

# Privacy Policy

Welcome to VisualCamp (“VisualCamp”, “we”, “us”, and/or “our”). We operate <https://visual.camp/>, <https://seeso.io/>, <https://manage.seeso.io> , API services, and data gathering projects,("Services"). This Privacy Policy (the “Policy”) sets forth VisualCamp’s policy with respect to personal data (“Information”) of users who use our services (“users”, “you”, “your”), and describes the treatment of the information which is provided or collected in our services.

We regard your information as important and will inform you of the purpose and method of our use of your information for protection.

By voluntarily providing information to us, you are consenting to our use of it in accordance with this Policy. If you provide information to us, you acknowledge and agree that it may be transferred from your current location to the offices and servers of VisualCamp and the authorized third parties referred to herein.

## Information to be collected and method of collection

### (1) Information to be collected

Information to be collected by us are as follows:

- Information provided by the users
  - Our Services ask your information by submitting any type of form for collecting data, arranging meeting, issuing license, and examining the application.
  - Name, email address, phone number, ID, national information, payment information, purchase activity, delivery, contact detail for transaction, and development information.
  - For minors, information of legal representatives (name, birth date, CI and DI of legal representatives)
  - anonymous numeric gaze data for SDK improvement
- Log-in features for Service ( <https://manage.seeso.io> )
  - Sign up and log in using your Google and Github account.
  - Google will ask your permission to share information from your Google or Github account with us.
  - It may include name, gender, location, timezone and birthday.
  - This information is collected by Google and Github under its privacy policy.
  - Google privacy policy: <https://policies.google.com/privacy?hl=en&gl=us>
  - Github privacy policy: <https://docs.github.com/en/github/site-policy/github-privacy-statement>
- Information collected while the users use Services
  - Log data, IP(internet protocol address), browser type, browser version, operation system, version, mobile hardware type, universally unique identifier, Services use time
  - Cookies and web beacon
    - Cookies are very small text files to be sent to the browser of the users by the server used for operation of the websites of VisualCamp and will be stored in hard-disks of the users’ computer. Web beacon is a small quantity of code which exists on the websites and e-mails. By using web beacons, we may know whether a user has interacted with certain webs or the contents of email. These functions are used for evaluating, improving services and setting-up users’ experiences so that improved services can be provided by us to you.
    - If you do not want cookies remain, you can set your browser to refuse all cookies or to indicate when a cookie is being sent. But, if you refuse to accept cookies, you may not be able to use some functions of our Services.
  - Information generated when you interact with our Services including from third parties.

### (2) Method of collection

We collect the information of users in the following ways:

- Services
  - Written form, telephone calling, e-mailing, meeting, social network
  - SeeSo related webpages: <https://seeso.io/>, <https://manage.seeso.io>, <https://docs.seeso.io/>
  - SeeSo API service
  - SeeSo Data gathering application
  - SeeSo SDK authentication
  - Provided by partner companies

## Use of information

We use the collected information of users for the following purposes:

### (1) Use of our Services

- Provide software, content, apps and other needs
- Performance of contract and service fee settlement regarding provision of services demanded by the users
- To detect and deter unauthorized or fraudulent use of or abuse of the Services
- Making notice of functional update of Services or policy

### (2) Improve our Services

- To give feedback for issues from Services
- Improve services when it integrated with third parties' hardware, software, content, apps and other needs
- improve accuracy of core algorithm

### (3) Other purpose

- Use of data with prior consent of users. For example, to provide Services and place advertisements based on statistical characteristics.
- To comply with applicable laws or legal obligation

VisualCamp agrees that it will get consent from the users, if VisualCamp desires to use the data other than those expressly stated in this Policy

## Share of information

Except for the following cases, we will not share information with third parties:

### (1) When we share the data with our affiliates, partners and service providers.

- Bill payment, execution of orders, products delivery and dispute resolution (including disputes on payment and delivery) for and on behalf of VisualCamp

### (2) When the users consent the sharing in advance;

- When the user selects to be provided information with certain companies
- Other cases where the user gives prior consent for sharing information

### (3) When the sharing is required by the laws

- If required to be disclosed by the laws and regulations
- If required to be disclosed by the investigative agencies for detecting crimes in accordance with the procedure

## **(4) Others**

- Share non-identified data to make statistics on users' service usage
- If required to be disclosed by the investigative agencies for detecting crimes in accordance with the procedure and method as prescribed in the laws and regulations

## **Deletion of information**

Your information will no longer remain with us when you request to delete your account to us by any method. However, transaction record may remain for legal or accounting purpose.

## **Security of your information**

We value your information and do our best to protect from unauthorized access and unlawful processing, and destruction and damage. However, internet transmission is not completely secure. As it is unavoidable environment, we cannot guarantee the security of your information submitted to us. Your information will be retained by us until your account deletion or certain date written on legitimate document.

