

Privacy Policy

GI Innovation Inc. (the "Company") will protect personal information and rights of data subjects and comply with the following privacy policy in order to deal with data subjects' complaints related to personal information, in accordance with applicable laws such as the Personal Information Protection Act.

Article 1. Purpose of Processing Personal Information and Method of Collection

1. The Company will process personal information for the following purposes. Personal information will not be used for purposes other than the following purposes, and without the relevant data subject's prior consent, personal information will not be used beyond the scope and purpose of use nor be disclosed to a third party.

- **the Company's pharmaco-medical research activities:**

conducting pharmaco-medical research and development activities (such as analyzing data collected from clinical trials), making decisions whether to request for lecture, consulting or research, and record-keeping for notification purposes, etc.

- **the Company's execution and delivery of contracts:**

identifying a party to a contract, making decisions whether to enter into a contract, performing obligations of contracts (such as making payments in consideration for receiving products and services), making contacts for contract purposes, responding to defaults of contracts, dealing with contract-related disputes and complaints, evidencing the execution and delivery of contracts, and managing computerized systems on contract status including contract partners, contents of the contracts, and payment details, etc.

- **the Company's performing legal or administrative duties:**

reporting adverse events in accordance with applicable laws such as the Pharmaceutical Affairs Act, conducting internal audits, conducting tax declaration and payment (such as income tax and value-added tax), performing other legal or administrative duties (such as issuing receipts and tax invoices) levied on the Company by applicable laws, regulatory authorities, administrative agencies, and government agencies, etc.

- **the Company's conducting marketing and pharmaco-medical information**

communication activities:

participating in market research, academic seminars, meetings, training, and other activities for communicating pharmaco-medical information to and from health professionals, handling and responding to questions and complaints, etc.

- **handling recruitment-related administrative affairs and proceeding with recruitment process:**

identification of real names and personal certifications, confirmation on willingness to apply during future recruitment drives, replying to questions related to recruitment, retention of documents for the issuance of documents after resignation, and confirmation on willingness to preserve the documents after a mandatory period of preservation, etc.

- **visitor identification, crime prevention, and facility safety for security purposes.**

2. The Company will collect your personal information in the course of monitoring the Company's tech tools and services including but not limited to emails, phone calls, fax, and other written forms. In addition, the Company will collect or create your information when you provide the Company with your information or communicate directly with the Company.

Article 2 Personal Information to be processed

1. Personal information items to be processed by the Company are as follows:
 - Health professionals' name, birth date, health institutions' name and address, title, phone number, cell phone number, fax number, email address, mail address, medical license number, resident registration number (alien registration number), passport number, specialty (education and work experience), bank account number, business registration number, etc.
 - Information collected in the course of conducting clinical trials based on patients' explicit consent and performing obligations under applicable laws related to clinical trials: patients' name (or patient ID, initials or other coded identity information), birth date, gender, health information related to disease (including health professionals (or doctors) who diagnosed and prescribed and the health institutions (or hospitals) they belong to).
 - Information on the Company's contract partners such as suppliers, shipping companies, translators, financial or legal advisers, and other consultants and contractors (if the partner is a corporation, the partner's directors, officers, and employees who are in charge of the transaction with the Company are included): e.g. their name, phone number, cell phone number, fax number, email address, resident registration number, business registration number, bank account number, work experience and qualifications.

- Job applicants' name, photo, gender, birth date, address, contact number, email address, education, major, grade or academic achievement, language skills, work experience, military records, cover letter, etc.
- Information to be automatically collected or created in the course of the performance of work or the use of services: data subject's entry and exit records, browser types, OS, access records (IP address, access time), etc.

Article 3 Period for retention and use of personal information

In principle, the Company will destroy personal information of a data subject without delay when the purpose of its collection and use has been achieved as above, unless such information has to be retained in accordance with applicable laws.

Article 4 Provision of personal information to 3rd parties

1. The Company will process personal information within the scope described in this Privacy Policy, and will not process or provide personal information of a data subject to a 3rd party beyond the scope without the data subject's prior consent, except during the following events in accordance with applicable laws:
 - in the event that the data subject's consent to the disclosure and provision is obtained; or
 - in the event that such provision is required or allowed by applicable laws or required by a competent investigative agency in accordance with due methods and procedures for investigation purposes; or
 - in the event that it is deemed manifestly necessary for the protection of life, bodily or property interests of the data subject or third party from imminent danger where the data subject or his or her legal representative is not in a position to express intention, or prior consent cannot be obtained owing to unknown addresses; or
 - in the event that pseudonymized information is provided for statistical purposes, scientific research purposes, and market research purposes.
2. The Company will provide personal information to 3rd parties as below.

