

PRIVACY NOTICE

Effective from March 3, 2025

PT Trimegah Sekuritas Indonesia Tbk (hereinafter referred to as "**We**") is committed to protecting the privacy and security of your Personal Data. This Privacy Notice provides complete information on how We collect, use and protect your data. We always comply with the applicable laws and regulations, including Law Number 27 of 2022 on Personal Data Protection and its amendments and/or updates from time to time, better known as the "**PDP Law**", as well as applicable and relevant implementing regulations, to ensure the security and privacy of your data.

We believe that transparency is key in building trust. Therefore, through this Privacy Notice, we intend to explain how we perform Personal Data Processing and protect your personal information. Thank you for entrusting us with your data.

A. Definition

In this Privacy Notice, the use of terms is explained as follows:

1. **Cookie** is a small file stored on the User's device (such as a computer or smartphone) when visiting a website to store information about the User's activities or preferences on that website, so that the website can "remember" the User on subsequent visits;
2. **Personal Data** refers to data about an individual that can be identified either alone or in combination with other information, directly or indirectly, through electronic or non-electronic systems;
3. **General Personal Data** is Personal Data that is of a general nature and does not fall under the category of Specific Personal Data, including but not limited to: full name, mother's maiden name, gender, address, place and date of birth, phone number, email address, occupation, identification number issued by the Competent Authority, nationality, and signature;
4. **Specific Personal Data** is Personal Data that is specific and requires a higher level of protection compared to other Personal Data under applicable laws and regulations, including but not limited to information and/or data related to bank accounts, investment objectives, sources of investment funds, risk profiles, trade confirmations, monthly reports, biometric data, and transaction data combined with or containing Personal Data;
5. **Group** refers to the parent company and subsidiaries of PT Trimegah Sekuritas Indonesia Tbk;
6. **We** refers to PT Trimegah Sekuritas Indonesia Tbk;
7. **Services** refers to all types of services and products provided by us, including websites, features, applications, social media, or other forms of media communication provided or used by us;
8. **User** refers to you, the party accessing the Services;

9. **Third Party** refers to any party that has a business relationship with us, including business partners, vendors, outsourcing companies, and/or other parties appointed to represent us;
10. **Data Subject** or **You** refers to all owners of Personal Data who have and/or will use the Services or cooperate with us, including but not limited to individuals in a kinship relationship and individuals who are appointed and/or authorized to represent clients, as well as visitors or Users of the Services and Third Parties to whom this Privacy Policy Notice applies;
11. **Personal Data Processing** refers to activities related to acquiring, collecting, processing, analyzing, storing, correcting, updating, disseminating, displaying, announcing, transferring, disclosing, deleting, and destroying Personal Data;
12. **Joint Data Controller** refers to Personal Data Controllers consisting of two (2) or more Personal Data Controllers who determine the purposes and have control over the processing of Personal Data; and
13. **Personal Data Processor** refers to any person, public body, or international organization that acts alone or jointly in processing Personal Data on behalf of the Personal Data Controller.

B. Types of Personal Data

Based on the services you use to interact with Us, the categories and types of Personal Data that may be processed include, but are not limited to:

1. General Personal Data:

- a. **Personal Profile Identification Data**
Full name, National Identification Number (NIK) stated on the Identity Card (KTP) for Indonesian Citizens (WNI) and Passport Number for Foreign Citizens (WNA), Taxpayer Identification Number (NPWP) or Tax Identification Number (TIN), immigration documents, gender, nationality, place and date of birth, birth mother's maiden name, alias or nickname, religion, and signature form.
- b. **Family Data**
Marital status, name of spouse, number of children, and number of dependents.
- c. **Correspondence Data**
Address according to ID card, address and domicile status, e-mail address, phone or mobile number, and emergency contact details (including name, type of relationship with you, address, phone or mobile number, and e-mail).
- d. **Education and Employee Data**
Level of education, type of work, field of business, position, division, year of starting work or business, name of company or agency where worked, address of place of work, and employment status.

