

## SoMa Privacy Policy

**SoMa Inc.** (hereinafter “the Company”) fully complies with the Personal Information Protection Act and related statutes, and strives to protect the personal information of data subjects. This Privacy Policy applies to the processing of personal information of members who use the **SoMa service platform (including website and mobile app)** operated by the Company, and sets forth the following:

---

### Article 1 (Items of Personal Information Collected and Collection Methods)

#### 1. Items collected

The Company collects only the minimum personal information necessary for membership registration and service provision:

- **At registration:** Mobile phone number (required)
- **During service use and consultations:** Information additionally collected through automatic synchronization of consultation forms after login, including:
  - Name, date of birth, gender, age, contact details, occupation, address, referral source
  - Exercise goals, special notes and medical history, exercise preferences, key consultation details, member requests
  - Preferred day/time, number and duration of sessions, payment date and method, tuition/fees, installment status, session format, ticket usage and cancellation deadlines
  - Membership tier, reward points (digital rewards), weight, skeletal muscle mass, BMI, body fat percentage and other physical data
  - Assigned instructor, body-type assessment results, first payment date, satisfaction ratings, total sessions attended, InBody trends, etc.

*The above items are mainly collected via member-submitted consultation forms or system integration; other data generated during service use may also be included.*

#### 2. Collection methods

- Direct input by the user at registration (e.g., mobile number)

- Automatic extraction via OCR from photos of consultation cards or questionnaires submitted during service use
- Additional inputs during web/app usage
- Information provided by the user when contacting customer support
- Automatic creation of usage logs via cookies and log analysis (see "Cookies" section below for details)

### **3. Sensitive and unique identifiers**

- In principle, the Company does not collect legally defined sensitive data (e.g., race, creed, political views, criminal records, health status).
- Health-related data (e.g., weight, body fat percentage) are collected and used solely for exercise analysis, with explicit user consent.
- Unique identifiers such as resident registration numbers are not collected during registration; if legally required, they will be processed only with separate consent and to the minimum extent necessary.

### **4. Protection of user rights**

- Members have the right to refuse providing optional information; refusal does not affect basic service use.
- The Company uses personal information only for stated purposes; any change in purpose will be preceded by obtaining separate consent from the member.

---

## **Article 2 (Purposes of Personal Information Collection and Use)**

The Company uses collected personal information for the following purposes:

### **1. Membership registration & service management**

- Confirming membership intent, identity verification, age verification, member identification and management, information maintenance/updates, processing membership withdrawal.

### **2. Consultation & personalized service provision**

- Conducting member consultations, identifying individual exercise goals, providing tailored exercise programs, managing class schedules and attendance, assigning instructors, reflecting special considerations, and facilitating smooth class operations.

### **3. Member benefits & analytics**

- Operating membership tiers and managing reward point accrual/use, conducting satisfaction surveys and implementing feedback, analyzing member exercise records and body data, and providing AI-driven personalized exercise reports to enhance service quality and offer value-added services.

### **4. Payments & settlements**

- Billing and processing fees for services used, managing payment histories, processing refunds, and settling instructor compensation.

### **5. Customer support & inquiries**

- Responding to customer support inquiries, preserving records for complaint resolution and dispute handling, and delivering notices.

### **6. Marketing & events**

- Informing members of new services or events, delivering promotional and advertising information to those who have consented to receive marketing messages.

### **7. Legal compliance & risk management**

- Imposing usage restrictions on members in violation of laws or terms, preventing fraudulent use, ensuring security and authentication, retaining records to comply with legal obligations and maintain service stability.

*If personal information is to be used for purposes beyond those listed above, the Company will notify members and obtain separate consent in advance.*

---

## **Article 3 (Retention and Use Period of Personal Information)**

### **1. General rule**

- The Company deletes members' personal information without delay upon membership withdrawal. However, to facilitate potential re-registration and service quality analysis, the Company may retain such information for up to three years based on the member's consent, after which the data are either destroyed or moved to separate storage for secure retention.

## **2. Statutory retention**

In accordance with relevant laws, the following records are retained for the periods specified, used only for their intended purposes, and destroyed promptly thereafter:

- Contracts and records of withdrawal: 5 years (Consumer Protection in Electronic Commerce Act)
- Payment and supply records: 5 years (Consumer Protection in Electronic Commerce Act)
- Consumer complaints and dispute resolution records: 3 years (Consumer Protection in Electronic Commerce Act)
- Website access and log records: 3 months (Protection of Communications Secrets Act)

## **3. Dormant accounts**

- Under the Personal Information Protection Act's validity period system, personal data of members inactive for over one year are moved to separate, secure storage (dormant account processing). After the retention period, data are destroyed without delay. Members are notified 30 days before conversion to a dormant account via email or other means.

---

## **Article 4 (Provision of Personal Information to Third Parties)**

### **1. Principle of non-provision**

- The Company does not provide personal information to third parties without the member's consent. If provision becomes necessary, the Company will notify the member of the recipient, purpose, items provided, retention period, etc., and obtain consent in advance.

