

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

1. Introduction, Purpose and Enforceability, Definition

1.1 Introduction

Protection of internal and external Data/Information is very important for PT Elang Mahkota Teknologi Tbk (“**EMTEK**”) and all the company as part of EMTEK group (each as “**Company**”) which are engaged in various business fields, where in conducting such business activities often require Data/Information processing. Data/Information is the main asset for the Company and its security must be protected. The application of Data/Information protection aims to ensure the continuity and availability of Data/Information from risks that may occur, which can cause Data/Information management and daily operational activities to be disrupted. For this reason, the Company has the responsibility to manage Data/Information in order to avoid the risk of damage, loss, or disclosure of Data/Information to outside parties who do not have permission or access to such Data/Information. The process of protecting the Data/Information must be managed properly therefore the confidentiality, integrity, and availability of the resulting Data/Information can be maintained effectively.

Through this Policy, EMTEK has commitment to maintain and protect privacy and Data/Information throughout the Company by implementing:

- a. commitment to provide notification in timely manner to the subject of Data/Information in the event of Policy change and data or Policy breach;
- b. commitment to implement reliable Data/Information protection standard;
- c. commitment to obtain Data/Information through lawful and transparent means, with consent;
- d. commitment to collect and process Data/Information on a limited basis in accordance with the stated purpose;
- e. provision and guideline, among others, for the collection, use, distribution, and removal of Data/Information;
- f. obligation for third parties including the Company Partner who receives Data/Information to comply with the Policy.

In connection with the foregoing, several companies in EMTEK group have obtained the following certifications:

- a. On 29 September 2021, PT Vidio Dot Com obtained ISO 27001:2013 Certificate issued by ACM-CCAS Limited that valid until 27 September 2024 for the information security management system in provision of customer data management for web and mobile video application;
- b. On 22 March 2022, PT Sakalaguna Semesta obtained ISO/IEC 27001:2013 Certificate issued by PT TUV Rheinland Indonesia that valid until 21 March 2025 in scope of Information Security of Digital Platform Serbada covering Mobile Application;
- c. On 01 June 2022, PT Indopay Merchant Services obtain Certificate of Compliance on the Payment Card Industry Data Security Standard (PCI

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

DSS) Version 3.2.1 Level-1 that was issued by ControlCase, the qualified security assessor certified by the PCI Security Standards Council.

1.2 Purpose and Enforceability

1.2.1 General Purpose

The general purpose of this Policy is to:

- a. comply with Law No. 27 Year 2022 regarding Personal Data Protection (“**PDP Law**”). As mandated by the PDP Law, EMTEK has appointed Data Protection Officer (“**DPO**”), namely Dwi Deila Wulandari T. S.H. (email: dwi.deila@emtek.co.id).

Duties of DPO include to:

- i. inform and provide advice to the Personal Data controller or Personal Data processor to comply with the provisions in the PDP Law;
 - ii. monitor and ensure compliance with the PDP Law and Policy;
 - iii. provide advice on assessing the impact of Personal Data protection and to monitor the performance of Personal Data controllers or Personal Data processors; and
 - iv. coordinate and act as a liaison for issues related to the processing of Personal Data.
- b. provide high-level guidance to ensure that Data/Information being non-promotional in nature from all the Company departments are protected against loss of confidentiality, integrity, and availability.

1.2.2 Specific Purpose

The specific purpose of this Policy is to provide high-level direction ensuring that critical and sensitive Data/Information is transparently defined therefore different safeguards can be implemented to protect and detect Data/Information against loss of confidentiality, integrity, and availability.

1.2.3 Enforceability

This Policy applies for EMTEK and each Company within EMTEK group, unless there exists a similar policy which is made separately by such Company. This Policy applies for all Company employees and all Company Partner(s) which access and process Company Data/Information in order to support the Company’s business target.

1.3 Definition

1.3.1 Company is EMTEK as well as all companies as part of EMTEK group.

1.3.2 Data is a collection of information constructed through processing or interpretation, including Personal Data.

1.3.3 Personal Data is data regarding an individual which is identified or may be identified separately or combined with another information whether directly or indirectly through an electronic or non-electronic system.

