

## CONSENT FORM

I hereby consent that my personal data (i.e., voice sample (audio file), speaker ID, year of birth, gender, nationality, native language, Korean language proficiency, TOPIK score, TOPIK level, level of education, Korean language study period, residence period in Korea, Korean language study purpose, Korean language study method, applied recording question set level, will be used for the purpose of machine learning for the development of Korean language proficiency test.

The personal data is collected by Septentrions OÜ (contact: admin@septentrions.com) and will be processed for the latter purpose without data subjects name using speaker ID as pseudonym by National Information Society Agency of Republic of Korea, NSDevil Co. Ltd and Ministry of Science and ICT of Republic of Korea their cooperation partners (Nara Information Co.Ltd, NAVER Corporation, Nectarsoft Co.,Ltd, Sogang University, Seoul National University, Sungkyunkwan University, Terinuu Co. LTD and Korean Society of Speech Science), all located in South Korea.

South Korea is a subject of EU Commission adequacy decision and there are appropriate safeguards in place.

Your data listed above will be retained 5 years since collecting the data.

You can withdraw permission at any time. Learn more about your data rights [HERE](#).

Date: 2023.02.08

Name: Janela Roaya

E-mail: alisnramona22@gmail.com

☒ I consent with the described data processing



# PRIVACY POLICY

PRIVACY POLICY PROVIDES AN OVERVIEW OF THE FOLLOWING:

1. DEFINITIONS
2. GENERAL INFORMATION AND CONTACT DETAILS
3. GENERAL PURPOSES, GROUNDS FOR, AND ACTIVITIES OF PROCESSING
4. COMPOSITION AND COLLECTION OF PERSONAL DATA
5. TRANSFER AND AUTHORISED PROCESSING OF PERSONAL DATA
6. RIGHTS OF THE DATA SUBJECT AND EXERCISE OF RIGHTS
7. STORAGE AND SECURITY OF PROCESSING PERSONAL DATA COOKIES AND OTHER WEB TECHNOLOGIES

## 1. DEFINITIONS

Under the definitions, you will find the meaning of the terms often used in the Privacy Policy.

**1.1 “Data Subject” or “you”** means a natural person regarding whom we have information or information that can be used to identify a natural person.

**1.2 “Privacy Policy”** means this text, which sets out our principles of personal data processing.

**1.3 “Cookies”** mean data files stored in the Data Subject’s device on the Website according to the selection made.

**1.4 “Website”** means our website <https://sa.ns dai.me/>.

All terms and definitions in relation to personal data are used in the same meaning as in the European Union [General Data Protection Regulation](#) (2016/679) (hereinafter “GDPR”).

## 2. GENERAL INFORMATION AND CONTACT DETAILS

Under general information, you will find information about who is the data controller regarding your personal data, how to contact us and some additional information about this Privacy Policy.

**2.1 About us.** Controller of your personal data is Septentrions OÜ (registry code 14814501, address Kiriku tn 6, 10130, Tallinn, Estonia) - a company engaged in collection of your voice data for the purpose of machine learning.

**2.2 Contacts.** You can contact us in matters related to personal data by e-mail at [admin@septentrions.com](mailto:admin@septentrions.com).

**2.3 About the Privacy Policy.** The Privacy Policy is applicable to Data Subjects, and all our employees and key cooperation partners who have access

to the personal data in our possession are guided by the rights and obligations specified in the Privacy Policy. We have the right to unilaterally amend this Privacy Policy. We will notify the Data Subject of all material changes on the Website or otherwise.

**All our processes, guidelines, actions, and activities related to personal data processing are based on the following principles: lawfulness, fairness, transparency, purposefulness, minimisation, accuracy, storage limitation, integrity, confidentiality, and data protection by default and by design.**

### 3. GENERAL PURPOSES, GROUNDS FOR, AND ACTIVITIES OF PROCESSING

Here you will find information about the purposes and grounds for processing your personal data.

