

Maestro Compass — Privacy Policy

Operator (data controller): 마에스트로 컴퍼스 (Maestro Compass), Business Registration No. 250-17-01863, owner: An Alexey (Republic of Korea)
Privacy contact: contact@maestro-compass.com **Website:** maestro-compass.com **Effective date:** [to be filled in at publication] **Version:** 0.2 — draft, pending legal review before publication (recommend checking compliance with Korea’s Personal Information Protection Act)

1. What Data We Collect

Mandatory data (the Platform cannot be used without this): name, phone number, email address.

Data you provide voluntarily: content you post — listing text and photos, business Directory cards, reviews, and review responses. We do not currently have separate optional fields at registration beyond the contact details above; if we add any (for example, an optional KakaoTalk ID), we will update this section and clearly mark them as optional.

Technical data: IP address, device and browser type, cookies, and usage data (pages visited, time on site) — collected automatically to operate and secure the site, and for basic analytics.

Payment data (once a payment provider is connected): when purchasing a Pro/Top subscription or a boost, your card details are processed directly by the payment provider (Toss Payments / KakaoPay / PortOne — provider to be finalized). We do not store full card details on our servers — we only receive payment confirmation and the minimum information needed to reflect your subscription status.

1.5. We do not verify user identity. The Platform does not perform official identity verification through Korean identification institutions (such as PASS, 본인인증, 아이핀, or similar services). The name, phone number, and email provided at registration are self-reported by the user, without cross-checking against government databases or identification documents. The “Verified” badge shown on Directory business listings (see Terms of Use, Section 7.3) is also not an official identity verification through the institutions mentioned above — it is only a basic check by the administration confirming that a business exists and its contact details are valid.

We do not collect special categories of personal data (health, religion, political views, etc.) and do not ask users for it.

2. How We Use Your Data

- creating and maintaining your account, confirming registration intent, identifying you when you contact support;
 - publishing and displaying listings and Directory cards;
 - processing payments for paid plans and boosts (via the payment provider);
 - moderating content and handling reports;
 - communicating with you about your use of the Platform (account activity notices, responses to inquiries);
 - keeping the site secure and preventing fraud and abuse;
 - basic analytics to improve the Platform.
- We do not use your personal data for purposes unrelated to operating the Platform without separate consent (for example, third-party marketing).

3. Legal Basis for Processing and Whether Consent Is Mandatory

- 3.1. We process your data based on: your consent when registering an account; the necessity of performing our contract with you (providing the Platform’s services, including paid plans); our legitimate interests (security, fraud prevention); and legal requirements where applicable.
- 3.2. Consent to process your mandatory data (Section 1) and to store it with our infrastructure providers (Section 5) is required to use the Platform. Without this consent, using the Platform, including creating an account, is not possible — this is a basic part of providing the Service, not an optional add-on.
- 3.3. If we request consent for optional processing in the future (for example, marketing communications), declining that consent will not affect the availability of the Platform’s core features.

4. Outsourcing of Data Processing

4.1. To operate the Platform, we outsource certain personal data processing to the following providers:

Provider	Role	Data processed
Supabase Inc.	Database storage, user authentication	Account data, user-generated content, technical data
Amazon Web Services (AWS)	Cloud infrastructure, hosting	Account data, user-generated content, technical data
Payment provider (Toss Payments / KakaoPay / PortOne — to be finalized)	Processing subscription and boost payments	Payment data

- 4.2. In line with Article 25 of the Personal Information Protection Act, our contracts with these providers prohibit using personal data for purposes unrelated to the outsourced work, require technical and organizational safeguards, restrict further sub-outsourcing, preserve our right to audit and supervise the provider, and establish the provider’s liability for damages.
- 4.3. If the providers we use or the scope of the work outsourced to them changes, we will update this section without delay.

