LG Electronics General Guideline for EU Data Act

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1. Data Processing Policy and Principles

1) Purpose of Policy

This policy aims to ensure customers' right to access and control data generated when using products and services, and to foster an innovative data ecosystem by promoting fair data sharing. We comply with relevant laws and regulations and transparently disclose all data processing procedures.

2) Scope of Policy

This applies to all data generated and collected in the process of using the products and related services provided by our company.

a) Key Applicable Data

• **Product Usage Data**: Usage logs of smart appliances, IoT devices, function operation records, sensor data, etc.

• **Service Usage Data**: In-app activity records, user interface (UI) interaction information, etc.

• **Automatically Collected Data**: Data related to the product's status, environment, and operation (e.g., temperature, location, error codes), etc.

b) Exclusions

This policy may not apply to the following data in accordance with the exception clauses of the Data Act:

• **Core Trade Secrets**: Algorithms, design data, etc., directly related to product performance and security.

Information Infringing on the Rights of Others: Copyrighted content, communication content of third parties, etc.

• **Public Security-Related Information**: Data processed at the request of law enforcement agencies.

• **Data that is technically very difficult to access.**

3) Definitions of Key Terms

The key terms related to data are as follows:

• **Data**: Any digital information created while using a product or service.

• **Customer**: The person (individual or enterprise) who buys or rents a product to use, and who is the actual owner of this data.

• **Data Holder**: The entity that stores or manages the data, typically meaning the service provider or manufacturer. (Here, it refers to 'our company').

• **Data Recipient**: The entity that plays the role of sending data to a third party upon the customer's request.

4) How We Collect and Use Data

We collect and use data in the following ways. All data is collected based on prior consent and is not used for purposes other than those specified.

• **Automatic Collection**: Logs, usage records, error information, etc., that occur during product/service use.

• **Direct Provision**: Information entered by the user through membership registration, consultation, event participation, etc.

• **External Interworking**: Data generated when interworking with other platforms or devices.

5) Customer's Data Rights

Customers have the following rights regarding their data and can make requests at any time through this site.

• **Access**: You can check what data is being used and how.

• **Portability**: You can request to have your data transferred to another location.

• **Deletion**: You can request the deletion of data that is no longer needed.

• **LG Service Connection**:
To access data under applicable law (including the EU Data Act), you must connect and sync your product with our LG services. Unless and until you establish such a connection, we will not receive, process, or store any data from your product, and therefore no data will be available for you to access or request from us.

6) Data Sharing Criteria

We share data with third parties only in the following cases and strictly enforce security measures in accordance with relevant laws through contracts:

• **Legal Obligation**: When required by relevant laws and regulations.

• **Customer Consent**: When the customer has explicitly consented.

• **Service Provision**: When cooperating with essential external contractors for service provision.

7) Data Security Measures

We operate the following security framework to protect customer data.

• **Data Encryption**: We encrypt customer information when storing and transmitting it.

• **Access Control Management**: We grant minimum necessary access rights only to

authorized personnel and regularly authenticate them.

• **Regular Security Checks**: We conduct monthly security checks and immediately fix any vulnerabilities found.

• **Incident Response**: In the event of a data breach, we immediately notify customers and respond promptly.

8) Data Retention and Destruction Policy

Collected data is stored in accordance with the company's privacy policy and is securely deleted after a set period.

When destroying data, we use methods that make recovery impossible, such as complete deletion or physical destruction.

9) Principle of Prior Information and Transparency

We actively protect your data rights and clearly guide you through the key information you need to know before purchasing a product or subscribing to a service.

• **Data Generation**: Data is generated continuously and in real-time while you use our products and services, and the amount of data increases with your usage. For more details on the types and formats of data we collect, please refer to our website and the Privacy Policy.

• **Data Storage and Management**: All collected data is securely stored on-device and on remote cloud servers. Data retention periods and deletion criteria are based on our Privacy Policy.

• **Your Rights and Control**: You can easily exercise your rights, such as accessing, transferring, or deleting your data, at any time through the 'My Data' menu.

• **Purpose of Data Use**: We promise that the collected data will only be used for the purposes specified in our Privacy Policy.

