

Privacy Policy

Final update: March 30, 2020

This privacy policy describes the method of personal information management and processing for KEYCUTstock website by 4by4 Inc.

and it details the purpose and method of use for the personal information of members according to this policy.

This policy may be amended frequently for improved protection of personal information and 4by4 Inc. shall announce such changes via public notice on the website or individual notices to members and the policy will always be available on the website.

Visitors and users of the website can directly review this privacy policy.

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1. Purpose of Personal Information Collection and Use

- (1) Website visitors can participate in various activities without providing personal information.
- (2) But 4by4 Inc. may collect the following personal information items according to the following method when users sign up, use, order/pay for products, contents, or services, inquire, or consult regarding the website as a subscriber of KEYCUTstock services. Personal information will not be used for any other purpose than the purpose necessary to provide services to the customer unless

consented otherwise. The purpose of personal information collection and use of the company are as follows:

1. Personal information collection method: Website(Membership), document, fax, phone, customer center inquiry, event
2. Items and purpose of personal information collection
 - (a) Name, date of birth, ID, password: Identity check, age restricted service provision, complaint processing, etc. for use of services provided by the company;
 - (b) Company name, department, title, industry, company phone number, fax number, company address: Corporate member service provision, etc.;
 - (c) Email address, phone number, mobile number, address: Securing accurate delivery address for bills, products, and giveaways, delivery of notice, confirmation of intent, securing effective communication method such as complaint processing, new service development, utilization for marketing and advertisements, etc.;
 - (d) Bank account number, credit card information, transaction records: Use of paid information and contents, payment and refund for product purchase/lease, etc.;
 - (e) Access log, access IP information, cookies, service use records, frequently used websites: Prevention of improper use, prevention of unauthorized use, new service development, custom service provision, etc.;
 - (f) Profile data such as user name and password, detailed purchase information, information on licensed contents, etc.
- (3) The company shall permit membership from age 14 and will not collect personal information from youth below age 14 which requires consent from legal representative for collection and use of personal information.
- (4) Information requested to be provided to the company are classified into required information and optional information depending on the activity details. When required data regarding certain activities are not provided, members cannot participate in such activities.
- (5) Members may have to provide the following information when submitting contents to the KEYCUTstock website for permission to use:
 1. Contact information such as name, phone number, mailing address, and email address
 2. 4by4 Inc. may request for the following to confirm such information:
 - a. Scanned copy of government issued identification (this is stored safely on the company server);
 - b. Credit card number. Credit card number of the member is used only for verifying the name and address of the member and it is not saved when being used for identity verification.
 3. Payment and contributor information such as payment method, payment email, preferred name, content topic, camera equipment, technology level, and creative process information.
- (6) When using this website, 4by4 Inc. or its third party sub-processors may collect information regarding certain technologies and routing information from the computers of members to assist in service use like many other websites. For example, 4by4 Inc. may record environmental variables such as browser type, operating system, CPU speed, and computer IP (internet protocol) address. Such environmental variables are used to assist in use of website and services and its tracking. 4by4 Inc. uses such environmental variables to measure the traffic pattern for the website as well. 4by4 Inc. may compare such information against the personal information of the members to determine the requirements from website visitors.

- (7) 4by4 Inc. may supplement the information provided by the members to the company with information acquired from third party sources to reduce database error, user authentication, and prevention of system abuse. 4by4 Inc. may supplement the information collected from members with information stored in third party database such as demographics and company information to increase the possibility of interest from members for the marketing communication sent out by KEYCUTstock