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

- 1.3.4 **Information** is the result of processing, collecting, developing and organizing Data in a way that adds to the knowledge of the recipient, including statement, declaration, idea, and signs which contains values, meaning, and message, whether data, fact, or its explanation which can be seen, heard, and read which is delivered in various packaging and format according to electronic and non-electronic information and communication technology development.
- 1.3.5 **Classification of Data/Information** is a process to determine the appropriate level of classification for Data/Information assets in order to ensure the related Data/Information receives an adequate level of protection.
- 1.3.6 **Confidential Information** is Data/Information accessed is limited only to parties who have been given permission or have the appropriate authority, including Personal Data.
- 1.3.7 **Confidentiality Agreement** is an agreement made between two parties to state the commitment of each party to maintain the confidentiality of certain Data/Information and/or materials along with their access or information, which is revealed during a cooperation relationship between the parties.
- 1.3.8 **Company Partner** is an outside party who has a contractual relationship with the Company, including any party which has previously signed a Confidentiality Agreement or any agreement which has confidentiality obligation therein with the Company. For example: vendors, consultants, auditors, outsourcers, and other external parties.

2. Scope

This Policy covers all Data/Information captured, processed, or stored by the Company, both in paper and electronic form.

3. Policy Statement

- 3.1 Classification of Data/Information
 - 3.1.1 Data/Information Criteria

Data/Information must be classified based on certain criteria set by the Company and access control to Data/Information on a regular basis to prevent and detect unauthorized distribution and/or leakage of sensitive or high-value Data/Information.
 - 3.1.2 The determination of the classification of Data/Information is basically determined by the controller of the Data/Information through the principle of risk assessment by considering the following factors:
 - a. The value of Data/Information, reputation, and business competition of the organization, including but not limited to the potential risks posed to public security, the potential for competitors to attack the Company's products/services in the

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

market with the intention of eliminating its competitive advantage or criminally by threatening sensitive Data/Information to be illegally disclosed.

- b. Sensitivity and criticality of Data/Information that will lead to significant negative exposure for public consumption.
 - c. Compliance with contracts, laws, regulations, and other requirements that may be relevant to the licensing and business environment.
- 3.1.3 The classification of Company Data/Information consists of 3 (three) categories, namely:
- a. Confidential Information, namely information that is very sensitive and is only intended and can only be accessed by certain individuals/parties.
 - b. Limited Information, namely data that can only be accessed internally within the Company environment.
 - c. Public Information, namely information that can be disseminated to the public.
- 3.1.4 Each relevant head of the Company can classify information that is deemed necessary as Confidential Information, outside the provisions of applicable laws and regulations to prevent disruption to the organization's business processes.
- 3.1.5 Protection of Data/Information assets shall be carried out adequately according to their classification.
- 3.1.6 The level of protection of Data/Information assets is carried out in accordance with the information handling rules applied in the Company.

3.2 Data/Information Labeling

Policy Rules :

- 3.2.1 Data/Information must be labeled/coded to ensure that its handling process is in accordance with its classification level.
- 3.2.2 Data/Information labeling can be done through:
 - a. Physical labeling on hardcopy documents;
 - b. Provision of watermark on softcopy documents;
 - c. Giving classification of information on metadata from softcopy information.
- 3.2.3 Data/Information handling must be carried out safely throughout the Data/Information life cycle, which includes the obtainment and collecting, processing and analyzing, storage, reparation and renewal, distribution, and removal process.
- 3.2.4 Data/Information handling needs to be adjusted according to the classification of such Data/Information.
- 3.2.5 Printed document
Where possible, the printout of the Data/Information shall be marked, which states the security classification of the document information with a

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

watermark. The watermark must be clearly visible on every page of the document. The following methods can be used:

- a. The classification will be displayed prominently on the front page and in the right footer on each subsequent page;
- b. Pre-printed paper indicates the security classification to be used; and
- c. The use of a stamp is used to mark each page according to security classification.

3.2.6 Screen Displays

The computer system must classify authorized users to be able to access Data/Information including warnings when logging in and the need to use passwords before and/or after using the system. If possible, the user will be given a warning if the user will enter into a system or area which is not their right. A further warning should also be displayed upon entering the option to print or save Data from the system.

3.2.7 Recording Media

Strict control is placed on the use of removable media such as CDs, DVDs, cassettes, external hard drives and USB memory sticks in the Company. Where it is lawfully used to store confidential data they will be labeled externally with the security classification of the most sensitive data on the media, together with the date of creation.