We use the following grounds as grounds for personal data processing:

**3.1 Consent.** Based on consent, we process personal data precisely within the limits, to the extent and for the purposes for which the Data Subject has given us their consent. The Data Subject's consent to us shall be freely given, specific, informed, and unambiguous, i.e., by ticking the box on the Website. We might have gathered your consent to processes data for the machine learning purpose for the development of Korean language. Consent might be given on behalf of a child by a parent or legal guardian.

**3.2 Legal obligation.** We process personal data to comply with a legal obligation in accordance with and to the extent provided by law. We process Personal Data to follow GDPR and other legal obligations.

**3.3 Legitimate interest.** Legitimate interest means our interest in managing or directing our activities. In case we are using legitimate interest, we have previously assessed your interests. We may process your personal data based on legitimate interest for the following purposes:

- (1) **operation of our Website;** we may analyse identifiers and personal data collected via our Website and use it for the operation of our Website;
- (2) **network, information, and cyber security reasons,** we take measures for combating piracy and ensuring the security of the Website as well as for making and storing back-up copies;
- (3) **establishing, exercising, or defending legal claims,** we may use personal data as evidence in a legal dispute.

Data subject has a right to access legitimate interest analysis related to Data Subject's personal data processing (please forward the corresponding request to our e-mail using the contact details provided in Chapter 2 p 2.2).

**3.4 New purpose.** Where personal data is processed for a new purpose other than that for which the personal data are originally collected or it is not based on the Data Subject's consent, we carefully assess the permissibility of such new processing.

#### 4. COMPOSITION AND COLLECTION OF PERSONAL DATA

Here you will find information about which personal data we collect and how we collect personal data.

##### 4.1 We collect the following types of personal data:

- (1) Personal data disclosed to us by the Data Subject (i.e., full name, username, data of birth, gender, e-mail, city, phone number, country, city, nationality, voice sample (audio file, voice recording date and time, recording level), Korean language proficiency, desired exam level, native language, TOPIK score, TOPIK grade, level of education, Korean language study period, residence period in Korea (years), Korean language study purpose, Korean language study method, Desired NIA exam level);
- (2) Personal data resulting from visiting and using the Website or generated by us (i.e., user data (voice sample recording date, time, hour, speaker ID).

#### 5. TRANSFER AND AUTHORISED PROCESSING OF PERSONAL DATA

Here you will find information about the transfer and authorised processing of personal data.

5.1 We cooperate with partners to whom we may transmit data, including personal data, concerning the Data Subjects within the context and for the purpose of cooperation. When transferring personal data to third parties, we comply with the applicable data protection requirements.

5.2 Such third parties include Korean government (Ministry of Science of ICT of Republic of Korea), National Information Society Agency and Korean Governments research partners (Nara Information Co.Ltd, NAVER Corporation, Nectarsoft Co.,Ltd, Sogang University, Seoul National University, Sungkyunkwan University, Terinuu Co. LTD, and Koran Society of Speech Science), ICT partners, i.e., service providers for various technical services, provided that:

- (1) the respective purpose and processing are lawful;
- (2) personal data is processed pursuant to the instructions of the controller and based on a valid contract.

5.3 As a rule, we do not transmit personal data outside the European Economic Area or to countries about whom EU Commission has not decided that there is an adequate level of protection. We transfer personal data to the Republic of Korea. Republic of Korea is a subject of EU Commission adequacy decision and there are appropriate safeguards in place.

## 6. RIGHTS OF THE DATA SUBJECT AND EXERCISE OF RIGHTS

Your personal data belongs to you, and here you will find information about your rights and protecting of your personal data.

### 6.1 Rights concerning consent:

- (1) You shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- (2) You can exercise your rights concerning consent by contacting us at the address [admin@septentrions.com](mailto:admin@septentrions.com) or via Websites self-service.