2. Use, Third Party Provision, Etc. of Personal Information

- (1) Members reserve the right to access their personal information and personal information default settings to correct or delete the information at any time. Click the link “My Account” and you can view and change the most of personal information immediately. Click the link “Change My Profile” on the website and follow the guidelines under the section “Delete My Account” to delete your account or to request 4by4 Inc. to no longer use your information. For security, you must contact contact@keycutstock.com or make an inquiry through the Q&A menu on the website to change certain personal information that cannot be changed on the website. Then the company will respond to your request in timely manner.
- (2) 4by4 Inc. shall use the personal information within the scope disclosed in ‘Purpose of personal information collection and use’ outlined in the user agreement and privacy policy and will not provide such information to another party, company, or institution outside of such scope: Provided , that the following instances are exceptions:
1. When user or member gives consent in advance;
 2. When there is a basis based on legal regulations or a request from an investigative agency according to the process and method designated by laws for the purpose of investigation.
- (3) 4by4 Inc. provides services to its members and complies with its legal obligations and collects information to improve its products and services. 4by4 Inc. does not sell, lease, or share the personal identity information to a third party in a method that is not outlined in this privacy policy: Provided , that such information may be used in the following instances as well:
1. Authentication and provision of access authority for KEYCUTstock website, mobile applications, and services;
 2. Processing financial transactions for members;
 3. Transmission or order/renewal confirmation;
 4. Registration of authority (if applicable) for member for technical support provided to registered users or other benefits;
 5. Response to customer service requests, inquiries, and considerations;
 6. Member account management;
 7. Transmission of product or service information requested by members;
 8. Provision of information regarding special benefits and services of KEYCUTstock and select third party;
 9. Notification of promotion, giveaway management and results participated by members;
 10. Investigation into illegal activities or actions in breach of KEYCUTstock service agreement, prevention and actions against such actions;
 11. Meeting necessities for research and product service development of 4by4 Inc., KEYCUTstock website, service and product improvement;

12. Provision of customized experience such as service, search results, and product provision appropriate for members.
- (4) 4by4 Inc. stores the information collected to generate summary on the preferences of the members in the form of cookies, log files, transparent images, and third party sources. 4by4 Inc. may add the personal identification information and membership use/purchase records to this summary information to provide customized promotion and marketing information to users and to improve the website contents appropriately for the users and to determine the preferences of users.
- (5) 4by4 Inc. may have to disclose personal data due to legal compliance at the request of government authorities as well as certain instances of national security and law enforcement.
- (6) Personal information may be disclosed to comply with legal obligations on grounds of legal requirement (ex: summons, warrants, court orders, response to legal summons delivered to 4by4 Inc.), protection of company's rights, lawsuit prevention, safety of members or other users, fraud investigation, response to government request, and other instances determined to be necessary as well as public interests such as national security and law enforcement.

3. Retention and Use Period of Personal Information

- (1) Personal information shall be discarded immediately after achieving its purpose of collection and use by principle:
 1. Membership information: After membership cancellation or membership dismissal;
 2. Payment information: After payment completion date or debt expiration period
 3. Information collected for surveys, events, etc.: After conclusion of surveys, events, etc.
- (2) Provided , that the company shall retain the member information for a certain period of time as designated in the following relevant laws when there is necessity to retain the information due to relevant laws.
 1. Records of contract, subscription withdrawal, etc.: Five (5) years (Act on the Consumer Protection in Electronic Commerce, Etc.);
 2. Records on payment and contents supply: Five (5) years (Act on the Consumer Protection in Electronic Commerce, Etc.);
 3. Records on consumer complaints or dispute settlement: Three (3) years (Act on the Consumer Protection in Electronic Commerce, Etc.);
 4. Records of website use and visit, access log, access IP: Three (3) Months (Protection of Communications Secrets Act).
- (3) Minimum information may be retained for the minimum period to achieve its purpose to prevent other significant damages to the company or for other criminal and legal proceedings even if there are no basis in relevant laws.
 1. Identity information to prevent rejoining for seven (7) days after the membership has been cancelled or dismissed;
 2. Identity information for transaction refusal when the member has been dismissed according to user agreement;
 3. Draft service records are stored for three (3) years for protection of copyrights and licenses;