3.2.8 Electronic Mail (E-Mail)

Confidential Information sent by e-mail must include the level of classification and if sent to the Company Partner, a warning will be given as well as an information control statement which must be completed by the email recipient. The information contained in the appendix must also clearly state the classification in the header of the document type, spreadsheet, or other file type.

3.2.9 File Transfer

The procedure for obtaining Confidential Information sent by hardcopy file transfer must include a step where the recipient understands the information from the classification level of the information being sent, prior to transmission. Transfers made in softcopy refer to point 3.2.8.

3.3 Handling of Data/Information

Policy Rules :

3.3.1 The handling of assets must comply with the classification of the Data/Information stored and/or processed to ensure the protection and security of the Data/Information assets.

3.3.2 For each level of protection and security classification, a set of security controls shall be followed to ensure that the Data/Information involved is appropriately protected at all times. The following sections define the main procedural components of existing controls.

A. Public

1. Security Process

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

In general there are no special controls that should be placed on the processing of such information, however there is a special place for the storage of items such as stationery and electronic equivalents which are freely available.

2. Storage

Information may be stored in a secure area accessible to the public. However, some documents such as leaflets are still vulnerable to theft or misuse.

3. Transmission

In general, public information in softcopy can be sent over the connection and is not encrypted. The distribution of public information in hardcopy can be done freely.

4. Declassification

Public information will not be subject to declassification because it is already at the lowest level.

5. Removal

Hardcopy information that falls under the public classification can be disposed of via normal waste routes without the need for special controls. Whenever possible, items can be recycled. Information in the form of softcopy which is included in the general classification can be disposed of normally.

6. Information Distribution Process

Public information assets will be freely distributed among the Company employees, customers, and members of the public where required.

7. Security Login

In general, there is no need to conduct security login related to public classification items except for criminal activities, such as theft of confidential documents, especially on a large scale.

B. Limited

1. Security Process

Information at this classification level will be subject to access controls involving either physical security or authorized use log-in or both. Public access should not be granted in public places and output such as print outs should be to areas where public access is prevented.

2. Storage

Classification information in hardcopy form must be stored in a locked room within the office and in an area where there is no public access. Information in the form of softcopy can be stored through including but not limited to the google drive or sharepoint application that has been provided by the Company or stored in electronic media such as USB and hard drives.

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

3. **Transmission**
Important softcopy information can be sent via a secure connection and its distribution must be with the consent of such information subject or according to prevailing laws and regulations. Important hardcopy information must be approved by such information subject or according to prevailing laws and regulations.
 4. **Declassification**
Important information will be subject to declassification but at a low level.
 5. **Removal**
Information that is included in important classifications in the form of softcopy and hardcopy needs to be specifically controlled. If possible, items should be removed after use.
 6. **Information Distribution Process**
Important information assets cannot be freely distributed. Limited assets can be distributed only after obtaining permission from the Company, subject to prevailing laws and regulations.
 7. **Security Login**
Subject to prevailing laws and regulations, permission is required from the Company for renewal and use of Information.
- C. **Confidential**
1. **Security Process**
When accessing Confidential Information, it is not permitted to bring items such as stationeries, cameras, and other recording devices when accessing Confidential Information assets. In addition, there is a need for assistance when accessing such Confidential Information asset.
 2. **Storage**
Confidential Information must be stored in a highly secure area and there must be no public access. Only certain personnel can access the information and with written permissions stating the purpose of borrowing the information and must be signed at least by the head/user concerned to access the information.
 3. **Transmission**
Confidential Information may only be sent after being encrypted (if through e-mail) and must be with the consent of the information subject and must be with a permit letter or a statement from the party who will access it or in accordance with prevailing laws and regulations. Likewise, in hardcopy form, permission must be obtained from the information subject, accompanied by a permit letter stating the purpose of using the information and must be signed at least by the Director of the Company or in accordance with the prevailing laws and regulations.

