Last updated: [month] [date], 2019

**PRIVACY STATEMENT**

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**SCOPE OF THIS PRIVACY STATEMENT**

IRM Co., Ltd. and its affiliated companies and subsidiaries (collectively, “**IRM**”) respect your privacy. This Privacy Statement applies to personal data collected by IRM through its website, application, and other products and services which we operate and on which we post a direct link to this Privacy Statement (“**Services**”).

As used in this Privacy Statement, “personal data” means any information relating to an identified or identifiable natural person (‘data subject’). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**THE PERSONAL INFORMATION WE COLLECT**

IRM collects personal information directly from you when you interact with us through our Services, including, without limitation, when you:

* Create a user account (individual or corporate) and use the Services;
* Make online purchases or register products;
* Request support;
* Request information or materials (e.g., whitepapers);
* Participate in surveys or evaluations;
* Participate in promotions, contests, or giveaways;
* Submit questions or comments; or
* Submit content or posts on our customer portal pages or other interactive webpages.

To the extent permitted by applicable law, the types of personal data collected directly from you may include, without limitation:

* Information used to communicate with you, such as name, title, date of birth, company name, email address, telephone number, postal address, country, and language;
* Information that IRM maintains in association with your account, such as your username, password, social network service email address and account number (limited to the users who have linked their social network service accounts to the Services), payment information, purchase records, credit and billing status and support inquiries; and
* Information that may be generated during your use of our Services, such as mobile and other hardware or device identifiers, mobile service providers, service usage (or crash) report, access log, and IP address.

We may also collect information relating to your use of our Services and response to our emails through the use of various technologies. Collecting information in this manner allows us to analyze the effectiveness of our Services and our marketing efforts, personalize your experience and improve our interactions with you. For more information about the technologies we employ for these purposes, see the “Cookies and Other Technologies” section below.

We may also supplement the personal data we collect from you with additional personal data we receive from third parties, such as your employer, our customers, and our business partners where you purchase any of our products or services through such business partners. We do this to help us improve the overall accuracy of the information and its completeness and to help us better tailor our interactions with you.

**HOW WE USE YOUR PERSONAL INFORMATION**

IRM uses personal information in an effort to enhance your experience with our Services. In addition, we may use personal information we collect about you to:

* *Identify and Authenticate You*. We use your personal data to verify your identity when you access and use our Services and to ensure the security of your personal data. This includes your creation of an account that is associated with your personal data. The personal data that may be collected and processed for this purpose includes: name, title, company name, email address, telephone number, postal address, language, username, and password. We process this information in order to comply with our contractual obligations to you.
* *Fulfill Your Requests*. If you request something from IRM, such as a product or service, a call back, a newsletter subscription, or specific marketing or other materials, we use the personal data you provide to respond to your request. Where required by applicable law, we will obtain your consent before sending marketing messages. The personal data that may be collected and processed for this purpose includes: name, title, company name, email address, telephone number, postal address, language, username, payment information, purchase records, credit and billing status, and support inquiries. We process this information in order to comply with our contractual obligations to you when responding to your requests. In other cases it is in our legitimate business interests to be able to provide customers and prospective customers with information, goods, or services they request.
* *Provide You with Information About Our Products, Services and Events*. IRM may use your personal data to notify you about product and service offerings as well as events that we believe may be of interest to you. Where required by applicable law, we will obtain your consent before using your personal data for the purpose set forth in this paragraph. IRM also may use your personal data to respond directly to your requests for information, including registrations for newsletters or other specific requests. The personal data that may be collected and processed for this purpose includes: name, title, company name, email address, telephone number, postal address, language, username, payment information, purchase records, credit and billing status, and support inquiries. It is in our legitimate business interests to be able to provide customers, prospective customers, and the public with information about our products, services, and events.
* *Provide Support and Customer Service*. We use your personal data to provide support for products or services you have obtained from us and answer other questions. In the course of providing technical support to you, we may sometimes have incidental access to data that you have provided to us or data that is located on your systems. This data may contain information about you, or your organization’s business, employees, customers, partners, or suppliers. This Privacy Statement does not govern our access to or handling of this information. The conditions regarding the handling and processing of that data is covered by the applicable agreement, if any, between you and IRM. The personal data that may be collected and processed for this purpose includes: name, title, company name, email address, telephone number, postal address, language, username, payment information, purchase records, credit and billing status, and support inquiries. We process this information in order to comply with our contractual obligations to you.

