

Privacy Policy

Effective Date: June 22, 2018.

Raylene Co., Ltd. and our affiliates ("Raylene", "we", "us", "our") respect your privacy and determines to protect your personal data. The purpose of this privacy policy is to inform you of our policies regarding the collection, use, and disclosure of personal data when you use our websites, services and/or products (each, a "Service", and collectively, the "Services").

1. IMPORTANT INFORMATION AND WHO WE ARE

It is important that you read this privacy policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of data about you which we have grouped together as follows:

- **Identity Data** includes First Name, Last Name, Job Title, area of expertise related to the Service.
- **Contact Data** includes, delivery or production installation address, email address, telephone numbers and your place of work details.
- **Transaction Data** includes details of Services you have used or purchased, directly or indirectly, from us.
- **Usage Data** includes your computer's internet protocol (IP) address, browser type and version, location, operating system and platform on the devices you use to access our Service. We may also collect log file for our machines, machine firmware and software version, images obtained by our product and/or raw data thereof if necessary, using Windows version and PMS version.
- **Profile Data** includes your purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Tracking & Cookies Data** includes files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service. Examples of Cookies we use:
 - ✓ **Session Cookies.** We use Session Cookies to operate our Service.
 - ✓ **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
 - ✓ **Security Cookies.** We use Security Cookies for security purposes.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with Services). In this case, we may have to cancel a Service you have with us but we will notify you if this is the case at the time.

3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity and Contact by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our Services;
- subscribe to our publications;
- Request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Through your supplier who supplies our Service to you, based on a direct or indirect contract with us, and collects your personal data required to provide the Service;
- Through publicly available website; or
- Identity and Contact Data from publicly available sources.

Your Duty of Changes to this Privacy Policy

It is important that the personal data we hold about you is accurate and current.

Please keep us informed if your personal data changes during your relationship with us.

We may, from time to time, transfer or merge any personal information which have been collected offline to our online databases or store off-line information in an electronic format.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Performance of Contract this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Legitimate Interest this means the interest of us or third parties in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Comply with a legal or regulatory obligation this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

We use the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service

- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

We, alone or jointly with others, determine the purposes and means of the processing of personal data, and/or also process personal data on behalf of others including our customers, distributors, dealers, purchasers, but not limited thereto.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased Services from us and, in each case, you have not opted out of receiving that marketing.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

A cookie is a small text file that is sent to your browser by a server used to run the website and is stored on your devices. We use cookies for the following purposes:

- Analyze the frequency of access and visitation time to identify the user's preferences and interests and trace their movements when on the site
- Provide targeted marketing and personalized service through various event attendance and number of visits.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

5. Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), our legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it or a contract for transferring data made with an exporter who transfer your data to us, i.e., importer.

we may process your Personal Data because:

- We need to perform a contract with you
- You have given us or exporter permission to do so
- The processing is in our or exporter's legitimate interests and it's not overridden by your rights
- To comply with the law

6. Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party). You can object to the processing of your personal information in some circumstances (in particular, where we don't have to process the information to meet a contractual or other legal requirement, or where we are using the personal information for direct marketing).

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly

unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

7. WHO WE SHARE YOUR PERSONAL DATA WITH

We will not disclose your personal information to third parties for their own independent marketing or business purposes without your consent or except as required or permitted by applicable laws. However, we may disclose your personal information, within the Purposes of Use specified above, as follows:

- to External Third Parties including: service provider who acts as processor and provides system administration,
- to other Services providers who help us provide Services to you to the extent it is needed to perform their duties and functions;
- to professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- to authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
- to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may also disclose your personal information when we have good faith belief that disclosure is necessary to protect the rights, property or safety of us, business partners, customers or others as required or permitted by law.

Service Providers

We may employ third party companies and individuals to facilitate our Service ('Service Providers'), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

8. Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

9. Data Security

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. Do Not Track Signals

We do not support Do Not Track ('DNT'). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

11. Children's Privacy

Our Service does not address anyone under the age of 19 ('Children').

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

12. Retention of Data

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to

retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

13 Disclosure of Data

Disclosure for Law Enforcement

Under certain circumstances, Rayence Co., Ltd. may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Legal Requirements

Rayence Co., Ltd. may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Rayence Co., Ltd.
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

14. Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and/or via email.

15. Customer Service Department Privacy Policy

In order to deal with customer complaints and to protect the personal information of users, we have appointed the related departments and privacy manager as follows.

(1) Customer Service Department

Contact Details

Domestic Customer Service Department
Address : 14, Samsung 1ro 1-gil, Hwaseong-si, Gyeonggi-do, 18449 Republic of Korea
E-mail: marketing@rayence.com
Telephone : +82-31-8015-6201

Foreign Customer Service Department
Address : 2200 Fletcher Ave, Suite 705B, Fort Lee, NJ 07024
E-mail: information@rayenceusa.com
Telephone : +1-201-585-0290

(2) Privacy Manager

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

Contact Details

Privacy Manager
Name : Myungku Kang
Address : VATECH EWOO Holdings Co., Ltd., 13, Samsung 1ro 2-gil, Hwaseong-si, Gyeonggi-do, 18449 Republic of Korea
Telephone : +82-31-8015-6115
E-mail : myungku.kang@vatechewoo.com