

CMIC Korea Co., Ltd.

Personal Information Processing Policy

CMIC Korea Co., Ltd. (hereinafter referred to as the “Company”) establishes and operates the following Personal Information Processing Policy in accordance with Article 30 of the Personal Information Protection Act, in order to protect the personal information of data subjects and to promptly and effectively handle complaints related thereto.

Article 1 (Purpose of Processing and Items of Personal Information)

The Company processes personal information for the following purposes. Personal information shall not be used for purposes other than those listed below; in the event the purpose of use changes, the Company shall take necessary measures, such as obtaining separate consent.

[Items of personal information processed with the consent of the data subject]

① Personal information of job applicants — Purpose: determination of suitability for employment (document screening, interviews, etc.), occasional recruitment, and use of a talent database for talent identification.

- Items collected (mandatory): name, nationality, gender, results of the recruitment process (department applied for, position, document/interview results, aptitude test results).
- Items collected (optional): e-mail address, mobile phone number, self-introduction, language and other qualifications, work experience, education, military service status, veteran-related information, recipient/near-poor status under the National Basic Living Security system.
- Sensitive information (optional): results of physical examinations, disability status, type of disability, grade of disability, disability registration number, certificate of disability.

② Personal information of employees — Purpose: performance of the employment contract (provision of labor and payment of wages), welfare benefits, education and training, HR management including compensation and disciplinary measures, handling of employee grievances and disputes, and provision of marketing services for employees.

- Items collected (mandatory): Korean name, English name, resident registration number, date of birth, e-mail address, home address, telephone number, home telephone number, mobile phone number, hire date, passport number, passport issue date, passport expiry date, nationality, allowances and military-service information for persons of distinguished service to the State (eligibility, details of allowances, certificate number, type of military service, period of service, reason for exemption where applicable), wage payment information (account number, account holder), education (period of attendance, name of university, major, other), career (period of employment, name of company, job, position), persons to be registered as dependents under health insurance (name, relationship, resident registration number), HR records (performance evaluation records, disciplinary records, dismissal/retirement records, records of salary, overtime, bonuses, etc., CCTV recordings), fingerprint.
- Items collected (optional): marital status, emergency contact (relationship, name, home telephone number, mobile phone number, address, postal code), family relationship and personal-deduction information (relationship, name, date of birth, occupation, dependents, recognition of disability), certifications (name of certification, date of acquisition, issuing authority, score or pass/fail).
- Sensitive information (optional): disability-related information (recognition of disability, grade of disability, disability registration number).

[Items of personal information processed without the consent of the data subject]

Legal Basis	Purpose of Collection	Items Collected	Retention and Use Period
Article 15(1)2 of the Personal Information Protection Act (special provisions of law); Article 41 of the Labor Standards Act	Management of workers	◦ Name, gender, date of birth, address, career, type of work performed, date of employment or renewal of employment, period in case of a fixed-term contract, other matters concerning employment, date and reason of dismissal/retirement or death, and other matters recorded in the workers' register, employment contract, payroll, and documents concerning employment, dismissal, and retirement	3 years
Article 15(1)2 of the Personal Information Protection Act (special provisions of law); Article 8(2) of the Guarantee of Workers' Retirement Benefits Act	Management of interim settlement of retirement allowance	◦ Name, resident registration number, year of hire, period subject to interim settlement, department, duties, and other matters recorded in evidentiary documents concerning the interim settlement of retirement allowance	5 years
Article 15(1)2 of the Personal Information Protection Act (special provisions of law); Article 33 of the Act on Equal Employment and Support for Work-Family Reconciliation	Eligibility management and premium calculation under the National Health Insurance	◦ Matters recorded in related documents, such as matters concerning recruitment and hiring, wages, allowances other than wages, training, assignment and promotion, retirement, dismissal, and mandatory retirement	3 years

Article 2 (Period of Processing and Retention of Personal Information)

- ① The Company processes and retains personal information within the retention and use period prescribed by statute, or within the retention and use period agreed upon by the data subject at the time of collection.
- ② Unless there is an obligation to retain an employee's personal information under relevant statutes, the period of processing and retention of personal information is as follows:
1. Personal information of job applicants: 180 days from the date the recruitment decision is finalized (this does not apply to those whose hiring has been confirmed).
 2. Personal information of employees: 3 years from the date of separation from employment.

