

Easy-to-
understand

Consent to Personal Information Handling



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Guide to Use

1. Considering the dramatically diversifying digital environment with its complex changes and the widening scope of data processing, we have published a consent guide that can help the information subject be fully familiarized with the details before they grant consent.
2. The duties and recommendations listed in the guide can be utilized by comprehensively referring to the relevant data, including the related laws/posting provisions, 「Personal Information Protection Act and Guide/Posting Interpretation」, and the guideline, etc.
* For more information about the Personal Information Protection Act, enforcement ordinance, posting and more: visit the national legislation information center. (www.law.go.kr)
** See the following sites
3. If you want consulting on this guide or have inquiries about the Personal Information Protection Act, visit 'Personal Information Infringement Reporting Center (www.privacy.kisa.or.kr, dial 118 (no area code))' or call the 'Personal Information Law Interpretation Support Center(02-2100-3043).'
4. We plan to reflect the changes in the personal information protection related laws and systems and ICT environment and consistently update the guide. The latest data for the personal information protection guide and brochure is posted at the website below.
* "Personal information protection commission's nuri book(www.pipc.go.kr)"(policy-law/legal information/guides) "Personal information protection portal(www.privacy.go.kr)"(data vault/guide data)
5. This guide shall replace the existing publications 「Personal Information Collection Minimization Guide('20.12.)」 and 「Online Personal Information Handling Guide('20.12.)」.

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Overview

1 Background

⊙ Suggestion of the principles of fair consent system implementation

- Addressing the tradition of excessive consent requests* and **formalization of consent****

* **More than 94% of personal information handlers in the private and public sectors** responded that the 'information subject's consent is the basis for personal information collection.' (2021 Personal information protection status investigation)

** To the question of why the information subject does not check the consent, the largest share of respondents said 'because they must use the service regardless of the content of the consent(34.9%).' (2021 personal information protection status investigation)

- Suggesting compliance items for consent including the handling of the minimum personal information required, clear notification of the consent details, guarantee of active selection rights for the information subject and so on.

⊙ How to prepare consent in each phase and case studies

- Explains the stepwise consent preparation methods of the personal information manager to guarantee the actual consent rights for the information subject.
- Reviews examples of actual consent, and guides them on the examples of consent in main areas to help the personal information manager to easily prepare agreements.

Improves on the traditional typical consent actions of the information subject and unnecessary demands for consent from the personal information handler in order to achieve the actual implementation of the personal information protection rules.

2 Meaning of Consent System

◎ Critical means of right of self-determination for personal information

- Self-determination rights for the personal information are guaranteed by Articles 10 and 17 of the constitution and are specified in the Personal Information Protection Act(hereinafter referred to as protection act).

* The right for the information subject to decide on when and whom and to what extent their personal information is disclosed and used (Constitutional court 99 Heon M313, etc.)

Korean constitution

Article 10 **Every Korean has dignity and value as a human and the right to pursue happiness.** The country has the duty to check the basic human rights of every individual that cannot be infringed and guarantee them.

Article 17 **Every Korean should have the right to avoid infringement of their privacy and freedom.**

- Article 4 of the Personal Information Protection Act defines the rights of the information subject to grant and determine consent over personal information handling and the like.

Personal information protection rights

Article 4(Rights of the Information Subject) The information subject has the following rights related to handling of their personal information.

1. **Right to receive information about their personal information handling**
2. Right to determine and select the scope of consent and whether to accept the handling of personal information

➔ Note) Information that Information Subject Must Know before Granting Consent(Appendix 2)

◎ Consent on the requirements on personal information handling

- The Personal Information Protection Act suggests special provisions of the law, execution of duties by the public organization, the information subject's contract signing and execution and so on as the requirements for collection and use (Article 15), supply(Article 17) and use and supply for purposes other than the intended purpose of use (Article 18) with regard to personal information handling, and also specifies that personal information can be collected, used and supplied even when consent from the information subject is given.
- Unlike other personal information handling requirements, consent is a means of the information subject to exercise the right to control their personal information handling.
 - ➔ Note) Information that Personal Information Handler Must Know before Obtaining Consent (Appendix 3)

3 Status of Personal Information Acts/Systems in Korea and Overseas

⊙ Domestic personal information protection law and systems

- **(Personal Information Protection Act)** Article 3 (Principles for Protecting Personal Information), Article 4 (Rights of Data Subjects), Article 15 (Collection and Use of Personal Information), Article 17 (Provision of Personal Information), Article 18 (Limitation to Out-of-Purpose Use and Provision of Personal Information), Article 22 (Methods of Obtaining Consent), Article 23 (Limitation to Processing of Sensitive Information), and Article 24 (Limitation to Processing of Personally Identifiable Information) state that the personal information manager should obtain consent to handle the personal information of the data subject.
- **(Guideline)** The two types of existing guides containing duplicated content related to personal information handling consent have been merged as an easy-to-understand guide on consent to personal information handling.

* The personal information handling minimization guides and the online personal information handling guide are discarded.

※ Reference 1 : Comparison between the consent-related guides(2 types) and the guide on consent of personal information handling.

⊙ Overseas personal information protection law and systems

- EU EDPB(European Data Protection Board) offers consent-related guides to provide information regarding valid consent factors defined by GDPR.
 - * ① Freely Given, ② Specific, ③ Informed, ④ Unambiguous indication of wishes
 - ※ Reference 2 : EU consent guidelines ('20.5.)
- In the consumer privacy bill of rights (USA), it states that the information subject should have individual control rights guaranteed for them to easily and clearly select whether to grant consent.
 - ※ Reference 3 : US consumer privacy bills of rights ('12.2.)

Reference 1: Comparison between the consent-related guides(2 types) and the guide on consent of personal information handling.

Consent related guidelines (2 types)
<p>■: Transfer to consent guides.</p> <p>■: Transfer to other guides and so on.</p> <p><Minimum personal information collection guideline></p> <ol style="list-style-type: none"> 1. Personal information collection principles 2. Personal information manager's action guides <ul style="list-style-type: none"> - Collection of minimum personal information required - Guarantee of actual consent rights for the information subjects - Restricted handling of unique ID information and sensitive information 3. The consent to personal information collection and use and the consent preparation guideline
<p><Online personal information handling guideline></p> <ol style="list-style-type: none"> 1. Minimum personal information required collection criteria <ul style="list-style-type: none"> - Basic principles and details 2. Easy-to-understand consent preparation criteria <ul style="list-style-type: none"> - How to get consent and details of such method
<div style="border: 1px solid black; padding: 2px;"> <p>3. Personal information handling policy disclosure and operation criteria</p> </div>
<div style="border: 1px solid black; padding: 2px;"> <p>4. Stepwise personal information discarding criteria</p> </div>
<div style="border: 1px solid black; padding: 2px;"> <p>5. Personal information viewing demand operation criteria</p> </div>
<div style="border: 1px solid black; padding: 2px;"> <p>6. Personal information usage details notice criteria</p> </div>

Consent related guidelines (2 types)
<ol style="list-style-type: none"> 1. Compliance Items for Obtaining Consent <ul style="list-style-type: none"> - Handling of minimum personal information required - Clear Notification of Consent Details - Confirmation of Active Willingness of Information Subject - Guarantee of Rights to Select for Information Subject 2. How to Prepare Consent and Handling Items <ul style="list-style-type: none"> - Checkpoints before Preparing Consent - Preparation of Consent - Actions after Granting Consent 3. Example of Consent in Main Areas
<div style="border: 1px solid black; padding: 2px;"> <ul style="list-style-type: none"> · Personal information disclosure and operation criteria are reflected in the personal information handling policy preparation guides. </div>
<div style="border: 1px solid black; padding: 2px;"> <ul style="list-style-type: none"> · Step-wise personal information disposal criteria is reflected in the Personal Information Protection Action guides. </div>
<div style="border: 1px solid black; padding: 2px;"> <ul style="list-style-type: none"> · Personal information perusal request operation criteria and use details notice operation criteria are reflected in the 'Personal information protection act and guide posting interpretation.' </div>

Reference 2 EU Consent related guidelines('20.5.) : Valid consent factors

1. Freely Given

- If the information subject feels coerced to consent or will be subject to disadvantages by declining to consent, it means that they do not have freedom to grant consent, and thus it is not a valid consent.
- If there exists an imbalance of power between the user and the employer or public authority as the subject of power, consent is restricted to use as lawful requirements of personal information handling.
- If attempts are made to obtain consent together with the contractual terms when it is not mandatory personal information that must be handled to establish a contract or if consent is required jointly with other terms and conditions, it is an invalid consent.
 - ※ Consent should be distinguished from personal information handling necessary for contracts, and should be obtained in a form where the data subject can make a free choice.
- The controller must prove that rejection or withdrawal of consent can be allowed without any cost or disadvantages.

2. Specific

- The goals of personal information handling should be specifically stated.
- When asking for consent, make sure to specifically state the goals of handling and do not expand the scope of such goals.
 - ※ In the event of changes in the goals, make sure to get consent again.

3. Informed

- Make sure to provide sufficient necessary information for the information subject to make a selection.
 - (1) Identity of the controller, (2) goals of processing, (3) collected and used personal information items (4) right to revoke consent, (5) information about data use for automated decision making, (6) danger that can arise from cross-border transfers
- If there is a joint controller or if you want to supply it to a third party, then you must additionally specify the recipient and the supplied items.
- Information can be provided in every format including written, audio, video message, etc.
 - Should use easy-to-understand, clear and general language that general readers can understand. Should provide information in a form that easily explains the details of personal information handling for the data subject separately from other contracts.
 - ※ If it is difficult to clearly check the details as they are unclearly stated in other contracts, then it cannot be regarded as a valid format of consent.