<Current Status of the Company's Provision of Personal Information to Third Parties>

Correct as of: 18th September 2020

Recipient (Contact Information)	Purpose of use by recipient	Personal Data to be provided	Period of use and retention by recipient
National Tax Service (126)	Tax declaration and payment of income tax, etc. Submission of payment statement for earned income, retirement income, etc.	Name, resident registration number of a person who is a party to a contract with the Company. Employees and their family members' year-end tax adjustment information, etc.	Until the date when the purpose of use is achieved
Four Social Insurance entities (National Pension, National Health Insurance, Employment Insurance, Industrial Accident Compensation Insurance)	Management of Social insurance qualification and requirements	Employees and their family members' resident registration number (alien registration number), address, contact information, income, etc.	Until the date when the purpose of use is achieved
Regulatory Authorities (Ministry of Food and Drug Safety in Korea (1577-1255), etc.)	Clinical study protocol review application (amendment submission), adverse drug reaction reporting, final report submission, etc. in accordance with applicable laws	Health professionals(Investigators)' name, title, contact information, health institutions(or hospitals)' name and address, adverse event information, patients(trial subjects)' age, birth date, height, gender, weight, medical history, disease name, drug name, and other health information at the time of occurrence	Until the date when the purpose of use is achieved

Article 5 Outsourcing personal information processing

The Company outsources personal information processing to external professional companies stated below. Any change in the outsourced companies and the outsourced services can be found on the Company's Privacy Policy webpage at www.gi-innovation.com.

<Current Status of the Outsourcers>

Correct as of: 18th September 2020

Outsourced company name	Description of outsourced services
Clinical Trial Service Providers in and outside Korea (Contact Research Organization, e.g. Syneos Health, LLC, Syneos Health UK Limited)	All or part of the sponsor's tasks and roles related to clinical trials (e.g. Project Management, Handling and Storage of clinical trial documents, Monitoring, Data Management, etc.)
ADT CAPS (1800-6400)	Unmanned security services & CCTV management

Article 6 Installation and Operation of Visual Data Processing Devices

The Company will install and operate visual data processing devices as below, pursuant to the Personal Information Protection Act.

1. Purpose of installation and operation of visual data processing devices:

- Ensuring the safety and security of facilities
- Crime prevention, e.g. theft

2. Location and scope of filming;

Location	Number of devices	Place and scope
Building A (1114 to 1117)	Two CCTVs	Passageways, entrances/exits
Building B (1014 to 1017)	Two CCTVs	Passageways, entrances/exits
document rooms in buildings A and B	Two Network Video Recorders (NVR)	Room

3. Management personnel and authorized personnel

The management personnel is in charge of managing the operation of the devices, protecting data subjects' visual data and dealing with complaints related to such visual data. In addition to the

management personnel, the authorized personnel is authorized to have access to the data.

	Name	Title	Department	Contact details
Management personnel	Sung-jin Park	Head of Team	IT / General Affairs Team	Tel: +82 70 7700 3862 (Monday to Friday 09:00~18:00, excluding public holidays)
Authorized personnel	Jun-yeong Jeong	Team Member	IT / General Affairs Team	Tel: +82 70 7700 3862 (Monday to Friday 09:00~18:00, excluding public holidays)

4. Duration of filming, retention period, retention place and processing method of the visual information:

Duration of filming	Retention period	Retention place and processing method
24 hours	Building A: up to [60] days from the date of filming Building B: up to [90] days from the date of filming	Saved in NVR in a document room

5. Outsourcing of the installation and management of visual data processing devices:

Outsourced Company Name	Purpose and scope of outsourced services	Contact details
ADT CAPS	<ul style="list-style-type: none"> · Installation, maintenance, and operation of visual data processing devices · Scope of filming necessary to achieve the purpose of installation, such as passageways, emergency stairs, entrances/exits, machine rooms, and document rooms. 	1800-6400

6. How and where to check the visual information:

- A data subject can check his or her visual information in the head office or branch office where the data subject wants to check such information, after submitting an access request to the Company and obtaining the prior approval from management personnel.