Article 3 (Provision of Personal Information to Third Parties)

① The Company processes the personal information of data subjects only within the scope specified in Article 1, and provides personal information to third parties only with the consent of the data subject or in cases falling under Articles 17 and 18 of the Personal Information Protection Act, including special provisions of law.

In the following cases, the Company provides the minimum personal information necessary, with the consent of the data subject, pursuant to Article 17(1)1 of the Personal Information Protection Act.

[General Personal Information]

Recipient	Purpose of Provision	Items Provided	Retention and Use Period
National Tax Service (126)	Imposition, reduction and collection of income tax, resident tax and various taxes; year-end tax settlement	Name, hire date, separation date, employment type, salary, leave date, working days, family-related information	Until the purpose of using personal information is achieved
National Health Insurance Service (1577-1000)	Enrollment, maintenance and management of health insurance, and receipt and refund of premiums	Name, hire date, separation date, reason for separation, date of acquisition of eligibility, date of loss of eligibility, employment type, salary, leave date, reason for leave, working days, account number, family-related information	Same as above
Ministry of Employment and Labor (1350)	Enrollment, maintenance and management of employment insurance and receipt/refund of premiums, payment of maternity-leave allowance and childcare-leave allowance, participation in award and certification programs	Name, hire date, separation date, reason for separation, date of acquisition, date of loss, employment type, salary, leave date, reason for leave, working days, family-related information, confirmation of maternity leave and childcare leave (including period of leave and wage information), photograph, video	Same as above
Korea Workers' Compensation and Welfare Service (1588-0075)	Enrollment, maintenance and management of industrial accident compensation insurance, and receipt and refund of premiums	Name, hire date, separation date, reason for separation, date of acquisition, date of loss, employment type, salary, leave date, reason for leave, working days	Same as above

Recipient	Purpose of Provision	Items Provided	Retention and Use Period
National Pension Service (1355)	Enrollment, maintenance and management of the National Pension, and receipt and refund of contributions	Same as above	Same as above
Human Resources Development Service of Korea (1644-8000)	Matters relating to worker training, handling of information requests, refund of employment-insurance premiums following group training	Name, e-mail, mobile phone number	Same as above
Ministry of Patriots and Veterans Affairs (1577-0606)	Handling of information requests, management of employment status of veterans, courteous treatment of persons of distinguished service to the State and their families	Name, veterans-related information, place of work, position, period of service, separation date, reason for separation, family-related information	Same as above
Korea Employment Agency for Persons with Disabilities (1588-1519)	Management of employment status of persons with disabilities and implementation of vocational training	Name, salary, hire date, separation date	Same as above
Samsung Life Insurance Co., Ltd. (Accident: 1577-4188 / Consultation: 1588-3115)	Enrollment in group accident insurance and related administrative tasks	Name, position, affiliation, work classification, hire date, separation date, mobile phone number	Same as above
oo Guarantee Insurance (0000-0000)	Enrollment in fidelity guarantee insurance and related administrative tasks	Name	Same as above
Hanaro Leaders Healthcare (02-2184-3000)	Health examinations for officers and employees (registration of subjects for health examinations)	Name, department, age, gender, health-examination card number	Same as above
oo Fire & Marine Insurance (0000-0000)	Subscription/cancellation of driver insurance and related administrative tasks (limited to officers and employees)	Name	Same as above

Recipient	Purpose of Provision	Items Provided	Retention and Use Period
	responsible for driving duties)		

[Unique Identification Information]

