the Privacy Policy and allow access to or use of the personal information only when such access or use is really needed.

## 8. Remedy Against Infringement on the Rights of Customers

Customers can contact the following institutes and inquire damage relief or get consultations about infringement on personal information.

Customers can contact these organizations, which are not related to HYUNDAI IFC,

if they are not satisfied with the results of HYUNDAI IFC's internal handling of complaints related to personal information or damage relief, or if they need additional support.

- Personal Information Infringement Report Center Korea (run by Korea Internet & Security Agency).
  - Tasks: to receive reports of personal information infringement, and application for consultations
  - Website: [privacy.kisa.or.kr](http://privacy.kisa.or.kr)
  - Phone: (without area code) 118
  - Address: (58324) 3 rd floor, 9, Jinheung-gil, Naju-si, Jeollanam-do, Republic of Korea
- Personal Information Dispute Mediation Committee.
  - Tasks: to receive applications for dispute conciliation regarding personal information and arbitrate collective disputes (civil case settlement)
  - Website: [www.kopico.go.kr](http://www.kopico.go.kr)
  - Phone: (without area code) 1833-6972
  - Address: (03171) 12th floor, 209, Central Government Complex, Sejong-daero, Jongno-gu, Seoul, Republic of Korea
- Internet Crime Investigation Center: 02-3480-3573 ([www.spo.go.kr](http://www.spo.go.kr))
- Cyber Bureau of the National Police Agency: 182 (<https://cyberbureau.police.go.kr>)

## 9. Director, Manager, and Department in Charge of Personal Information Protection

9.1 HYUNDAI IFC designated following Personal Information Protection Director to be responsible for the supervision of personal information processing, as well as related customer complaints and damage relief.

### Director and Manager in Charge of Personal Information Protection

- Personal Information Protection Director: Jung Woo-bong, Managing Director.
  - Department: Business Management Office
- Personal Information Protection Manager: Kim Rae-hyun, Team Leader.
  - Department: Management Support Team
  - Phone: 061-760-7330
  - Email: [ingot@hyundai-ifc.com](mailto:ingot@hyundai-ifc.com)

9.2 For all inquiries, complaints, and damage relief related to personal information protection that may arise while using HYUNDAI's services (or business), customers can contact the above personal information protection director or responsible department.

HYUNDAI IFC will respond to and handle customer inquiries without delay.

## 10. Matters Related to Changing Privacy Policy

In the case of changing this Privacy Policy, HYUNDAI IFC will notify the reason and details of the change in advance, either via the notice menu on the first page of the website or via a separate window, before changing and adopting the policy change.

This Policy will take effect starting on July 5, 2022.