# PRIVACY POLICY

This Privacy Policy applies to the live streaming broadcast service offered by Cobra Inc. ("COBRA", "Company", "we", "our" or "us")

#### 1. Personal Information We Collect

When we refer to "personal information" in this Privacy Policy, we mean information that relates to an identifiable individual. The following types of personal information are collected in connection with our Service:

#### Information You Provide Directly to Us or Third Parties

We may collect information directly from you or from other companies with whom you have a relationship. For example:

- When you create an account and register for or use our Service, you will provide us with information such as, your name, nickname, email address, password, date of birth, gender, mobile phone number, HeyG service ID.
- When you login with a third party account, we receive information about you from third parties
  including from other companies such as Facebook, Apple and Google. For example, we will get
  access to information such as your Social Network Service (SNS) account information, email
  address, date of birth, gender, profile information of your SNS account and your friend list (
  depending on your choices).
- When you start using the Service, we will collect user—generated contents, including comments, short messages, photographs, voice and videos (including captured picture thereof), that you choose to share, transmit, broadcast and/or upload on our platform.
- When you win a prize from a promotional event, or when you decide to cash out, you will provide us with information such as, a copy of identification card, your name, account information

#### Information about Your Use of Our Service

<u>In addition to the information you provide</u>, we will collect information about your use of our Service through software on your devices and by other electronic means, including by the use of cookies (For more information, please see our <u>Cookie Policy</u>. This includes:

- Device information: OS platform of your device, device information including type of device , brand, model and version of OS, IP address, advertising identifier, device language, device timezone, version of application that you are using, locale country and language of the device, the location (country and city) where you log in, your purchase history in application store, available languages, device capability, bandwidth, network type, and traffic to and from our websites, error—reporting information, the time the error occurred, the feature being used and the state of the Application when the error occurred.
- Log information: Usage information, such as, URL, redirected URL, performance timing, referrer, network type, network info, charge status, ad block info, cookies and access history.
- Location information: We will process your location or geographical information based on your consent or if permitted, where this is necessary to deliver the Service you have

requested.

• Service usage information: Details of your interactions with other users, details of interaction between you and the Service or you and our website, and other information about your use of our Service, such as bookmarks and visit history.

#### Links to Other Websites, Devices, Apps and Features

Our Service may enable you to connect to other websites, devices, apps and other features, which may operate independently from us and have their own privacy notices or policies. If you accessed a website, product or service provided by a third party, including through the Service or Company's website, such third party may also collect information about you. Please see the privacy policies of each such third party for more information about how they use the information they collect. This Privacy Policy does not apply to any exchange of information between you and any third party.

### 2. How We Use this Information

#### Provision of our Service based on your contractual relationship with us

We process your personal information when this is necessary under our contract with you, to:

- Provide you with our Service, and specific features you select when using our Service, which may require personalizing the content of our Service;
- Identify and authenticate you so that you may use our Service and to prevent illegal or inappropriate use of the Service;
- Restrict the collection of personal information of children under certain age as defined in this Privacy Policy;
- Deliver to you any administrative notices, alerts and communications relevant to your use of the Service;
- Effectively manage our relationship with our customers, including by communicating with you, responding to your queries, resolving technical issues, providing you with customer care support and sending you necessary information relating to our Services

Use of information for further purpose

- To improve the Service, and to develop and offer new services;
- To provide information about various events and opportunities to participate in the events, to provide advertising information;
- To contact you via email, SMS or otherwise for the purpose of informing you about new products, services or promotions offered by the Company (you can opt-out of such emails or SMSs by sending an email to info@heyg.com);
- To collect statistics on the use of Service including Service usage history, access frequency and interaction between users, to analyze customer behaviors, build up customer usage patterns and profiles in order to identify regional and global user trends and optimize our offering to customers globally and to improve the Service and its environments using the statistics;
- To protect against, identify, monitor and prevent fraud and other criminal activities, any other activities that may violate our Terms of Service or other applicable laws, or lead to claims or other liabilities.

• To restrict use of Service that violates laws and our Terms of Service, to prevent use of Service that interfere with the operation of the Service, including fraudulent use, and to prevent account theft.