Recipient	Purpose of Provision	Items Provided	Retention and Use Period
National Tax Service (126)	Imposition, reduction and collection of income tax, resident tax and various taxes; year-end tax settlement	Alien registration number	Until the purpose of using personal information is achieved
National Health Insurance Service (1577-1000)	Enrollment, maintenance and management of health insurance, and receipt and refund of premiums	Same as above	Same as above
Ministry of Employment and Labor (1350)	Management of enrollment and maintenance, etc. of employment insurance and receipt/refund of premiums; payment of maternity-leave and childcare-leave allowances	Same as above	Same as above
Korea Workers' Compensation and Welfare Service (1588-0075)	Enrollment, maintenance and management of industrial accident compensation insurance, and receipt and refund of premiums	Same as above	Same as above
National Pension Service (1355)	Enrollment, maintenance and management of the National Pension, and receipt and refund of contributions	Same as above	Same as above
Human Resources Development Service of Korea (1644-8000)	Management of employment status of persons with disabilities and implementation of vocational training	Same as above	Same as above
Ministry of Patriots and Veterans Affairs (1577-0606)	Enrollment in group accident insurance and related administrative tasks	Same as above	Same as above
Korea Employment Agency for Persons with Disabilities	Handling of information requests, management of employment status of veterans,	Same as above	Same as above

Recipient	Purpose of Provision	Items Provided	Retention and Use Period
(1588-1519)	and courteous treatment of persons of distinguished service to the State and their families		
oo Non-Life Insurance Co., Ltd. (0000-0000)	Matters relating to worker training, handling of information requests, refund of employment-insurance premiums following group training	Same as above	Same as above
oo Guarantee Insurance (0000-0000)	Enrollment in fidelity guarantee insurance and related administrative tasks	Same as above	Same as above
oo Fire & Marine Insurance (0000-0000)	Subscription/cancellation of driver insurance and related administrative tasks	Alien registration number, driver's license number (limited to officers and employees responsible for driving duties)	Same as above
Hanaro Leaders Healthcare (02-2184-3000)	Health examinations for officers and employees (registration of subjects for health examinations)	Alien registration number	Same as above

[Sensitive Information]

Recipient	Purpose of Provision	Items Provided	Retention and Use Period
Headquarters and affiliated companies worldwide	All sensitive information collected as described in the mandatory collection of sensitive information	Integrated HR management (including provision of welfare benefits), inter-affiliate HR exchange and budget planning, inter-affiliate business cooperation, performance of legal/administrative obligations under the laws of each jurisdiction, inter-affiliate compensation comparison/analysis and adjustment, registration for	Until the purpose of using personal information is achieved

Recipient	Purpose of Provision	Items Provided	Retention and Use Period
		global system operations such as the provision of e-mail accounts	
Korea Employment Agency for Persons with Disabilities (1588-1519)	Management of employment status of persons with disabilities and implementation of vocational training	Disability-related information	Same as above
Hanaro Leaders Healthcare (02-2184-3000)	Health examinations for officers and employees (registration of subjects for health examinations)	Results of basic items of health examination, results of items examined by the public service	Same as above

② The Company may provide personal information to relevant authorities without the consent of the data subject as follows:

Legal Basis	Recipient	Purpose of Provision	Items Provided	Retention and Use Period
Article 17(1)2 and Article 15(1)2 of the Personal Information Protection Act; Article 165 of the Income Tax Act	National Tax Service	Issuance of evidentiary documents for the simplified year-end tax settlement	Name, resident registration number, details of deductible medical expenses	5 years from the date of receipt

Article 4 (Outsourcing of the Processing of Personal Information)

① The Company outsources the following processing of personal information for the smooth performance of its business:

1. National Pension Service, National Health Insurance Service, Korea Workers' Compensation and Welfare Service

- Personal information provided: name, resident registration number, salary, name/resident registration number of persons to be registered as dependents, date of hire, date of termination of employment

