**1. INTRODUCTION**

Welcome to the Cowellmedi’s privacy notice.

Cowellmedi Сo.,LTD respects your privacy and is committed to protecting your personal data. This privacy notice will inform you how we look after your personal data when you visit our website or register in our desktop application INNO PLAN (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

**PURPOSE OF THIS PRIVACY NOTICE**

This privacy notice aims to give you information on how Cowellmedi collects and processes your personal data through your use of this website and desktop application INNO PLAN, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service.

It is important that you read this privacy notice together with any other privacy notice or fair processing 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 notice supplements the other notices and is not intended to override them.

**CONTROLLER**

Cowellmedi Сo., LTD is the controller and responsible for your personal data (collectively referred to as “Cowellmedi”, “INNO PLAN ”, “we”, “us” or “our” in this privacy notice).

**CONTACT DETAILS**

Our full details are:  Cowellmedi, 48, Hakgam-daero 221beon-gil, Sasang-gu, Busan, Republic of Korea

Full name of legal entity: **COWELLMEDI CO., LTD**

Name of data privacy manager: Seongkyu Son

Email address: innoplan@cowellmedi.co.kr

Postal address: Cowellmedi, 48, Hakgam-daero 221beon-gil, Sasang-gu, Busan, Republic of Korea

**WHERE WE STORE YOUR PERSONAL DATA:**

Personal data of users registered in INNO PLAN  is stored on a VPS server located in EU.

You have the right to make a complaint at any time to the appropriate  supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance.

**CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated on 2nd May 2024 and historic versions can be obtained by contacting us.

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website – https://www.cowellmedi.com/

**THIRD-PARTY LINKS**

Application and this website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

1. **THE 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 personal data about you which we have grouped together follows:

* **Identity Data** includes first name, last name, username or similar identifier.
* **Contact Data** includes email address, telephone number, city and country of residence.
* **Technical Data** includes device identifiers.
* **Usage Data** includes information about how you use our website, and services.
* **Marketing and Communications Data**includes your preferences in receiving marketing from us and your communication preferences and surveys information.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

In the course of discharging our contractual obligations to you, 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 your payment cards details.

**IF YOU FAIL TO PROVIDE PERSONAL DATA**

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

1. **HOW IS YOUR PERSONAL DATA COLLECTED?**

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

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

* create an account on our website or app;
* subscribe to our service or publications;
* request marketing to be sent to you;
* enter a competition, promotion or survey; or
* give us some feedback.

**Automated technologies or interactions.** As you interact with our website [https://www.cowellmedi.com/](https://www.cowellmedi.com/customer/eng/index.jsp) we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

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

**(a)**  analytics providers such as Google Analytics and Google tag manager;

**(b)**  advertising networks such as Google AdWords;

**(c)**social networks such as Facebook, Instagram, LinkedIn;

**(d)**  Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as bank’s merchant services. We are do not collect and/or store  information about your payment cards details.

1. **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:

* Where we need to perform the service we are about to enter into or have entered into with you.
* Where it is necessary for our legitimate interests, when we acting in pursue of our business purposes and your interests and fundamental rights do not override those interests.
* Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](https://www.cowellmedi.com/customer/eng/page/cowell_cs_center.jsp)or by using unsubscribe link in our emails.

**PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](https://www.cowellmedi.com/customer/eng/page/cowell_cs_center.jsp)if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| To register you as a new user | (a) Identity  (b) Contact | Performance of a service for you |
| To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Notifying you about changes in our app  (c) Asking you to leave a review or take a survey | (a) Identity  (b) Contact  (d) Marketing and Communications | (a) Performance of a service for you  (b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) |
| To run, administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting, hosting of data) | (a) Identity  (b) Contact  (c) Technical | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | (a) Technical  (b) Usage | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |

**MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

**PROMOTIONAL OFFERS FROM US**

We may use your Identity, Contact, Technical, Usage and Marketing 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 products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details or registered for a promotion and, in each case, you have opted in for receiving that marketing.

**THIRD-PARTY MARKETING**

We do not share your personal data to third-parties marketing. We will get your express opt-in consent before we share your personal data with any company outside the Cowellmedi Co., LTD for marketing purposes or potential investors, if such necessity appears.

**OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](https://www.cowellmedi.com/customer/eng/page/cowell_cs_center.jsp)at any time.

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

**COOKIES**

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 this website may become inaccessible or not function properly.  Our Cookie policy.

**CHANGE OF PURPOSE**

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](https://www.cowellmedi.com/customer/eng/page/cowell_cs_center.jsp).

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.

1. **DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

* External Third Parties (paragraph 10)*.*
* Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets; or who may be interested in buying our business or investing. 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.

In case of reorganization, full or partial sale of the company, any use of the data will be performed in accordance with applicable law for the processing of personal data.

1. **INTERNATIONAL TRANSFERS**

Your personal data can be transferred to third countries, including the United States, if it is necessary to ensure quality service. In this case Cowellmedi Co.,LTD will obey to legal norms and requirements to provide sufficient guarantees for the protection of confidentiality and fundamental rights and freedoms.

1. **DATA SECURITY**

We strive to protect the safety of your personal data.

Transfer of personal data from the INNO PLAN software is carried out using secure protocols.

The data in the database is encrypted. Access to the database is carried out using personal digital keys.

Only qualified personnel have access to data. All employees involved in working with personal data follow procedures that ensure the confidentiality and integrity of data.

1. **DATA RETENTION**

**HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We may delete your data when it becomes unnecessary to use it in accordance with the objectives set in the item 4. Data in anonymous form may be stored for a longer period of time.

1. **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data

* Request access to your personal data;
* Request correction of your personal data;
* Request erasure of your personal data;
* Object to processing of your personal data;
* Request restriction of processing your personal data;
* Request transfer of your personal data;
* Right to withdraw consent.

If you wish to exercise any of the rights set out above, please [*Contact us*](https://www.cowellmedi.com/customer/eng/page/cowell_cs_center.jsp)*.*

**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.

1. **GLOSSARY**

**LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us.](https://www.cowellmedi.com/customer/eng/page/cowell_cs_center.jsp)

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

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

**THIRD PARTIES**

**EXTERNAL THIRD PARTIES**

* regulators and other authorities acting as processors who require reporting of processing activities in certain circumstances.

**YOUR LEGAL RIGHTS**

You have the right to:

**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, the further retention of the personal data should be lawful where it is necessary, for exercising the right of freedom of expression and information, for compliance with a legal obligation, for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, on the grounds of public interest in the area of public health, for archiving purposes in the public interest, scientific or research purposes or statistical purposes, or for the establishment, exercise or defence of legal claims.

**Object to processing**of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**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.