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

4. Declassification
Confidential Information must be declassified because it is already at a high level in the classification of information assets.
 5. Removal
Information that is classified as Confidential must be removed; by burning for printed documents, completely and permanently deleted for electronic documents.
 6. Information Distribution Process
Confidential Information assets are distributed in a very limited nature and only to parties authorized by the information subject who can access them and in accordance with prevailing laws and regulations.
 7. Security Login
Associated with Confidential Information should not be lent to be taken out of the secure area. Subject to prevailing laws and regulations, it is only permitted to be read in a secure area and prior permission must be obtained from the Confidential Information controller and the project holder.
- 3.3.3 For every Data/Information, it is required to carry out data backup activities that have been authorized and carried out by authorized officers/employees, which aims to protect Data/Information from the risk of loss, therefore with data backup, the required Data/Information can be restored.
- 3.3.4 Any Data/Information including but not limited to management system documentation, policies within the Company environment, training materials, user manuals for operating procedures, business continuity plans, software including source code, system developer devices, licenses, user manuals, user guidance, physical infrastructure including computer equipment, network and communication equipment, and intangible assets that will be registered or updated periodically.
- 3.3.5 In the event of damage to the device used to access Data/Information, the employee is required to report the damage of the device to the IT Support team.
- 3.3.6 The Company is required to carry out a hardening and Vulnerability Assessment implementation mechanism periodically through Automated Vulnerability Assessment and Manual Vulnerability Assessment to identify weaknesses in the system and prevent external threats that take advantage of these weaknesses.
- 3.3.7 In the event of an information security incident related to the informatics security system, it is mandatory to report to IT Support or OnCall Engineers to conduct further investigations.

PRIVACY AND DATA/INFORMATION PROTECTION POLICY **(“Policy”)** **PT ELANG MAHKOTA TEKNOLOGI Tbk** **(“Company”)**

4. Responsibility

The following are the stages of the person in charge of Data/Information management.

No.	Stages	Person in Charge
1	Register the Data/Information owned	Each business unit/division
2	Classifying Data/Information	Relevant owner of Data/Information
3	Labeling Data/Information	Relevant owner of Data/Information
4	Handling Data/Information	The party/entity granted access rights in accordance with the Policy

5. Compliance

- 5.1 Compliance with this Policy is mandatory for all Company employees, consultants, contractors, partners, suppliers, vendors, customers, or other parties who have an employment or contractual relationship with the Company or working on behalf of the Company, individuals with authorized access to the Company's information resources, computing and/or network facilities must comply with the Policy. In the implementation of the relationship with the Company, the Company (in connection with among others the performance of its legal and contractual obligations) may collect and use, as “controller”, any “Personal Data” it may obtained and therefore the employees, consultants, contractors, partners, suppliers, vendors, customers, or such other parties are also bound and subject to Privacy Notice as attached in this Policy.
- 5.2 The Company must ensure that the Company Partner engaged by it comply with the applicable obligations of this Policy and its supporting information security requirements, by signing a Confidentiality Agreement prior to entering a cooperation relationship.
- 5.3 Any intentional or unintentional deviation or violation of Company policies, practices, or standards will be subject to disciplinary action, up to and including termination of employment or contract and possible civil or criminal action.
- 5.4 All personnel suspected of having committed a security breach or deviation will be entitled to due process, fair treatment, and a full investigation to protect their legal rights.

6. Exception

In certain circumstances, there may be business conditions where compliance with the implementation of this Policy cannot be implemented, therefore it needs to be waived. Any waiver to the classification and handling policies of Data/Information that have been determined must be submitted in writing and reviewed by the Director of the Company.

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

7. Reviews and Updates

This Policy will be reviewed periodically at least once a year or in the event of an incident or significant change, whether related to laws, regulations, and other rules relating to the Company's products, services, or changes to the information technology system of the Company.

The Company encourages its employees, consultants, partners, suppliers, vendors, or other parties who have an employment or contractual relationship with the Company to regularly review this Policy and any updated version of this Policy to ensure that such parties are always aware of how Personal Data is collected, used, stored, and disclosed.

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

Attachment

Privacy Notice

The purpose of this document is to provide information on the Company's use of Personal Data in accordance with Law No. 27 Year 2022 regarding Personal Data Protection its amendment and implementing regulations that may be issued from time to time (together, the **“Data Protection Regulation”**).

The Personal Data will be processed by the Company, and by persons engaged by the Company. Under the Data Protection Regulation, the Company is the data controller, and the Company has obligations, with respect to the Personal Data. The purpose of this notice is to explain how and why the Company, and persons engaged by the Company, will collect, use, store, share and otherwise process the Personal Data. This notice also sets out the rights of personal data subject under the Data Protection Regulation.