- Purpose: enrollment in insurance

- Period of use: until termination of the employment contract

2. Joins HR Co., Ltd.

- Personal information provided: name, resident registration number, salary, name/resident

registration number of persons to be registered as dependents, date of hire, date of termination of employment

- Purpose: payment of wages, enrollment in the four major insurances, tax reporting and management, etc.
- Period of use: until 5 years after termination of the employment contract

②When entering into an outsourcing contract, the Company specifies in the contract or other documents matters such as the prohibition of processing personal information for any purpose other than that of the outsourced work, technical and managerial protective measures, restrictions on sub-outsourcing, supervision of the outsourcee, and liability for damages, and supervises whether the outsourcee processes personal information safely.

③In the event of any change in the contents of the outsourced work or in the outsourcee, the Company shall disclose such change without delay through this Personal Information Processing Policy.

Article 5 (Rights, Obligations and Methods of Exercise of the Data Subject)

①A data subject may request the Company to peruse the personal information processed by the Company. However, where perusal is prohibited or restricted by statute, where there is a risk of harm to the life or body of another person, or where there is a risk of unjust infringement on the property and other interests of another person, or in any other case falling under Article 35(4) of the Personal Information Protection Act, the Company may restrict or refuse such perusal.

②A data subject who has perused personal information may request the Company to correct or delete such personal information. However, the data subject may not request the deletion of any personal information that is specified as a subject of collection under other statutes.

③A data subject may request the Company to suspend or withdraw the processing of personal information. However, where there is a special provision in any statute or where it is unavoidable in order to comply with statutory obligations, where there is a risk of harm to the life or body of another person, or where there is a risk of unjust infringement on the property and other interests of another person, or where the performance of the employment contract would be difficult unless personal information is processed and the data subject has not clearly expressed an intention to terminate such contract, or in any other case falling under Article 37(2) of the Personal Information Protection Act, the Company may refuse such request to suspend or withdraw processing.

④Where the data subject has consented to the fact that an automated decision is made, or has been informed in advance through a contract or the like, or where there are express provisions of statute, the right to refuse the automated decision is not recognized; only the right to request an explanation and a review is available. In addition, requests to refuse or for an explanation of an automated decision may be denied where there are justifiable grounds, such as where there is a risk of unjust infringement on the life, body, property, and other interests of another person.

The data subject may exercise the rights under paragraphs (1) through (3) of this Article in writing, by e-mail or other means, against the Privacy Officer of the Company, in accordance with Article 41 of the Enforcement Decree of the Personal Information Protection Act, and may exercise such rights through a legal representative or an agent duly authorized (in such case, a power of attorney in the form prescribed by Annexed Form No. 11 of the Public Notice on the Methods of Processing Personal Information shall be submitted).

⑤When a data subject exercises any right, the Company shall verify whether the requester is the data subject in person or a duly authorized agent. Except where a special procedure is provided in other statutes, the Company shall, without delay, take necessary measures in accordance with the data subject's request and notify the data subject thereof.

Article 6 (Destruction of Personal Information)

① Where personal information becomes unnecessary, including where the purpose of collection and processing has been achieved or where the retention and use period has expired, the Company destroys such information without delay, except where the data subject has separately consented or where retention is required under relevant statutes. Where personal information must continue to be retained pursuant to other relevant statutes, such personal information shall be transferred to a separate database (DB) or stored in a different location. Personal information necessary for issuing certificates of career to retired workers shall be retained separately from the personal information of incumbent workers for three (3) years.

② The Company selects personal information for which grounds for destruction have arisen and destroys such information upon the approval of the Company's Privacy Officer. Personal information recorded on paper, etc., shall be shredded or incinerated, and personal information stored in electronic form shall be deleted by technical methods that prevent the records from being recovered.

