

SK Innovation (hereinafter the service named "mySUNI") Privacy Policy

SK Innovation Co., Ltd. (hereinafter "Company"), hereby establishes and publishes the privacy policy as follows to protect the personal information of information subjects and handle related grievances promptly and smoothly in accordance with Article 30 of the Personal Information Protection Act, in relation to the operation of the mySUNI website.

Article 1 (Items of Personal Information Processed)

- ① The Company processes the following types of personal information.
 - 1) Registration and management for website membership (employees)
 - Required items: Department, name, employee identification number, position, job title, email, mobile phone number, password, year of birth, sex, learning status (name of the lecture, lecture type, learning time, completion status, completion day, test result, assignment result)
 - Optional items: Fields of interest, preferred learning type, photo, nickname, playlist
 - 2) Registration and management for website membership (external lecturers)
 - Required items: Name, email, mobile phone number, password, Organization/department
 - Optional items: Teaching area, work experience, photo, playlist
- ② During the use of the online services, the following personal information may be automatically created and collected
 - IP addresses, cookies, MAC addresses, service use records, visit records

Article 2 (Purposes of Processing Personal Information)

- ① The Company processes personal information for the following purposes. The personal information being processed will not be used for purposes other than the following purposes. If the purposes of use are changed, we

will take necessary measures, such as obtaining separate consent, in accordance with Article 18 of the Personal Information Protection Act.

1) Registration and management for the mySUNI Learning Management System (hereinafter "mySUNI")

- The personal information is processed for the purposes of confirming the user's intention to be a registered member, identification/certification of the user's identity in relation to the provision of membership services, maintenance/management of the membership status, the prevention of the unauthorized use of the service, providing various public announcements or notices, and handling member grievances.

2) Provision of services

- The personal information is processed for the purposes of providing content/services and customized services, verifying the user's identification, etc.

3) Link with affiliates' and external content providers' systems

- Personal information is processed for the purpose of utilizing educational programs and providing services to affiliates and external contents provider companies.

Article 3 (Personal Information Processing and Retention Period)

- ① The Company processes and retains personal information within the period permitted by law or agreed to by the subject of the information upon collection of his/her personal information.
- ② Personal information processing and retention periods are as follows:
 - 1) Registration and management for website membership (employees):
Within the member's employment period
 - 2) Registration and management for website membership (external lecturers): Until withdrawal of membership (Upon withdrawing membership, the above information will be retained for 1 year for

content history management purposes.)

- 3) Provision of services: Until the expiration of the validity period of the content or until the affiliated company system and linked external services are terminated. However, in the following circumstances, the retention period is extended to the end of the corresponding circumstances:

- If an investigation is in progress due to a violation of relevant legislation, until the investigation is finished
- Log data, IP address, etc., required when providing communication confirmation data: Three (3) months (Communication Privacy Act)
- Complaints and service inquiry records retention: 3 years

Article 4 (Provision of Personal Information to Third Parties)

- ① The Company processes the user's personal information only within the scope specified in Article 2 (Purpose of Processing Personal Information). The Company provides personal information to third parties only when it falls under Articles 17 and 18 of the Personal Information Protection Act, such as in the cases where the consent of the information subject is obtained and where special provisions exist in other laws.

- ② The Company provides personal information to third parties as follows:

Recipient of personal information	Purpose for which the recipient uses such information	Particulars of the personal information provided	Retention and usage period
SK group affiliates (details available at http://sk.co.kr)	Management of a member's training application and completion status	Course completion status	Until the retirement of the member
Linked In	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email	Until the retirement of the member

Recipient of personal information	Purpose for which the recipient uses such information	Particulars of the personal information provided	Retention and usage period
Coursera	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email	Until the retirement of the member
Elice	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email	Until the retirement of the member
SK M&Service	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email, mobile phone number	Until the retirement of the member
Panopto	Member SSO access, learning status management, processing of course completion	Department, name, email	Until the retirement of the member
Globe Smart (APERIAN Global)	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email	Until the retirement of the member
Bloom Company	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email	Until the retirement of the member
IDEO	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email	Until the retirement of the member