We will not use your personal data in a manner that is inconsistent with the purpose of its original collection, unless you have consented.

**HOW WE DISCLOSE YOUR PERSONAL INFORMATION**

IRM will not share, sell, rent or lease your personal information to others without your consent.

IRM discloses personal information in the following ways:

* IRM may with your consent disclose personal data to business partners and service providers in order to support our business operations, such as (but not limited to) fulfilling your orders, following up on requests, providing support and assisting IRM with sales, marketing and communication initiatives. These business partners and service providers include distributors, resellers, payment processors, financial service providers and institutions, materials production and shipping companies, postal or government authorities, market intelligence and consulting service providers, and information technology service providers. Business partners and service providers are required by contract to keep the information received on behalf of IRM confidential and secure and not use it for any purpose other than the purpose for which it was provided to them.
* IRM may disclose personal data as required by law or legal process, such as responding to a duly authorized and lawful request of a police or public authority (including to meet national security or law enforcement requirements), to enforce or protect the rights of IRM, when such disclosure is necessary or appropriate to prevent physical harm or financial loss as permitted by applicable law, or in connection with an investigation of suspected or actual illegal activity.
* IRM may also disclose personal data in the context of a business transaction involving part or all of IRM, such as a merger, acquisition, consolidation, or divestiture. Such a transaction may involve the disclosure of personal data to prospective or actual purchasers, or the receipt of it from sellers. It is IRM’s practice to seek appropriate protection for information in these types of transactions and to give affected users notice before personal information is transferred or becomes subject to a different privacy policy as a result of such transactions. Following such a business transaction, you may contact the entity to which we transferred your personal data with any inquiries concerning the use of that information.

**COOKIES AND OTHER TECHNOLOGIES**

When you visit or use our websites or Services we may automatically collect information such as your IP address, browser type and language, operating system, location, date and time. We may also use cookies to collect information as you navigate our websites. A cookie is a small amount of data that is sent to your browser from a web server and stored on your device.

IRM uses some cookies that are strictly necessary for the delivery of services on our websites and Services. Cookies that are strictly necessary allow us to improve the safety and security of our websites and Services, authenticate account users, allow you to access your private accounts on our websites and Services, allow you to sign into different portions of our websites and Services with the use of only one login, balance the traffic on our websites, and remember items in your shopping cart. Cookies that are strictly necessary are not used for marketing purposes.

IRM also uses cookies to improve our service to you and personalize your experience with our websites and Services, such as by gaining a better understanding of your interests and requirements regarding our websites, Services, our business or our products and services. Cookies that IRM uses to improve our services and your website and Services experience may remember your language and site preferences, invite you to participate in surveys or evaluations, show you when you are logged into our system and allow you to remain logged-in for a period of time, help provide you with support services, remember your login information, and prepopulate forms that you have already completed.

IRM also uses cookies that collect information about how you use our websites and Services, including which pages you visit, and whether you experience any errors. These cookies use aggregate information to provide statistics on how our websites and Services are used, help us improve our websites and Services by measuring errors, testing different designs on our websites and Services, and helping us measure the traffic on our websites so that we can optimize our content accordingly. These cookies are used to help us improve how our websites and Services work, understand what interests our users, and measure website quality and the effectiveness of our online advertising.

In addition, we may use remarketing technology to advertise on other websites and Services you may visit or use. In doing so, a third party may place or read a unique ad-serving cookie on your device and use technical information about your browser and your activity at an IRM website or Services to serve advertisements to you on non-IRM websites or Services.