Article 7 (Measures for Ensuring the Safety of Personal Information)

In handling the personal information of data subjects, the Company has prepared the following technical and managerial measures to ensure safety so that personal information is not lost, stolen, leaked, altered, or damaged:

1. Technical Protective Measures

- In preparation for external intrusions such as hacking, the Company uses intrusion prevention systems on its servers to detect and control unauthorized access from outside, and has put in place technical safeguards to ensure security at the system level, including encryption of personal information, installation and updating of security programs.

- Users are identified at the point of output of personal information (such as printing and on-screen display).

2. Managerial Protective Measures

- Establishment and implementation of an internal management plan

- Restricting access to data subjects' personal information to the minimum number of personnel

- Designating and managing personal-information processing systems and persons handling personal information so that personal information is not disclosed to unauthorized persons via the Internet, P2P, shared-folder settings or other means

- Receiving security pledges from employees in order to prevent the leakage of information by human factors

- Handover/takeover of duties relating to personal information is conducted in a secure manner, and responsibility for personal-information incidents arising before/after hire or separation is clearly defined

3. Physical Protective Measures

- Designating the data center and the areas where personal information is stored as specially protected zones and controlling access to such areas

Article 8 (Privacy Officer)

In order to protect the personal information of data subjects and handle complaints related to personal information, the Company designates a Privacy Officer and Personal Information Protection Manager as follows:

1. Privacy Officer

- Name: Park Hye-sook

- Position: Business Unit Head

- Contact: 02-3708-3600 / hyesook-park.hp@cmicgroup.com

2. Department in charge of Personal Information Protection

- Department: HR, IT & Admin
- Person in charge: Hwang Hyeon-cheol
- Contact: 02-3708-3653 / hyeoncheol-hwang@cmicgroup.com

Article 9 (Request for Perusal of Personal Information)

A data subject may file a request for perusal of personal information under Article 35 of the Personal Information Protection Act with the following department. The Company shall endeavor to handle requests for perusal by data subjects promptly.

▶ Department Receiving and Handling Requests for Perusal of Personal Information

- Department: HR, IT & Admin
- Person in charge: Hwang Hyeon-cheol (hyeoncheol-hwang@cmicgroup.com)
- Personnel: Jang Jung-han (junghan-jan@cmicgroup.com), Kim Ji-sue (jisue-kim@cmicgroup.com)
- Contact: 02-3708-3653

Article 10 (Remedies for Infringement of Rights and Interests)

① Data subjects may inquire about the remedy of damages, consultation, etc., concerning the infringement of personal information at the following organizations. The following organizations are independent of the Company; please contact them if you are not satisfied with the Company's own handling of personal-information-related complaints or the result of remedies for damages, or if you need more detailed assistance.

1. Personal Information Infringement Report Center (operated by the Korea Internet & Security Agency)

- Functions: receipt of reports of personal-information infringement and requests for consultation
- Website: privacy.kisa.or.kr
- Phone: 118 (without area code)
- Address: (138-950) Personal Information Infringement Report Center, Korea Internet & Security Agency, 135 Joongdae-ro, Songpa-gu, Seoul

2. Personal Information Dispute Mediation Committee

- Functions: application for personal-information dispute mediation and collective dispute mediation
- Website: www.kopico.go.kr
- Phone: 1833-6972 (without area code)
- Address: (03171) 4th Floor, Government Complex Seoul, 209 Sejong-daero, Jongno-gu, Seoul

3. Supreme Prosecutors' Office: 1301 (without area code) (www.spo.go.kr)

4. National Police Agency: 182 (without area code) (ecrm.cyber.go.kr)

② The Company guarantees the right of self-determination over personal information of data subjects and endeavors to provide consultation and remedies for damages arising from the infringement of personal information. If you need to file a report or request a consultation, please contact the following department:

▶ Consultation and reporting related to personal-information protection

- Department: HR, IT & Admin
- Contact: 02-3708-3653 / hyeoncheol-hwang@cmicgroup.com

Article 11 (Installation and Operation of Video Information Processing Devices)