• **Inquiries and Support**: If you have any data-related questions, please contact us through the 'Inquiry Board' or via the contact information provided in the Privacy Policy, and we will respond promptly.

• **Trade Secrets and Confidential Business Information:** We have an obligation to protect trade secrets and confidential business information. Please note that we are under no obligation to share data containing trade secrets or confidential business information that could harm our legitimate operating income if disclosed. Should access to such data be provided, strict confidentiality measures may be applied to prevent unauthorized use or disclosure of sensitive information.

• **Contract Term and Cancellation Options:** You may request service cancellation at any time via the 'My Data' menu on this site or within each service, with no mandatory commitment period.

2. Data Coverage & Specifications (Product/Service)

We provide a data specification that presents clear standards for the format, structure, access method, and terms of use of data so that customers can understand and utilize it more easily. This specification is designed in accordance with the law to allow data users to effectively access and utilize the data.

1) Definition of Data Specifications

A document that defines the structure, storage format, access method, security, etc. of data, allowing customers to use the data in a consistent and interoperable manner.

- **Data Format:** The way data that a computer can understand and process is stored and transmitted.

- **Data Structure:** Clarifies the components of the data through field names, data types, descriptions, example values, etc.

2) Data Specification Information by Product/Service

Below is the data specification information provided by our main products and services.

- Personal Identification Information (name, email, date of birth, address, phone number, etc.)

- Device Information (device name, unique identifier, OS version, IP address, Mac address, etc.)

- Usage History Information (access records, content viewing history, menu click records, etc.)

- Inquiry Content Information (customer center conversation content, 1:1 inquiries, customer response content, etc.)

Service Name	Service Type	Target Product Group	Data Type	Estimated Volume	Data Format
LG Account	Website	-	Account Information, Product and Service Use Information	100KB~100MB (Monthly)	CSV, PDF
LG ThinQ	App	Refrigerator, Wine Cellar, Washing Machine, Tumble Dryer, WashTower, Commercial Washing Machine, Commercial Tumble Dryer, Dishwasher, Styler, Stick Cleaner, Robot Cleaner, Oven, Range, Microwave Oven, Gas Stove, Hood, Wall-mounted Air Conditioner, Window Room Air Conditioner, System Room Air Conditioner, Commercial Air Conditioner, Cassette Air Conditioner, Portable Air Conditioner, Ducted Air Conditioner, Window Sash-type Air Conditioner, Air Purifier, Aero Furniture, Humidifier, Dehumidifier, Air Purifying Fan, Ceiling Fan, Water Heater, Ventilation Module, Mask Case, System Boiler, etc.	Account Information, Device Information, Product and Service Use Information	100KB~100MB (Monthly)	CSV, PDF
Smart Media Product	Website, App	Smart TV, Monitor, Laptop, etc.	Account Information, Device Information, Product and Service Use Information	100KB~100MB (Monthly)	CSV, PDF
LG.com (Online Brand Shop)	Website	-	Account Information, Product and Service Use Information	100KB~100MB (Monthly)	CSV, PDF
LG BECON Cloud	Website	Air Purifying Fan, System Boiler(AWHP), System Air Conditioner(EHP, GHP), Chiller, etc.	Account Information, Device Information	100KB~100MB (Monthly)	CSV, PDF
LG EnerVu	Website	Solar Panel, Energy Storage System(ESS), etc.	Account Information, Device Information, Product and Service Use Information	100KB~100MB (Monthly)	CSV, PDF
LG Commercial Laundry Application	App	Commercial Washing Machine, Commercial Tumble Dryer(TD), etc.	Account Information, Device Information, Product and Service Use Information	100KB~100MB (Monthly)	CSV, PDF

- **LG Account Service**

a) Data Scope: LG Account Service

b) Information about the Provider:

Data provider name: LG Electronics Inc.
Address(HQ): LG Twin tower, 128 Yeoui—daero, Yeongdeungpo-gu, Seoul, Republic of Korea
LG Data Act Channel: Contact Information: contact.lgaccount@lge.com, Website: privacy.lg.com

c) Description of the Generated Data:

Data type: Account Information, Product and Service Use Information
Data Format: CSV, PDF
Data estimate volume: 100KB ~ 100MB (Monthly)

d) Scope of Data Use:

Data type:
Account Information: LG Account Information: Account ID (Email)
Product and Service Use Information: Log-in History, Terms Agreement History

Continuously and in real-time: Data is continuously generated in real time while you use our products and services, and the amount of data increases based on usage.

e) Data Storage:

Data Storage Options: All collected data is securely stored on your device and remote cloud servers.
Data Retention Period: The data retention period and deletion criteria follow our Privacy Policy.

f) Data Specification Summary:

Data Category	Data Category Details	Data Field and Description
Account Information	LG Account Information	Account ID(Email)
Product and Service Use Information	Log-in History	Last Log-in Date and Time
		Log-in Service Information
		Log-in Connection Information
	Terms Agreement History	Terms Agreement History
		Terms Agreement Update History

LG Data Act Channel(Website): privacy.lg.com | The Privacy Policy can be found in the footer area at the bottom of the LG Privacy website or under the Data Principles menu.

• LG ThinQ Service

a) Data Scope:

Service: LG ThinQ Service

Product: Refrigerator, Wine Cellar, Washing, Machine(WM), Tumble Dryer(TD), Wash Tower, Commercial Washing Machine, Commercial Tumble Dryer(TD), Dishwasher(DW), Styler, Stick Cleaner, Robot Cleaner, Oven, Range, Microwave Oven(MWO), Gas Stove, Hood, Wall-mounted Air Conditioner(RAC), Window Room Air Conditioner(WRAC), System Room Air Conditioner(SRAC), Commercial Air Conditioner(SAC), Cassette Air Conditioner(CST), Portable Air Conditioner(POT), Ducted Air Conditioner(DUCT), Window Sash-type Air Conditioner(WINSQ), Air Purifier, Aero Furniture, Humidifier, Dehumidifier, Air Purifying Fan, Ceiling Fan, Water Heater, Ventilation Module, Mask Case, System Boiler(AWHP), etc.

b) Information about the Provider:

Data provider name: LG Electronics Inc.

Address(HQ): LG Twin tower, 128 Yeoui-daero, Yeongdeungpo-gu, Seoul, Republic of Korea

LG Data Act Channel: Contact Information: thinq@lge.com, Website: privacy.lg.com

c) Description of the Generated Data:

Data type: Account Information, Device Information, Product and Service Use Information

Data Format: CSV, PDF

Data estimate volume: 100KB ~ 100MB (Monthly)

d) Scope of Data Use:

Data type:

1) Account Information: LG Account Information,

2) Device Information: Device Usage Information, Device Status Information, Device Settings Information, Information Collected from Device and Functions, Device Diagnostics Information, Device Identification or Registration Information, Information Created from User

3) Product and Service Use Information: LG Account Based Service User Information, Device Identification or Registration Information, Image and Video Information, Voice Information

Continuously and in real-time: Data is continuously generated in real time while you use our products and services, and the amount of data increases based on usage.

e) Data Storage:

Data Storage Options: All collected data is securely stored on your device and remote cloud servers.

Data Retention Period: The data retention period and deletion criteria follow our Privacy Policy.

f) Data Specification Summary:

Data Category	Data Category Details	Data Field and Description
Account Information	LG Account Information	UUID
		Country Name or Code
		Domestic/Foreigner Information
		Personal Authentication Information
		Date of Birth
		Gender
		Account ID
		User Name
		Address
		Duplicate Subscriber Authentication Information
		Telecommunication Carrier

		Mobile Phone Number
Device Information	Device Usage information	Information About Being Operated and Used of Device
	Device Status Information	Information About Status Including Operating Status of Device, and its Accessories and Consumables
	Device Settings Information	Information About Device Operation Settings by User
	Information Collected from Device and Functions	Information Collected from Device and Functions Such as Spatial Data, Sensing Data
	Device Diagnostics Information	Product Error/Malfunction Information, Device Behaviour and History of Use, Information Execution and Operation of Functions
	Device Identification or Registration Information	IP Address
		Identity Information or Code
		Type of Product or Device
		Model Name
		Version Information
		Manufacturing Information
		Device Name
		Manufacture Number
		Manufacturer
		Type of Product or Device
		Sales Country
	Information Created from User	Information Created from User During Use Product or Service
Product and Service Use Information	LG Account Based Service User information	Identity Information or Code
		Advertising ID
		Device Identification Information
		Nickname
		Language
		Connecting Information (Model Name, OS Version, Browser Information etc.)
		Cookie
		Phone Number
	Device Identification or Registration Information	Identity Information or Code
		Type of Product or Device
	Image and video information	Information Taken and Collected from Device or Functions Due to the User's Settings Such as Photo, Video etc.
	Voice Information	Voice information or Information Converted from Voice to Text

LG Data Act Channel(Website): privacy.lg.com | The Privacy Policy can be found in the footer area at the bottom of the LG Privacy website or under the Data Principles menu.