4. Unambiguous indication of wishes

- It is valid consent only if the information subject explicitly states their willingness to consent.
 - ※ If the consent checkbox is already checked before consent is granted, then it is not valid, since the data subject does not need to act.
- The controller can develop and apply their own specific method of consenting.
 - ※ A physical action such as swiping the smartphone screen, shaking one's hands in front of the smartphone camera or turning the smartphone clockwise is allowed.
- Consent should be granted before handling the personal information.
 - ※ There can be negative effects if the data subject does not read the details of consent, so care should be taken to make sure the issues are resolved by developing proper consent methods without just going through seemingly formal procedures.

Reference 3 US consumer privacy bills of rights ('12.2.) : 7 Principles to protect privacy

1. Individual Control

- Individual Control: Consumers have a right to exercise control over what personal data companies collect from them and how they use it.
- Companies should allow a consumer to make a meaningful decision on personal information collection and use by providing them with clear and easy to make selection rights.
- Revoke and limitation: Consumers have a right to revocation and limitation on consent.

2. Transparency

- Transparency: Consumers have a right to easily understandable and accessible information about privacy and security practices.
- Companies should clearly state personal information items to be collected and the reasons for its collection, etc. and provide them to consumers.

3. Respect for Context

- Respect for Context: Consumers have a right to expect that companies will collect, use, and disclose personal data in ways that are consistent with the context in which consumers provide the data.
- If the company uses personal information for purposes not in the context, they should clearly state it and guarantee the selection rights for customers.

4. Security

- Security: Consumers have a right to the secure and responsible handling of personal data.
- The company should assess the security risk and protect personal information against threats such as loss, illegal access and so on.

5. Access and Accuracy

- Access and Accuracy: Consumers have a right to access and correct personal data in usable formats, in a manner that is appropriate considering the sensitivity of the data and the risk of adverse consequences to consumers if the data is inaccurate.
- A company should provide consumers with proper methods or chances to correct the incorrect data.

6. Focused Collection

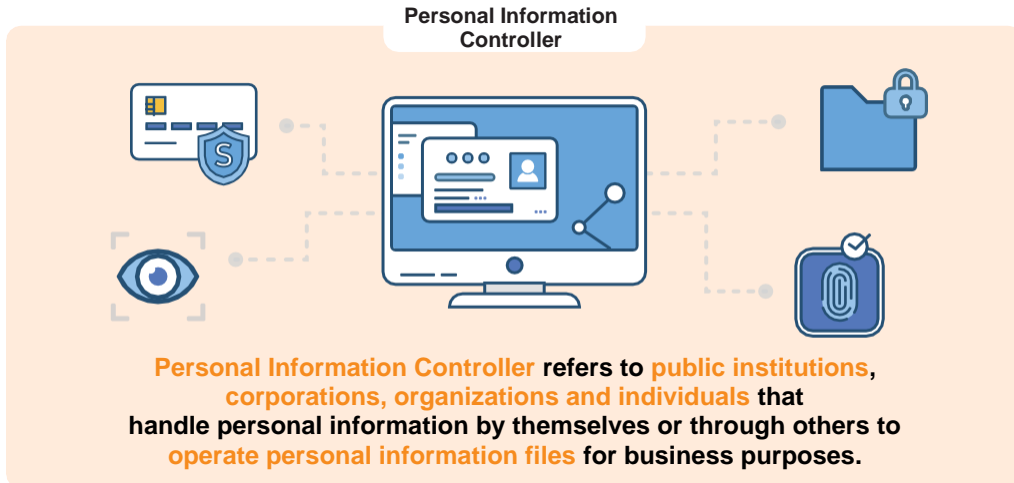
- Focused Collection: Consumers have a right to reasonable limits on the personal data that companies collect and retain.
- A company should collect the minimal personal information for achieving the goals.

7. Accountability

- Accountability: Consumers have a right to have their personal data handled by companies with appropriate measures in place to assure they adhere to the Consumer Privacy Bill of Rights.
- The company should notify consumers about the principles that must be complied with and train employees to enable them to lawfully process personal information.

4 Target of Application

- Every personal information controller, such as a public organization or private business, that processes personal information when granted consent



Confirmation Criteria to determine a personal information controller*

1. Operation of the personal information file for the purpose of business

- A personal information controller has to handle personal information for the purpose of business, and thus an entity which processes personal information for purely individual purposes or housekeeping works cannot be a personal information controller.
- Business means all the duties or business that one must continue to be involved with due to one's social rank or vocation, and is not relevant to the wage or benefits at all, and even if it is a single case incident, as long as the person expresses willingness to repeat or continue it, it can be seen as business.
- Personal information file is a group of personal information systematically arranged or configured according to a certain rule to enable easy searching for the personal information, and the personal information controller is a person who processes personal information to operate the personal information file.

2. Handle personal information by yourself or through other persons

- The personal information processor can process personal information on their own but can also vicariously process it through other persons.
- A consignee, agent or aide hired to process personal information can fall under the category of personal information processor.

3. Public organization, corporate, group, individual

- The Personal Information Protection Act defines the concept of personal information controller broadly so that it can be applied to every personal information processing person, as it is a general law for personal information protection. Thus, public organizations, non-profit or for-profit organizations, groups or individuals can all fall under the category of personal information processor.

* See Personal Information Protection Act and guide/posting interpretation, pp.17~21.



Compliance Items for Obtaining Consent

1 Handling of Minimum Necessary Personal Information

① Collection of minimum personal information required

Must collect minimum personal information required only.

- Considering the goals businesses seek to execute by collecting personal information, you must collect the minimal personal information within the reasonable scope.
 - For a hiring contract, only collect the information related to the establishment and fulfillment of the hiring contract, and do not collect personal information not directly relevant to the applicant, etc.

Example
1

Physical conditions, hometown, marital status, or properties of a job seeker irrelevant to the hiring contract

Incorrect example of excessive personal information collection, such as family's educational background, vocation and so on

사진	이름							
	생년월일							
	주소							
	채용 계약시 가족사항 등 개인정보 수집은 불필요함							
전화번호	집 전화				E-mail			
	휴대전화				비상연락처			
신체사항	신장	체중	혈액형	시력	기타	종교	취미	특기
가족사항	관계	성명	연령	학력	직업	직위	동거여부	

- Even if only the minimal personal information is collected that reflects the goals of collection, we must respect the willingness of the data subject regarding the personal information items subject to collection.
- If a contact is required, then notify the data subject about the purpose of use for each of contact including mobile phone number, home telephone number, company telephone number, email address and so on, and collect the minimal personal information necessary based on the choice made by the data subject.

Example 2 Incorrect case of collecting multiple pieces of contact information at the same time

▶ 개인정보 수집·이용 안내

- 개인정보 수집 목적 및 항목
 - 멤버십 마일리지 관리 : 성명, ID, 비밀번호
 - 여행상품 안내 등 마케팅 : 휴대전화번호, 자택전화번호, 회사전화번호, 주소, 이메일
- 보유 및 이용기간: **회원 탈퇴 시**
 - * 귀하는 개인정보 수집에 동의를 거부할 권리가 있으며, 동의를 거부 할 경우에는 마일리지 적립 및 여행상품 안내를 받을 수 없습니다.

위 개인정보를 수집·이용하는 것에 동의합니다.(선택) 동의함 동의하지 않음

수집 목적별로 개인정보 수집항목 등을 명확히 알리고 동의를 받아야 함

수집 목적	이용 내역	수집 항목	보유기간	동의여부(선택)
관심분야 상품 맞춤형 정보 제공	웹 매거진 발송(월1회)	이 메일	회원탈퇴 시까지	<input checked="" type="checkbox"/>
이벤트	SMS를 통한 이벤트 참여 기회 제공	휴대전화번호	'00년 00월00일까지	<input checked="" type="checkbox"/>
맞춤형 광고	관심 상품 관련 쿠폰 배송	주소	수집일로부터 6개월	<input type="checkbox"/>

- The personal information process should be responsible for proving that the minimal personal information is within the scope of goals of the personal information processing.
- If the collected information becomes unnecessary, then you must dispose of it and consistently manage it thereafter.

Example 3 Incorrect case of collecting personal information that cannot be verified as necessary for mileage membership management

▶ 개인정보 수집·이용 동의

- 개인정보 수집 목적 : Membership management, mileage accumulation
- 개인정보 수집 항목 : Name, email, mobile phone number, hobby, marital status, height, weight, education, job, income, property
- 보유 및 이용기간
 - 보유기간: **회원 탈퇴 시**
 - 이용기간: **마일리지 서비스 제공 기간**
- 동의 거부권 및 불이익 : 정보주체는 개인정보 수집·이용에 동의하지 않을 권리가 있으며, 동의를 거부할 경우 마일리지 적립 서비스를 받으실 수 없습니다.

회원관리, 마일리지 적립 목적에 꼭 필요한 정보임을 입증할 수 있는 개인정보만 수집하여야 함

위 개인정보를 수집·이용하는 것에 동의합니다.(선택) 동의함 동의하지 않음

② Collection when necessary

If you collect personal information ahead of time despite there being uncertainty regarding how it will be used, it can fall under the category of unnecessary personal information collection, and thus you must collect personal information only when it becomes necessary to do so.

- It is desirable to collect the personal information necessary for membership signup and member service supply, and collect the personal information related to online payment or delivery at the time when it is applicable.
- But it is possible to collect information related to online payment and delivery based on independent selections by the data subject for the convenience of the data subject who would like to repeatedly use such online payment and delivery service.

Example 4 Incorrect case of collecting payment and delivery information when signing up for a department store membership

▶ 개인정보 수집·이용 동의

1. 수집·이용 목적 : 회원가입, 민원처리, 결제서비스, 배송서비스
2. 수집하는 개인정보의 항목 : 이름, 아이디, 비밀번호, 이메일주소, 생년월일, 휴대전화번호, 자택주소, 카드번호
3. 보유 및 이용기간 : 0000년 00월 00일까지
4. 동의 거부권 및 불이익 : 정보주체는 개인정보 수집·이용에 동의하지 않을 권리가 있으며, 동의를 거부할 경우 00 서비스를 제한 받을 수 있습니다.

