

Korea Privacy Statement

Last updated: July 1, 2021

Scope of this policy

This Privacy Statement applies to all Morningstar Korea users and customers (or “you”) who use, order, or interact with Morningstar or any of its products or services. This Privacy Statement applies to the personal data you provide us, whether through our website or otherwise.

Morningstar Korea is part of the Morningstar, Inc. group of companies. To the extent that there are discrepancies between this Morningstar Korea Privacy Statement and Morningstar’s global policies and procedures, this Privacy Statement will take precedence in relation to Morningstar Korea.

How we collect your information

Morningstar collects your personal information through your interactions with us or from third-party sources. Specifically, we collect your information when:

- You use, purchase, or subscribe to our products or services.
- You interact with us, including when you ask us for support, attend one of our events, or otherwise contact us.
- You visit our sites or use our products. If you would like more information about how we use cookies to collect personal information, please read our [Cookie Policy](#).

We may also collect information about you from third parties, including:

- Your employer, organization, or other third party who arranges access to our products and services for you.
- Our partners and other service providers that work with us to provide you with our products or services. For example, with your consent, we may receive your information from your bank or other financial institutions.
- Your financial advisor, who may give us personal information about you when they use our products or services.
- Other publicly available sources.

Personal information we collect

The types of personal information we collect depend on your interactions with us and may include the following:

- Name and contact information: Your first and last name, email address, postal address, phone number, and other contact information.
- Account credentials: Your user ID, password, password hints, and other similar security information used to authenticate your account.
- Demographic information: Your age, sex, geographic location, and preferred language.
- Payment details: Your bank account information, credit card number, and other information used to process payments.
- Subscription and usage information: Information about the products or services you subscribe to and how you use them, including preferences, browsing history, and help information.
- Device and network information: Information about your device, such as IP address, location, or internet service provider.
- Financial and portfolio information: Information about your finances, portfolio, and transactions.
- Audio or video information: If you visit a Morningstar location or participate in a Morningstar event, Morningstar may record your image or voice.
- User content: Your files or other information you upload to our products or services.

How we use personal information

How Morningstar uses your information depends on the product and service that you use and your relationship with us. We use personal information as permitted under applicable law, as you request or consent to, and for the following purposes:

- Provide products and services, including to verify your identity, personalize the content you receive, create and administer your account, and send important account and product update information.
- Provide content or offers of content from third parties that you request.
- Provide customer service, as well as technical and product support.
- Provide you with marketing or targeted third-party advertisements.
- Conduct research and develop, improve, test, and enhance the features and functions of our products and services.
- Protect your, our, or third parties' networks, systems, property, or physical safety.
- Comply with requests from regulatory agencies, law enforcement, and other public and government authorities.
- Enforce our contracts, terms, and conditions, or otherwise exercise our legal rights; defend ourselves from claims; and comply with laws and regulations that apply to us or third parties with whom we work.
- Generate anonymous, aggregated data that we use for research and product development. We may publish or otherwise provide the results of this research data in our products and services.
- Participate in any merger, acquisition, or other corporate transaction.
- Meet our or third parties' audit and compliance requirements.

How we share personal information

Morningstar does not share personal information with third parties. If at any time we begin to share personal information with third parties, we will notify you by updating this policy.

Links to other websites

Where applicable, Morningstar may provide links to one or more third-party sites within our products or services. This Privacy Statement does not apply to those sites. We encourage you to read any third-party site's privacy policy before providing any of your personal information to them.

How we protect, store, and transfer your personal information

Morningstar maintains a comprehensive information security program intended to keep your information safe. We have technical, physical, and organizational measures in place to protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of personal information. The measures we use are appropriate to the nature, scope, and purpose for which we use the personal information we collect.

Our security and privacy policies are periodically reviewed and enhanced as necessary and only authorized individuals have access to the information provided.

Morningstar companies, its operations, workforce, and service providers are located throughout the world. Depending on how you interact with us, your personal information may be handled and stored in, accessed from, or transferred to different countries. Whenever we transfer personal information to different countries, we take steps to ensure that the personal information we transfer receives adequate protection in the jurisdictions that we handle or store it.

If you have additional questions about how we protect your information, please [contact us](#).

How long do we keep your information?

We may collect and use personal information as prescribed in the General Privacy Statement. In principle, **when the purposes of collection and use of the information are attained**

or the retention period is expired, we will destroy the information without delay. Also, if a data subject withdraws his/her consent to the collection and use of the information, or requests deletion thereof, we will destroy the information without delay. Notwithstanding anything to the contrary herein, if the personal information is required to be preserved under applicable laws and regulations, we will continuously retain the information for the period as prescribed under such laws and regulations, and use only for the purposes as prescribed under the laws and regulations.