Interpretation

For the purpose of this document, **“Personal Data”** means data regarding an individual which is identified or may be identified separately or combined with another information whether directly or indirectly through an electronic or non-electronic system. **“You”** or **“your”** shall mean, employees, consultants, contractors, partners, suppliers, vendors, customer, or other parties who have an employment or contractual relationship with the Company and shall also include any individual connected to you which could include: any person owning or controlling the relevant party, having a beneficial interest in the relevant party, and the directors, managers, shareholders, officers and employees of all the relevant party. **“We”**, **“us”** or **“our”** means the Company in its capacity as data controller of the Personal Data.

Your Personal Data

By virtue of entering into employment or contractual relationship with the Company (including the initial engagement and ongoing interactions with the Company and persons engaged by the Company) or by virtue of you otherwise providing us with personal information on individuals connected with you (for example family members, directors, employees, representatives, shareholders, investors, clients, beneficial owners or agents), you will provide us with certain personal information which constitutes Personal Data within the meaning of the Data Protection Regulation. The Company and its respective authorized officers, affiliates, partners (**“Authorized Party”**) may collect, record, store, transfer and otherwise process Personal Data by which individuals may be directly or indirectly identified.

In particular, you will provide us with personal information within the forms, questionnaires, agreements, and any associated documentation that you complete or given in writing, in person, by telephone (which may be recorded), fax, electronically or by any other means, when you provide it to us or our service providers in correspondence and conversations (including by email), when you make any contact, request, cooperation, or transaction with the Company.

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

We may combine Personal Data that you provide to us with Personal Data that we collect from, or about you. This may include Personal Data collected in an online or offline context including from other available public databases or data sources, such as news agencies, websites, and other media sources.

We may also obtain Personal Data on you from other publicly accessible directories and sources. These may include websites, bankruptcy registers, tax authorities, court databases and registers, governmental agencies and departments, and regulatory authorities, to whom we have regulatory obligations, and any relevant agencies and organizations, including law enforcement.

This includes information relating to you and/or any individuals connected with you such as: name, address, email address, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, correspondence records, identity card number, passport number, bank account details, source of funds details, and any other details relating to you.

If you are a corporate entity, this document will be relevant for those individuals connected to you and you should transmit this document to such individuals for their awareness and consideration.

How the Company may use your Personal Data

The Company, as the data controller, may collect, store and use your Personal Data for purposes including the following.

- I. The processing is necessary for the fulfillment of our obligations to you, including:
 - a. for the investors, processing your investment in the Company or any payment or distribution to you, such as recording your information in the registers and accounts of the Company;
 - b. facilitating the continuation or termination of the contractual relationship between you and the Company;
 - c. facilitating the transfer of remuneration, payment, fund, and administering and facilitating any other transaction, between you and the Company; and
 - d. operating, administering or managing the Company on an on-going basis which enables the Company to satisfy its contractual duties and obligations.
- II. The processing is necessary for compliance with applicable legal, tax or regulatory obligations, including:
 - a. undertaking due diligence and verifying the identity and addresses of our shareholders;
 - b. complying with requests from regulatory, governmental, tax, and law enforcement authorities;
 - c. surveillance and investigation activities;
 - d. carrying out audit checks, and instructing our auditors;
 - e. maintaining statutory requirements; and

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

- f. preventing and detecting fraud.

III. In pursuance of our legitimate interests, or those of a third party to whom your Personal Data are disclosed (including the Authorized Party), including:

- a. complying with a legal, tax, accounting, or regulatory obligation to which we or the third party (including the Authorized Party) are subject;
- b. assessing and processing requests you make;
- c. sending updates, information, and notices, or otherwise corresponding with you in connection with your interest with the Company;
- d. assisting the Company in the improvement and optimization of our services, advertising, and marketing;
- e. investigating any complaints, or pursuing or defending any claims, proceedings or disputes (either domestic or foreign);
- f. providing you with, and informing you about the Company’s products and services;
- g. managing and controlling our risk and operations;
- h. complying with audit requirements;
- i. ensuring internal compliance with our policies and procedures;
- j. to facilitate business transactions involving the Company or its affiliates;
- k. detecting, preventing, investigating, and prosecuting fraud and/or other criminal activity, and sharing this data with legal, compliance, risk and managerial staff to assess suspicious activities, and protecting the Company against fraud, breach of confidence or theft of proprietary materials;
- l. seeking professional advice, including legal advice;
- m. facilitating transactions involving the Company, including to verify the identity of the Company to third parties in connection with any actual or proposed investments and/or for any purpose which the Company considers is necessary or desirable;
- n. monitoring communications to/from us (where permitted by law); and
- o. protecting the security and integrity of our IT systems.