위 개인정보를 수집·이용하는 것에 동의합니다. 동의함 동의하지 않음

회원정보 입력 화면

성명 *	<input type="text"/>	<input type="text"/>	<input type="radio"/> 남성	<input type="radio"/> 여성									
아이디 *	<input type="text"/>	중복확인											
비밀번호 *	<input type="text"/>	비밀번호 확인	<input type="text"/>										
이메일 *	<input type="text"/>	@	선택하세요										
집 전화번호	<input type="text"/>	-	<input type="text"/>	-	<input type="text"/>	휴대 전화번호	<input type="text"/>	-	<input type="text"/>	-	<input type="text"/>		
주소	<input type="text"/>										주소 찾기		
카드종류	선택하세요					카드번호	<input type="text"/>	-	<input type="text"/>	-	<input type="text"/>	-	<input type="text"/>
회원이입단계에서 상품의 결제·배송에 필요한 개인정보를 미리 수집해서는 안됨													
												가입하기	

③ Collection of minimum personal information required

Must collect the minimum personal information required only.

- Minimize the personal information items to be provided.
 - Make sure that no excessive personal information is provided regardless of the goals of use for the recipient.
- Minimize the scope of the third parties who receive personal information.
 - Do not use expressions such as 'etc., and so on' when indicating the scope of recipients because it can lead to an unexpected expansion of the scope of the personal information controller, and make sure to provide a homepage link that can identify any third parties who receive the personal information.
 - ※ If it is difficult to specify a third party who receives personal information due to special circumstances, it is possible to obtain consent after notifying them about the special circumstance, the type of third party and so on.

Example 5 Incorrect case related to consent to supply personal information to a third party

1. Recipients of personal information : OO Life Insurance, △△ Life Insurance, □□ Life Insurance, etc. ← delete this.

OR ▽▽ company selling insurance products that is indicated on the oo of the company's home page as of December 11, 2021.

(Specific company name can be checked at the ## website.)

2. Goals of use for the recipient : ▽▽ insurance product guide and sales marketing phone calls

3. Personal information items provided : name, date of birth, mobile phone number

4. Ownership and usage period : Month Date of OOOO

5. Right to reject consent and disadvantages : The data subject has the right to refuse to consent to the supply of their personal information to a third party, and if they do, they cannot receive guidance on insurance products.

I hereby permit the above personal information to be shared with a third party. (Optional)
Permit Do not permit

2 Clear Notice of Consent Details

① Notice about the personal information controller

Make sure to clearly indicate the identity of the person to process personal information (personal information controller).

- If the personal information controller is not clearly shown, then the user can raise an issue regarding whether the consent is valid.
- If the consignee of the personal information handling business obtains consent on personal information handling instead of the personal information controller, etc. you must clearly indicate the identity of the consignor that actually collects the personal information, and specify that the personal information handling business is consigned from someone else.
- If the data subject uses an online platform, you should clearly indicate the identity of the person handling the personal information, namely, a business operator or seller.

② Notice about the details of personal information handling

- **(Collection and use) i) Goals, ii) Items, iii) Ownership and usage period, iv) Fact that they can decline consent and disadvantages of declining**
- **(Supply) i) Recipients, ii) Goals iii) Items, iv) Ownership and usage period, v) Fact that they can decline consent and disadvantages of declining**

- If there are items to report when obtaining consent of handling details, consider the specific context and make sure to specifically notify the data subject about necessary items for making a decision on giving consent.

**Example
6**

Case of incomplete notice of personal information collection goals in the personal information handling consent document

▶ **Consent of personal information collection and use**

**Goals of personal information collection
(Omitted)**

**Failure to acknowledge the goals of personal
information collection on the personal information
collection and use consent document**

1. Personal information collection items : Blood type, handicap, vocation

2. Ownership and usage period : **6 months from the date of collection**

* You have the right to decline the personal information collection, and if you do, you cannot get promotional ads or customized ads.

I hereby consent to the above personal information collection and use. (Optional) **Accept** **Do not accept**

- It is desirable to specifically state the personal information collection items.
 - Use of expressions such as ‘~etc’ and expanding the scope of collection does not mean that sufficient information is provided to obtain consent, allowing room for disputes.

Example 7 Incorrect case of notice that can lead to expansion of the scope of personal information collection items

▶ 개인정보 수집·이용 동의

OOOO는 "개인정보 보호법"에 따라 본인의 동의를 얻어 맞춤형 광고, 이벤트, 타겟 마케팅 서비스 제공을 위한 개인정보를 수집·이용합니다.

1. 개인정보 수집 목적 : 맞춤형서비스, 이벤트, 타겟 마케팅
 2. 개인정보 수집 항목 : 휴대전화번호, 쿠키, 이메일 등
 3. 보유 및 이용기간 : 회원탈퇴시(이벤트 종료시)

"수집목적과 수집항목을 구체적으로 명시하도록 개선"

수집 목적	수집 항목	보유기간
맞춤형 광고	생년월일, 성별, 휴대전화번호	수집일로부터 6개월
경품 행사	이 메일, 주소	OO년 OO월 30일까지

* 귀하는 개인정보 수집 동의를 거부할 권리가 있으며, 거부에 따른 불이익은 없습니다.
 위 개인정보 수집·이용에 동의합니다.(선택) 동의함 동의하지 않음

- Provide specific and clear details of disadvantages when consent is refused, so the data subject's right to select is not infringed.

Example 8 Incorrect case of poorly written notice about disadvantages if the data subject declines to consent to personal information collection and use

▶ Consent to personal information collection and use

OOOOO is collecting personal information for the following purposes.

1. Personal information collection goals and items
 - ① Member sign-up
 - Self-identification due to membership service use : sex, ID, duplicated confirmation information, date of birth, password, email, address, telephone number
 - Data to provide customized services : date of birth, email address, mobile telephone number
 - ② Service use information
 - User's convenience service provided, use information analysis, data acquired in case of cyber attacks: access IP address, contents use logs, cookies
2. Ownership and retention period: **(at the time of membership withdrawal)**.
 - ※ Dear customer, you have the right to reject above terms and conditions.
 - But if you reject them, there may be some restrictions on your service use.

The restriction of service if consent is refused is not explicitly stated.

I hereby consent to the above personal information collection and use. (Optional)
 Accept Do not accept

When asking for consent, you must clearly distinguish each consent item and make sure that the information subject can clearly understand them.

- When there are two or more personal information handling items, you must clearly distinguish each consent item and make sure that the information subject can clearly understand them, and consent should be obtained separately.
 - ※ If you want to obtain consent from the data subject and collect and use personal information such as names, contacts, addresses, and date of birth for the purpose of service supply, and supply names, contacts and date of birth to another business operator for the purpose of partnership service supply, you must separately notify the customer of the personal information collection and use by your company and by the partner company, and receive consent for each separately.

When obtaining consent via written paper(e-doc included), make sure to clearly indicate the critical items such as purposes of collection and use, items and so on set forth by the president's decree for ease of understanding.

- The fact that the personal information can be used to contact the data subject for the purpose of goods or service advertisement or sales solicitation, which is one of the goals of personal information collection and use, the fact that sensitive information such as driver's license, passport number, foreigner's registration number is handled, personal information ownership and use period(if supplied, the ownership and use period for the recipient), the recipient of personal information and their purpose of use and so on should be indicated via the means set forth by the personal information protection commission.

How to indicate critical items on written consent(Personal information handling method posting, Article 4)

- Use a font size of at least 9 points and make it at least 20% bigger than the other text for good visibility.
 - Use an appropriate font size, thickness or underline, etc. to clearly indicate the content.
 - If there are many items to be consented to, and it is difficult to clearly understand the critical details, then make sure to distinguish such critical details from the remaining details by marking them properly.
-
- If consent is obtained from e-documents such as through a website, mobile app, etc. the original font size should be at least 9 points.
 - Depending on the medium (PC· mail · telephone· SMS· social media, etc.), the resolution or the user environment (UI) and so on, the legible font size for the data subject can vary, but at a minimum you must ensure that the data subject can read it properly by zooming in.

③ Personal information handling for advertisements

If you collect personal information for product and service advertisement and marketing, make sure to clearly indicate the goals.

- When you try to obtain consent for personal information handling to advertise services or goods to the data subject or solicit their sales to the data subject, make sure to clearly notify the data subject about them first.
 - While collecting personal information for advertisement or marketing, you should not add goals such as additional service supply, partnership service supply, etc.

Example 9 Incorrect case of unclear guidance on the fact that marketing purposes are included in it

1. Personal information collection goals : Send informative emails to improve customers' convenience, send news for members.
2. Personal information collection items : name, mobile phone number, email address
3. Ownership and retention period : at the time of membership withdrawal
 * Sir/madam, you have the right to refuse to provide your personal information, and if you do so, you will no longer receive information emails or newsletters.

I hereby consent to the above personal information collection and use.
 (Optional) Accept Do not accept

※ (Unclear goals of collection) Sending informative emails to improve customer's convenience
 → (Example of modification) Advertisement on new product development related to purchased items

- Unless it is unavoidably necessary to collect personal information for fulfilment or establishment of the contract, as long as you use cookies and so on to collect personal information, you must first obtain consent from the data subject.

* Text file transmitted from the website visited by the user to the user's web browser

Example 10 Incorrect case of failure to obtain consent from the data subject when collecting personal information included in the cookies for marketing purposes

개인정보 처리방침

▶ 쿠키에 의한 개인정보 수집

① 쿠키란?
 ○○○는 고객의 정보를 저장하고 '쿠키(cookie)'를 사용합니다. 쿠키는 웹사이트가 고객의 컴퓨터 브라우저에 전송하는 소량의 정보입니다.