The Company installs and operates video information processing devices as follows:

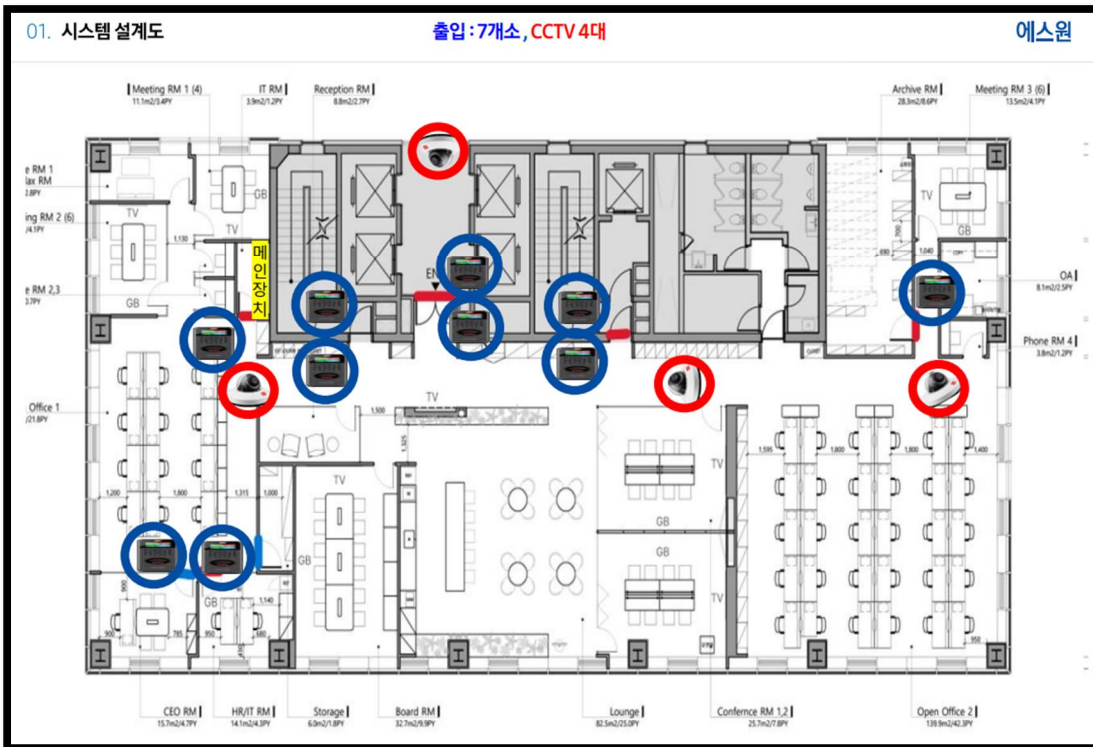
- 1. Basis and purpose for installation: facility safety and fire prevention of the Company
- 2. Number of devices, location of installation, scope of recording: refer to the installation drawings for details

- Number of devices installed: 4 units installed on the ceiling of major facilities (main entrance, network equipment room, in front of the freight elevator, in front of the document storage room)