If you do not want your information to be stored by cookies, you can configure your browser so that it always rejects these cookies or asks you each time whether you want to accept them or not. However, you must understand that choosing to reject cookies may reduce the performance and functionality of our websites or Services. Your browser documentation includes instructions explaining how to enable, disable or delete cookies at the browser level (usually located within the “Help”, “Tools” or “Edit” facility). While IRM websites and Services at this time generally do not recognize automated browser signals regarding tracking mechanisms, such as “do not track” instructions, you can generally express your privacy preferences regarding the use of most cookies and similar technologies through your web browser.

IRM also uses web beacons alone or in conjunction with cookies to compile information about usage of our websites and Services, and interaction with emails from IRM. Web beacons are clear electronic images that can recognize certain types of information on your device, such as cookies, when you viewed a particular website tied to the web beacon, and a description of a website tied to the web beacon. For example, IRM may place web beacons in marketing emails that notify IRM when you click on a link in the email that directs you to one of our websites or Services. IRM uses web beacons to operate and improve our websites and email communications.

**YOUR RIGHTS AND CHOICES**

In accordance with the laws of certain countries, you may have certain rights and choices regarding the personal data we collect and maintain about you, and how we communicate with you.

Where the EU General Data Protection Regulation 2016/679 (“**GDPR**”) applies to the processing of your personal data, especially when you access the website from a country in the European Economic Area (“**EEA**”), you have the following rights, subject to some limitations, against the respective IRM company responsible for the website or Services you are using:

* The right to access your personal data;
* The right to rectify the personal data we hold about you;
* The right to erase your personal data;
* The right to restrict our use of your personal data;
* The right to object to our use of your personal data;
* The right to receive your personal data in a usable electronic format and transmit it to a third party (also known as the right of data portability); and
* The right to lodge a complaint with your local data protection authority;

If you would like to exercise any of these rights, you may do so via our Personal Data Request Form.

Where the GDPR applies, you also have the right to withdraw any consent you have given to uses of your personal data. If you wish to withdraw consent that you have previously provided to us, you may do so via our Feedback Form. However, the withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

Where the GDPR does not apply, IRM grants you the ability to access, modify, or update some of your personal data online at any time. You may log in and make changes to your information, such as your password, your contact information, your general preferences, and your personalization settings. If necessary, you may also contact us via our Feedback Form and describe the changes you want made to the information you have previously provided. However, note that changing or deleting information necessary for IRM to assist with support, services, and purchases may result in a delay or interruption in processing your requests.

You will be given an opportunity to tell us whether you would like to receive information, special offers, and promotional materials by email from IRM or our business partners when you create an account for our websites or Services which we operate and on which we post a direct link to this Privacy Statement, when you register for a service, when you provide us with your personal data, or when we send you a marketing email. Where required by applicable law, we will obtain adequate consent to provide you with these marketing materials. You also have the ability to opt out of receiving marketing emails from IRM at any time without cost by clicking on the relevant link contained in our marketing emails or by contacting us via our Feedback Form. You can also exercise your rights and choices by contacting us as described below under “How to Contact Us.”

**SECURITY**

IRM intends to protect your personal data. We have implemented appropriate physical, administrative and technical safeguards to help us protect your personal data from unauthorized access, use and disclosure. For example, we encrypt certain personal data such as payment information when we transmit such information over the Internet. We also require that our business partners and service providers protect such information from unauthorized access, use and disclosure.

**Retention Of Your Information**

If you have an account with IRM websites or Services, we will retain your information for as long as your account is active or as reasonably necessary for the purposes set out above, unless applicable law requires otherwise. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

**CHILDREN’S ONLINE PRIVACY**

IRM does not knowingly collect online personal data from children under the age of 13 (or the age otherwise defined under applicable law) without parental consent or unless permitted by applicable law. If you are a parent or guardian of a minor under the age of 13 and believe that he or she has disclosed personal data to us, please contact us via our [Feedback Form](https://www.redhat.com/en/about/feedback) or as described below under “How to Contact Us.”