- **Smart Media Product**

a) Data Scope:

Service: Smart Media Product
Product: Smart TV, Monitor, Laptop, etc.

b) Information about the Provider:

Data provider name: LG Electronics Inc.
Address(HQ): LG Twin tower, 128 Yeoui—daero, Yeongdeungpo-gu, Seoul, Republic of Korea
LG Data Act Channel: Contact Information: tv.privacy@lge.com, Website: privacy.lg.com

c) Description of the Generated Data:

Data type: Account Information, Device Information, Product and Service Use Information
Data Format: CSV, PDF
Data estimate volume: 100KB ~ 100MB (Monthly)

d) Scope of Data Use:

Data type:
1) Account Information: LG Account Information,
2) Device Information: Device Identification or Registration Information
3) Product and Service Use Information: Application Download History, External Device Information, Feature/Application Execution History, Gaming Portal Service Use Information, LG Movies & TV Service Use Information, Radio+ Service Use Information, Search Usage History, Sports Alert Settings Information, Viewing Information, webOS Pay Service Use Information

Continuously and in real-time: Data is continuously generated in real time while you use our products and services, and the amount of data increases based on usage.

e) Data Storage:

Data Storage Options: All collected data is securely stored on your device and remote cloud servers.
Data Retention Period: The data retention period and deletion criteria follow our Privacy Policy.

f) Data Specification Summary:

Data Category	Data Category Details	Data Field and Description
Account Information	LG Account Information	Account ID
Device Information	Device Identification or Registration Information	IP Address
		Mac Address
		Country Name or Code
		Model Name
Product and Service Use Information	Application Download History	Application Download History
	External Device Information	External Device Information
	Feature/Application Execution History	Feature/Application Execution History
	Gaming Portal Service Use Information	Gaming Portal Service Use Information of Registration Favorite Games
	LG Movies & TV Service Use Information	LG Movies & TV Service Use Information of Purchase/Rental/Wishlist on My Library

		Voucher Information
	Radio+ Service Use Information	Radio+ Service Use Information of Registration Favorite Channel
	Search Usage History	Search Usage History
	Sports Alert Settings Information	Sports Alert Settings Information
	Viewing Information	Viewing Information of Live TV, LG Channel
	webOS Pay Service Use Information	webOS Pay Service Use Information

LG Data Act Channel(Website): privacy.lg.com | The Privacy Policy can be found in the footer area at the bottom of the LG Privacy website or under the Data Principles menu.

- **LG.com (Online Brand Shop) Service**

a) Data Scope: LG.com (Online Band Shop) Service

b) Information about the Provider:

Data provider name: LG Electronics Inc.
Address(HQ): LG Twin tower, 128 Yeoui—daero, Yeongdeungpo-gu, Seoul, Republic of Korea
LG Data Act Channel: Contact Information: LG.com (Country-Specific Contact Channels), Website: privacy.lg.com

c) Description of the Generated Data:

Data type: Account Information, Product and Service Use Information
Data Format: CSV, PDF
Data estimate volume: 100KB ~ 100MB (Monthly)

d) Scope of Data Use:

Data type:
1) Account Information: LG Account Information,
2) Product and Service Use Information: Website or Application Use Information, Comments or Similar Posts on the Website, Purchase Information, Customer Service Information
Continuously and in real-time: Data is continuously generated in real time while you use our products and services, and the amount of data increases based on usage.

e) Data Storage:

Data Storage Options: All collected data is securely stored on your device and remote cloud servers.
Data Retention Period: The data retention period and deletion criteria follow our Privacy Policy.

f) Data Specification Summary:

Data Category	Data Category Details	Data Field or Description
Account Information	LG Account Information	Unique Code
		Name
		Mobile Number
		Email Address
Product and Service Use Information	Product Registration Info	Product Registration Info
	Information collected when using the store (If applicable to the Online Brand Shop service)	Order Info
		Billing Info
		Shipping Info
		Return Info
		Cancel Info

LG Data Act Channel(Website): privacy.lg.com | The Privacy Policy can be found in the footer area at the bottom of the LG Privacy website or under the Data Principles menu.

