

# Privacy Policy

**itswellness**, a non-profit organization (hereinafter referred to as "the Organization"), recognizes that personal information obtained from individuals through its business activities, as well as personal information of its employees (hereinafter referred to as "Personal Information"), is highly valuable. The Organization acknowledges its responsibility to protect such information appropriately as part of its social duty.

To ensure compliance with this responsibility, the Organization handles Personal Information based on the following policies, thereby providing reassurance to individuals and fulfilling its social obligations regarding personal information protection.

## **1. Collection, Use, and Disclosure of Personal Information**

- The Organization collects Personal Information through lawful and fair means.
- The Organization uses Personal Information within the necessary scope to achieve the stated purposes.
- The Organization will obtain prior consent from the individual before providing Personal Information to third parties.
- The Organization will not use Personal Information beyond its intended purpose and will take appropriate measures to prevent such misuse.
- If a change in the intended purpose of use arises, the Organization will obtain renewed consent from the individual before proceeding.

## **2. Compliance with Laws, Regulations, and Guidelines**

- The Organization ensures continuous awareness of relevant laws, regulations, and governmental guidelines concerning personal information and mandates compliance by all members engaged in its business operations.

## **3. Security Management of Personal Information**

- To prevent unauthorized access, leakage, loss, or damage of Personal Information, the Organization establishes and maintains a robust security management system.
- The Organization conducts regular inspections and promptly addresses any detected violations, incidents, or vulnerabilities. Preventive measures are also implemented as necessary.
- All employees undergo thorough security training.

## **4. Handling of Complaints and Inquiries**

- The Organization establishes a dedicated contact point for inquiries, complaints, and concerns regarding the handling of Personal Information, ensuring prompt and sincere responses.

## **5. Continuous Improvement**

- The Organization monitors and audits its internal policies to identify violations, incidents, accidents, or vulnerabilities related to personal information protection.
- Regular reviews by management ensure ongoing improvements in the Personal Information Protection Management System.
- All improvements comply with applicable laws and regulations.

## **6. Contact for Personal Information Inquiries**

For notifications regarding the purpose of use, disclosure, correction, addition, deletion,

suspension of use, erasure, or cessation of third-party provision of Personal Information, please contact us at **contact@itswellness.org**

### **7. Behavioral Data and Cookies**

- The Organization may collect and use non-identifiable “Cookies” for marketing, service improvements, product development, and advertising.
- Additionally, technologies such as Cookies and JavaScript may be used to collect “anonymous attribute information” (e.g., age, gender, occupation, residence area) and “user activity data” (e.g., accessed URLs, viewed content, browsing order).
- When using mobile devices, location information may also be collected based on user consent.
- Personal Information is **not included** in any Cookies or behavioral data.

### **8. Revisions to This Policy**

The Organization may amend this policy in whole or in part. Changes will be made within a reasonable scope related to the original purpose of use, and in such cases, users will be notified or informed through public announcements.