**DATA TRANSFERS**

Information we collect may be transferred to countries outside your home country for the purposes set out in this statement. By using our Services, you acknowledge that your information may be transferred to recipients in some countries that may not have the same data protection laws as the country from which you initially provided the information.

Where required by applicable law, we have put in place appropriate safeguards (such as standard contractual clauses approved by the European Commission) in accordance with applicable legal requirements to ensure that your data is adequately protected. When transferring your personal data internationally, IRM will protect your personal data as provided in this Privacy Statement.

**CHANGES TO THIS PRIVACY STATEMENT**

IRM reserves the right to make corrections, changes or amendments to this Privacy Statement at any time. The revised Privacy Statement will be posted on IRM’s website or Services. A notice will be posted on our homepage for thirty (30) days whenever this Privacy Statement is changed in a material way, and the date of last update will be indicated at the top of the Privacy Statement. If you do not refuse the changes in writing within that notice period, this shall mean that you have consented to the Privacy Statement as changed, including with respect to personal data provided to us prior to the changes in the Privacy Statement. We encourage you to periodically review this Privacy Statement for any changes or updates.

**EEA DATA PROTECTION AUTHORITY**

If you are a resident of the European Economic Area and wish to raise a concern about our use of your personal data, you may direct questions or complaints to the Data Protection Officer at [\_\_\_@irm.kr]. Alternatively, you may contact your local supervisory authority.

**HOW TO CONTACT US**

If you have any questions about IRM’s privacy practices or use of your personal data, please feel free to contact us at [\_\_\_@irm.kr], via our [Feedback Form](https://www.redhat.com/en/about/feedback) or by mail at:

IRM Co., Ltd.

4F-D, Myung-Woo Bldg.

169, Yeoksam-ro Gangnam-gu, Seoul, Korea 06247

Appendix I

**Personal Data Request Form**

Please complete this form to submit a personal data request to IRM. You may be required to provide proof of your identity before we can disclose personal data. Once your identity has been validated, we will attempt to process your request within 30 calendar days.

**Personal details**

Please fill out as may fields as possible to help expedite your request and verify your identity.

\*Email address

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Please use an active email address which can be used for communication. Any additional emails you have used during interactions with IRM can be included in the “Additional request details” field below.)

\*Country of residence Current address

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Name Previous address

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date of birth Phone number

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Other personal details

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (Examples: username, login ID, previous names, job title etc.)

**Type of request**

Please provide details about your personal data request

\*Choose your request type (Select one)

[ ] I want to review the personal data that IRM has about me.

[ ] I want an electronic copy of the personal data that IRM has about me.

[ ] I want to correct or modify personal data that IRM has about me.

[ ] I want IRM to stope processing personal data about me.

[ ] I want IRM to delete the personal data that IRM has about me.

[ ] Other: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\*Select the type of relationship you have/had with IRM (Check all that apply)

[ ] Employee

[ ] Contractor

[ ] Customer

[ ] Vendor

[ ] Partner

[ ] Applicant/prospective employee

[ ] Lead/prospective customer

[ ] Reseller

[ ] Other: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Additional request details (more information about your relationship with IRM, data that needs to be corrected or deleted, etc.)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Data subject declaration**

I certify that the information provided on this form is correct to the best of my knowledge and that I am the person to whom it relates. I understand that IRM is obliged to confirm proof of identity/authority and it may be necessary to obtain further information to comply with this request.

[ ] \* I agree

SUBMIT

APPENDIX II

**WEBSITE FEEDBACK**

Our corporate website is designed to provide an easy-to-use, informative, online experience. Please tell us in this quick contact form.

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Email: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Country:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

I would like to (Select one):

[ ] provide a comment or suggestions.

[ ] report link or page issues.

[ ] report site or performance issues.

[ ] report translation issues or problems.

[ ] get help adding/editing/deleting content.

[ ] get help finding something.

[ ] get answers to webstore questions or issues.

[ ] have sales contact me.

[ ] get help with training questions or information.

[ ] get help with evaluation or downloads.

[ ] give suggestions to IRM.

[ ] provide other input.

URL: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Additional Information: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

SUBMIT