## **2. Exceptions**

- Personal information may be provided without consent when:
  - Requested by law enforcement agencies under lawful procedures
  - Required urgently to protect life or safety
  - Permitted under other provisions of applicable laws

## **3. Current status**

- The Company does not currently provide member information to external partners. Should this change, the Policy will be updated and published, and members will be asked to consent separately if required.

---

## **Article 5 (Commissioned Processing of Personal Information)**

### **1. Commissioning**

- To ensure smooth service, the Company may outsource certain tasks to specialized external firms, such as service development and maintenance, payment processing (PG), SMS/LMS messaging, and data storage (cloud hosting).

### **2. Protection measures**

- The Company enforces contracts with commissioned processors in accordance with Article 26 of the Personal Information Protection Act, stipulating prohibitions on secondary uses, technical and managerial safeguards, restrictions on further delegation, oversight obligations, and liability for damages.

### **3. Commissioned processor disclosure**

- Currently, no specific service providers are listed in this Policy. Should new contracts or changes occur, the Policy will be amended and published promptly, and consent obtained if required by law.

---

## **Article 6 (Procedures and Methods for Data Destruction)**

## 1. **Destruction procedures**

- When retention periods expire or purposes are fulfilled, personal data are selected for destruction with the approval of the Company's Data Protection Officer. Upon member withdrawal or consent withdrawal, data are deleted immediately or moved to separate storage for the legally mandated retention period, then destroyed. Data in separate storage are used only for legal retention purposes and never for other purposes.

## 2. **Destruction methods**

- Electronic files: permanently deleted using irreversible methods (e.g., data wiping, overwriting).
- Paper records: shredded or incinerated.

---

## **Article 7 (Rights of Data Subjects and How to Exercise Them)**

### 1. **User rights**

Members and legal representatives may exercise at any time:

- **Access:** Request to view personal information held by the Company
- **Correction/deletion:** Request correction or deletion of inaccurate or incomplete data (unless required by other laws)
- **Processing suspension:** Request suspension of processing (may be refused under certain legal exceptions)
- **Consent withdrawal & membership withdrawal:** Withdraw consent and request account deletion (the Company may retain data already collected within legal limits)

### 2. **How to exercise rights**

- Requests may be made via the website/app's personal information management menu, customer support email, or in writing/fax. The Company will act without delay under applicable laws, verifying the requester's identity or representative status.

### 3. **Exercise via representative**

- Legal representatives or authorized agents may act on behalf of the member, subject to submission of a power of attorney form per the Enforcement Rule of the Personal Information Protection Act.

#### 4. **Limitations on rights**

- The Company may limit or refuse requests when:
  - Required by other laws or legal obligations
  - Others' life, body, or property rights may be harmed
  - Requests are unreasonably frequent or repetitive

#### 5. **Correction/deletion processing**

- Until corrections are completed, inaccurate data will not be used or provided to third parties; if already provided, the Company will notify those third parties to effect corrections.

---

### **Article 8 (Protection of Personal Information of Children Under Age 14)**

- The Company's services target those aged 14 and older. Children under 14 may register only with the consent of their legal guardian. The guardian may exercise all rights (access, correction, withdrawal) on behalf of the child. The Company does not unjustly provide children's data to third parties or processors, and collects only the minimum necessary information.

---

### **Article 9 (Measures to Ensure Data Security)**

The Company implements the following technical and administrative safeguards to manage personal data securely:

- **Access control & authorization management:** Restrict system access to authorized personnel; use firewalls to block unauthorized external access.
- **Encryption:** Store passwords with one-way encryption; encrypt data transmission with SSL or equivalent.
- **Access logging & review:** Retain and monitor access logs for at least six months, employing security measures to prevent tampering or loss.

- **Internal management plan & training:** Appoint a Data Protection Officer, establish and enforce internal policies, and conduct regular training for employees and contractors.
  - **Physical security:** Control access to facilities storing personal data, and secure server rooms with locks and CCTV.
  - **Continuous security updates:** Regularly apply system updates and patches to ensure ongoing compliance with legal requirements.
- 

#### **Article 10 (Data Protection Officer and Responsible Department)**

To handle inquiries, complaints, and relief related to personal data, the Company designates the following:

- **Data Protection Officer:** Changjae Lee, CEO
- **Responsible Department:** SoMa Service Operations Team
- **Contact:** Email [cjlee@soma.ai.kr](mailto:cjlee@soma.ai.kr) / Phone 010-8583-5972
- **Address:** 4F, Room 406, 198 Heojeon-ro, Gangseo-gu, Seoul (To the Data Protection Officer, SoMa Inc.)

Members may contact the above for any personal data protection matters arising during service use. The Company will respond quickly and comprehensively under applicable laws.

---

#### **Article 11 (Policy Change Notification)**

This Privacy Policy may be amended due to legal or policy changes or security improvements. Significant changes will be notified at least seven days in advance via the website or app notices; changes materially affecting user rights will be announced at least 30 days in advance.

This Policy is effective as of **June 16, 2025**. Previous versions remain accessible via the archived Privacy Policy section on the Company's website.