2. Specific Personal Data:

- a. Financial Data
Fund account number, financing data, source of income, amount of monthly or annual income, amount of monthly or annual expenses, transaction data, tax data and other data of our services that you receive.
- b. Data related to Personal Preferences
Communication preferences, hobbies, and interests.
- c. Digital Activity Data
Data in the form of time of each of your activities in connection with the use of the service including registration, login and transaction times, your activities on our service, and interactions in our service with other applications or sites on your electronic device; device data including hardware model, operating system and version, software, Internet Protocol address (IP Address), Wi-Fi or mobile network information that you use to access the service.
- d. Interaction Data
CCTV recordings in our environment, recordings of Call Center telephone conversations, transcripts of conversations through our communication media including but not limited to e-mail and social media.
- e. Processed Data
The data obtained from the processing of your data includes, but is not limited to, profiling based on service usage activities.

C. Personal Data Collection

We will obtain and collect information, including Your Personal Data, in connection with your relationship with us as:

1. From You

In the context of providing the service, we collect your Personal Data in various forms, including:

- a. When you or an individual authorized to represent you visit or use our services;
- b. Request information, register and use our services;
- c. Contacting us to provide questions or feedback, either through our branches or head office, Call Center, social media, and other official communication media and any of our services; and
- d. Participate in activities organized by us or our appointed third parties such as webinars or surveys.

2. Employee/Candidate Employee

- a. Apply for a job and fill out an application form that includes Personal Data information;
- b. Provide additional information such as identification number, bank account number, emergency contacts, and other information required during the onboarding process;
- c. Agreeing to documents such as employment contracts, letters of agreement, and other legal documents that contain Personal Data of Our Employees;

- d. Use a human resource management system that stores Employee Personal Data, including attendance, performance and other records;
- e. Apply for benefits such as health insurance or retirement; and
- f. Completing surveys or questionnaires that collect Personal Data.

3. Third Parties

We may also collect your Personal Data from other parties (depending on the type of service you use), including:

- a. The party you authorize (Power of Attorney) to give instructions, manage your account and make decisions on your behalf;
- b. The Group and/or Third Parties for the purpose of providing the Services;
- c. Your place of work or companies affiliated with you;
- d. Our other customers;
- e. Other parties who refer you to Us, for example referral programs provided by institutional marketing partners;
- f. Financial institutions, government agencies and other authorized parties;
- g. Other parties' sites/applications that use Our Application Programming Interface (API) or that are used by Us; and
- h. Other public information sources, including but not limited to: social media services, Financial Information Service System (SLIK) from the Financial Services Authority (OJK), population information registered with Dukcapil, company information registered with the Ministry of Law and Human Rights.

D. Personal Data Processing

We use your Personal Data and ensure that we have your consent to deliver, maintain and develop our products and services. Our use of your Personal Data includes:

1. Provision, Management and Support Services

- a. Management of our products, services and/or services including profiling and scoring in order to improve services for you;
- b. Carrying out your requests, e.g. executing transaction instructions, document requests and updating Personal Data;
- c. Analyzing and processing your application for securities financing facility;
- d. Communicating with you face-to-face or via telephone, e-mail, SMS, Whatsapp, and social media related to information on features or benefits of the service, transaction notifications, notification of changes to the terms and conditions of the service;
- e. Providing user support services, e.g. responding to your inquiries, feedback and complaints, and keeping records of such interactions.

2. Promotion and Bidding Activities

- a. Provision of promos or programs we can cooperate with other parties for products and / or services that you already have;
- b. Marketing and/or offering of our products, services and/or other companies within our financial conglomeration and/or third parties that cooperate with us for products and/or services that you do not yet have; and
- c. Providing information regarding your Personal Data to the group and third parties as permitted under applicable law for commercial purposes in which case we will ask for Your consent separately for the offering activities as listed above for example when opening an account.

3. Legitimate Interest

- a. Carry out service provision activities and improve business performance;
- b. Evaluate, improve and update service problem solving from time to time;
- c. Analyze and understand your trends and behavior in using the service in order to improve the quality of the service and comply with the applicable provisions;
- d. Conduct market research and create analysis reports for the purposes of developing the service, protecting our security, carrying out internal audit purposes and investigating suspicious and/or unlawful activities such as fraud, money laundering, terrorism financing, bribery and corruption.

