

## GDPR Privacy Notice for Clients

### Nota Inc.

#### Scope and Overview

Nota Inc. is committed to protecting the privacy and security of your personal data. This Privacy Notice describes how Nota Inc. and its subsidiaries, affiliates, and related entities (collectively, "NOTA," "we," or "us") collect and process personal data about you. This Privacy Notice applies to clients (including prospective clients) of NOTA ("Clients") located in European Union only.

This Privacy Notice describes the categories of personal data that we collect, how we use your personal data, how we secure your personal data, when we may disclose your personal data to third parties, and when we may transfer your personal data outside of your home jurisdiction. This Privacy Notice also describes your rights regarding the personal data that we hold about you including how you can access, correct, and request erasure of your personal data.

We will only process your personal data in accordance with this Privacy Notice unless otherwise required by applicable law. We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

#### Collection of Personal Data

For the purposes of this Privacy Notice, personal data means any information about an identifiable individual. Personal data excludes anonymous or de-identified data that is not associated with a particular individual. To carry out our activities and obligations, we may collect, store, and process the following categories of personal data, which we require to administer the relationship with you:

- Personal information: Name, organization(affiliation), title/position, company(location, postal code), cell phone number, and email address.
- Inquiry details: Name, email address, organization(affiliation), Inquiry details

The personal data listed in this notice is mandatory in order for us to administer the Clients. Failure to provide or allow us to process mandatory personal data may affect our ability to accomplish the purposes stated in this Privacy Notice.

We will collect the personal data that we process directly from you.

#### Use of Personal Data

We only process your personal data where applicable law permits or requires it, including where the processing is necessary for the performance of our contract with you, where the processing is necessary to comply with a legal obligation that applies to us, for our legitimate interests or the legitimate interests of third parties, to protect your vital interests, or with your consent if

applicable law requires consent. We may process your personal data for the following legitimate business purposes:

- Client information management and administration
- Client information management and administration before transferring the information to long-term Client DB
- Submission and processing of inquiries

We will only process your personal data for the purposes we collected it for or for compatible purposes. If we need to process your personal data for an incompatible purpose, we will provide notice to you and, if required by law, seek your consent. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

You will not be subject to decisions based on automated data processing without your prior consent.

Our web servers also seek (as many Websites do) to place a "cookie" (a small data file) on your computer's hard drive which allows the server to recognize the computer when it visits again. This helps track statistical information about navigation through our site. This cookie is not used to obtain your name or any personal data, and the information that is tracked is used only for internal purposes, such as to improve site navigation. The Company uses these data to measure the usage of, and improve the content of our sites.

Domain name information that we collect is only used to measure the number of visits, average time spent on the site, pages viewed, etc. We use this information to measure the use of our site and to improve the content of our site. Information provided from you, such as your name, e-mail address and etc, is used by us only to respond to your inquiry or to process your request. We will not provide your personal data to third parties, but only if necessary to fulfill your request or for related purposes. The collected information will be discarded if the related purpose is completed. If you choose not to have your personal data used, we will respect your choice.

### **Collection and Use of Special Categories of Personal Data**

The following special categories of personal data are considered sensitive under the laws of your jurisdiction and may receive special protection:

- Racial or ethnic origin.
- Political opinions.
- Religious or philosophical beliefs.
- Trade union membership.
- Genetic data.
- Biometric data.
- Data concerning health.
- Data concerning sex life or sexual orientation.

Data relating to criminal convictions and offences may also receive special protection under the laws of your jurisdiction.

Where we have a legitimate need to process special categories of personal data, we will only do so only after providing you with notice and, if required by law, obtaining your prior, express consent.

### **Use of Cookies**

Our website uses cookies. Cookies are text files that are stored in the internet browser or the internet browser on the user's computer system. If a user calls up a website, a cookie can be stored on the user's operating system. These cookies contain a string of characters that allows the browser to be uniquely identified when the website is reopened. We use cookies to make our website more user-friendly. Some elements of our website require the calling browser to be identified even after a page break. The following data is stored and transmitted in the cookies:

- Session-Key

The legal basis for the processing of personal data using cookies is Article 6, Section 1, Point (f) of GDPR.

