



# Information Security & Data Privacy

NC implements the decision-making process and necessary controls and procedures to oversee and manage the risks and opportunities associated with information security and data privacy.

## Mandate and Management & Oversight

 Decision-making Body	Category	Information Security Committee	Data Privacy Committee
	Composition	Head of the Information Security Center (Chair), Head of the Privacy Protection Division, and executives at major departments under the CEO and COO	Head of the Privacy Protection Division (Chair), Head of the Information Security Center, Head of the Legal Division, Head of the Global Communication Center, and Head of the Ethics & Compliance Division
	Mandate (Regulations)	Deliberate and decide on key security issues (Information security regulations)	Deliberate and decide on key issues including modifications in data privacy-related work (Personal data processing guidelines/Data Privacy Committee procedure)
	Management and Oversight	<ul style="list-style-type: none"><li>• Comprehensive security measures and action plans, organizational operation</li><li>• Establish/amend information security regulations, guidelines, and key policies</li><li>• Perform information security audits and review implementation progress</li><li>• Other matters requiring approval for security operations</li></ul>	<ul style="list-style-type: none"><li>• Establish the data privacy management system and operational matters</li><li>• Establish/amend data privacy regulations, guidelines, and key policies · Manage data privacy risk assessment and address data breaches · Consult on other data privacy issues related to respective operations</li></ul>
	Cycle	Annual	Annual
	2022 Activity	<ul style="list-style-type: none"><li>• Amended the key details of regulations/guidelines</li><li>- Introduced new processes including a security assessment process</li><li>- Amended internal regulations in line with statutory amendments</li></ul>	<ul style="list-style-type: none"><li>• Amended the key details of regulations/guidelines</li><li>- Amended internal regulations in line with statutory amendments</li></ul>
 Dedicated Organization	Organization	Information Security Center	Privacy Protection Division
	Headed by	CISO (Chief Information Security Officer) * Head of the Information Security Center	CPO (Chief Privacy Officer) * Head of the Privacy Protection Division
	Mandate	<ul style="list-style-type: none"><li>• Establish information security strategies and policies, develop security technology</li><li>• Operate the information security management system and raise employees' awareness</li><li>• Establish and operate a security breach response system</li><li>• Engage in activities to identify security threats and beef up security operations</li></ul>	<ul style="list-style-type: none"><li>• Establish data privacy strategies and policies</li><li>• Operate the data privacy management system and raise employees' awareness</li><li>• Prevent privacy risks</li></ul>

## Policy

### Information Security Regulations and Policies

NC establishes and implements information security regulations to keep our information assets safe, and amends them on an annual basis. These regulations apply to our employees, including contract workers, dispatched workers, visitors, partners (companies and individuals who sign a contract with NC and perform work accordingly), and our subsidiaries in Korea and overseas. Our subsidiaries operate their information security regulations in reflection of their distinctive business conditions. We hold global consultative meetings to elevate our security performance and maintain our information security management system, and launch Security Care Service as our security check activity to work as one team at the global level.

### Data Privacy Regulations and Policy

NC establishes and implements data privacy regulations to keep personal data safe, and amends these regulations on an annual basis. These regulations apply to customers, our employees including contract workers, visitors, and suppliers. They also apply to our subsidiaries in Korea and abroad, and each subsidiary operates their own data privacy regulations and guidelines in reflection of their business conditions.

NC and all our subsidiaries manage the personal data of service users in accordance with respective personal data processing guidelines. In line with our advancement into the global games market, we have stipulated our Global Privacy Policy to enable our global users to access our data privacy policy at any given time. We have minimized the collection of personal data in accordance with respective personal data processing guidelines, do not store sensitive information as specified in the Personal Data Protection Act, and securely store personal data such as phone number and account information that is likely to pose high risks when leaked through encryption and de-identification. We use personal data collected and stored for their intended purposes only, and do not loan, sell or provide such data to third parties. We make sure that personal data is immediately disposed of once it has fulfilled its intended purpose. New vendors who process personal data on behalf of NC are subject to NC's data privacy policy.