7. Measures to deal with the data subject's request to access the visual information:

A data subject may request to access his or her personal visual information by submitting the request to the Company to access, verify the existence of, or delete such visual information. The Company will allow such access, verification, or deletion:

- only for footage containing the data subject;
- otherwise only when it is necessary for the protection of life, bodily or property interests of the data subject from imminent danger

8. Measures for ensuring safety of visual information:

The Company will take the following measures to protect personal visual information:

- access control, access authorization limits, storage of processing records, installation of a storage facility and lock, etc.

Article 7 Rights of Data Subjects and Exercise of Rights

1. A data subject may exercise the following rights regarding the collection, use, sharing of personal information by the Company in accordance with applicable laws such as the Personal Information Protection Act:

- the right to access to his or her personal information;
- the right to make corrections or deletion;
- the right to make temporary suspension of treatment of personal information; or
- the right to request the withdrawal of their consent provided before;

at any time by sending Form 1 (Personal Information (Access, Correction, Deletion, Processing Suspension, Withdrawal of Consent) Request) by e-mail to the Company or the DPO of the Company.

<download link>

2. A data subject can exercise the rights provided in Section 7.1 through an agent, including a legal representative and a power of attorney ("Representatives") by sending Form 2 (the Power of Attorney) by e-mail to the Company or the DPO of the Company.

<download link>

3. The Company will take measures regarding the request from data subjects or their Representatives without delay, in accordance with applicable laws such as the Personal Information Protection Act. However, where any of the following is applicable, the Company may notify the data subject of the reason and deny the request of such data subject:

- Where special provisions in other laws so require or it is inevitable to observe legal obligations;
- Where access may cause damage to the life or body of a third party, or unjustified infringement of property and other interests of any other person;
- Where it is impracticable to perform a contract such as the provision of services as agreed upon with the said data subject without processing the personal information in question, and the data subject has not clearly expressed the desire to terminate the agreement.

Article 8 Destruction of Personal Information

- The Company will destroy a data subject's personal information immediately after the personal information becomes unnecessary owing to the expiration of the retention period, attainment of the purpose of processing the personal information.
- Despite the expiration of the retention period or attainment of the purpose of processing the personal information, where the Company is obliged to retain the personal information under other laws and regulations, the relevant personal information or personal information files will be transferred to another database or stored and managed separately from other personal information.
- The personal information stored in electronic files will be destroyed using technical means to prevent the recovery of the records, while personal information preserved in paper documents will be shredded or incinerated.

Article 9 Measures for Ensuring Safety of Personal Information

The Company, in accordance with Article 29 of the Personal Information Protection Act, takes the following technical, administrative and physical measures necessary to ensure safety:

- Formulation and implementation of internal management plans
- Minimizing and educating personnel authorized to process personal information
- Installing security programs and updates and inspecting the programs to protect personal information from being leaked externally or destroyed by hacking or computer viruses

Article 10 Complaints Related to Personal Information

To protect personal information and deal with complaints related to personal information, the Company designates the following Data Protection Officer (DPO).

[Data Protection Officer]

- Name: Sung-jin Park
- Office and position: GI Innovation, Inc., Head of IT/general affairs team
- Tel.: +82 70 7700 3862
- E-mail: niceca@gi-innovation.com
- Address: Building A,#11116, 167 Songpa-daero, Songpa-gu, Seoul, 05855 the Republic of Korea

Article 11 Remedies for Violation of Rights and Interests

A data subject may file a petition for settlement of a dispute, consultation, etc. with the Personal Information Dispute Mediation Committee, the Korea Internet and Security Agency or the Personal Information Infringement Reporting Center to seek remedies for the breach of privacy. In addition, you may contact any of the following agencies to report or receive counselling on the breach of privacy:

- Personal Information Infringement Reporting Center (Korea Internet and Security Agency): 118 (without area code) (<https://privacy.kisa.or.kr>)
- The Cyber Crime Investigation Team of the Supreme Prosecutors' Office: 1301 (without area code) (<http://www.spo.go.kr>)
- The Cyber Terrorism Response Center of the National Police Agency: 182 (without area code) (<http://cyberbureau.police.go.kr>)

Article 12 Amendment of Privacy Policy

In case of modification of this Privacy Policy in accordance with applicable laws and internal policies, the Company will, without delay, make a public notice of such modification or amendment in such

a way as prescribed by applicable laws.

Effective from 18 September 2020