The purpose of using technically necessary cookies is to simplify the use of websites for users. Some features on our website cannot be offered without the use of cookies. For these features, it is necessary that the browser is recognized even after a page break.

We require cookies for the following features:

- Seminar-Sign In, Frontend-Login

The data collected through the technically necessary cookies will not be used to create profiles of the users.

Cookies are stored on the computer of the user and are transmitted to us. Therefore, as a user, you have full control over the use of cookies. By changing the settings in your internet browser, you can disable or restrict the transmission of cookies. Cookies that have been saved can be deleted at any time. This may also occur automatically. If cookies are disabled for our website, it may not be possible to use all the features on the website to its full potential. The transmission of Flash cookies cannot be prevented by the settings on the internet browser, but by changing the setting on the Flash Player instead.

### **Data Sharing**

We will only disclose your personal data to third parties where required by law or to our data processors, such as contractors, designated agents, or third-party service providers who require such information to assist us with administering the relationship with you, including third-party service providers who provide services to us or on our behalf. These third-party service providers may be located outside of your home jurisdiction.

In accordance with the General Data Protection Regulation (GDPR), we operate as the Data Controller for our clients' personal data. As a Data Controller, we determine the purposes and means of processing personal data. Additionally, we conduct regular audits and assessments to

ensure that third-party service providers acting as Data Processors maintain GDPR compliance and implement the necessary safeguards to protect personal data.

The following third-party service providers process personal information about you for the following purposes:

- Nota America Inc. (US): Co-management and administration of long-term Client DB
- HubSpot, Inc. (US): Client information management and administration

We have entered into a Data Processing Agreement (DPA) with Nota America Inc., HubSpot, Inc ([LINK](#)), outlining all relevant obligations and ensuring that personal data is processed securely and in compliance with applicable regulations.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations applicable to us. We do not permit our third-party service providers who process your personal data on our behalf to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.

We may also disclose your personal data for the following additional purposes where permitted or required by applicable law:

- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances.
- During emergency situations or where necessary to protect the safety of persons.
- Where the personal data is publicly available.
- If a business transfer or change in ownership occurs and the disclosure is necessary to complete the transaction. In these circumstances, we will limit data sharing to what is absolutely necessary, and we will anonymize the data where possible.
- For additional purposes with your consent where such consent is required by law.

### **Cross-Border Data Transfers**

Where permitted by applicable law, we may transfer the personal data we collect about you to other jurisdictions that may not be deemed to provide the same level of data protection as your home country, as necessary for the purposes set out in this Privacy Notice.

We have the following appropriate safeguard in place to offer an adequate level of protection of your rights and freedoms as a data subject:

**Adequacy decisions:** international transfers of personal data take place on the basis of decisions that the relevant third country ensures an adequate level of protection. Such a transfer does not require any specific authorization. For example, the European Commission has issued adequacy decisions for, *inter alia*, Republic of Korea and EU-U.S. Data Privacy Framework.

We have implemented DATA TRANSFER MECHANISM FROM ARTICLE 49 OF THE GDPR to secure the transfer of your personal data to the United States(other than the participants of EU-U.S. Data Privacy Framework).

For the data transfer to Nota America Inc., the transfer is necessary for the performance of a contract between the data subject and the controller(GDPR Art. 49 (1)(b)). The data transferred to Nota America Inc. is limited to the data of Clients in contractual relationships with us.

## **Data Security**

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal data to those agents, contractors, and other third parties that have a legitimate business need for such access.

We take the following measures to ensure the security of personal data:

1. Organizational measures: establishment and implementation of internal management plan, operation of dedicated organization, regular employee training
2. Technical measures: management of access rights to personal data processing systems, installation of access control system, encryption of personal data, installation and update of security programs
3. Physical measures: Security Measures on Hubspot Inc. Services, Access control to computer rooms, data storage rooms, etc.