② 쿠키 사용 목적
 - 개인의 관심 분야에 따라 차별화된 정보를 제공
 - 접속빈도 또는 방문시간 등을 분석하고 이용자의 취향과 관심분야를 파악하여 **타겟 마케팅 및 서비스 개선의 척도로 활용**

③ 쿠키 운용
 고객은 웹브라우저에 설정을 통해 모든 쿠키를 허용/거부하거나, 쿠키를 저장될 때마다 확인을 거치도록 할 수 있습니다. 쿠키 설정 거부 방법은 다음과 같습니다. 웹브라우저 [도구] 메뉴 [인터넷 옵션] 선택 > [개인정보] 탭 > [모집]에서 옵션 선택

개인정보 수집·이용 동의서

▶ 개인정보 수집·이용 동의
 ○○○는 "개인정보 보호법"에 따라 본인의 동의를 받아 홍보 및 마케팅을 위한 개인정보를 수집·이용합니다.

1. 수집 목적: 신규 서비스/상품 안내 **개인 맞춤형 광고 및 마케팅(노력)**

2. 수집 항목: 휴대폰번호, 이메일 **쿠키에 의한 자동수집 정보(노력)** → **처리방침에 쿠키 사용을 안내하고 있으나, 정보주체 동의 없이 홍보 및 마케팅 목적으로 사용하고 있음**

④ Separate consent for uniquely identifying information and sensitive information

Except for the resident registration number, uniquely identifying information or sensitive information can be handled only if there is a legal basis in the laws or consent is obtained separately.

- Uniquely identifying information (excluding the resident registration number) or sensitive information should not be handled at the sole discretion of the personal information controller without a legal basis.
 - ※ Uniquely identifying information: Resident registration number, passport number, driver's license number, foreigner registration number
 - ※ Sensitive information : ideology, beliefs, admission to or withdrawal from a trade union or political party, political opinions, health, sexual preference, and other personal information that is likely to markedly threaten the privacy of any data subject
- If the collection of such information is indispensable despite a lack of legal grounds, then clearly state the goals and obtain consent from the data subject before handling it.
- You should not obtain consent to collect uniquely identifying information or sensitive information simply because there is a possibility of its collection in the future.

Example 11 Incorrect case of collecting sensitive information despite low possibility of its use in the future

▶ 개인정보 수집·이용 동의

1. 개인정보 수집 목적 : 회사의 상품/서비스에 대한 이용실적 정보와 분석 및 고객의 관심에 부합하는 서비스와 이벤트 기획 및 개인별 최적화된 서비스 제공

2. 개인정보 수집 항목 : 설치한 어플리케이션 관련 정보(APP패키지명, 버전, 설치경로, 이용횟수, 이용시간), 이용환경(단말기 모델명, OS, 통신사) 정보, 기기관리 번호

*위 정보 중에서, 이용자가 이용한 어플리케이션에 따라 (1) 사상, 신념 (2) 노동조합, 정당의 가입 및 탈퇴 (3) 정치적 견해 (4) 건강, 성생활 등에 관한 정보 (5) 유전정보, 형의 실효에 관한 법률상 범죄 경력에 해당하는 정보가 포함될 수 있음

3. 보유 및 이용기간 : **회원 탈퇴 시** **민감정보 수집 시에는 다른 정보와 별도로 동의 필요**

* 귀하는 개인정보 수집에 동의를 거부할 권리가 있으며, 거부 시 상품 홍보 및 이벤트 참여에 제한될 수 있습니다.

위 개인정보를 수집·이용하는 것에 동의합니다.(선택) 동의함 동의하지 않음

민감정보의 수집 필요성이 불분명하면서 수집 가능성에 대하여 동의를 요구해서는 안 됨

The resident registration number can be handled only if there are legal grounds according to the laws, president's decree, national assembly rules, supreme court rules, constitutional court's small rules, central election management committee's rules or the board of audit and inspection of Korea's rules.

- Resident registration number cannot be handled based on consent from the data subject, and can be handled only if the laws or president's decree specifically demands or permits its handling.
 - Even where the resident registration number is handled according to Article 24-2 Paragraph 1 of the Personal Information Protection Act, when the data subject signs up for a membership at the homepage, you should provide a means to sign up without using their resident registration number.
- When handling a resident registration number, it is desirable to provide guidance on the goals and the legal background.

Example 12 Incorrect case of failure to guide the subject on the legal background for resident registration number handling

개인정보 처리방침

개인정보 수집 항목

OOOO는 서비스 제공을 위해 필요한 최소한의 개인정보만을 수집하고 있으며, 광고 및 마케팅을 위해 필요한 정보는 별도 동의를 받아 수집·이용하고 있습니다.

구분	수집 목적	수집 항목	비고(수집 근거)
회원가입	서비스 이용에 따른 본인식별	ID, 비밀번호, 이메일, 휴대전화번호	
멤버십 회원	멤버십 회원관리, 포인트 적립	ID, 비밀번호, 이메일, 휴대전화번호, 자택주소, 생년월일	
개인 판매회원	상품 판매자 식별 및 관리	ID, 비밀번호, 이메일, 휴대전화번호	
	세금계산서 발행	주민등록번호	부가가치세법 제16조 및 동법 시행령 제53조에 따라 수집
상품 구매(배송)	상품 구매에 따른 배송	(주문자 정보) 성명, 전화번호, 이메일 (수령자 정보) 성명, 전화번호, 주소	주민등록번호 수집 근거법령 안내 필요
상품 구매(결제)	상품 구매에 따른 대금 결제	은행명, 계좌번호, 예금주명 신용카드사 및 카드번호, 소유주명	

3 Confirmation of Active Willingness of Information Subject

Can use paper, telephone, internet, phone(Main content) + internet(details), e-mails and so on to notify them of the details of consent and check their willingness to give consent.

How to inform subject of details of consent	How to verify their willingness to consent
Written	Written(sign or stamp)
Tel	Voice
Tel(brief items)+internet(details)	Voice + click
Internet	Click
Sending emails	Receiving emails
Other similar methods	

① Guidance on the details of consent

- The details of consent should be prepared in plain language via writing, telephone, internet, mobile app, email, etc. so that anyone can easily understand it; if it conveyed by voice, use a normal conversation pace.
 - ※ Avoid the excessive use of legal terms and long phrases. If you must use professional terms, then provide explanations separately.

② Confirmation of the details of consent

- Willingness to consent should be checked explicitly through signs/stamps or voice for the information subject, or email indicating ‘consent,’ ‘consent’ clicked on the internet homepage, etc. which indicate active actions or statement.
 - ※ To check willingness to consent, you can use a way to inform the details of consent.
 - Do not make a phone call to demand consent without differentiating between the items requiring consent and not requiring consent. Just because the phone call goes through, it does not mean that they are willing to give consent.
 - Even when they prepare a personal information handling consent document online, the Consent check box should not be set to Yes by default.*
 - * If the Consent box is set to Yes on the internet homepage, then then the data subject might skip to the next screen without reading it, in which case it cannot be assumed that consent has been given.

Example 13

Incorrect case of setting the Consent box in the personal information handling consent document to Yes by default

▶ 개인정보 수집·이용 동의

1. 수집·이용 목적 : 신상품 홍보 및 맞춤형 광고, 타겟 마케팅 제공
2. 수집하는 개인정보의 항목 : 이메일, 휴대전화번호
3. 보유 및 이용기간 : **회원 탈퇴 시까지**
4. 동의 거부권 및 불이익 : 정보주체는 개인정보 수집·이용에 동의하지 않을 권리가 있으며, 동의를 거부할 경우 신상품 홍보 및 맞춤형 광고, 타겟 마케팅 서비스 이용에 제한을 받을 수 있습니다.

'동의함'이 기본값(Default)으로 설정되어서는 안 됨

위 개인정보를 수집·이용하는 것에 동의합니다.(선택)

동의함 동의하지 않음

- Since there are increasingly numerous and diversifying cases of personal information handling, there can be many complex issues to be reported when the data subject gives consent.
 - You must seek out various ways to ensure that the data subject fully understands the necessary information for giving consent, and then decides whether to give consent and expresses their willingness.

Reference 4 Case of ruling related to lawful consent(Supreme court 2014 Du 2638)

- ① Lawful consent means that the user can freely exercise their right to make a decision on personal information. To make sure that ordinary users can easily understand the specifics of the legal notice, the entire legal notice should be clearly indicated.
- ② In addition, even if your user is likely to realize that consent is being sought as well as the legal notices, it is not sufficient, but you have to make sure users are fully aware of the fact and are making a voluntary decision to give consent.
- ③ By placing the legal notice section very close to the user's consent section, allow users to fully understand the legal notice before granting consent, and the expression of willingness to give consent should be made under the condition where users clearly understand that they are giving consent.

③ Consent from a child under age 14

When obtaining consent to process the personal information of a child under age 14, you must obtain consent from their legal representative.


- The minimal information necessary to obtain consent from a legal guardian can be directly collected from a child without consent from their legal representative.
 - * In general, a parent as a parental authority plays the role of legal representative, but depending on circumstances, the legal representative may be a custodian appointed by the court.
- In case of non-face-to-face membership signup such as on the internet, for the check of whether the person is 14 years or older, it is desirable for the information subject to enter the legal date of birth on their own or check the field “14 years or older” on their own.

Example 14 How to verify whether the person is below the age of 14 years old

Example 1

생일이 언제인가요?

생일은 공개되지 않습니다.



2005년 10월 23일

다음

2004	9월	22
2005	10월	23
2006	11월	24

Example 2

서비스 약관에 동의해 주세요.

만 14세 이상입니다.

Example 3

14세 미만입니다.
14세 미만 가입시 법정대리인 동의 필수입니다.

만 14세 미만 회원은 법정대리인(부모님) 동의를 받은 경우만 회원가입이 가능합니다.