4. Download service records are stored for fifteen (15) years for protection of copyrights and licenses.

4. Personal Information Discarding Process, Method, Etc.

- (1) 4by4 Inc. shall immediately discard the information after achieving the purpose of personal information collection and use by principle. Discarding process and method are as follows:
 1. Discarding process: Information entered by members through signup, etc. are moved to a separate DB after achieving its purpose and then discarded after being stored for a certain period of time on grounds of information protection due to internal policies and other relevant laws. Personal information moved to separate DB are not used for any other purpose than retainment of information aside from instances due to legal regulations.
 2. Discarding method
 - (a) Personal information stored in electronic file format are deleted using technical method where records cannot be recovered once deleted;
 - (b) Personal information printed on paper are discarded using the shredder or incinerator.
- (2) From August 18, 2012, users are notified in advance regarding discarding of personal information or separate storage and management of personal information based on 'Article 29 of the Act on Promotion of Information and Communications Network Utilization and Information Protection, Etc.' when there is no record of use for one (1) year by a user: Provided, that the personal information of the user is stored for a certain period of time designated in the relevant laws when there is necessity to preserve the information due to relevant laws such as the Protection of Communications Secrets Act and the Act on the Consumer Protection in Electronic Commerce, Etc.

5. Option to Provide Information

- (1) You can click the link "My Account" on the website and select the corresponding items to disable email newsletters from KEYCUTstock. KEYCUTstock may contact the member when there are changes to the service agreement or the submitter service agreement even if the member has disabled email newsletters from KEYCUTstock. Service related alarms that include automatically sent emails and billing related notifications resulting from actions taken by the member on the website may also be sent to the registered email, benefit notification email, etc. You cannot disable newsletters that are not in the nature of promotion listed above. Members who do not wish to receive such news can delete their account. You can click the link "Change My Profile" on the website and follow the guidelines under "Delete My Account". Contact contact@keycutstock.com if you cannot access your account.

6. Consignment of Personal Information Processing

- (1) 4by4 Inc. has consigned the personal information as below for service improvement and has designated necessities for safe management of personal information through the consignment agreement according to relevant laws. The consigned institution for personal information processing and the details of consigned work for the company are as follows:
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Consigned Company	Details of Consigned Work	Retention and Use Period of Personal Information
KG INICIS, PAYPAL	Provide payment method	Until membership cancellation or termination of consignment agreement

7. Withdrawal of Consent for Collection, Use, and Provision of Personal Information

- (1) Members may withdraw their consent for collection, use, and provision of personal information and request for deletion and restriction of personal information at any time. Members may withdraw their consent by requesting for “Membership cancellation” and the company shall take necessary actions for membership cancellation immediately through the identity check procedure after the member makes contact to the personal information protection officer outlined on this agreement via document, phone, email, etcetc.: Provided , that such information shall be discarded seven (7) days after membership cancellation date to prevent re-joining and such during the rejoin grace period.

8. Rights of Members and Their Legal Representatives, Etc.

- (1) Members and their legal representatives may view or change their registered personal information and request for membership cancellation at any time.
- (2) To view and change member’s personal information, click “Manage My Information” to view or change the information and you can click “Cancel Membership” or contact the personal information protection officer via document, phone, or email to cancel membership or withdraw consent.
- (3) When a member requests for correction of error in personal information, such personal information shall not be used or provided until the correction is complete. When incorrect personal information has already been provided to a third party, the third party shall be notified immediately of correction results to correct such information
- (4) Personal information cancelled or deleted at the request of users or their legal representatives shall be processed as outlined in “Retention and use period of personal information collected by 4by4 Inc.” and such information shall be processed to prevent any access or use for other purposes.

9. Installation, Operation, and Refusal of Automatic Personal Information Collection Device

- (1) The company utilizes ‘Cookies’ which is frequently store and discover your information. Cookies are very small text files sent by the server the company utilizes to operate the website to your web browser which is stored in your computer’s hard drive. 4by4 Inc. shall use the cookie for the following purposes:
 1. To provide targeted marketing and personal services through analysis of access frequency/visit hours of members and non-members, tracking of interests and tastes of users, counting of various event participations and visits, etc.

- (2) Users and members reserve the right on cookie installation. Therefore, you can select the options in the web browser they use to permit all cookies, confirmation for every cookie stored, or refuse all cookies from being stored to reject cookies.