6.2 In the event of processing personal data, the Data Subject has the following rights, provided that the prerequisites set out in the GDPR are met:

- (1) **Right to receive information**, i.e., the Data Subject has the right to receive information about the personal data collected about them.
- (2) **Right to access data**, which includes, inter alia, the right of the Data Subject to a copy of the personal data processed.
- (3) **Right to rectification of inaccurate personal data**. The Data Subject can rectify incorrect data by contacting us using the contact details provided above.
- (4) **Right to erasure**, i.e., in certain cases, the Data Subject has the right to obtain the erasure of personal data, for example where data is processed solely based on consent.
- (5) **Right to restriction of processing personal data**. This right arises, inter alia, where the processing of personal data is not permitted by law or temporarily when the Data Subject contests the accuracy of personal data.
- (6) **Right to data portability**, i.e., in certain circumstances, the Data Subject acquires the right to receive their data in a machine-readable format or to require the transmission of the data to another controller in a machine-readable format.
- (7) **Rights related to automated processing and profiling** mean that the Data Subject, on grounds relating to their situation, has the right to object at any time to the processing of personal data concerning them based on automated decisions/profiling and to require human intervention. The Data Subject may also require an explanation regarding the logic of making an automated decision. Automated processing/profiling may also be partially based on data collected from public sources. **We do not use automated processing or profiling that has a significant effect on the Data Subject or their rights.**
- (8) **Right to object** means that Data Subject shall have the right to object, on grounds relating to his or her situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of GDPR Article 6(1), including profiling based on those provisions.

(9) **Right to an assessment by a supervisory authority** as to whether the processing of the personal data of the Data Subject is lawful.

(10) **Right to compensation for damages** where the processing of personal data has caused damages to the Data Subject.

**6.3 Exercise of rights.** In the event of a question, request, or complaint regarding the processing of personal data, the Data Subject has the right to contact us using the contact details provided in Chapter 2 p 2.2.

**6.4 Filing complaints:**

(1) The Data Subject has the right to file their complaint with us, the Data Protection Inspectorate, or the court.

(2) Contact details of the Data Protection Inspectorate (DPI) can be found on the DPI's website at <https://www.aki.ee/en>.

## 7. STORAGE AND SECURITY OF PROCESSING PERSONAL DATA

Here you will find a description of how we protect your personal data and for how long we store personal data.

**7.1 Storage.** We store personal data only for the period necessary for the purpose of processing. As a rule, for the duration of the period of five years.

When data is processed in relation to legal claims, we process data until it is necessary for the dispute (until the dispute is resolved or the expiry date of such claims).

When storage period has expired, we destroy or anonymise data.

When storing personal data, we comply with the purpose of processing, limitation periods for potential claims in the event of filing claims, and storage periods provided for in the law.

**7.2 Security measures.** We have established guidelines and rules of procedure on how to ensure the security of personal data using both organisational and technical measures. Among others, we do the following to ensure security and confidentiality:

(1) we provide our employees with access to personal data only where this is necessary for the performance of their duties and where the respective permission has been requested and rights have been granted;

(2) a processor may process the personal data transferred to them only for the purpose and to the extent necessary for providing the services set out in the contract;

(3) we use software solutions that help ensure a level of security that meets the market standard.

7.3 In the event of any incident or breach involving personal data, we do our best to mitigate the consequences and alleviate the relevant risks in the future. When the personal data breach is likely to result in a high risk to the rights and freedoms of Data Subject, we shall communicate the personal data breach to the Data Subject.

## 8. COOKIES AND OTHER WEB TECHNOLOGIES

Here you will find information about which Cookies or other technologies we use.

8.1 We may collect data via Website by using Cookies (i.e., small fragments of information stored in the hard drive of the Data Subject's computer or another device by the browser) or other similar technologies and process such data.

8.2 We use the following types of Cookies:

8.2.1 Necessary Cookies are required to use the Website – to navigate the page and use its functions –, and necessary Cookies enable logging into the Website, distinguishing bots from people, and ensuring other security functions. Without these Cookies, the Website cannot function properly, and the provision of service may be hindered. Because necessary Cookies are essential for the operation of the Website these Cookies are always enabled.

8.3 The processing is generally based on legitimate interest as only necessary cookies are used.

Date: 2023.02.08

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