4. Fulfillment of Legal Obligations

- a. Carry out Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD) for the implementation of Anti-Money Laundering Program for the Prevention of Financing of Terrorism and Prevention of Financing of Proliferation of Weapons of Mass Destruction (AML/CFT PPPSPM);
- b. Verify the accuracy of your information regarding the use of the service;
- c. Submitting reports in accordance with the provisions of the applicable laws and regulations to the Financial Service Authority (OJK), Indonesia Stock Exchange (IDX), PT Indonesia Central Securities Depository (KSEI), Clearing and Guarantee Institution or Central Counterparty (KPEI), and other authorized parties;
- d. Carry out and comply with all applicable laws and regulations;
- e. Performing our obligations in the context of fulfilling the interests of national defense and security, law enforcement processes, state administration, supervision of the financial services sector, monetary, payment systems, and financial system stability, statistics and scientific research in the context of state administration; and/or
- f. State of emergency that has been determined by the government.

E. Disclosure of Personal Data

We will share your Personal Data with third parties only in the manner set out in this Privacy Notice or set out at the time the Personal Data is collected, including to the following parties:

1. The Competent Authority for the needs of examination, investigation or inquiry, fulfillment of a court order on a legal process, or to comply with filing or reporting obligations under a law or regulation, and for other purposes as required under applicable laws and regulations;
2. Parties designated by the Authority for contact tracing, supporting the Authority's initiatives, policies or programs, and other purposes as reasonably required;
3. Other parties in order to resolve an emergency related to your safety, in particular (i) to prevent financial loss or damage, to report suspected illegal activities or to respond to any claims or potential claims brought against or (ii) in the event that you experience loss of your stored Personal Data in the event that you request assistance from law enforcement and/or other parties to collect Your Personal Data stored with us. Then, to assist you, we may submit your Personal Data stored by us to such law enforcement or other parties for the purpose of assisting you to recollect your lost Personal Data;
4. Payment processors, who process your payments on the service;
5. Institutional marketing partners who separately manage accounts with you;
6. Business partners or vendors in connection with the processing of any promotion, event or service organized by us;
7. Professional advisors and consultants;
8. Agents, contractors or service providers who provide operational services to us, such as online cloud storage and processing, marketing optimization, information technology, telecommunications, backup and disaster recovery service providers, security or other related services that require the collection, use or disclosure of your Personal Data;
9. Third Parties that you authorize us to disclose your Personal Data. In connection with the disclosure of your Personal Data to third parties, including from third parties to other parties, we will require such third parties and other parties to maintain the security and confidentiality of your Personal Data in accordance with the provisions of the applicable laws and regulations. If the interested third party does not require certain Personal Data to be associated with you, your relevant Personal Data will be reasonably deleted so that such Personal Data cannot be associated with you as an individual before it is disclosed or transferred to such third party; and

10. Google Analytics to help us understand how our customers use this service.

F. The Basis for Personal Data processing

We will only process your Personal Data by fulfilling 1 (one) or more of the following processing bases:

1. An Explicit Valid Consent

Personal Data is processed for specific purposes based on your consent or that of a party authorized to represent you.

2. Fulfilment of Agreement Obligations

Processing is carried out in order to fulfill the obligations in the agreement between you and us, or as a step prior to such agreement being performed.

3. Fulfilment of The Legal Obligations

Personal Data is processed to comply with legal requirements in accordance with applicable laws and regulations.

4. Fulfilment of Other Legitimate Interests

Processing is carried out to fulfill our legitimate interests without prejudice to your rights as a Personal Data Subject. We remain mindful of the balance between our interests and your rights, in particular in improving the quality of the services.

5. Carrying Out Duties in The Context of Public Interest

Processing is carried out to carry out our responsibilities in safeguarding the public interest, providing public services, and fulfilling authorities based on applicable regulations.

6. Fulfilment of The Protection of Vital Interests

Personal Data is processed to protect your vital interests as a Personal Data Subject.

Processing on these bases ensures that the use of Personal Data is carried out in accordance with the rights and obligations applicable to us and you.

G. Rights of Personal Data Subjects

We fully understand that Personal Data is an asset and important data to you. In accordance with the Law, here are the rights that you have as a Personal Data Subject:

1. Right to Obtain Information and Access

You have the right to obtain information regarding the identity of the party requesting your Personal Data, the purpose of the request, and access to a copy of your Personal Data. We will provide access to such information through our official means, such as through our branch offices and/or head office or other official channels, in accordance with the provisions of laws and regulations and our policies. You understand that in the event you request a copy of your Personal Data information and/or details of the processing of your Personal Data, you may be charged a fee by us.