이름 _____

이메일 _____ 직접입력 ▾

가입동의받기

4 Guarantee of Rights to Select for Information Subject

① Items not requiring consent should be excluded from the scope of consent requirements

Differentiate items requiring consent from those not requiring consent, and exclude those not requiring consent from the scope of consent requirement.

- If you do not differentiate items requiring consent from items not requiring consent when demanding consent, it can cause confusion, so be extra careful.
- * If the law has special provisions or it is unavoidably necessary to comply with the legal duties, or for the successful establishment and fulfillment of the contract with the information subject, etc., and thus you try to collect personal information and use within the scope of goals.

Personal information protection rights

Article 22 (Method of Obtaining Consent) ③When a personal information manager obtains the consent of an information subject regarding the management of personal information pursuant to Articles 15 (1) 1, Article 17 (1) 1, subparagraph 1 of Article 23 and Article 24 (1) 1, he or she shall classify the personal information that can be managed without obtaining the consent of the information subject and the personal information requiring the consent of the information subject for the purpose of entering into a contract with the information subject. In such cases, a personal information manager is responsible for proving that the personal information is information that can be managed without obtaining consent.

- When processing the personal information that does not require consent, it is desirable to guide the information subject regarding personal information handling items, goals and basis, etc.

Example 15 Case of guiding them on the personal information that can be handled without their consent

▶ Consent to personal information collection and use

If unavoidably necessary for fulfillment of legal duty or due to the existence of special provisions in the law, it is possible to collect and use the personal information without consent from the data subject.

1. Basis for collection and use : Framework Act on Consumers, Article 48, Personal Information Protection Act, Article 15 Paragraph 1 Subparagraph 2
2. Goals of collection : Enforcement of recall duties for defective products
3. Personal information items to be collected : ID, password, email address
4. Ownership and use period : [Framework Act of Consumers, Article 48 states the requirements for recall duty enforcement](#)

② Guarantee that the data subject has the actual right to decide whether to give consent

You should guarantee that the data subject has the actual right to decide whether to give consent or not.

- If the data subject can make a choice, then you should never restrict their use of the service because they did not give consent.
 - In particular, if the setting is such that users cannot move to the next step online unless they accept the minimal personal information handling necessary, then even if the data subject gives consent, it does not necessarily mean that their willingness to give consent is established.

Example 16 Incorrect case of ensuring users cannot move to the next screen unless consent is given

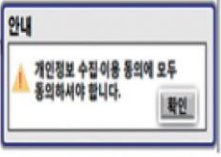
▶ 개인정보 수집·이용 동의

1. 개인정보 수집 목적 : 신상품 홍보 및 맞춤형 광고, 타겟 마케팅
2. 수집하는 개인정보의 항목 : 이메일주소
3. 보유 및 이용기간 : **회원 탈퇴 시**

* 귀하는 개인정보 수집에 동의를 거부할 권리가 있으며, 거부에 따른 불이익은 없습니다.

위 개인정보를 수집·이용하는 것에 동의합니다.(선택) 동의할 동의하지 않음

동의하지 않음을 이유로 다음 화면으로 못 넘어가게 하서는 안 됨



- Generally, in the relation between business owners and workers or administration and ordinary Korea, there is a limitation of guaranteeing freedom to give consent, and thus it is desirable to process the personal information on a basis other than the consent granted.
 - However, consent can be used as the basis for processing the contact to give benefits to the data subject or deliver news to them.

Example 17 Case of consent in the relations between business owners-workers or administration-citizen.

- ▶ (Case that can be interpreted as coercion) If the employer does not fully explain about the need for and justification of monitoring equipment inside the business premises to workers or seek out their understanding but still demands them to give consent, then it is highly likely to be interpreted as coercion.
- ▶ (Case of non-coercion) The administration sends a newsletter only if the user gives consent on the homepage.

② Prohibited disadvantages due to refusal to consent

Just because the data subject refuses to give consent or demands the suspension of handling, etc. you cannot give them disadvantages by demanding additional fees or rewards.

- Just because the data subject does not consent to the handling of personal information beyond the scope of minimal personal information handling necessary, you cannot refuse to supply goods or services to the data subject.
 - Personal information necessary for additional goods and service supplies in addition to the original goods and service supplies

Example 18 **Incorrect case of denying supply of goods or service due to the reason that they did not agree to receive advertisements and marketing**

- ▶ ○○ bank refuses to issue credit card because the data subject did not give consent to advertisement and marketing of check cards, credit cards and loan products.

- If the customer refuses to consent to or demands the suspension of the handling of personal information, etc. they should not be subject to disadvantages by demanding additional fees, or
 - a deceitful or unfair means or method to cause them to misunderstand the costs or results of rejecting consent.
- The Personal Information Protection Act states that when obtaining consent, if there are disadvantages to the information subject should they decline to give consent, the details of such shall be disclosed to them.
 - This does not mean that they can be subject to disadvantages due to rejection of giving consent, it is more like a provision to require that you should notify them of the fact that benefits which normally accompany the consent granted may be absent.

Example 19 **Incorrect case of prohibiting sales of products due to reasons such as rejection of giving consent to unnecessary personal information handling**

- ▶ If a business operator with monopoly status uses their own position to demand the purchase of additional products or services and decides not to sell the original service or products if they do not accept the personal information handling related to it, then it is likely to be a violation of the Personal Information Protection Act.



How to Prepare Consent and Handling Items

1 Checkpoints before Preparing Consent

① Check the personal information necessary for business handling

- Determine the minimum personal information that is required for the business to be handled.
 - ※ Example) If you collect additional personal information other than the necessary personal information for the installation and operation of smartphone app, it can be a violation of the minimum personal information collection principle.
- Check if there is uniquely identifying information* or sensitive information**.
 - * Uniquely identifying information: Resident registration number, passport number, driver's license number, foreigner registration number
 - ** Sensitive information : ideology, belief, admission to or withdrawal from a trade union or political party, political opinions, health, sexual preference, and other personal information that is likely to markedly threaten the privacy of any data subject

② Check if consent is required

- Check if it is necessary to obtain consent(if there is a legal basis).
 - If consent is required, then prepare a consent document; if not, then guide the subject on the basis for collection and use.

Reference 5 Cases where it is possible to collect and use personal information without consent

1. Where there are special provisions in the law or it is unavoidably necessary to comply with legal requirements
2. Where it is unavoidably necessary to fulfill the duties set forth for a public organization according to the law
3. Where it is unavoidably necessary to fulfill and establish the contract with the data subject
4. Where it is deemed obviously necessary for the physical safety and property interests of a subject of information or a third party when the subject of information or his or her legal representative cannot give prior consent because he or she is unable to express his or her intention or by reason of his or her unidentified address, etc.
5. Where it is necessary to achieve the fair benefits of the personal information controller and such has obviously higher priority than the rights of the data subject. In this case, it shall be limited to cases where it is significantly relevant to the fair benefits of the personal information controller and it does not exceed the scope of reasonable benefits.
 - ※ However, ICT service providers can collect and use personal information from the data subject without consent in the following cases.
 1. The personal information is necessary for fulfillment of the ICT service supply contract and it is difficult to obtain consent for due to economical or technical reasons
 2. It is necessary for fee settlement due to ICT service supply
 3. There are special provisions in other laws

- Avoid the handling of sensitive or uniquely identifying information as much as possible.
 - If there is a ground in the laws or separate consent is obtained, then handle it.
 - ※ can handle the resident registration number only if the law, president's ordinance and so on have specific grounds in them.
- If the information subject is a child under age 14, you should obtain consent from their legal representative.

③ Check the ownership period for personal information

- Set the ownership period of personal information collected and used.
 - ※ See the relevant laws or internal privacy policy.
- If the retention period is not set forth throughout the privacy policy, then considering the business characteristics, set the minimal retention period necessary.

④ Confirmation of personal information supply to a third party

- Check whether it is necessary to supply personal information to a third party.
 - 1. A person who receives personal information, 2. Goals of use of personal information by a person who receives it 3. Personal information items provided, 4. Ownership/retention period of personal information for a person who receives it 5. Whether they can refuse consent and if there are disadvantages due to rejection, and the details of such disadvantages.
- Check whether is necessary to get consent for supply to a third party.

Reference 6 Case where it is possible to supply personal information to a third party without consent

1. Where there are special provisions in the law or it is unavoidable for compliance with the legal duties
2. Where it is unavoidably necessary to fulfill the duties set forth for a public organization according to the law
3. Where it is deemed obviously necessary for the physical safety and property interests of a subject of information or a third party when the subject of information or his or her legal representative cannot give prior consent because he or she is unable to express his or her intention or by reason of his or her unidentified address, etc.
 - ※ When it is supplied to a third party overseas, you must obtain consent from the data subject.

- If the information subject is a child less than age 14, you should obtain consent from their legal representative.

⑤ Check whether personal information handling business is consigned

- When consigning a personal information handling business, there is no need to obtain consent from the data subject regarding consignment.
 - ※ Must post information such as consignment facts, consignment details and consignee on the homepage, etc.

⑥ Check whether the personal information is used or supplied for purposes other than the intended purpose

- If you want to change the consented items(item, purposes, ownership and use period, etc.), you should notify the subject accordingly and obtain their consent.
- If you want to use the personal information being collected and used for purposes other than the goals of its collection, or supply it to a third party due to changes in the business environment, separate consent should be obtained.

Reference 7 Case of using personal information for purposes other than the intended purpose of use, or supplying it to a third party

- If there is no possibility of unfairly infringing the benefits of the data subject or third party, and the use falls under any of the following categories, it is permitted.