#### Other

- Comply with and enforce requirements under applicable laws, relevant industry standards and our policies, including this Privacy Policy.
- Comply with court orders and subpoenas, and respond to legally binding requests from government, law enforcement agencies, public authorities and/or regulators.
- Protect our legal rights, including by handling complaints, obtaining legal advice and establishing, exercising or defending legal claims relating to us or other companies in our group and our Service;

## 3. Sharing of Information

We transfer or disclose your personal information to third parties as described below:

- <u>Affiliates, subsidiaries and personnel:</u> We share your information with our personnel, including contractors and agents, and other companies in our group, to the extent this is necessary to provide our Service and to fulfil the purposes set out in Section 2 above.
- <u>Service providers:</u> We also transfer or disclose your information to carefully selected companies that provide services on our behalf; for example companies that help us develop and operate systems for our Service, providers of IT services, security, hosting, analytics, mailing, billing or marketing services. These entities are only authorized to access and use your personal information to the extent this is necessary for them to provide us with their services and they are not allowed to use this information for other purposes.
- <u>Business advisors:</u> We may share, for example, your information with our lawyers, accountants, business consultants, insurers, and auditors, to the extent it is necessary for them to provide us with their services.
- Government authorities, judicial authorities, regulators or other third parties where required: We will disclose personal information to government authorities, judicial authorities, regulators or other third parties where we have a legal requirement to do so or where we believe this is necessary:
  - to comply with the law or respond to compulsory legal processes (such as a search warrant, subpoena or court order);
  - to verify or enforce compliance with the terms and policies governing our Service and to investigate fraud or other unlawful activity relating to the use of our Service or affecting our business, to the extent such disclosure is permitted by applicable data protection laws; and
  - to protect and defend our rights, property, and the security or safety of our business operations and those of any of our respective affiliates, staff, business partners, our customers or members of the public.
- Corporate transactions: We may disclose your information to a third party (and their

business advisors) in connection with any reorganization, restructuring, merger, acquisition or sale (including in the context of negotiations), dissolution, other transfer of assets, or in the event of a bankruptcy.

• Other parties with your consent or on your request. In addition to the disclosures described in this Privacy Policy, we may share information about you with third parties when you separately consent to or request such sharing.

Any information or content that you voluntarily disclose for posting to the Service ("User Contents") may become available to the public. Once you have shared User Contents or made it public, that User Contents may be re-shared by others. This Privacy Policy does not apply to such public information.

### 4. Retention of Personal Information

We take appropriate steps to ensure that we process and retain information in accordance with the following principles:

- <u>at least</u> for the duration for which the information is used to provide you with our Service;
- as required under law, a contract, or with regard to our statutory obligations (e.g., tax laws); or
- only for as long as it is necessary for the purpose for which it was collected, is processed, or longer if required under any contract, by applicable law, or, in anonymized form, for statistical purposes, subject to appropriate safeguards. For example, if a dispute arises between you and Company or you fail to make payment for our Service, we may retain relevant information until such dispute is resolved or until such payment is made, respectively.
- Where we process your information with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of your requests in order to respect them in future.

## 5. Your Choices

Where permitted we may contact you via email, phone call, text messages or push notifications through our mobile apps. To submit a request concerning the receipt of such communications from us, please contact us using the information specified in the "Contact Us" Section below.

You can unsubscribe from our marketing communications at any time by contacting us directly (see "Contact Us" section below). As noted in the Your Rights section below, you have the right to object to use of personal data for direct marketing purposes at any time.

Please note that if you unsubscribe from our marketing communications, we will still send you service messages to provide you with necessary information in relation to your contract and the Service you use (for example, to update you on changes to our Terms of Use).

### 6. Your Rights

To the extent provided by applicable law, you can request access to your personal information, or correct or update out-of-date or inaccurate personal information we hold about you. You may also

have the right to request that we delete personal information that we hold about you. You may access and update some of your information through your account settings. You are responsible for keeping your personal information up—to—date.

To the extent provided by applicable laws, you can also ask us to restrict or limit the processing of your personal information, as well as to provide you with personal information that we have collected from you so that you may use it for your own purposes, and to ask us to share (port) this data to another controller.

In addition, to the extent provided by applicable law, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement).

You also may have the right under applicable law to object at any time to the use of your personal information for direct marketing purposes, including profiling relating to direct marketing.

However, these **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. We will inform you of relevant exemptions we rely upon when responding to any request you make. To make a request concerning your rights or to make an inquiry, use the contact details under the "Contact Us" section below.

#### 7. How We Protect Personal Information

We take the protection of your information seriously and we have in place safeguards designed to protect the information we collect through our Service. However, please note that although we take reasonable steps to protect your information, no website, Internet transmission, computer system, or wireless connection is completely secure.

Please note, however, that the Service allows you to share text messages, photos, screenshots, videos and other communications in the Service with other users, and if you choose to share these items with other Service users, we may not be able to remove them from our servers or make them unavailable to anyone you have shared them with. Sending and sharing text messages, photos, screenshots, videos or other communications in the Service is your decision. By choosing to share that information, you should understand that you may no longer be able to control how that information is used and that it may become publicly available (depending in part on your actions or the actions of others with whom you have shared the information). The Service is not responsible for any use or misuse of information you share.