2. Right to Complete, Update and/or Correct Errors and/or Inaccuracies

You have the right to complete, update, and/or correct Personal Data that is inaccurate or not in accordance with your latest circumstances. We reserve the right to verify the Personal Data provided by you. The use of false Personal Data may be considered a violation of the Privacy Notice including violations of law and may result in restrictions or termination of user access to our services. You shall be responsible for the authenticity, validity, correctness and security of any Personal Data that you submit to us for the purposes of the service.

3. Right to Obtain, Use and/or Transfer Personal Data to Other Parties

You have the right to obtain, utilize, or provide your Personal Data that is with us to a Third Party, as long as the communication system used by us and the Third Party in question has been deemed secure by us.

4. Right to End Processing, Delete and/or Destroy Personal Data

You have the right to terminate the processing, erasure and/or destruction of your Personal Data. You agree to allow us time to process the termination of processing, deletion and/or destruction of your Personal Data to the extent required by us. To exercise the right to terminate the processing, erasure and/or destruction of such Personal Data, you may contact us through the means of communication set out in this Privacy Notice.

To be understood, the termination of processing, deletion and/or destruction of such Personal Data may affect our ability to provide products, services and services to you and the contractual relationship that has been made between us and you or between us and other third parties, including may result in the cessation of the services that you receive and/or the termination of 1 (one) or several of your agreements with us and/or the breach of 1 (one) or several of your obligations under the agreement with us.

In connection with this, termination of processing, deletion and/or destruction of Personal Data results in you giving us the right to freeze securities accounts and funds. Any losses arising from the exercise of your right to terminate the processing, deletion and/or destruction of Personal Data shall be your responsibility. Our obligation to delete and destroy your Personal Data is excluded for the purposes of: national defense and security; law enforcement process; public interest in the context of state administration; supervision of the financial services sector, monetary, payment system, and financial system stability carried out in the context of state administration.

5. Right to Withdraw Consent

You have the right to withdraw the consent to the processing of Personal Data that you have provided to us, except in the case of an exempted interest based on laws and regulations, and you agree to provide us with additional time to process the termination of the processing of your Personal Data to the extent we require. To exercise the right to withdraw consent, you may contact us through the means of communication set out in this Privacy Notice.

You need to understand that the withdrawal of such consent may affect our ability to provide products, services and services to you and manage the contractual relationship that has been made between us and you or between us and other third parties including may result in the termination of the services you receive and/or the termination of one or more of your agreements with us and/or breach of one or more of your obligations under the agreement with us.

In connection with this, the withdrawal of consent to the processing of Personal Data results in you giving us the right to freeze your securities account and funds. Any losses arising from the exercise of your right to withdraw consent to the processing of Personal Data shall be your responsibility.

6. Right to Object a Decision-Making Action

You have the right to object to the results of automated processing of your Personal Data that has legal consequences or has a significant impact on you, including profiling and/or scoring. You understand and agree that this right is excluded, if there is an obligation of us based on the order of the applicable Law.

7. Right to postponement or restriction Processing

You have the right to postponement or restriction the processing of your Personal Data in proportion to the purposes for which your Personal Data is processed, subject to the reasons for such postponement and restriction of processing. For the exercise of this right, you may contact us through the means of communication set out in this Privacy Notice. You need to understand that the request for postponement or restriction of processing may affect our ability to provide products, services and services to you, as well as the contractual relationship that has been made between us and you or between us and other third parties including may result in the termination of the services you receive and/or the termination of one or more of your agreements with us and/or breach of one or more of your obligations under the agreement with us. In connection with this, the postponement or restriction of the processing of Personal Data results in you giving us the right to freeze your securities account and funds. Any losses arising from the exercise of your right to postponement or restrict the processing of Personal Data shall be your responsibility.

8. Other Rights in Accordance with Laws and Regulations

You are entitled to assert other rights in relation to the processing of Personal Data to the extent provided for in the applicable laws and regulations.

H. Obligations of Personal Data Subjects

You have an important responsibility to ensure the accuracy and maintain the security of your Personal Data. You are responsible for actively ensuring that the Personal Data you provide to us is true, accurate, complete, and always updated according to your latest circumstances. If there are errors or inaccuracies in the Personal Data that you submit, you must immediately notify us to make corrections, completions, or updates. If we, with reasonable efforts, cannot verify the inaccuracy of the data, then we reserve the right to take the necessary steps, including stopping the Service to you or rejecting transaction requests based on our knowledge and judgment.