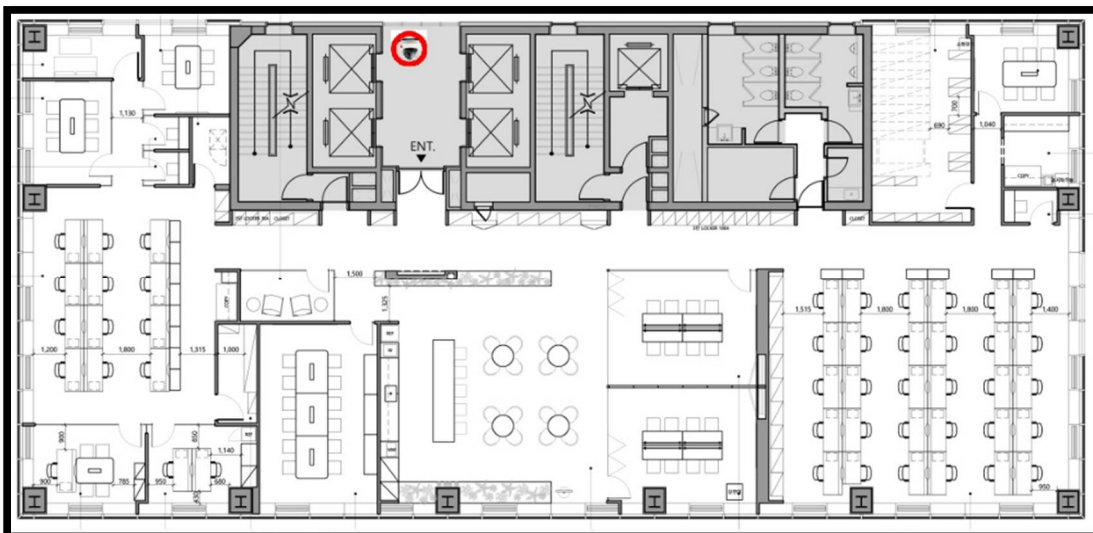
- ※ S1 SECOM (4 units), Building's lateral disaster-prevention room (1 unit)

- Scope of recording: entrances and corridors of major facilities

[Reference: Installation Drawing – S1 SECOM]



[Reference: Installation Drawing – iTower Disaster-Prevention Room]



※ Manager in charge, department in charge, and persons with access to video information:
→ HR, IT & Admin: Manager (Hwang Hyeon-cheol), persons with access (Jang Jung-han, Kim Ji-sue)

3. Recording time, retention period, place of storage, processing method of video information

[Outsourced Operator: S1 Co., Ltd., 1588-3112]

- Recording time: 24 hours a day (365 days a year)
- Retention period: 30 days from the time of recording
- Place of storage and processing method: stored and processed on the hard disk of the video information processing device in encrypted form. Matters relating to use of the personal video information for purposes other than the original purpose, provision to third parties, destruction, requests for perusal, etc., are recorded and managed, and upon expiration of the retention period the data is permanently deleted by methods that make recovery impossible.

[Operator: iTower Disaster-Prevention Room, 02-569-3284]

- Recording time: 24 hours a day (365 days a year)
- Retention period: 30 days from the time of recording
- At the time of completion of the building, one unit per floor is installed in the common areas of each floor (entrance/elevator hall)
- Place of storage and processing method: stored and processed on the hard disk of the video information processing device in encrypted form. Matters relating to use of the personal video information for purposes other than the original purpose, provision to third parties, destruction, requests for perusal, etc., are recorded and managed, and upon expiration of the retention period the data is permanently deleted by methods that make recovery impossible.
- Place of storage: iTower Disaster-Prevention Room

4. Method and place for confirming video information: request to the Manager of HR, IT & Admin

5. Measures taken in response to requests by data subjects for perusal of video information: applications must be made via the Application for Perusal and Verification of Existence (Deletion) of Personal Video Information; perusal is permitted only where the data subject is the person recorded, or where it is clearly necessary for the life, body, property or interests of the data subject

6. Technical, managerial, and physical measures (measures for ensuring safety) to protect video information: establishment of an internal management plan, access control and restriction of access privileges, application of secure storage/transmission technologies for video information, retention of processing records and prevention of forgery/alteration, provision of storage facilities and installation of locking devices, etc.

Article 12 (Implementation of the Personal Information Processing Policy)

① This Personal Information Processing Policy shall take effect on October 1, 2024.

② Where this Personal Information Processing Policy is amended, the Company shall announce the comparison of the contents before and after the amendment from seven (7) days prior to the effective date of the amendment, so that data subjects can easily check the changes. The previous Personal Information Processing Policy (in effect from December 1, 2020 to October 1, 2024) is available [here].