Recipient of personal information	Purpose for which the recipient uses such information	Particulars of the personal information provided	Retention and usage period
Google	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email	Until the retirement of the member
Microsoft	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email, mobile phone number	Until the retirement of the member
BTS	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email	Until the retirement of the member
UNIVtomorrow	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email, mobile phone number	Until the retirement of the member
Fair Play	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email, mobile phone number	Until the retirement of the member
theplaycompany	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email	Until the retirement of the member
multicampus	Member SSO access, learning status	Department, name, email, mobile phone	Until the retirement of

Recipient of personal information	Purpose for which the recipient uses such information	Particulars of the personal information provided	Retention and usage period
	management, processing of course completion, sending of information emails	number	the member
Unity Technologies Korea	Member SSO access, learning status management, processing of course completion, sending of information emails	Department, name, email	Until the retirement of the member
MYSC	SV College course assignments grading	name, email	Until the end of the course
Seed & Partners	SV College course assignments grading	name, email	Until the end of the course
Amazon Web Service	learning status management, processing of course completion, sending of information emails	Department, name, email	Until the retirement of the member

Article 5 (Entrustment of Personal Information Processing)

- ① The Company entrusts certain affairs related to personal information processing as follows in order to smoothly handle such matters..

Entrusted party (the trustee)	Entrusted affairs
SK Inc.	Entrustment of the operation/development of the "mySUNI" LMS

SK M&Service	Email guidance for service operation, training operation/management, results data arrangement, and Help Desk operation
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- ② When entering into an entrustment agreement, the Company specifies the matters related to responsibilities, such as the prohibition of processing personal information for any purpose other than for the performance of the entrusted affairs, technical and administrative protection measures, restrictions on re-entrustment, management, and supervision of the entrusted party, along with the compensation for damages in the agreement or any written form in accordance with Article 26 of the Personal Information Protection Act so that the Company can make sure that the entrusted party handles the personal information safely.
- ③ Any change in the entrusted party or content of the entrusted affairs will be immediately disclosed through this Policy.

Article 6 (Rights and Obligations of information subjects, and Legal Representatives and Methods to Exercising Such Rights)

- ① The information subject may, at any time, exercise the right to access, correct, delete, or request the suspension of the processing of personal information from the Company.
- ② The rights referred to in Paragraph 1 may be exercised by submitting a written request, email, or fax to the Company in accordance with Article 41 Paragraph 1 of the Enforcement Decree of the Personal Information Protection Act. The Company will immediately take action upon receipt of such requests.
- ③ The rights referred to in Paragraph 1 may be exercised by a legal agent or an authorized representative of the information subject. In such cases, a power of attorney, as provided in the form of Attachment 11 of the "Public Notice on the Personal Information Protection Act (No. 2020-7)," must be submitted to the Company.
- ④ An information subject's right to access and request the suspension of processing of personal information may be restricted in accordance with Articles

35 (4) and 37 (2) of the Personal Information Protection Act.

- ⑤ Request for correction or deletion of personal information is not permitted if the personal information is collected for other statutes.
- ⑥ The Company confirms whether or not the person who made the request in accordance with the information subject's rights, such as a request for access, request for correction or deletion, or request for suspension of processing, is the same person or a legitimate agent.

Article 7 (Destruction of Personal Information)

- ① The Company will promptly destroy any personal information when the personal information in question is no longer needed, such as when the retention period for the personal information has expired or the purpose of processing such personal information has been achieved.

- ② The procedure and method of the destruction of personal information are as follows:

- 1) Procedure for destruction

The Company identifies the personal information that needs to be destroyed, and after obtaining approval from the Company's personal information manager, destroys the information.

- 2) Methods of destruction

Personal information recorded and stored in electronic files is destroyed using methods to make sure that such information cannot be reproduced, and personal information recorded and stored in paper documents is destroyed by shredding with a paper shredder or incineration.

Article 8 (Measures to Ensure the Safety of Personal Information)

The Company takes the following measures to ensure the safety of personal information:

- 1) Administrative measures: Establishment and implementation of internal management plans, regular employee training, etc.
- 2) Technical measures: Management of access rights such as with a personal information processing system, installation of an access control system, encryption

of unique identification information, installation of security programs, etc.