## **(1) Demo**

Our demo application and website request camera access ONLY for experiencing demo with eye tracking software. We DO NOT store any images or video from user.

### **Web Demo**

In the web demo(<https://webdemo.seeso.io/#/>) case,

- if you want to enhance your information security, you can start it from "incognito" browser.
- It may store anonymous calibration data for demo functionality

## **(2) Data Gathering Application**

For the data gathering purpose applications, we ask participants and panel before start the application. We can NOT store images and video generated by data gathering application without user's consent in advance.

Information from data gathering application will be secure on our encrypted S3 buckets (AWS, Amazon Web Services), which can ONLY be accessed by our designated project manager.

## **(3) Authentication Information**

We store information for SDK authentication in our server.

- Operation system, mobile hardware type, and universally unique identifier of user
- Browser type, browser version
- number of authentication call by registered package or web domain

Information is used for trouble shooting, reporting usage of SDK, and product statistics.

All information is secure on our encrypted S3 buckets (AWS, Amazon Web Service), which can ONLY be accessed by our designated product manager and engineer.

## (4) Calibration Service for Web SDK

We provide calibration service for web SDK developer as Calibration page API. If you decide to use this service you must know the calibration information of your user will be stored for page functionality.

- License key, user ID, calibration data
- Camera location information, screen size information

All information is secure on our encrypted Mongo DB which can ONLY be accessed by our designated product manager and engineer.

# GDPR Compliance

## (1) Lawful processing of under GDPR

- Processing personal data by VisualCamp shall be lawful only if and to the extent that at least one of the following applies:
- A user has given consent to the processing of his or her personal data
- Processing is necessary for the performance of a contract to which a user is party or in order to take steps at the request of a user prior to entering into a contract:
  - Member management, identification, etc.
  - Performance of a contract in relation to providing the services required by users, payment and settlement of fees, etc.
- Processing is necessary for compliance with a legal obligation to which VisualCamp is subject
  - Compliance with relevant law, regulations, legal proceedings, requests by the government
- Processing is necessary for compliance with a legal obligation to which VisualCamp is subject
  - Member management, identification, etc.
- Processing is necessary in order to protect the vital interests of users, or other natural persons
  - Detection of, prevention of, and response to fraud, abuse, security risks, and technical issues that may harm users or other natural persons.
- Processing is necessary for the performance of a task carried out in the public interest of in the exercise official authority vested in VisualCamp
- Processing is necessary for the purposes of the legitimate interests pursued by VisualCamp by a third party (except where such interests are overridden by the interests of fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child)

## (2) Users' right when applying GDPR

The users or their legal representatives, as main agents of the information, may exercise the following rights regarding the collection, use and sharing of personal data by VisualCamp:

- The right to access to personal data;

The users or their legal representatives may access the data and check the records of the collection, use and sharing of the data under the applicable law.

- The users or their legal representatives may request to correct inaccurate or incomplete data
- The right to erasure.
  - The users or their legal representatives may request the deletion of the data after the achievement of their purpose and the withdrawal of their consent.
- The right to restriction of processing.
  - The users or their legal representatives may make temporary suspension of treatment of personal data in case of the disputes over the accuracy of data and the legality of data treatment, or if necessary to retain the data.
- The right to data portability
  - The users or their legal representatives may request to provide or transfer the information
- The right to object

- The users or their legal representatives may suspend the treatment of personal data if the data is used for the purpose of direct marketing, reasonable interests, the exercise of official duties and authority, and research and statistics.
- The right to automated individual decision-making, including profiling
  - The users or their legal representatives may request to cease the automated treatment of personal data, including profiling, which has critical impact or cause legal effect on them.

If, in order to exercise the above rights, you, as an user, use the menu of ‘amendment of member information of webpage or contact VisualCamp by sending a document or e-mails, or using telephone to VisualCamp (person in charge of management of personal information or a deputy), VisualCamp will take measures without delay: Provided that VisualCamp may reject the request of you only to the extent that there exists either proper cause as prescribed in the laws or equivalent cause.

## Modification of Privacy Protection Policy

We remain the right to amend or modify this Policy from time to time and, in such case, we will make a public notice of it through our websites (or through individual notice such as written document, fax or e-mail) and obtain consent from the users if required by relevant laws. Please review this policy periodically, and especially before you provide any Personal Data. This Policy was last updated on the date indicated below. Your continued use of the Services shall indicate your agreement with the terms of such revised Policy.

## Contact

VisualCamp designates the following person in charge of privacy policy in order to protect information of customers and deal with complaints from customers:

Yun Chan Suk

+82 70-7945-7799

[contactus@visual.camp](mailto:contactus@visual.camp)

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