## **Data Retention**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal data, we consider applicable legal requirements, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes we process your personal data for, and whether we can achieve those purposes through other means.

The retention periods for your personal data are as follows:

Collected/received by	Purpose of data processing	Category of data	Retention period
Nota Inc.(Controller)	Client information management and administration	Name, organization(affiliation), title/position, company(location, postal code), cell phone number, and email address	5 years from the date of collection
	Client information management and administration before transferring the		6 months from the date of collection

	information to long-term Client DB		
	Submission and processing of inquiries	Name, email address, organization(affiliation), Inquiry details	Until the inquiry response is completed
Nota America Inc. (3 <sup>rd</sup> party service provider)	Co-management and administration of Client DB	Name, organization(affiliation), title/position, company(location, postal code), cell phone number, and email address	5 years from the date of collection
HubSpot, Inc.(3 <sup>rd</sup> party service provider)	Client information management and administration		5 years from the date of collection

We will retain your personal data only for as long as is necessary to fulfill the purposes for which it was collected or as required by applicable laws and regulations. Once personal data is no longer necessary due to the expiration of the retention period or the fulfillment of the purpose for processing, we will securely delete or anonymize your personal data in accordance with our internal data deletion and destruction policies.

#### 1. Deletion Procedure

NOTA identifies the personal data that is no longer needed and deletes it in accordance with NOTA's internal data deletion procedures, subject to final approval by Nota's CPO

#### 2. Method of Deletion

Personal data stored electronically will be deleted in a manner that ensures the data cannot be recovered or reconstructed. For personal data stored in physical form, we will securely shred or incinerate the documents. Should you require further details on our data retention and destruction policies, please contact us.

#### **Rights of Access, Correction, Erasure, and Objection**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes. By law you may have the right to request access to, correct, and erase the personal data that we hold about you, or object to the processing of your personal data under certain circumstances. You may also have the right to request that we transfer your personal data to another party. If you want to review, verify, correct, or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact us at [privacy@nota.ai](mailto:privacy@nota.ai)(tel: 82-2-555-8659). Any such communication must be in writing.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal data that we hold about you, or we may have destroyed, erased, or made your

personal data anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

### **Right to Withdraw Consent**

Where you have provided your consent to the collection, processing, or transfer of your personal data, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at [privacy@nota.ai](mailto:privacy@nota.ai)(tel: 82-2-555-8659).

### **Data Protection Officer**

We have appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal data, or would like to request access to your personal data, please contact the Data Protection Officer at:

Position	Name	Contact
Chief Privacy Officer	Myungsu Chae	<a href="mailto:myungsu.chae@nota.ai">myungsu.chae@nota.ai</a>
Privacy Department - IP&Legal&Compliance Team	Seonghan Lee	82-2-555-8659 <a href="mailto:privacy@nota.ai">privacy@nota.ai</a>
Data Protection Officer (123 Factory GmbH)	EunSeo Yi	<a href="mailto:eunseo.yi@123factory.de">eunseo.yi@123factory.de</a>

If you are unsatisfied with our response to any issues that you raise with the Data Protection Officer, you may have the right to make a complaint with the data protection authority in your jurisdiction by contacting the data protection authority.

### **Changes to This Privacy Notice**

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any updates. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

### **Contact Us**

If you have any questions about our processing of your personal data or would like to make an access or other request, please contact us at: Nota Inc, [privacy@nota.ai](mailto:privacy@nota.ai)(tel: 82-2-555-8659)/the Data Protection Officer at: EunSeo Yi, [eunseo.yi@123factory.de](mailto:eunseo.yi@123factory.de). If you are unsatisfied with our response to any issues that you raise, you have the right to make a complaint with the data protection authority in your jurisdiction.

Effective Date: [2024. 10. 01.]

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