

Addendum for Republic of Korea

This section applies to the extent that Snorkl is subject to the Personal Information Protection Act (“PIPA”), and supplements the information in the Privacy Policy. This is an addendum to the Privacy Policy and should be read in conjunction with the Privacy Policy. This Addendum may be amended or updated from time to time.

1. Items of Personal Information Collected and Purpose of Use

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Purpose of Use	Items of Personal Information	Legal basis
Account management	First and last names, email addresses, contact information (for enterprise customer)	Consent Contractual necessity
Providing the platform and services, improving and personalizing the platform	School name, country, audio recordings of verbal explanations of work, recordings of user interactions with the Snorkl whiteboard (including whiteboard drawings and annotations), and type of device/operating system/browser used to access the Platform	Consent Contractual necessity
Web analytics, fraud protection, security and debugging	Device information, browser type, operating system, IP address, and user interactions with the platform	Consent Contractual necessity
Communication with users	identifying information in emails, letters, texts, or other communications you send us	Contractual necessity
Sending promotional emails and other communications	Name and email address	Consent
Fulfilling our legal obligations and resolving disputes	Personal information collected through the platform, including name, email address, communications with us, and content submitted by users	Consent

2. Provision of Personal Information to Third Parties

Snorkl does not provide personal information to third parties for their independent use (e.g., direct marketing). Personal information is shared only with authorized service providers (subprocessors) necessary to provide the Platform, as described in Section 3 below.

3. Delegation of Processing Personal Information

Snorkl delegates the processing of personal information to the authorized service providers (subprocessors) listed on our website. The delegates may process personal information according to the purpose of the delegation.

For a current list of our subprocessors, please refer to our subprocessors List: <https://snorkl.app/legal/subprocessors-list>

4. Overseas Transfer of Personal information

Snorkl transfers personal information overseas as follows:

Recipient's Name (Contact Info.)	Destination Country	Date and Method of Transfer	Items of Personal information Transferred	Recipient's Purpose of Use	Period of Retention and Use by Recipient	Legal Basis for Overseas Transfer
Render	USA	Transmitted via secure network when users access and use the platform	All personal information collected through the platform, including user account information and content created	Cloud hosting, infrastructure management, and database hosting for the platform	Until withdrawal of membership or achievement of processing purpose	Performance of a contract
Amazon Web Services (AWS)	USA	Transmitted via secure network when users access and use the platform	Video/image content uploaded by users	Cloud infrastructure and storage for platform data	Until withdrawal of membership or achievement of processing purpose	Performance of a contract
SendGrid	USA	Transmitted via secure network when sending platform emails	Name and email address	Sending transactional emails and platform notifications	Until withdrawal of membership or achievement of processing purpose	Performance of a contract
OpenAI	USA	Transmitted via secure network when AI feedback features are used	Audio recordings, transcripts, whiteboard images, and coaching messages (personal identifiers removed before transfer)	Providing AI-powered feedback and coaching features	Not retained by the recipient; processed only transiently to generate AI feedback and discarded	Performance of a contract

Recipient's Name (Contact Info.)	Destination Country	Date and Method of Transfer	Items of Personal information Transferred	Recipient's Purpose of Use	Period of Retention and Use by Recipient	Legal Basis for Overseas Transfer
					thereafter.	
Anthropic	USA	Transmitted via secure network when AI feedback features are used	Transcripts of audio recordings, whiteboard images, and coaching messages (personal identifiers removed before transfer)	Providing AI-powered feedback features	Not retained by the recipient; processed only transiently to generate AI feedback and discarded thereafter.	Performance of a contract
Google	USA	Transmitted via secure network when AI feedback features are used	Audio recordings, transcripts, whiteboard images, and coaching messages (personal identifiers removed before transfer)	Providing AI-powered feedback & coaching features	Not retained by the recipient; processed only transiently to generate AI feedback and discarded thereafter.	Performance of a contract
Intercom	USA	Transmitted via secure network when customer support features are used	Teacher names and email addresses	Customer support and communication with users	Until withdrawal of membership or achievement of processing purpose	Performance of a contract
Mixpanel	USA	Transmitted via secure network during	Name, email, device information, and user	Analytics and usage reporting	Until withdrawal of membership or achievement	Performance of a contract