Destruction of personal information

We will destroy personal information without delay when the information becomes unnecessary, upon, including, without limitation, the expiration of the retention period set forth above or attainment of the purposes of processing consented to by the relevant data subject. However, if the information is required to be preserved under other laws and regulations notwithstanding that the retention period consented by the data subject is expired or the purposes of processing personal information are attained, such information will be transferred to a separate database or storage place. We will permanently destroy any personal information recorded and/or saved in electronic format by using a means that can ensure that it cannot be restored and recovered. Personal information printed on paper will be destroyed by shredding or incineration thereof.

Individual data access requests

You can exercise your rights by sending us a personal data access request [here](#). In response to a request, we'll ask you for additional information to verify your identity and may ask that you provide further information to help us better fulfill your request. A user may exercise such rights through his or her legal guardian or agent empowered by the user and in such a case, a power of attorney must be submitted to us.

If you request that we erase your personal information and we process that request, we may still retain certain elements of your personal information as permitted by law, including to comply with legal, regulatory, or our own policy requirements.

We won't discriminate against our customers who choose to exercise their rights to access, control, or delete their personal information. Some of our products and services, however, may require your personal information. If you choose not to provide your personal information, you may not be able to use those products or services.

Cookies and similar technologies

We use cookies and similar technologies to recognize when you've signed into our sites and personalize your experience with our products and services. For more information about how we use cookies, please read our [Cookie Policy](#).

Information from children under 14

We are a general audience website and do not direct any of our content specifically at children under the age of 14 years old. Users must be at least 18 years old to use the Site. We understand and are committed to respecting the sensitive nature of children's privacy online and we do not knowingly collect information online from children under 14. If you are a parent or guardian and you learn that your children have created an account or otherwise provided us with personal information, please contact us. If we become aware that we have collected personal information from a child under age 14 without verification of parental consent, we will take steps to remove that information from our servers.

Product-specific policies

- [Sustainalytics, a Morningstar company](#)
- [PitchBook](#)

How we revise this statement

Our business frequently changes, and we may need to update this statement to reflect those changes. When we make changes to this Privacy Statement, we'll revise the "last updated" date at the top of this page. If we make material changes to this statement, we'll notify you directly as required by law.

Chief Privacy Officer

We appointed the following person as the CPO to process personally identifiable information and handle complaints regarding processing personal information. A data subject may file any complaints relating to protection of personal information with the CPO at the following contact details:

- Name – Abigail Yoon (한글이름: 윤이나)
- Contact Information – Telephone: 02-3771-0751, Email: PrivacyKR@morningstar.com

Addendum to Morningstar General Privacy Statement for Korean Users

This addendum to the General Privacy Statement (the “Addendum”) is to address matters that are necessary to process personal information of clients and customers of Morningstar in compliance with Korean privacy laws and regulations including the Personal Information Protection Act (the “PIPA”). Please refer to the Terms and Conditions and General Privacy Statement for more details on the conditions of using the Site.

1. Retention Period of Personal Information

We may collect and use personal information as prescribed in the General Privacy Statement. In principle, **when the purposes of collection and use of the information are attained or the retention period is expired**, we will destroy the information without delay. Also, if a data subject withdraws his/her consent to the collection and use of the information, or requests deletion thereof, we will destroy the information without delay. Notwithstanding anything to the contrary herein, if the personal information is required to be preserved under applicable laws and regulations, we will continuously retain the information for the period as prescribed under such laws and regulations, and use only for the purposes as prescribed under the laws and regulations.

2. Destruction of Personal Information

We will destroy personal information without delay when the information becomes unnecessary, upon, including, without limitation, the expiration of the retention period set forth above or attainment of the purposes of processing consented to by the relevant data subject. However, if the information is required to be preserved under other laws and regulations notwithstanding that the retention period consented by the data subject is expired or the purposes of processing personal information are attained, such information will be transferred to a separate database or storage place. We will permanently destroy any personal information recorded and/or saved in electronic format by using a means that can ensure that it cannot be restored and recovered. Personal information printed on paper will be destroyed by shredding or incineration thereof.

3. Third-Party Provision of Personal Information

Where and if it became applicable, we would disclose such third parties.