5. Cross-Border Data Transfer

- 5.1. The Platform’s infrastructure runs on Supabase and Amazon Web Services (AWS) servers. As of now, these servers are physically located **outside the Republic of Korea** (the exact country/region will be added here once the specific hosting region is finalized — for example, Singapore or the United States, depending on the Supabase/AWS configuration chosen).
- 5.2. Data transferred: account data (name, phone, email), user-generated content (listings, Directory cards, reviews), technical data (IP, cookies, usage logs).
- 5.3. Recipient: Supabase Inc. and Amazon Web Services, Inc. (or their relevant regional affiliates, depending on the hosting region chosen).
- 5.4. Purpose of transfer: data storage and operation of the Platform (cloud infrastructure and database).
- 5.5. Timing and method of transfer: data is transferred and stored continuously, in real time, as the Platform is used, over an encrypted connection.
- 5.6. Retention period abroad: the same as set out in Section 6 of this Policy — Supabase and AWS act as processors on our instructions and under their own Data Processing Agreements, rather than independently determining the purposes or duration of processing.
- 5.7. Legal basis for transfer: your consent under Article 28-8(1) of the Personal Information Protection Act. Because storing data on this infrastructure is necessary to operate the Platform, consent to this transfer is required to use the Platform (see Section 3.2).
- 5.8. We will make reasonable efforts to bring this section fully into compliance, including specifying the exact server location, before this Policy is published.

6. Data Retention Periods

Data category	Retention period	Basis
Account data (name, phone, email)	Until account deletion or termination of the Platform usage agreement; if a debt or dispute remains unresolved, until it is resolved	Personal Information Protection Act
Payment and service-delivery records (once a payment provider is connected)	5 years	Act on Consumer Protection in Electronic Commerce (전자상거래 등에서의 소비자보호에 관한 법률)
Access logs to the personal data processing system	At least 6 months	Personal Information Protection Act and related technical-safeguard regulations
User-generated content (listings, reviews) after account deletion	Deleted or anonymized within 5 days of retention no longer being necessary	Internal data destruction policy (see Section 7)

7. Data Destruction

- 7.1. We destroy personal data without delay once the purpose of its processing has been achieved, except where longer retention is required by law (see Section 6).
- 7.2. **Destruction timeline:** if a data retention period has expired, destruction occurs within 5 days of that expiration; if data becomes unnecessary for another reason (purpose achieved, discontinuation of a related Platform feature), destruction occurs within 5 days of that determination.
- 7.3. **Procedure:** electronic data is deleted using methods that prevent recovery. Where data must be retained longer under legal requirements, it is moved to separate, access-restricted storage and used only for the purpose justifying the extended retention — not for the Platform’s day-to-day operation.

8. Security Measures

In line with Article 29 of the Personal Information Protection Act, we apply the following technical and organizational measures:

- limiting the number of staff with access to personal data to the minimum necessary;
- encrypting passwords and other sensitive data at rest and in transit;
- retaining access logs to the personal data processing system for at least 6 months, protected against tampering and unauthorized access;
- controlling access to infrastructure — access to servers and databases is restricted and protected through the security measures and agreements provided by our infrastructure providers (Supabase, AWS).

9. Your Rights

You have the right to:

- request access to the personal data we hold about you;
- request correction of inaccurate data;
- request deletion of your data (subject to the limitations in Section 6);
- request suspension of processing of your data;
- withdraw your consent to processing at any time (this may limit access to some Platform features, including basic account use, where the consent withdrawn was mandatory — see Section 3.2);
- file a complaint with Korea’s Personal Information Protection Commission (개인정보보호위원회) if you believe your rights have been violated.

We will respond to access and correction requests within 10 business days of receipt.

To exercise these rights, contact: **contact@maestro-compass.com**

10. Children and Minors

- 10.1. The Platform is not intended for individuals under 14 years old, and we do not knowingly collect personal data from such individuals. If we learn that a child under 14's data was collected without a legal representative's consent, we will delete it.
- 10.2. Users aged 14-18 may create an account and use the Platform's basic features; however, paid transactions (subscriptions, boosts) require a legal representative's consent, as described in the Terms of Use.
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11. Cookies and Analytics

We use cookies and similar technologies to operate the site, remember preferences, and collect basic usage statistics. You can manage cookies through your browser settings; disabling some cookies may limit site functionality.

12. Privacy Officer

► **Personal Information Protection Officer (개인정보 보호책임자)** Name: An Alexey Title: Representative / business owner (마에스트로 컴퍼스, Reg. No. 250-17-01863) Email: contact@maestro-compass.com Phone: [contact phone number to be added before publication]

For all inquiries, complaints, and requests related to the processing of personal data in connection with the Platform, you may contact the Privacy Officer directly. We will respond to inquiries without delay.

13. Changes to This Policy

We may update this Policy. For material changes, we will notify users on the site at least 7 days before the changes take effect.

14. Contact

For any questions about how we handle personal data, contact: **contact@maestro-compass.com**