



Cincinnati, Ohio – USA, 19 June 2020

EXCLUSIVE INTERVIEW

PrivacyRules is pleased to publish an interview with Bae Won Seok, Director of Development of Tina3D. PrivacyRules is the largest global alliance of legal and tech experts in the field of data privacy (www.privacyrules.com/). PrivacyRules was formed in 2017 to meet the growing demand of businesses and associations for legal advice and tech solutions for data protection and cybersecurity. The alliance has grown dramatically in the past three years and now has members in more than 50 jurisdictions.

TINA3D (www.tina3d.com) is the South Korean tech and entertainment company that developed Corona 100m, the tracing app to help prevent the spread of the corona virus. It uses covid-19 visitation point data which is freely available data provided by the South Korean government. Covid-19 tracing apps are still under development in many countries all around the world, and are rising issues in relation to the precarious balance between upholding privacy of the individuals and benefits to public health. South Korean Corona 100m has been used as a model in many continents and rose a lot of attention in international media, hence we are very pleased to speak about it with its creator Bae Won Seok.

Q. Director, thank you for releasing this interview to PrivacyRules. How would you introduce Corona 100m vis-à-vis privacy?

A. Thank you to PrivacyRules for giving me the opportunity to describe the app we developed. First, let me explain about our app. Our app is serviced only with data officially released by the Korean government.

The following information is officially disclosed by the Korean government:

1. The name of the location of the local point visited by a confirmed case person



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2. The date of the visit of the local point visited by the confirmed case person

3. Age, gender and nationality (nationality is currently not disclosed)

Our app used the data from 1, 2, and 3 for the first two weeks since its launch. After two weeks the number of confirmed cases increased rapidly. We are excluding data from number 3 but the service is still the same. In order to send a notification when a user approaches a confirmed case visitation point, we need the app user's location information. This user location data is only used within the device. Therefore, there is no need to store this information on the app server. Our app is not a tracking app to find someone who has been in contact with a confirmed patient. The purpose is to provide a notification when approaching the area that the confirmed case person has visited in order to make a detour. It can potentially reduce the chance of contact with asymptomatic infected people.

Q. Was it difficult to program the app taking into consideration South Korean privacy regulations?

A. It wasn't difficult because no private information was provided to us. In many media reports abroad, our app is wrongly known as collecting users' location points which is incorrect information.

Another misinformation is that TINA3D was commissioned by the Korean government to develop the app. We were not commissioned by the Korea government to develop the app. Because the Korean government freely shared the infected case visitation point data, it was possible for us to develop the app on our own. We developed it to help prevent the spread of the corona virus throughout Korea.

Q. In your experience, the developer of an application takes into consideration privacy compliance requirements in the outset of the programming phase or at the very end of it? Could you describe the phase when privacy becomes a key element for consideration?

A. To use the notification function in the app, the app requests the authorization to access the user's device location. If you refuse, you cannot use the notification function. If the user agrees to the authorization the location information will only be used within the app. It was designed to collect no personal information except for data on confirmed cases which is released by the Korean government. Of course, at the beginning of development we considered data collection but we thought tracking is something that the government should do, that it was not appropriate for private companies to do. I had an idea that can provide useful information without collecting information from app users and our app became the results.



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Q. Does the app interact with other apps and possibly devices different from the mobile phone where it is installed? How is consent collected in such case/s?

A. I don't think we should collect any personal information directly because privacy sensitive. For our alerting service, only the date and location point information of confirmed case visitation points can be useful to the end user. The Korean government does not disclose residence information of the confirmed cases, and we do not know or provide it either.

In order for our app to know the current corona status of Korea and the rest of the world, it requests and receives data from our servers. There is nothing related to personal information collection, so it is not necessary to ask for consent to collect it.

Q. Is Corona 100m app allowed to collect, process and transfer data of non-South Korean citizens? If so, are they informed about that in a language they can understand?

A. Since the Corona 100m app only needs confirmed case location point information and date of visit to the location, the service can be used in a format that can be used anywhere if the collection of data visited by the confirmed cases is possible. (Requires approval from distribution platforms such as Google Play Store)

Q. If I were a data subject who's data have been collected by your app, could I effectively and rapidly obtain the deletion of my personal data?

A. Other than the location and date of a visited of case points, no personal data is collected so it doesn't need to be deleted. The location and date of a visited of case points is deleted 14 days after the visitation date during our data processing phase.

Q. Did you receive clear and detailed guidance on how to design / develop the app from the South Korean Personal Information Protection Commission?

A. We didn't need to be informed because we don't directly collect personal information.

Q. Your app has been in use for some time now, got international relevance and undisputed success. Which is the feedback you still receive from South Korean users, and how do you assess it?

A. Current feedback from users in Korea is that there is a difference in global statistics when compared to statistics they have been provided from other channels because of the difference in the update time intervals. Users have access to real-time Internet articles, broadcast news, etc. Time intervals between such real-time information and the update to the information of our app



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does not create a problem. In the Korean market there were 3.5 million downloads from the Google Play Store, and 200,000 downloads from the ONE-Store in Korea. Most of the users were very positive. There were a lot of e-mails and phone calls from users who had experienced the app's alerting function thanking us. Due to the restrictions imposed on the distribution of Corona-related apps in the Google Play Store, many users in Korea have made numerous inquiries by phone or email to our company about not being able to find the app in the Play Store. Currently, we are providing continuous notices of guidance and maintaining the distribution of new functions through the ONE-Store in Korea.

END OF THE INTERVIEW

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