1. When separate consent is obtained from the data subject
2. When there are special provisions in other laws
3. Where it is deemed obviously necessary for the physical safety and property interests of a subject of information or a third party, when the subject of information or his or her legal representative cannot give prior consent because he or she is unable to express his or her intention or by reason of his or her unidentified address, etc.
4. Where using personal information for any purpose other than the intended purpose or a failure to provide a third person with such information makes it impossible to perform affairs provided for in any other Act, and this has undergone deliberation and resolution by the Protection Committee
5. Where it is necessary to provide personal information to a foreign government or international organization to fulfill a treaty or other international convention
6. Where it is necessary for the investigation of a crime, indictment and prosecution
7. Where it is necessary for a court to proceed with trial-related duties
8. Where it is necessary for the enforcement of punishment, probation and custody

※ ICT service providers are subject to 1 and 2 only, while public organizations are subject to 4 through 8.

⑦ Check the disadvantages if consent is refused

- Need to clarify the details of benefits provided when consent is granted.
 - ※ Unfair disadvantages such as rejection of service or goods sales not directly relevant to the personal information handling should not be applied.

2 Preparation of consent. *Written consent including e-document

① Indicate the title of consent

- Prepare the title of consent to make sure that they can easily understand the goals and content of consent.
 - ※ Example) Consent to personal information collection and use for the ○○ event
- If you want to supply it to a third party as well as to collect and use the information, indicate this fact as well.
 - ※ Example) Consent to personal information collection and use and supply to a third party for OO membership signup

② Indicate the details of consent

- Prepare the details related to items, goals, details, ownership and use periods of personal information to be handled.

Examples

■ Details of personal information collection and use

Items	Goals of collection/use	Ownership/retention period
Name, tel	<u>Sending SMS with ads</u>	<u>1 year</u>

- Necessary items for preparing consent documents include: i) Font size should be at least 9 points and 20% larger than fonts used for other contents, ii) Font color or underline should be used to clearly indicate the content, iii) If there are too many consent items and it is hard to distinguish each of them, the critical items should be clearly marked so that they can be distinguished from others.

Check critical items in the consent document

- ① The fact that a data subject may be contacted to promote goods or services or solicit purchase thereof using the data subject's personal information with respect to the purpose of collecting and using personal information
- ② Sensitive information to be processed
Uniquely identifying information to be processed such as passport number, driver's license number, and alien registration number
- ③ The period of retaining and using personal information (in the case of provision, meaning the period of retaining and using personal information by the recipient)
 - ④ The recipient of personal information and the purpose for which the recipient of the personal information uses such information.

③ Mark the details of supply of personal information to a third party (if necessary)

- When asking for their consent to personal information collection and use, you must clearly distinguish each consent item and make sure that the information subject can clearly understand them.
 - If you try to obtain separate consent, i) Prepare separate consent documents and get a sign and stamp on each of them, ii) Prepare only one consent document but indicate consent boxes for collection/use and supply separately but get only one signature or stamp.

Examples

Recipient	Supplied items	Goals of supplies	Ownership/retention period
<u>OO Co</u>	Name, age, tel	<u>Marketing and ads</u>	<u>1 year and 6 months</u>

※ You have the right to refuse to consent to supply the above personal information. Please note that if you do, you will no longer receive marketing or ads services.

I hereby agree to supply the personal information above.

Year Month Date
Name (sign or stamp)

< If the information subject is a child under age 14 >

I hereby accept the personal information collection and use policy specified above.

Year Month Date
Name of legal guardian (Sign or stamp)

○○ company

④ Indicate the details of handling sensitive and uniquely identifying information (if necessary)

- If there is a need to obtain consent from the data subject before handling sensitive or uniquely identifying information, you should prepare a separate consent document, as shown in the following example.
 - ※ If it is unavoidably necessary due to the legal background, etc., it is desirable to guide them regarding this fact.
- Indicate that they can refuse to consent to providing sensitive and uniquely identifying information and the details of the disadvantages of refusing if any exist.

Example Sensitive information

We hereby collect and use the following sensitive information.

Items	Goals of collection/use	Ownership/retention period
<u>Health information</u>	Supply of customized health information	<u>3 years</u>

※ You have the right to refuse to consent to the above personal information handling.
Please note that if you refuse, there may be limitations on the use of the customized health information.

I hereby accept the sensitive personal information policy specified above.

Year Month Date
Name (sign or stamp)

< If the information subject is a child under the age of 14 >

I hereby accept the personal information collection and use policy specified above.

Year Month Date
Name of legal guardian (Signature or

○○ company

Example Unique identification information

As follows, we hereby collect and use the following uniquely identifying information.

Items	Goals of collection/use	Ownership/retention period
<u>Passport number</u>	Used to identify the person, when issuing an entry permit.	<u>2 years</u>

※ You have the right to refuse to consent to our handling of the above uniquely identifying information.
Please note that if you refuse, there can be limitations on entry permit issuance or your identification.

I hereby agree to the handling of sensitive personal information policy specified above.

Year Month Date
Name (sign or stamp)

< If the information subject is a child under 14 >

I hereby accept the personal information collection and use policy specified above.

Year Month Date
Name of legal guardian (Sign or stamp)

○○ company

- Resident registration number cannot be handled based on consent from the data subject.
- The resident registration number can be handled only if the laws, president's decree, national assembly rules, supreme court rules, constitutional court's small rules, central election management committee's rules or the board of audit and inspection of Korea's rules specifically demands or permits its handling.

⑤ Mark the details of personal information handled without the consent of the data subject

- Prepare the items for which the personal information can be handled without the consent of the data subject as shown in the following example and guide them accordingly.

Examples

According to Article 15 Paragraph 1 Subparagraph 3 of the personal information protection act, we will collect and use the personal information.

Personal information item	Goals of personal information collection and use	Basis for collection
Name, date of birth, address, ○○ license	○○ license issuance and reissuance	「○○ related act」

⑥ Indicate the personal information controller

- At the bottom of the consent document, indicate the personal information controller.
 - ※ When the consignee collects personal information instead of the personal information controller, make sure to indicate the personal information controller and the consignee information separately.

Examples

I hereby accept the personal information collection and use policy specified above.

Year Month Date
Name (sign or stamp)

< If the information subject is a child under 14 >

I hereby accept the personal information collection and use policy specified above.

Year Month Date
Name of legal guardian (Sign or stamp)

Dear ○○ company (Consignee △△ company)

⑦ Indication of the right to refuse consent, and disadvantages resulting therefrom

- If the information subject can refuse consent and there are disadvantages due to rejection, then indicate the details of such disadvantages.
 - ※ Ex) You have the right to refuse to consent to supply the above personal information. If you refuse consent, then you cannot receive the OO service provided.

3 Actions after granting consent

① Confirmation of the willingness of consent

- Expression of willingness to give consent should be checked by signature or seal, etc.
- If the data subject is a child under 14 then check whether the legal representative gave consent.

② Verification of consent

- It is the duty of the personal information controller to verify whether the personal information handled is really necessary for business execution.
- If the personal information is handled based on obtained consent, then in the event of possible disputes regarding the basis for handling the personal information, you should be able to verify that consent was actually obtained.
 - It is possible for the personal information controller to freely select a verification method as long as it can verify that the data subject made a decision based on their own free will.
 - * Recording, written consent stored, etc.
 - However, it is not desirable to handle additional personal information beyond the personal information currently handled for the reason of verifying consent.
 - * If you obtain consent from the data subject to process their name, telephone number or address and then mark additional profile such as date of birth on the consent stored for verification of consent, this type of processing is a case of incorrect handling of personal information.

※ If an ICT service provider obtains consent to collect and use the personal information of users, then the special provision of Article 39-3 of the Information Protection Act is applied. (Reference 8)

Reference 8 Special case of ICT service providers



■ **Strict classification of required and optional consent items**

- Business operator should obtain separate consent for both required items* and optional items when collecting personal information.

* Personal information that must be obtained to provide the service

** Personal information requested of the user based on needs of the business operator or additional functions of the service

※ When signing up for a membership at the homepage of an online shopping mall, contact(email address, and so on) for product ads should be an optional item, not a required item, so that separate consent can be obtained for it.

▶ **Cautions for setting the required consent item necessary for the service supply**

- Even if the personal information is supplied after obtaining users' consent from other business operators according to Article 17 of the personal information protection act, you should review the goals, items, use and storage periods and so on agreed upon by users to make sure that only the minimum personal information is provided.
 - In this case, the information is not directly collected from the user, and thus there is no need to obtain consent as set forth in Article 15 and Article 39-3 Paragraph 1 of the personal information protection act, but you must indicate the content related to the privacy policy so that users can check it anytime they want to.
- In addition, make sure that optional consent items are divided into different service goals and users can give consent on each of them separately, thus enabling the user's selective decisions regarding the supply of their personal information.
 - Optional consent items should not indicate the service goals too broadly but should be specific enough to get consent from the data subject.

■ **How to check the consent from the legal representative**

- Recently, there are many incidents involving supply of inadequate data for children or collection of children's personal information without consent from their legal representative through ICT services in which new technologies such as AI are applied, thus the special provision for ICT service providers states how to obtain consent from the legal representative to reinforce personal information protection for children.
- If the ICT service provider tries to obtain consent from the legal representative of a child below age 14 regarding personal information handling, etc. you can use one of the following methods to check if the legal representative has granted consent.
 - ※ Even if consent is obtained from the legal representative, in some cases, it is unofficial consent or even worse, no consent is obtained at all, thus you must check whether the legal representative actually granted consent.

Method of Confirming Legal Representative's Consent(Enforcement decree Article 48-3)

1. Having the legal representative indicate whether he or she consents on the website that specifies the consent items, and informing the legal representative via mobile text message that the information and communications service provider confirmed the indication of consent
2. Having the legal representative indicate whether he or she consents on the website that specifies the consent items, and receiving credit, debit, etc. card information of the legal representative
3. Having the legal representative indicate whether he or she consents on the website that specifies the consent items, and verifying the identity of the legal representative via an identity verification process on the legal representative's mobile phone, etc.
4. Issuing or delivering the document that specifies the consent items to the legal representative directly or via mail or fax, and having the legal representative submit the document after signing and affixing a seal on the document with respect to the consent items
5. Sending an email that specifies the consent items and having the legal representative send an e-mail with an indication of consent
6. Informing the legal representative of the consent items and receiving the legal representative's consent via phone call, or providing the legal representative with the means (e.g., web address) to confirm the consent items and obtaining the legal representative's consent via a phone call
7. Other methods of informing the legal representative of the consent items and confirming the legal representative's indication of consent in a manner comparable to subparagraphs 1 through 6
8. If it is difficult for an Information and Communications Service Provider, etc. to indicate all the consent items due to the particular nature of the medium by which the personal information is collected, the information and communications service provider may provide the legal representative with the means to confirm the consent items (e.g., web address, telephone number of the workplace, etc.).