IV. The processing is necessary for other relevant and the following purposes, including:

- a. questionnaire, survey, assessment, evaluation, provision of information by the Company to you and policies or decision making by the Company;
- b. execution of legal actions taken by the Company or those carried out against the Company and/or affiliates of the Company, particularly where the Company carries out corporate actions or the Company becomes the object of a corporate action such as: consolidation, merger, acquisition, sale and purchase of assets, restructuring, procurement and/or financing;
- c. distribution of information that the Company deems useful for you, namely information about policy updates or third parties who have officially cooperated and signed confidentiality agreement with the Company, updates, developments, and/or improvement of policies or decisions of the Company;
- d. personalization for your maximum benefit provided by the Company and/or third parties who have officially cooperated with and signed confidentiality agreement with the Company;

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

- e. internal administrative purposes, specifically for matters related to (i) human resources, (ii) legal, (iii) accounting and finance, (iv) audit, (v) taxation, (vi) data analysis for testing, research, analysis, development, commercial partnerships, and collaboration related purposes, and/or (vii) records in the database;
- f. the Company's compliance with obligations imposed by the competent authorities or applicable laws and regulations as suggested, recommended, expected or requested to do so by internal and/or external legal advisers of the Company and/or competent authorities, which includes disclosures made in accordance with subpoenas, decisions and/or court orders, orders from law enforcement authorities in the context of inquiry, investigation, or other legal processes or requirements that apply to the Company or affiliates of the Company (particularly any alleged criminal acts of embezzlement, fraud or data theft, anti-money laundering, and prevention of terrorism financing);
- g. process your requests regarding access, correction, updating, and/or erasure/removal of your Personal Data in the Company system, as well as to contact you regarding your request to the Company;
- h. where you otherwise consent to the processing of Personal Data for any other specific purpose; and
- i. other purposes provided that these purposes are not prohibited by applicable laws and regulations. For the avoidance of doubt, the Company will notify the other purposes to you when seeking your consent, unless otherwise provided by applicable laws and regulations.

We will only process your Personal Data in pursuance of our legitimate interests where we have considered that the processing is necessary and, on balance, our legitimate interests are not overridden by your legitimate interests or rights.

The Company continues to be a data controller even though it has engaged service providers and other third parties to perform certain activities on the Company's behalf.

Unless as required under the applicable laws, if at any time you do not wish us to continue to process your Personal Data, then you may exercise your “opt-out” right by notifying us through communication channel provided by us.

Sharing your Personal Data and Third-Party Disclosure Policy

We may share your Personal Data with the Authorized Party, our affiliates, and partners for the purposes set out in this document as well as advisers (e.g. auditors, legal counsel, and tax advisers) to the Company relating to or in connection with your engagement or cooperation with the Company. We may also share relevant Personal Data where it is lawful to do so and necessary to comply with our contractual obligations or your instructions or where it is necessary or desirable to do so in connection with any regulatory reporting obligations. In certain circumstances we may be legally obliged to share your Personal Data and other financial information with respect to your interest in the Company with relevant regulatory, prosecuting and other governmental agencies or departments. They, in turn, may exchange this information with foreign authorities, including tax authorities and other applicable regulatory authorities. At times, it may also be necessary to share relevant Personal Data with

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

(i) a prospective service provider of the Company including one which is replacing an existing service provider or (ii) to people or companies where required in connection with a potential or actual corporate restructuring, merger, acquisition, or takeover of the Company and/or its affiliates.

The Company's affiliates and delegates may process your Personal Data on the Company's behalf, including with our banks, accountants, auditors and lawyers which may be data controllers in their own right. The Company's services providers are generally processors acting on the written instructions of the Company. Additionally, a service provider may use your Personal Data where this is necessary for compliance with a legal obligation to which it is directly subject (for example, to comply with applicable law in the area of anti-money laundering and counter terrorist financing or where mandated by a court order or regulatory sanction). The service provider, in respect of this specific use of Personal Data, may be deemed to be acting as a data controller.

