

CCPA Privacy Policy

Last Updated: August 23, 2021

1. General

This CCPA Privacy Policy (“this Policy”) supplements the information contained in our Privacy Policy and applies to Assemble Circle Co., Ltd. and its WebCeph website (“we” or “WebCeph”) with regard to the processing of personal information of users who reside in the State of California (“Consumers” or “you”). If you are not a Californian resident, please refer to our **Privacy Policy**.

We adopt this Policy to comply with the California Consumer Privacy Act of 2018 (“CCPA”), and any terms used and not otherwise defined in this Policy shall have the same meaning as those terms in the CCPA.

2. Personal Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual (“Personal Information”). In particular, our Website, <https://WebCeph.com/en/>, has collected the following categories of personal information from Consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	YES
C. Protected classification characteristics under Californian or federal law.	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information	Records of personal property, products or	YES

	services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data	Physical location or movements.	NO
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of Personal Information listed above through the following categories of sources:

[Directly from you] For example, from forms you complete on our Website.

[Indirectly from you] For example, from observing your actions on our Website.

3. Use of Personal Information

We may use, or disclose the personal information we collect for one or more of the following business purposes:

- Member management and identification
- Collect and store it for your continued use of our website and Services;
- To detect and deter unauthorized or fraudulent use of or abuse of the Service
- Performance of contract and service fee settlement regarding provision of services demanded by the users
- Improvement of existing services and development of new services
- Making notice of function of company sites or applications or matters on policy change
- To help you connect with other users you already know and, with your permission, allow other users to connect with you
- To make statistics on member's service usage, to provide services and place advertisements based on statistical characteristics
- To provide information on promotional events as well as opportunity to participate
- To comply with applicable laws or legal obligation
- Use of information with prior consent of the users (for example, utilization of marketing advertisement)

We agree not to collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes other than those expressly stated in this Policy without providing you notice.

4. Sharing of Personal Information

We may disclose your Personal Information to a third party for a business purpose. When we disclose Personal Information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We may share your personal information with the following categories of third parties:

- Service providers
- Data analytics providers

Disclosure of Sharing of Personal Information for a Business Purpose

Within the last twelve (12) months, we have shared the following categories of Personal Information for a business purpose:

- [Category A: Identifiers.]
- [Category B: California Customer Records personal information categories.]
- [Category D: Commercial information.]
- [Category F: Internet or other similar network activity.]

We have shared your Personal Information for a business purpose to the following categories of third parties:

- Service providers
- Data analytics providers

Disclosure of Sales of Personal Information for a Business Purpose

Within the last twelve (12) months, we have not sold Personal Information.

5. Your CCPA Rights

The CCPA provides Consumers (California residents) with specific rights regarding their Personal Information. For more detailed information on your CCPA rights and how to exercise those rights, see **Guide to CCPA Consumer Privacy Rights**.

Access

You may request that we disclose certain information regarding our use of your personal information over the past twelve (12) months. You may only make such requests twice per twelve (12) months.

Upon verifying your request (see below), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- The specific pieces of personal information we collected about you.
- Our business purpose for collecting that personal information.
- The categories of third parties with whom we share personal information.

Deletion

You may request that we delete any of the personal information collected from you and retained by us, subject to certain exceptions.

Once your request is verified (see below) and we have determined that we are required to delete that information in accordance with applicable law, we will delete and direct our service providers to delete your personal information from our records. Your request to delete your personal information may be denied if it is necessary for us to retain your information under one or more of the exceptions listed in the CCPA. Please note that a record of your deletion request may be kept pursuant to our legal obligations.

Opt-out of Sales

You have the right to opt-out of the sale of your personal information.

Within the last twelve (12) months, none of your personal information has been sold to a third party, but in such case, we will promptly provide a “Do not sell my Personal Information” banner through which you may submit your request to opt-out of the sale of your personal information.

If you wish to submit your request to opt-out of any potential sales, please email us at admin@assemblecircle.com.

Other Rights

California Shine the Light. The California “Shine the Light” law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their

personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

Non-Discrimination. California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

To exercise any of the rights described above, please please email us at admin@assemblecircle.com.

6. Verifying your Request

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

7. Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

8. Changes to this Policy

We reserve the right to amend or modify this Policy at our discretion and at any time, and in such case, we will post the updated Policy on the Website and update the effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

9. Contact Information

If you have any questions or comments about this Policy, the ways in which we collect and use your personal information, your choices and rights regarding such collection and use, or wish to exercise your rights under Californian law, please do not hesitate to contact us at:

- Address : R02-ho, 8th floor, 12, Daewangpangyo-ro 645beon-gil, Bundang-gu, Seongnam-si, Gyeonggi-do, Republic of Korea
- Tel.: +82-31-697-0433
- E-mail: admin@assemblecircle.com