Recipient's Name (Contact Info.)	Destination Country	Date and Method of Transfer	Items of Personal Information Transferred	Recipient's Purpose of Use	Period of Retention and Use by Recipient	Legal Basis for Overseas Transfer
		platform use	interactions in the app		ent of processing purpose	
LogRocket	USA	Transmitted via secure network during platform use	Name, email, device information, and user interactions in the app	Session replay, analytics, and debugging	Until withdrawal of membership or achievement of processing purpose	Performance of a contract
Vercel	USA	Transmitted via secure network during platform use	Device information and county-level location	Platform hosting, analytics, and reporting	Until withdrawal of membership or achievement of processing purpose	Performance of a contract
LangSmith	USA	Transmitted via secure network when AI processing occurs	Text transcripts of video recordings	AI analytics and system monitoring	Until withdrawal of membership or achievement of processing purpose	Performance of a contract

You may request that your personal information not be transferred overseas by contacting Snorkl at support@snorkl.app. However, refusing such transfer may prevent Snorkl from providing some or all of its services.

5. Overseas Collection of Personal Information

Snorkl collects and processes personal information from overseas for the purposes set forth in the Privacy Policy.

- Countries where personal information is collected and processed: United States

6. Rights of Data Subjects

At any time, you may exercise your right to request that Snorkl access, correct, delete, or suspend the processing of your personal information, withdraw consent, refuse automated decisions, or seek an explanation for such decisions. Snorkl will take prompt action in response to such requests. However, your rights to access and suspend processing may be restricted under Articles

35(4) and 37(2) of PIPA. Furthermore, Snorkl cannot delete personal information if other laws and regulations require its retention.

Under Article 41(1) of the PIPA Enforcement Decree, you may exercise your rights in writing, via email, facsimile, or similar means. You may also exercise your rights through an authorized representative or agent. In such cases, a power of attorney must be submitted in the form specified in Annex No. 11 of the Notification on How to Process Personal Information, and Snorkl will verify the identity of the person exercising the rights.

For children under the age of 14, the above rights must be exercised by their legal representative. Minors aged 14 or older may exercise their rights independently or through their legal representative.

7. Destruction of Personal Information

Act on Consumer Protection in Electronic Commerce (Article 6):

- Records of contracts or rescission of offers: 5 years
- Records of payment and service provision: 5 years
- Records of consumer complaints or disputes: 3 years

Protection of Communications Secrets Act (Article 15-2):

- Computer communication or internet logs and access point trace data: 3 months

Snorkl will destroy personal information as follows:

Destruction Procedure: Snorkl will select the personal information subject to destruction and destroy it after obtaining approval from the Data Protection Officer.

Destruction Method: Snorkl will destroy personal information recorded and stored in electronic files in an irrevocable manner, and shred or incinerate personal information recorded and stored in paper documents.

8. Additional Use and Provision

In accordance with PIPA, Snorkl may use or provide personal information within the scope reasonably related to the initial purpose of collection, considering whether disadvantages have been caused to data subjects and whether necessary security measures such as encryption have been implemented. Snorkl will exercise due care in determining whether to use or provide personal information, considering general circumstances including relevant laws and regulations, the purpose of use or provision, how personal information will be used or provided, items to be used or provided, matters to which data subjects provided consent or which were disclosed, impact on data subjects, and protective measures taken. Specific considerations include:

- Whether the additional use or provision of personal information is related to the original purpose of collection;
- Whether the additional use or provision of personal information is foreseeable in light of the circumstances in which personal information is collected or practices of processing personal information;
- Whether the additional use or provision of personal information unduly infringes on the interests of users; and
- Whether necessary measures have been taken to ensure security, such as pseudonymization or encryption.

9. Contact Information

To protect your personal information and handle related complaints, Snorkl has designated the following department responsible for personal information protection:

Department in Charge of Personal Information Protection: Security (security@snorkl.app)

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