### 8. Personal Information of Children

The Service is not directed to children under the age of fourteen (14) and we do not knowingly solicit or collect personally identifiable information from children under the age of fourteen (14) as part of the Service. Additionally, we do not knowingly sell the personal information of children under the age of sixteen (16). If we become aware that we have inadvertently received personally identifiable information from a user under the age of fourteen (14) as part of the Service, we will immediately delete such information from our records. If you believe that a child under the age of

fourteen (14) may have provided us with personal information, please contact us using the information specified in the "Contact Us" section below.

#### 9. Contact Us

For more information about our privacy practices, or to exercise any rights you may have pursuant to applicable law, please contact us at info@heyg.com or via post 77, Jungang-ro 1261beon-gil, Ilsandong-gu, Goyang-si, Gyeonggi-do, Republic of Korea. In addition, our Data Protection Officer can be contacted info@heyg.com.

## 10. Updates to Our Privacy Policy

We reserve the right at our discretion to make changes to this Privacy Policy from time to time. We will notify you before we make changes to this Privacy Policy. You may also review updates to our Privacy Policy at any time via links on our website. You agree to accept electronic communications and/or postings of a revised Privacy Policy on the Service and our website, and you agree that such electronic communications or postings constitute notice to you of the Privacy Policy.

If we make material changes to this policy, we will notify you by publishing a revised Privacy Policy or by means of a notice on our website, or as required by law. You agree that your continued use of the Service after we publish a revised Privacy Policy or provide a notice on our website constitutes your acceptance of the revised Privacy Policy. If you do not agree with the terms of the Privacy Policy, you may not use the Service at any time.

# Cookie Policy

This Cookie Policy applies to the live streaming broadcast service (the "Service") offered by Cobra Inc. ("Company", "we", "our" or "us") at 77, Jungang-ro 1261beon-gil, Ilsandong-gu, Goyang-si, Gyeonggi-do, Republic of Korea and gives you information on how we use cookies and similar technologies. Please read this Cookie Policy carefully and feel free to contact us if you have any questions.

## What are Cookies?

A cookie is a small text file that is saved in your computer or mobile device when you use the Service. It enables our website to remember your actions and preferences (such as language preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to our website or browse from one page to another. When we talk about cookies in this Cookie Policy, this term includes technologies that we are using which serve a similar purpose, for example web beacons, tags and tracking pixels or software development kits (SDKs) in our mobile apps.

## How do we use Cookies and how long do they last?

Cookie categories	
Essential Cookies: These are required to enable core functionality and	
provide you with the service you have requested. Without these cookies,	These are usually session cookies and expire when you close the browsing
services that you have asked for cannot be provided. For example,	session or your app, or shortly thereafter.
essential cookies enable us to remember the items you place in the	session or your app, or snortly thereafter.
shopping basket so that you can order products.	
Performance Cookies (Audience measurement): To analyse the use,	
performance and design of our Service, detect errors and improve user	
experience. For example, this type of cookie enables us to understand how	
often you are using our Service, to recognise that you have visited our	N/A
websites before and to identify which parts of our Service and which	N/A
sections of our website are most popular, for example by allowing us to	
see which pages visitors access most frequently and how much time	
visitors spend on each page.	
Functional Cookies (Content customisation): To deliver a better user	
experience, and build up customer usage patterns and profiles. For	
example, this type of cookie ensures that the information displayed when	N/A
you use our Service (e.g. on your next visit to our website) will match up	N/A
with your user preferences (such as language preferences, font size or	
auto-fill options).	
Advertising Cookies (Behavioural advertising): To personalise our website,	
deliver customized advertisements to you, or contact you directly where	
you have separately consented to such communications, in a way which is	N/A
relevant to you and which matches your interests by, for example, using	
information about services purchased on our website.	

We use cookies by default. Please see the "How to manage cookies?" section for more information.

Note that by disabling cookies that we use by default, you will not be able to use our Service.

# Third parties using cookies through our Service for their own purposes

Our Service uses some cookies that are not controlled by us. This may occur when the part of the Service you are using makes use of a third-party analytics or marketing automation/management tool or includes content displayed from a third party. You should review the privacy and cookie policies of these parties to find out how they use cookies and the information they collect through cookies.

## How to manage cookies?

We rely on your consent to use cookies that are not essential. We will seek your consent when you first access our Service (for example via our apps or our websites): you are free to refuse to consent to some or all of these non-essential cookies.

You can withdraw your consent at any time, by changing your preferences.

We do not provide the option to manage essential cookies - these are activated by default.