

NUBO Rosetta Privacy Policy

1. What is TESOLLO Privacy Policy?

Tesollo Inc. (hereinafter “Tesollo”) uses and provides the user’s personal information based on the user’s consent, and actively guarantees the user’s right.

Tesollo complies with applicable laws, personal information protection regulations and guidelines of the Republic of Korea.

Tesollo Privacy Policy refers to guidelines on protecting the user’s valuable personal information which Tesollo is required to comply with, in order to ensure that users use its services with confidence.

2. Collection of Personal Information and Installation /

Management of Automatic Collection of Personal Information

Tesollo collects the minimum personal information to provide its service.

In addition, Tesollo may collect and process additional information intended to provide better services; such additional information is not collected unless the users have provided their consent. However, in this case, there will be negative consequences on the services provided if the user has declined to give his or her personal information which is required at a minimum when using the services provided by Tesollo.

The following minimum personal information is collected when the user signs up for the service or while the user uses the service.

2.1 Information that you may provide to Tesollo

Tesollo may collect user’s personal information under the following circumstances:

- Applying for a form for app registration or uploading information
- Making contacts to customer service center

The user’s personal information collected by Tesollo may contain the following information:

- Name
- Email address

2.2 Information that is collected automatically

Through use of your Tesollo application, the following information will be gathered automatically:

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- Log Information: Like most mobile application publishers, we collect information mobile devices typically make available such as, the date and time of access, the type and version of operating systems (e.g., iOS, Android)
- Usage Information: We collect information about your usage of our mobile application. For example, we collect information about the actions that you may take when using our mobile applications (e.g. smartpen's monthly usage, online navigation records and the time and the status of the reply given by the server)
- Location Information: We may determine the approximate location of your device from your mac address. We collect and use this information to, for example, calculate how many people visit our mobile application from certain geographic regions.

2.3 Use of Google Analytics

To assess the usage situation of the service, Google Analytics may be used to gather information as follows:

- Usage of App event (including installation, deletion, update)
- Smartpen's Mac Address
- Type of device and OS
- Location where App event takes place, gender, age, funnels

However, personal information is not gathered when using Google Analytics.

The data collected by using Google Analytics is managed pursuant to Google's privacy policy. Please check the Google Analytics homepage for information on the terms of service and privacy policy of Google Analytics.

- Google Analytics Terms of Service:
<http://www.google.com/analytics/terms/us.html>
- Google's Policy and Principles:
<http://www.google.com/intl/en/policies/privacy/>

Tesollo does not take responsibility for any damages caused by use of the Google Analytics service.

2.4 The Method of Personal Information Collection

The method of personal information collection is as follows.

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When collecting personal information, Tesollo informs the fact to the user in advance and asks for an agreement. Personal information is collected using the following method:

- The user agrees to the collection of personal information and enters relevant information while the user uses the service.

3. Use of Personal Information

Personal information is used for the following purposes.

- Fulfillment of a contract and provision of contents in relation to providing service
- Confirmation of the user's will to sign up

4. Access Right to Personal Information

In cases where access rights to user's personal information are necessary in providing its services, Tesollo informs the followings and gets consent from the user:

1) Necessary Access Rights

- Information and items of function which access rights are needed
- The reason why the access rights are necessary

2) Optional Access Rights

- Information and items of function which access rights are needed
- The reason why the access rights are necessary
- The fact that the user may not give his or her consent being sought for permission to the access rights

Tesollo does not reject the provision of its services to users when the user does not give consent for permission to access rights which are not necessary.

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5. Provision of Personal Information

Tesollo does not provide personal information to any third party without your consent or unless demanded by applicable laws.

However, personal information may be provided to third parties in the course of entrusting some parts of the affairs required for service provision.

6. Retention Period of Personal Information and Destruction of Personal Information

The retention period of personal information is as follows:

- 1) Information to be retained by Tesollo: Name, E-mail address
- 2) Retention period: Personal information described in 1) above will be retained until the user's unregistration from the service.

Other personal information which are required to be retained by law and their respective provisions are as follows:

records of contract or withdrawal of subscription
records of consumer's complaint and the settlement dispute
Service visit records

The user's personal information is to be destroyed immediately once the purpose of the collection and use of personal information is fulfilled. The procedure and method of destruction is as follows:

- Method of Destruction: Personal information stored in electronic file formats is to be deleted using technical means which make the information unrecoverable. Personal information printed on paper records, printed matters and documents is to be destroyed through shredding or incineration.

7. Rights and its exercise by User and User's Legal Representative

The user may view and edit his or her personal information at any time (through a legal representative for users aged under 14), and may at any time withdraw his or her agreement on personal information provision or unregister from the service. Users may contact the customer service via in writing, or through phone or email. If a user requests the revision of personal information, the user's information is not to be used or provided until the revision is completed.

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8. Compliance with the General Data Protection Regulation

Tesollo complies with the General Data Protection Regulation (GDPR) as well as the domestic laws of each member country.

The following may apply when Tesollo provides services to users in EU countries.

1) Purpose and Basis of Personal Information Processing

Tesollo uses personal information collected from users only for purposes specified in “3. Use of Personal Information”, informs users prior to any use thereof and asks for agreement.

We process, among others, data revealing the geolocation (with the prior consent of the data subject) and the access to photos, multimedia contents and files on your device through the Tesollo App (with the prior consent of the data subject).

In addition, Tesollo may process personal information in accordance with applicable laws including GDPR in any of the following cases:

- A. When agreed by the data subject
- B. For signing and fulfilling a contract with the data subject
- C. For legal compliance
- D. When personal information processing is necessary for the material benefit of the data subject
- E. For the pursuit of legitimate interests of the company (except for cases where the benefits, rights or freedom of the data subject is more important than that of the company.)

2) Rights of the Data Subject

A. You may exercise your rights pursuant to Regulation EU 2016/679, by contacting the Data Controller sending an email to “support@tesollo.com”. You have the rights, at any time, to request the Data Controller to access your personal information (Art. 15), the rectification (Art. 16) or the erasure (Art. 17) of the personal information, or the restriction of the processing (Art. 18) or to object to the processing activities based on the legitimate interest (Art. 21). Lastly, you have the right to data portability (Art. 20).

B. Where the processing activity is based on consent, you have the right to withdraw your consent, at any time, without affecting the lawfulness of processing based on consent given before the withdrawal.

C. You have the right to lodge a complaint with a supervisory authority.

D. No automated decision process is carried out.

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9. Safeguards for Your Personal Information

We maintain technical and administrative safeguards designed to protect personal information we obtain through the services against accidental, unlawful or unauthorized destruction, interference, loss, alteration, access, disclosure, or use.

1) Technical Safeguard: We do our best in protecting the user's personal information from the accidental, unlawful or unauthorized access, disclosure or destruction.

2) Administrative Safeguard: We do our best to promptly correct any issues regarding the user's personal data by making sure that Tesollo is in compliance with its privacy policy.

Tesollo also maintains reasonable procedures to help ensure that such data is reliable for its intended use and is accurate, complete, and current.

10. Changes in Privacy Policy

Tesollo may amend its Privacy Policy to reflect any legal or service changes. Tesollo will notify such amendment in advance, and the amended Privacy Policy will take effect seven (7) days after the notification of the amendment.

However, any major change in user rights, including personal information items to be collected and the purpose of collecting thereof, will be notified at least 30 days in advance.