In exceptional circumstances, we will share your Personal Data with regulatory, prosecuting and other governmental agencies or departments, and parties to litigation (whether pending or threatened) in any country or territory.

Sending your Personal Data internationally

We will not sell your Personal Data. Due to the expansion of our business, your Personal Data may be transferred to jurisdictions that do not offer equivalent protection of Personal Data as under the Data Protection Regulation. In such cases, we will process Personal Data or procure that it be processed in accordance with the requirements of the Data Protection Regulation, which may include having appropriate contractual undertakings in legal agreements with service providers who process Personal Data on our behalf. For example, where data is to be transferred to a person in a country which does not provide an adequate level of data protection, the Company will ensure it puts in place appropriate safeguards, such as contracts which seek to ensure that any data processor is contractually bound to provide an adequate level of protection in respect of the Personal Data transferred to it and that any such transfer complies with the requirements of the Data Protection Regulation.

Security of Personal Data

We take our responsibility to protect the privacy and confidentiality of your Personal Data very seriously. We maintain appropriate physical, electronic, and procedural safeguards to store and secure your Personal Data from unauthorized access, alteration, and destruction. Our control policies, for example, authorize access to investor or shareholder information only by individuals who need such access for the purposes set out in the section headed “How the Company may use your Personal Data” above.

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

Retention and erasure or removal of your Personal Data

We will keep your Personal Data for as long as it is required by us for the purpose of the data processing. For example, we may require it for our legitimate business purposes, to perform our contractual obligations, or where law or regulation obliges us to. We will generally retain your Personal Data throughout the lifecycle of the employment or cooperation you are involved in. Some Personal Data will be retained after your relationship with us ends. We expect to remove your Personal Data (at the latest) once there is no longer any legal or regulatory requirement or legitimate business purpose for retaining your Personal Data.

Automated decision-making

We will not take decisions producing legal effects concerning you, or otherwise significantly affecting you, based solely on automated processing of your Personal Data, unless we have considered the proposed processing in a particular case and concluded in writing that it meets the applicable requirements under the Data Protection Regulation.

Your rights

Subject to the Data Protection Regulation, you have certain data protection rights, including the right to:

- a. obtain information on the identity, basis of legal interest, purpose of requesting and using Personal Data, and the accountability of the party requesting the Personal Data;
- b. rectify your Personal Data by completing, updating and/or correcting your Personal Data;
- c. access your Personal Data;
- d. stop the processing and erasure or removal of your Personal Data, according to the prevailing laws and regulations;
- e. withdraw the consent for processing of your Personal Data;
- f. object decision making actions based on automated processing including profiling, that has significant legal effects to you;
- g. suspend or limit the processing of your Personal Data proportionally according to the purpose of Personal Data processing;
- h. claim and obtain compensation for the breach of your Personal Data processing, in compliance with the prevailing laws and regulations;
- i. data portability that allows you to obtain and/or use your Personal Data or transfer of your Personal Data to other service providers;
- j. be informed of a Personal Data breach.

Please note that if you do not wish to provide us with requested Personal Data or subsequently withdraw your consent, you may not be able to continue the cooperation or receive the benefit the Company may offer, and it will affect our ability to fulfill our obligations to you.

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

Contact us

We are committed to process your Personal Data lawfully and to respect your data protection rights. Please contact us if you have any questions about this document, marking “Data Protection Enquiry” or should you intent to exercise of any “opt-out” right, to our contact details as follows:

PT Elang Mahkota Teknologi Tbk
SCTV Tower 18th Floor, Senayan City
Jl. Asia Afrika Lot 19,
Jakarta 10270, Indonesia

Attn. :
Dwi Deila Wulandari T. S.H. (email: dwi.deila@emtek.co.id)
Data Protection Officer

PRIVACY AND DATA/INFORMATION PROTECTION POLICY
(“Policy”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
(“Company”)

**Additional Information
on Use of Customer Data**

EMTEK regularly discloses the number of requests for customer information from government or law enforcement agencies and the percentage of the requests which resulted in such disclosure by EMTEK, which can be found in the table below.

Year	Requests for disclosure of customer information	Percentage of requests that result in the disclosure of some customer information
2020	0	0
2021	0	0
2022	0	0