**Cookie rejection configuration method

1. Members can select the options in the web browser they use to permit all cookies, confirmation for every cookie stored, or refuse all cookies from being stored to reject cookies.
2. Example of configuration method (for Internet Explorer): Tools on top of the web browser > Internet Options > Personal Information
※ Provided , that the difficulties may arise in providing some services when you refuse to install cookies.

10. Change in Privacy Policy

- (1) 4by4 Inc. has the authority to frequently change this privacy policy for protection of personal information and the company will announce any significant changes applied to this privacy policy before such changes enter into effect via website or email to provide the public announcement to the members and users.
- (2) Members shall be considered to have acknowledged such changes and to be under its effect after the disclosure of significant changes to this privacy policy.
- (3) When 4by4 Inc. is acquired or merged with another corporate, 4by4 Inc. may provide the customer information relevant to the business of acquiring or merging company without consent from the members but 4by4 Inc. shall announce the sale, acquisition, or merger of such assets through its website.

11. Regarding Use of Other Linked Websites

- (1) KEYCUTstock website provided by 4by4 Inc. may contain links to websites of other companies with different privacy policies. When members submit personal information to such websites, all member information is under the effect of the privacy policy of the corresponding website. Please read the privacy policies of all websites you visit.

12. Social Media Widget, Etc.

- (1) KEYCUTstock website provided 4by4 Inc. may include social media functions such as Facebook like buttons and widgets (ex: Share button or mini chat program launched from KEYCUTstock website). Social media functions and widgets are hosted by a third party or by the company's website and it can collect information on pages visited on this website and configure cookies for smooth operation of functions and the privacy policy of the company providing the corresponding functions apply for interaction with such functions.

13. Plan for Technical, Managerial Protection of Personal Information

- (1) 4by4 Inc. has established the following technical and managerial protection plans to secure safety to prevent loss, theft, leak, alteration, or damage of personal information when it comes to processing personal information of users and members.
1. Encryption of personal information
User and member passwords are encrypted for storage and management and only the person who knows the password can check and change personal information. Password rules to avoid use of predictable numbers and such are implemented for passwords.
 2. Plan for Hacking, Etc.
The company is putting forth its best effort to prevent leak or damage of personal information of members from hacking, computer virus, etc.
 3. Minimization and training of personal information handlers
The company restricts the number of personal information handlers to the minimum and it is also emphasizing the importance of personal information protection through managerial actions such as training of personal information handlers, etc.

14. Personal Information Protection Officer, Consultation, Report, Etc.

- (1) 4by4 Inc. has designated the following department and personal information protection officer to protect personal information of customers and to process personal information related complaints.

Customer service department: Platform development team

Contact Number: +82.2.838.4416

E-mail : kyungsub@4by4inc.com

Name of personal information protection officer: Kyungsub Kim

Contact Number: +82.2.838.4416

E-mail : kyungsub@4by4inc.com

You can submit all personal information protection related complaints that may occur as you use the services of 4by4 Inc. to the personal information protection officer or department responsible. 4by4 Inc. will give you quick and sufficient response to reports from users.

Please contact the following institution for reporting or consultation regarding other personal information infringement issues.

1. Personal Information Infringement Report Center (www.118.or.kr / No area code 118)
2. Cybercrime Investigation Department (www.spo.go.kr / 02-3480-3571)
3. Cyber Terror Response Center of the Korean National Police Agency (www.ctrc.go.kr / 1566-0112)

15. Duty of Disclosure, Etc.

- (1) Current privacy policy may be changed due to government policy or needs of 4b4 Inc. and announcements for any additions, deletions, and revision of details shall be made at least seven (7) days in advance before enforcement via website or email and announcements will be made immediately when announcement in advance is not possible: Provided , that the significant changes in user rights such as collection, utilization, and third party provision of personal information shall be announced at least thirty (30) days in advance.

“(Enforcement date) This provision shall enter into force on March 30, 2020 and the previous privacy policy will be substituted with this privacy policy.”