- **LG BECON Cloud Service**

a) Data Scope:

Service: LG BECON Cloud Service
Product: Air Purifying Fan, System Boiler(AWHP), System Air Conditioner(EHP, GHP), Chiller, etc.

b) Information about the Provider:

Data provider name: LG Electronics Inc.
Address(HQ): LG Twin tower, 128 Yeoui—daero, Yeongdeungpo-gu, Seoul, Republic of Korea
LG Data Act Channel: Contact Information: tms-kr-privacy@lge.com, Website: privacy.lg.com

c) Description of the Generated Data:

Data type: Account Information, Device Information
Data Format: CSV, PDF
Data estimate volume: 100KB ~ 100MB (Monthly)

d) Scope of Data Use:

Data type:
1) Account Information: LG Account Information,
2) Device Information: Device Information, Device Usage Information, Device Status Information
Continuously and in real-time: Data is continuously generated in real time while you use our products and services, and the amount of data increases based on usage.

e) Data Storage:

Data Storage Options: All collected data is securely stored on your device and remote cloud servers.
Data Retention Period: The data retention period and deletion criteria follow our Privacy Policy.

f) Data Specification Summary:

Data Category	Data Category Details	Data Field and Description
Account Information	LG Account Information	Created Date
		Account Level
		Account Type
		Country Name or Code
		Authenticated Date
		Account ID
		User Name
Device Information	Device Information	Device Status Information
	Device Usage information	Log-in Error
		Log-in Date
		Device Control Schedule Settings Information
		Device Control Information
	Device Status Information	Device Token Information
		Device Registration Information
		Error Information
		Software information(OS Version)

LG Data Act Channel(Website): privacy.lg.com | The Privacy Policy can be found in the footer area at the bottom of the LG Privacy website or under the Data Principles menu.

• LG EnerVu Service(User)

a) Data Scope:

Service: LG EnerVu Service
Product: Solar Panel, Energy Storage System(ESS), etc.

b) Information about the Provider:

Data provider name: LG Electronics Inc.
Address(HQ): LG Twin tower, 128 Yeoui—daero, Yeongdeungpo-gu, Seoul, Republic of Korea
LG Data Act Channel: Contact Information: enervu-ess@lge.com, Website: privacy.lg.com

c) Description of the Generated Data:

Data type: Account Information, Device Information, Product and Service Use Information
Data Format: CSV, PDF
Data estimate volume: 100KB ~ 100MB (Monthly)

d) Scope of Data Use:

Data type:
1) Account Information: LG Account Information,
2) Device Information: Device Dat, Installation Data, Log Files / IP Address
3) Product and Service Use Information: Energy Generation and Storage Data
Continuously and in real-time: Data is continuously generated in real time while you use our products and services, and the amount of data increases based on usage.

e) Data Storage:

Data Storage Options: All collected data is securely stored on your device and remote cloud servers.
Data Retention Period: The data retention period and deletion criteria follow our Privacy Policy.

f) Data Specification Summary:

Data Category	Data Category Details	Data Field and Description
Account Information	LG Account Information	Account ID(Email)
		Telephone Number
		User Name
		Address
	Sign-Up Using Facebook Credentials	Email Address Used to Log in to Facebook
Device Information	Device Data	Device Authentication Information
	Installation Data	Installation Information
		Array Data
		Power System
		Battery
Product and Service Use Information	Energy Generation and Storage Data	Energy Generation and Storage Data
		Commercial Energy Supply Data
		Data Collected by LGE-ESS, Power System, and Batteries
		Battery Status and Consumption
		Power Supply Data
		Data Provided Through the Web Monitoring Service
	Log files / IP Address	Web Page Access Log
		IP Address

LG Data Act Channel(Website): privacy.lg.com | The Privacy Policy can be found in the footer area at the bottom of the LG Privacy website or under the Data Principles menu.