■ Collection and use without consent

- (Article 39-3 Paragraph 2 Subparagraph 1 of the Personal Information Protection Act, service use details related personal information) If the personal information is necessary for service contract fulfillment, even if the business operator collects the personal information by using an auto collector or the service use details are created and collected in the service supply process, the minimal collection principle should apply.
 - However, if due to the information's characteristics of being consistently collected during the course of service supply, if it is difficult to obtain consent every time, then it is possible to collect it without consent.
 - Even in this case, you should specify the ownership period, purpose of use and items of personal information collected, and indicate them in the privacy policy.

▶ Use of personal information for purposes irrelevant to the fulfillment of the service supply contract

If personal information is collected for a purpose of use irrelevant to the service contract's fulfillment,* it should be classified as an optional consent item subject to separate consent.

* e.g., behavior pattern information collected from cookies for customized ads for individuals

- (Article 39-3, Paragraph 2, Subparagraph 2 of the Personal Information Protection Act, personal information needed for fee payment) Without consent from the user, it is possible to collect it, but you still have to collect the minimal information necessary to achieve the goal of fee payment.
 - Corresponding cases are service fee related fee amount, fact of payment or non-payment and so on, and you cannot collect information irrelevant to fee payment for the purpose of bond collection and so on.
- (Article 39-3 Paragraph 2 Subparagraph 3 of the Personal Information Protection Act, if there are special provisions in the law) Even if there are special provisions in the Personal Information Protection Act or other laws, but the collection items are defined too broadly, you should collect, use and store the minimal personal information within the scope of goals defined by the law.*

* According to Article 6 of the 「Act on Consumer Protection in Electronic Commerce, etc.」, if you maintain the trade records and store all the personal information apart from the personal information needed for identification of the trade subject, then it is likely to violate the minimum collection principle.

① HR-labor

Consent to personal information collection and use and supply to a third party for hiring drivers (Example)

For the smooth hiring of drivers, we would like to collect and use the following personal information and supply it to a third party as follows. Read the following carefully and decide whether to grant consent.

▶ Details of personal information collection and use

Items	Goals of collection/use	Ownership/retention period
Experience	Proceeding with recruiting procedures and confirmation of experience and qualifications	<u>180 days after the the hiring is terminated according to the 「Fair Hiring Procedure Act」</u>

※ You have the right to refuse to consent to the above personal information collection and use.

But if you do, as recruiting interviews cannot be done smoothly, there may be limitations on hiring.

☞ Do you consent to the personal information handling as specified above?

Consent	<input type="checkbox"/>	Do not consent	<input type="checkbox"/>
---------	--------------------------	----------------	--------------------------

▶ Details of sensitive information collected and used

Items	Goals of collection/use	Ownership/retention period
<u>Mental illness(Y/N)</u>	Driver hiring management	<u>180 days after the the hiring is terminated according to the 「Fair Hiring Procedure Act」</u>

※ You have the right to refuse to consent to the above sensitive information handling.

But if you do, as recruiting interviews cannot be done smoothly, there may be limitations on hiring.

☞ Do you consent to the sensitive information handling as specified above?

Consent	<input type="checkbox"/>	Do not consent	<input type="checkbox"/>
---------	--------------------------	----------------	--------------------------

▶ Details of uniquely identifying information collected and used

Items	Goals of collection/use	Ownership/retention period
<u>Driver's license number</u>	Driver hiring management	<u>180 days after the the hiring is terminated according to the 「Fair Hiring Procedure Act」</u>

※ You have the right to refuse to consent to the above uniquely identifying information handling.

But if you do, as recruiting interviews cannot be done smoothly, there may be limitations on hiring.

☞ Do you consent to the uniquely identifying information handling as specified above?

Consent	<input type="checkbox"/>	Do not consent	<input type="checkbox"/>
---------	--------------------------	----------------	--------------------------

▶ Detail of supply of personal information to a third party

Recipient	Goals of supplies	Supplied items	Ownership/retention period
○○ affiliates	<u>Proceeding with recruiting procedures</u>	Experiences	<u>180 days after the the hiring is terminated according to the 「Fair Hiring Procedure Act」</u>

※ You have the right to refuse to consent to the above personal information supply.

But if you do, as recruiting interviews cannot be done smoothly, there may be limitations on hiring.

☞ Do you consent to the supply of personal information to a third party as specified above?

Consent	<input type="checkbox"/>	Do not consent	<input type="checkbox"/>
---------	--------------------------	----------------	--------------------------

Year Month Date
Name (sign or stamp)

○○ company

③ School

Consent to personal information collection and use and supply to a third party for field trips (sample)

The school would like to collect and use the following personal information and supply it to a third party for the purpose of field trips scheduled to take place on ○ month ○ date ○○ year. Read the following carefully and decide whether to grant consent.

▶ Details of personal information collection and use

Items	Goals of collection/use	Ownership/retention period
Student's name, grade, class and mobile phone number, and guardian's name and mobile phone number	Operation of the field trip	<u>1 year</u>

※ You have the right to refuse to consent to the above personal information collection and use. But if you do, there can be limitations on the field trip study.

☞ Do you consent to the personal information handling as specified above?

Consent	<input type="checkbox"/>	Do not consent	<input type="checkbox"/>
---------	--------------------------	----------------	--------------------------

▶ Details of sensitive information collected and used

Items	Goals of collection/use	Ownership/retention period
<u>Name of disease, infection period, disease infection route</u>	Student's health management	<u>1 year</u>

※ You have the right to refuse to consent to the above sensitive information handling. But if you do, there can be limitations on the field trip study.

☞ Do you consent to the sensitive information handling as specified above?

Consent	<input type="checkbox"/>	Do not consent	<input type="checkbox"/>
---------	--------------------------	----------------	--------------------------

▶ Detail of supply of personal information to a third party

Receiving organization	Goals of supplies	Supplied items	Ownership/retention period
○○ <u>army base</u>	<u>ID check for the person entering and exiting the field trip site</u>	Student's name, grade, class and mobile phone number	<u>1 year</u>

※ You have the right to refuse to consent to the above personal information supply. But if you do, there can be limitations on the field trip study.

☞ Do you consent to supply of personal information to a third party as specified above?

Consent	<input type="checkbox"/>	Do not consent	<input type="checkbox"/>
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<Other notice items>

According to Article 15 Paragraph 1 Subparagraph 3 of the Personal Information Protection Act, we will collect and use the following personal information without the consent of the data subject.

Reason for personal information handling	Personal information items	Basis for collection
Academic affairs management	Student's name., date of birth and address, and guardian's name and date of birth	Article 25 of the 「Elementary and Junior High School Education Act」 Article 21 of the 「School Life Record Preparation and Management Rules」

Year Month Date
 Self Name (Sign or stamp)
 Name of legal guardian (Sign or stamp)

Dear ○○ school principal

⑤ Travel agency(travel, lodging, rental)

Consent to personal information collection and use and supply to a third party for membership signup(sample)

For smooth operation of the membership of the homepage of OO travel company, we would like to collect and use the following personal information and supply it to a third party. Read the following carefully and decide whether to grant consent.

▶ **Details of personal information collection and use**

Items	Goals of collection/use	Ownership/retention period
Name(Korean/English), contact	Travel product and air ticket reservation, membership mileage management	<u>2 year</u>

※ You have the right to refuse to consent to the above personal information collection and use.
But if you do, there can be limitations on the travel product and air ticket reservation and membership mileage service use.

☞ Do you consent to the personal information handling as specified above?

Consent	<input type="checkbox"/>	Do not consent	<input type="checkbox"/>
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▶ **Detail of supply of personal information to a third party**

Receiving organization	Goals of supplies	Supplied items	Ownership/retention period
<u>○○ hotel</u>	<u>Ads and marketing</u>	Name, contact, interesting travel destinations, travel history	<u>1 year</u>

※ You have the right to refuse to consent to the above personal information supply.
But if you do, there can be limitations on the advertisement and marketing service use.

☞ Do you consent to the supply of personal information to a third party as specified above?

Consent	<input type="checkbox"/>	Do not consent	<input type="checkbox"/>
---------	--------------------------	----------------	--------------------------

Year Month Date
Name (Sign or stamp)
Dear ○○ travel agency

④ Construction

Consent to personal information collection and use and supply to a third party for membership signup on the homepage(sample)

For smooth operation of the membership on the homepage of OO construction company, we would like to collect and use the following personal information and supply it to a third party. Read the following carefully and decide whether to grant consent.

▶ Details of personal information collection and use

Items	Goals of collection/use	Ownership/retention period
Name, address, contact	New house owner recruiting information, construction industry trend information provided.	<u>1 year</u>

※ You have the right to refuse to consent to the above personal information collection and use.
But if you do, there can be limitations on your use of new house or construction trend information.

☞ Do you consent to the personal information handling as specified above?

Consent	<input type="checkbox"/>	Do not consent	<input type="checkbox"/>
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▶ Detail of supply of personal information to a third party

Recipient	Goals of supplies	Supplied items	Ownership/retention period
○○ <u>architecture research center</u>	<u>Customized construction trends information collection</u>	Name, address, contact	<u>1 year</u>

※ You have the right to refuse to consent to the above personal information supply.
But if you do, there can be limitations on your use of the customized construction trend information.