4. Delegation of Processing Personal Information

For the performance of the services detailed in this privacy policy, we delegate the processing of personal information to the following professional service providers,

Delegatee	Description of Services Delegated
<p>Morningstar’s Headquarters and other Affiliates</p> <p>(Affiliates of Morningstar, Inc. are listed in the latest 10-K Exhibit 21.1 at the link below.</p> <p>https://shareholders.morningstar.com/investor-relations/financials/sec-</p>	<ul style="list-style-type: none"> ▪ Provide products and services, including to verify your identity, personalize the content you receive, create and administer your account, and send important account and product update information. ▪ Provide content or offers of content from third parties that you request. ▪ Provide customer service, as well as technical and product support. ▪ Provide you with marketing or targeted third-party advertisements. ▪ Conduct research and develop, improve, test, and enhance the features and functions of our products and services. ▪ Protect your, our, or third parties' networks, systems, property, or physical safety.

filings/default.aspx)	<ul style="list-style-type: none"> ▪ Comply with requests from regulatory agencies, law enforcement, and other public and government authorities. ▪ Enforce our contracts, terms, and conditions, or otherwise exercise our legal rights; defend ourselves from claims; and comply with laws and regulations that apply to us or third parties with whom we work. ▪ Generate anonymous, aggregated data that we use for research and product development. We may publish or otherwise provide the results of this research data in our products and services. ▪ Participate in any merger, acquisition, or other corporate transaction. ▪ Meet our or third parties' audit and compliance requirements.
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5. Data Transfers to a Third Country

We transfer personal information overseas as follows:

Recipient (Contact Information of Information Manager)	Country where Recipient is Located*	Date and Method of Transfer	Types of Personal Information Transferred	Purpose s of Use by Recipient	Period of Retenti on of Use by Recipie nt
<p>Morningstar's Headquarters and other Affiliates (Affiliates of Morningstar, Inc. are listed in the latest 10-K Exhibit 21.1 at the link below. https://shareholders.morningstar.com/investor-relations/financials/sec-filings/default.aspx)</p>	<p>US Australia Canada China France Germany Hong Kong India Italy Japan Luxembourg Netherlands Poland Romania Singapore</p>	<p>Transferred immediately upon collection via web-based applications</p>	<ul style="list-style-type: none"> ▪ Name and contact information: Your first and last name, email address, postal address, phone number, and other contact information. ▪ Account credentials: Your user ID, password, password hints, and other 	<p>To perform delegated services (for more details, please refer to 4. Delegation of Processing Personal Information)</p>	<p>As long as delegated service is provided</p>

Recipient (Contact Information of Information Manager)	Country where Recipient is Located*	Date and Method of Transfer	Types of Personal Informati on Transfere d	Purpose s of Use by Recipien t	Period of Retenti on of Use by Recipie nt
			<p>similar security information used to authenticate your account.</p> <ul style="list-style-type: none"> ▪ Subscription and usage information: Information about the products or services you subscribe to and how you use them, including preferences, browsing history, and help information. ▪ Device and network information: Information about your device, such as 		

Recipient (Contact Information of Information Manager)	Country where Recipient is Located*	Date and Method of Transfer	Types of Personal Informatio n Transfere d	Purpose s of Use by Recipien t	Period of Retenti on of Use by Recipie nt
			IP address, or internet service provider.		

*: This includes the countries that the personal data might be sent to within the Morningstar group. We anticipate that only a small subset of this list would be delegated to process data on behalf of Morningstar Korea.

6. Measures to Ensure the Security of Personal Information

1) Managerial Measures

- We have appointed a Chief Privacy Officer ("CPO") to ensure that data subjects' personal information is processed in conformity with Korean privacy laws. We have established and implemented an internal management plan to this end.
- We have established and implemented personal information protection education plans for our employees, delegates and others who are directly in charge of processing personal information.
- We periodically conduct an internal audit to verify personal information protection, in accordance with the internal management plan.

2) Technical Measures

- We control access to personal information, and restricts and manages the access right.
- We record the details of the management of access right to personal information, and retains such records for a certain period of time.
- We have installed and operated an intrusion blocking/prevention system to prevent any unauthorized access to personal information.
- We install and periodically update programs to fix security defects in software, including operating systems.
- We keep the records of access to the personal information processing system in a safe manner for a certain period of time.

3) Physical Measures

- We take physical access prevention measures, including restrictions on access and placing locks, to store personal information kept by way of hard copy in a safe manner.

7. Exercise of Data Subject's Rights

If you wish to exercise Data Subject's rights, please contact us [here](#). A user may exercise such rights through his or her legal guardian or agent empowered by the user and in such a case, a power of attorney must be submitted to us.

8. Information from Children Under 14

We are a general audience website and do not direct any of our content specifically at children under the age of 14 years old. Users must be at least 18 years old to use the Site. We understand and are

committed to respecting the sensitive nature of children’s privacy online and we do not knowingly collect information online from children under 14. If you are a parent or guardian and you learn that your children have created an account or otherwise provided us with personal information, please contact us. If we become aware that we have collected personal information from a child under age 14 without verification of parental consent, we will take steps to remove that information from our servers.

9. Chief Privacy Officer

We appointed the following person as the CPO to process personally identifiable information and handle complaints regarding processing personal information. A data subject may file any complaints relating to protection of personal information with the CPO at the following contact details:

- Name – Abigail Yoon (한글이름: 윤이나)
- Contact Information – Telephone: 02-3771-0751, Email: PrivacyKR@morningstar.com