• LG Commercial Laundry Application

a) Data Scope:

Service: LG Commercial Laundry Application Service
Product: Solar Panel, Energy Storage System(ESS), etc.

b) Information about the Provider:

Data provider name: LG Electronics Inc.
Address(HQ): LG Twin tower, 128 Yeoui—daero, Yeongdeungpo-gu, Seoul, Republic of Korea
LG Data Act Channel: Contact Information: b2b.solutionprovider@lge.com, Website: privacy.lg.com

c) Description of the Generated Data:

Data type: Account Information, Device Information, Product and Service Use Information
Data Format: CSV, PDF
Data estimate volume: 100KB ~ 100MB (Monthly)

d) Scope of Data Use:

Data type:
1) Account Information: LG Account Information, Sign-Up Using Facebook Credentials
2) Device Information: Device Dat, Installation Data
3) Product and Service Use Information: Energy Generation and Storage Data, Log Files / IP Address

Continuously and in real-time: Data is continuously generated in real time while you use our products and services, and the amount of data increases based on usage.

e) Data Storage:

Data Storage Options: All collected data is securely stored on your device and remote cloud servers.
Data Retention Period: The data retention period and deletion criteria follow our Privacy Policy.

f) Data Specification Summary:

Data Category	Data Category Details	Data Field and Description
Account Information	LG Account Information	UUID
		Country
Device Information	Device Usage information	Shop Name
		Shop ID
		Service Use Log
		Smart Application Use Log
		Payment Amount
		Payment Complete Result
	Connected Device Information	Connected Device Information(Smart Phone)
	Device Settings Information	App Push Notification Setting
Product and Service Use Information	Information Created from User	Email
		Information Created from User During Use Product or Service

LG Data Act Channel(Website): privacy.lg.com | The Privacy Policy can be found in the footer area at the bottom of the LG Privacy website or under the Data Principles menu.

3. LG Privacy Site (privacy.lg.com)

1) [Feature 1] Data Principles

• **Data Processing Policy:** To manage data securely and transparently, we systematically outline data processing methods and operational principles.

• **Data Scope and Specifications:** This section outlines the scope of data processing and details the data items and criteria that can be processed upon customer request.

• **Data Processing Procedure:** This section outlines the procedures and methods for handling data user's(data subject's) data-related requests.

• **Privacy Policy:** Data user(data subject) can review the privacy policies deemed established in accordance with each country's personal information protection laws.

2) [Feature 2] My Data

• **Account Information:** Show information about my account
• **Service List:** View services I'm currently using
• **Request History Information:** Displays details related to the data processing you requested.
• **Data Provision:** Providing data requested by the customer
• **Data Transfer:** Requesting to transfer your data to a third party
• **Data Deletion and Processing Restriction:** Request to delete your data and cease processing it.
• **Consent and Withdrawal Settings:** Review service-specific terms of use, privacy policy consent forms, and manage consent and withdrawal settings.
• **Service and Account Termination:** Provides functionality to terminate specific services and cancel membership.
• **Log Out:** Log out of your account on the site
• **Account Deletion:** Consolidated to LG Membership account deletion

3) [Feature 3] Inquiry Board

• **FAQs:** Frequently Asked Questions about Account/Site Usage
• **Contact Us:** Inquire via each service channel Email or forum consolidated

6. Contact Information

1) Services

Service	URL	Contact Information
LG Account	https://(cntryCode).lgemembers.com/	contact.lgaccount@lge.com
LG ThinQ	https://www.lge.co.kr/lg-thinq	thinq@lge.com
Smart Media Product	https://www.lgappstv.com	tv.privacy@lge.com
LG.com	https://www.lg.com/global	https://www.lg.com/global/privacy/#tabs-privacy-policy
LG BECON cloud	https://beconcloud.lge.com/	tms-kr-privacy@lge.com
LG EnerVu	https://enervu.lg-ess.com/	enervu-ess@lge.com
LG Commercial Laundry	Application	b2b.solutionprovider@lge.com
LG Developer	https://developer.lge.com/main/Intro.dev	https://kr.lgappstv.com/main/inquiry/register?confirmPopYn=Y