

Privacy Policy

MUFIN INC. (the “**Company**”) highly values your personal information and is committed to complying with all privacy laws and other applicable laws and regulations including the Personal Information Protection Act (“**PIPA**”). The Company’s privacy policy (this “**Privacy Policy**”) may be amended pursuant to applicable laws and regulations, regulatory instructions and the Company’s internal policy.

1. Items of Personal Information Processed

The Company may process your personal information listed below in the course of business:

- email address, password, cryptocurrency wallet address, IP address, browser type and version, language, referring site, time zone setting, operating system and platform preference to receiving marketing material, transaction history and information, account history and information, inquiry history and communication history, name, date of birth, identification information and contact information

2. Purpose of Processing Personal Information

The Company processes the collected personal information for the following purposes:

- diagnosing and troubleshooting issues related to connection and network
- performing routine tests to ensure website functions are working properly
- detecting for and preventing fraudulent activities
- assessing the geographic reach of our services
- co-operating with proper authorities for any legal or compliance issues
- aggregating statistical data related to the Company’s platforms
- tracking users’ movements in the Company’s platforms for service improvements
- marketing products, services or offers that may be relevant to you
- verifying your identity for the purpose of satisfying our anti-money laundering obligation
- determining your compliance with our Terms of Use that apply to any of our products or services and applicable law
- addressing any queries and requests you may have with the Company
- complying with our legal and regulatory obligations
- conducting market analysis and researches
- monitoring use of our products and services

3. Period of Retention and Processing of Personal Information

In principle, personal information will be immediately destroyed when the purposes of processing such personal information are attained unless it is necessary to retain the personal information pursuant to the relevant laws and regulations. Specific periods of retention and processing are as follow:

- Personal Information is preserved until the closure of the applicable user’s account.
- Personal Information for a dormant account (an account with no activity for 1 year) is preserved on a segregated basis.
- Account-related activities including but not limited to login, deposit, withdrawal, service usage activities are preserved for up to 5 years.
- Record of website visits is preserved for 3 months.

4. Procedure and Method of Destroying Personal Information

- Procedure of destruction
After the purpose of processing of the information is attained, your information will be transmitted to a separate database (or moved to a separate storage if your information is retained in a paper form) and retained for a certain period under the Company’s internal regulations and other applicable laws and regulations before it is destroyed. Your personal information relocated to a separated database will not be used for other purposes unless it is required under the applicable laws and regulations.
- Method of destruction
Personal information printed out on paper will be destroyed by shredding or incinerating it, and personal information stored in electronic form will be deleted by employing a technical method that renders it irrecoverable.

5. Provision of Personal Information to a Third Party

The Company does not provide your personal information to a third party, with exception of the following cases:

- Where you agreed to provide your personal information to a third party in advance; and
- Where provision of personal information to a third party is required under the applicable laws and regulations

6. Delegation of the Processing of Personal Information

In order to provide better services, the Company delegates the processing of personal information as follows:

Delegatee	Descriptions of Delegated Services
Fullstack Inc.	Information processing relating to compliance with Know-Your-Customer and anti-money laundering regulation

7. Rights and Obligations of Users and Their Legal Representatives and the Method of Exercising thereof

Data subjects (including their legal representatives) may make the following requests: (i) access to his/her personal information, (ii) correction or deletion of his/her personal information, or (iii) suspension of processing of his/her personal information.

When requested as above, the Company will check whether the requesting party is the data subject or their legal representatives. The Company may reject such request if there exists a justifiable reason for rejection under applicable laws or a reason equivalent thereto. The Company will take appropriate measures without delay if you contact the Data Privacy Department via e-mail.

8. Installation, Operation and Denial of a Device that Collects Personal Information Automatically

The Company uses cookies and/or similar technology. Cookies are files saved on a customer’s computer, which save the record of customers’ visits to the Site and provide such information to the Company. By using cookies, the Company may easily understand each customer’s preferences toward the Site. Cookies allow the Company to adjust the Site based on preferences of customers and measure the level of their usage of the Site.

When customers access the Site, the Company analyzes the frequency of access, and visit time, etc.,

traces customers and obtains information on participation in events or number of site visits. And the Company uses this information to conduct targeted marketing or provide customized services to customers.

Customers have an option to install cookies. Customers may accept all cookies or instruct the web browser to send notice when cookies are installed, or refuse to accept all cookies by adjusting the relevant function in the web browser of their own computer. However, customers may experience difficulties in using the Company's services if they refuse the installation of cookies.

An example of the installation method (in the case of Internet Explorer): The Tool button on the top of the web browser > Internet Options > Privacy

9. Handling of Complaints Related to Personal Information

The Company has a department in charge of protecting your personal information and handling complaints related to your personal information.

- Department in charge of Protecting Personal Information

Name of the Department: Data Privacy Department

Email address: support@icon-fi.com

You may file any complaint related to the protection of your personal information arising during your use of the Company's services to the department above. The Company will provide sufficient response to complaints from members in a timely manner.

If you need to report on any other personal information infringement or require further consultation, you may contact the following agencies:

- Personal Information infringement reporting center (privacy.kisa.or.kr / 118 without regional code)
- The Personal Information Dispute Mediation Committee (kopico.go.kr / 1833-6972)
- Cyber Safety Bureau of the Korean National Policy Agency (cyberbureau.police.go.kr / 182 without regional code)

10. Measures to Ensure the Security of Personal Information

The Company takes technical, managerial and physical measures necessary to ensure the security of personal information in accordance with the PIPA, including the followings:

- Managerial measures: Establishment and implementation of an internal management plan, regular training of employees on personal information protection, etc.
- Technical measures: Management of the right to access the personal information processing system, installation of an access control system, encryption of unique identification information, installation of security programs, etc.
- Physical measures: Restriction on access to personal information storage medium such as the computer room and data storage room, etc.

11. Amendments to this Privacy Policy

This Privacy Policy will be effective as of January 20, 2021. If the Company makes any amendment to this Privacy Policy, the Company will take measures such as notification of such amendments in accordance with the relevant laws and regulations.