3) Physical measures: Access control to the computer rooms, archives, etc.

Article 9 (Installation/Operation of Automatic Personal Information Collection Devices and the Refusal to Use Such Devices)

- ① The Company uses "cookies" to store and retrieve the information subject's usage information from time to time to provide users with individually customized services.
- ② Cookies are text files with small pieces of data that are sent from a website's server (HTTP) to the user's computer browser and are stored in the user's computer hard drive.
 - 1) Purpose of using cookies: Cookies are used to provide optimized information to users by identifying the types of visits and usage, popular search terms, and secure access to each service and website visited by the user.
 - 2) Installation/operation of cookies and refusal to use cookies: Users may refuse to store cookies by changing the settings in the Tools --> >Internet Options> --> Privacy menu at the top of the web browser.
 - 3) If cookies are not allowed to be stored at all, users may experience inconveniences when using customized services.

Article 10 (Privacy Manager)

- ① The Company has appointed a Privacy Manager, as described below, to assume the overall responsibility of processing personal information, handling the information subjects' grievances related to personal information, requests for the compensation for damages suffered by the users, etc.

Company	Classification	Privacy Manager	Privacy Representative
SK Innovation	Department	Information Security Officer	LMS

	Name/Position	Heung-tae Ko/Officer	Anna Kwon/RF
	Phone No.	02-6323-9002	02-6323-9002
	Email	anna.kwon@sk.com	anna.kwon@sk.com

- ② Information subjects may refer to the Company's Privacy Manager and Privacy Protection Department for inquiries and other matters related to the handling of privacy-related grievances, compensation for damages, etc., occurring in the course of using the services (or business) of the Company. Upon receipt, the Company will promptly respond to and handle such inquiries made by the information subjects.
- ③ Information subjects may request that the above Privacy Representative allow access to their personal information in accordance with Article 35 of the Personal Information Protection Act.

Article 11 (Standards for Judgment of Additional Usage and Provision)

The Company may additionally use and provide personal information without the consent of the information subject in consideration of matters in accordance with Article 14-2 of the Enforcement Decree of the Personal Information Protection Act, in accordance with Article 15 (3) and Article 17 (4) of the Personal Information Protection Act.

Accordingly, to enable the Company to use and provide additional information without the information subject's consent, the following matters have been considered:

- 1) Whether or not the purpose of additional usage and provision of personal information is related to the original purpose of collection
- 2) Whether or not there is any predictability of additional usage or provision in light of the circumstances in which the personal information was collected or processing practices of personal information
- 3) Whether or not the additional usage or provision of personal information unreasonably infringes on the interests of the information subject
- 4) Whether or not the measures necessary to secure safety, such as

pseudonymization or encryption, have been taken

※ The judgment criteria for considering additional usage and provision of personal information are prepared and disclosed by the business operator/group autonomously.

Article 12 (Remedy for the Infringement of the Rights and Interests of Users)

The information subject may contact the Personal Information Dispute Mediation Committee, the Personal Information Infringement Report Center operated by the Korea Internet & Security Agency, etc., for dispute resolution, consultation, and other matters regarding personal information infringement. For reporting or consultation about other privacy violations, please contact the following agencies:

1. Personal Information Dispute Mediation Committee: (Toll-free) 1833-6972
(www.kopico.go.kr)
2. Personal Information Infringement Report Center: (Toll-free) 118
(privacy.kisa.or.kr)
3. Supreme Prosecutors' Office Cyber Crime Investigation Division: (Toll-free) 1301
(www.spo.go.kr)
4. National Police Agency Cyber Safety Guardian: (Toll-free) 182
(ecrm.cyber.go.kr/minwon/main)

Article 13 (Changes of the Privacy Policy)

- ① In the case of any addition, deletion, or revision to this Privacy Policy in accordance with applicable laws, internal Company policies, etc., the Company will provide a public notice of such changes by posting the details on the website at least seven (7) days before the effective date.
- ② This Privacy Policy will come into effect on Mar 22, 2022.