☞ Do you consent to supply your personal information to a third party as specified above?

Consent	<input type="checkbox"/>	Do not consent	<input type="checkbox"/>
---------	--------------------------	----------------	--------------------------

Year Month Date
Name (Sign or stamp)
Dear ○○ construction CEO

⑤ **Wired broadcasting company**

Consent to personal information collection and use and supply to a third party for wired broadcasting service signup

For smooth operation of the membership signup for cable TV on the homepage of OO wired broadcasting company, we would like to collect and use the following personal information and supply and consign it to a third party. Read the following carefully and decide whether to grant consent.

▶ **Details of personal information collection and use**

Items	Goals of collection/use	Ownership/retention period
Name, address, contact	Cable TV service supply	<u>2 year</u>

※ You have the right to refuse to consent to the collection and use of the above personal information. But if you do, there can be limitations on the cable TV use.

☞ Do you consent to the personal information handling as specified above?

Consent	<input type="checkbox"/>	Do not consent	<input type="checkbox"/>
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▶ **Detail of supply of personal information to a third party**

Recipient	Goals of supplies	Supplied items	Ownership/retention period
<u>○○ research</u>	<u>Cable TV satisfaction level surveys</u>	Name, tel	<u>1 year</u>

※ You have the right to refuse to consent to the above personal information supply. But if you do, there can be limitations on the use of the service through cable TV satisfaction surveys.

☞ Do you consent to supply personal information to a third party as specified above?

Consent	<input type="checkbox"/>	Do not consent	<input type="checkbox"/>
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▶ **Details of personal information handling consignment (notice)**

Consignee	Business details
○○ ICT	New cable TV installation and disposal, repair and maintenance service

Year Month Date

Name (Sign or stamp)

Dear ○○ cable TV company

한눈에 보는 동의서 작성 시 확인사항

점검 항목	확인
<p>1. 처리하고자 하는 업무에 반드시 필요한 최소한의 개인정보인가요?</p>	<input type="checkbox"/>
<p>2. 정보주체의 동의가 필요한가요? 정보주체의 동의가 필요하지 않은 경우인지 확인하였나요?</p> <p><<동의 없이 개인정보 수집·이용이 가능한 경우(보호법 제15조)>></p> <ol style="list-style-type: none"> 1. 법률에 특별한 규정이 있거나 법령상 의무 준수를 위해 불가피한 경우 2. 공공기관이 법령 등에서 정하는 소관업무 수행을 위해 불가피한 경우 3. 정보주체와의 계약의 체결 및 이행을 위해 불가피하게 필요한 경우 4. 정보주체 또는 법정대리인이 의사표시를 할 수 없는 상태에 있거나 주소불명 등으로 사전 동의를 받을 수 없는 경우로서 명백히 정보주체 또는 제3자의 급박한 생명, 신체, 재산의 이익을 위하여 필요하다고 인정되는 경우 5. 개인정보처리자의 정당한 이익을 달성하기 위하여 필요한 경우로서 명백하게 정보주체의 권리보다 우선하는 경우. <p style="text-align: center;">※ 이 경우 개인정보처리자의 정당한 이익과 상당한 관련이 있고 합리적인 범위를 초과하지 아니하는 경우에 한함</p> <p>※ 다만, 정보통신서비스 제공자는 다음의 경우에 동의없이 수집·이용 가능</p> <ol style="list-style-type: none"> 1. 정보통신서비스 제공에 관한 계약 이행을 위해 필요한 개인정보로서 경제적·기술적인 사유로 통상적인 동의를 받는 것이 뚜렷하게 곤란한 경우 2. 정보통신서비스의 제공에 따른 요금정산을 위하여 필요한 경우 3. 다른 법률에 특별한 규정이 있는 경우 <p><<동의 없이 제3자 제공이 가능한 경우(보호법 제17조)>></p> <ol style="list-style-type: none"> 1. 법률에 특별한 규정이 있거나 법령상 의무 준수를 위해 불가피한 경우 2. 공공기관이 법령 등에서 정하는 소관업무 수행을 위해 불가피한 경우 3. 정보주체 또는 그 법정대리인이 의사표시를 할 수 없는 상태에 있거나 주소불명 등으로 사전 동의를 받을 수 없는 경우로서 명백히 정보주체 또는 제3자의 급박한 생명, 신체, 재산의 이익을 위하여 필요하다고 인정되는 경우 <p style="text-align: center;">※ 국외 제3자에게 제공 시에는 정보주체의 동의 필요</p> <p><<동의 없이 수집 목적 외로 개인정보를 이용하거나 제3자 제공이 가능한 경우(보호법 제18조)>></p> <ol style="list-style-type: none"> 1. 다른 법률에 특별한 규정이 있는 경우 2. 정보주체 또는 그 법정대리인이 의사표시를 할 수 없는 상태에 있거나 주소불명 등으로 사전 동의를 받을 수 없는 경우로서 명백히 정보주체 또는 제3자의 급박한 생명, 신체, 재산의 이익을 위하여 필요하다고 인정되는 경우 3. 개인정보를 목적 외의 용도로 이용하거나 이를 제3자에게 제공하지 아니하면 다른 법률에서 정하는 소관 업무를 수행할 수 없는 경우로서 보호위원회의 심의·의결을 거친 경우 4. 조약, 그 밖의 국제협정의 이행을 위하여 외국정부 또는 국제기구에 제공하기 위하여 필요한 경우 5. 범죄의 수사와 공소의 제기 및 유지를 위하여 필요한 경우 6. 법원의 재판업무 수행을 위하여 필요한 경우 7. 형(刑) 및 감호, 보호처분의 집행을 위하여 필요한 경우 <p style="text-align: center;">※ 정보통신서비스 제공자는 1만 해당, 3-7는 공공기관만 해당</p> <p>▶ 개인정보 처리 위탁의 경우, 위탁사실, 위탁하는 업무의 내용, 수탁자 등을 홈페이지 등에 게시 ▶ 정보주체의 동의 없이 개인정보를 처리하는 경우에는 처리 근거를 작성하여 안내</p>	<input type="checkbox"/>

점검 항목

확인

3. 동의서의 목적과 내용을 쉽게 이해할 수 있도록 동의서 제목을 작성하였나요?
수집·이용과 함께 제3자 제공도 하려는 경우에 이에 대한 사실도 제목에 기재하였나요?

※ 예시) ○○이벤트를 위한 개인정보 수집·이용 동의서, ○○회원 가입을 위한 개인정보 수집·이용 및 제3자 제공 동의서

4. 처리하려는 개인정보의 항목, 목적, 처리내용, 이용 및 보유기간 등의 내용을 작성하였나요?
아래의 중요 사항은 i) 글씨의 크기는 최소한 9포인트 이상으로서 다른 내용보다 20퍼센트 이상 크게, ii) 글씨의 색깔, 굵기 또는 밑줄 등을 통하여 그 내용이 명확히 표시, iii) 동의 사항이 많아 중요한 내용이 명확히 구분되기 어려운 경우에는 중요한 내용이 쉽게 확인될 수 있도록 그 밖의 내용과 별도로 구분하여 표시하였나요?

<<동의서의 중요한 사항>>

- 개인정보의 수집·이용 목적 중 재회나 서비스의 홍보 또는 판매 권유 등을 위하여 해당 개인정보를 이용하여 정보주체에게 연락할 수 있다는 사실
- 처리하려는 개인정보 항목 중 민감정보, 고유식별정보(여권번호, 운전면허번호 및 외국인등록번호)
- 개인정보의 보유 및 이용 기간(제공 시에는 제공받는 자의 보유 및 이용 기간)
- 개인정보를 제공받는 자와 제공받는 자의 개인정보 이용 목적

5. 민감정보, 고유식별정보 처리에 대한 동의 여부를 확인하였나요?

- 민감정보나 고유식별정보를 처리하기 위하여 정보주체의 동의가 필요한 경우, 동의서를 별도로 작성하여야 함
※ 법령의 근거 등으로 동의가 불필요한 경우, 그 내용을 안내하는 것이 바람직
- 민감정보나 고유식별정보 처리의 동의를 거부할 권리가 있다는 사실 및 동의 거부에 따른 불이익이 있는 경우에는 그 불이익 내용을 기재

6. 개인정보 처리 주체를 기재하였나요? 정보주체의 동의사를 확인하였나요?
동의를 입증할 수 있는 방법을 정하였나요?

- 동의서 하단에는 개인정보 처리 주체를 명시
- 동의사를 서명이나 날인 등으로 확인
- 정보주체가 만 14세 미만의 아동이라면 법정대리인의 동의 확인
- 향후 분쟁 등에 대비하여 동의 내용의 녹음, 서면 동의서의 보관 등 정보주체가 자유로운 의사로 동의하였음을 입증할 수 있는 방법 마련

7. 동의 거부권 및 동의 거부에 따른 불이익을 안내하였나요?

- 개인정보 처리에 관한 동의를 거부할 권리가 있다는 사실 및 동의 거부에 따른 불이익이 있는 경우에는 그 불이익 내용을 기재
※ 예시) 위 개인정보 수집·이용 동의를 거부할 권리가 있습니다. 동의를 거부하는 경우 동의 시에 제공하는 ○○ 서비스를 제공받을 수 없습니다.

동의하기 전에 이것만은 확인하세요!

개인정보 처리자가 필요한 **최소한의** 개인정보를 처리하고 있는지 살펴보셨나요?

개인정보 처리 주체, 내용 등이 **명확하게** 고지되어 있나요?

적극적인 동작이나 진술을 통해 **동의의사**를 표현하실 수 있나요?

동의 **거부**로 인하여 서비스 이용을 **제한**받고 있으신가요?



개인정보 침해 사실이 있는 경우에는 개인정보침해신고센터
(privacy.kisa.or.kr, 국번없이 118)에 피해 내용을 신고할 수 있습니다.