You are also responsible for maintaining the confidentiality of your Personal Data information, such as username, password, email address, and One Time Password (OTP) that we may send to you from time to time. You are not allowed to share this information with any party and must maintain the security of the device used to access our services. This safeguard is important to prevent unauthorized access or misuse of your Personal Data. Failure to maintain the accuracy and security of your Personal Data may result in risks such as termination of the service, denial of transactions, or other consequences at our discretion.

In addition, you understand that the retrieval, collection, disclosure, dissemination, use, or sale of Personal Data belonging to another party without the express written or recorded consent of the Personal Data Subject is expressly prohibited. Violation of this provision can be considered a violation of privacy and has the potential to cause legal consequences in accordance with applicable laws and regulations.

I. Control and Transfer of Personal Data

In processing your Personal Data, we may involve Third Parties as Joint Personal Data Controller and/or Processor of your Personal Data, both inside and outside Indonesia. In this case, we will ensure adequate protection of your Personal Data in accordance with the applicable laws and regulations. If we transfer your Personal Data outside Indonesia, we will ensure that the transfer destination country has a level of Personal Data protection that is equivalent, or even higher, than the protection provided by Indonesian law.

However, if the transfer destination country does not have an equivalent (or higher) level of protection, we may proceed with the transfer of your Personal Data as long as it meets the requirements of applicable law. In addition, we may also transfer your Personal Data outside the territory of Indonesia for legitimate purposes, such as to combat criminal acts of fraud, other financial crimes, and to handle disputes or other issues that may arise, in accordance with applicable laws and regulations. Thus, We still maintain the protection of Your Personal Data, despite the transfer abroad, as long as it is in accordance with applicable regulations.

J. Personal Data Security Measures

In managing your Personal Data, we comply with the provisions of applicable laws and regulations, and we do not trade your Personal Data obtained through access and/or utilization of our services.

We are committed to maintaining the confidentiality of your Personal Data by making all best efforts possible, one of which is by using encryption technology, encryption techniques, authentication procedures, and periodic eligibility and/or security check procedures, with the aim of protecting your Personal Data.

However, in the event of illegal access or unlawful activities related to your Personal Data that are beyond our control, we will make best efforts to notify you immediately. If at any time we conduct a Corporate Action (merger, separation, takeover, consolidation, or dissolution of a legal entity) that may impact the security of your Personal Data, we will immediately provide notice through an official announcement published on our website and/or through official social media that we manage. This is done to enable you to take the necessary steps to reduce the risks that may arise from the implementation of the Corporate Action.

K. Period of Retention and Processing of Personal Data

We will carry out processing of your Personal Data from the moment we obtain a lawful basis for processing, i.e. processing consent. This processing will continue for as long as you continue to use Our Services or in accordance with the provisions of applicable laws and regulations. We may retain your Personal Data after you terminate your use of Our Services, to the extent necessary for legal purposes or based on our internal policies referring to applicable laws and regulations, or in accordance with the retention period stipulated in such regulations.

Some of your Personal Data may also be stored by Third Parties that work with us to provide the services that You use. If we share your Personal Data with authorized government agencies or other Agencies appointed by the government, you agree and acknowledge that the storage of your Personal Data by the relevant agencies will follow the data storage policies applicable in each of these agencies. In addition, we have a legal obligation to retain your Personal Data if it is related to the completion of ongoing legal proceedings.

L. Cookie Policy

Each time you access our services, we may collect certain Personal Data of yours such as IP address, information of the web pages you access, duration of each visit or session, internet device identity and other device information from your device.

1. How do we use cookies?

To give you the best experience, we use the following types of cookies:

- a. Session Cookies. We use these cookies to operate our Electronic Systems.

- b. Preference Cookies. We use preference cookies to help us remember how you like to use our services. Some cookies are used to personalize content and provide you with a customized experience. For example, location can be used to provide you with services and offers in your area.
- c. Security Cookies. We use these cookies for security purposes.

2. How Do We Control Your Cookies?

Cookies are sent to your browser from websites and stored on your device. Tracking technologies such as beacons, tags and scripts, we use to collect and track information and to improve the reliability and analyze our services.

You can instruct your browser to refuse all Cookies or to indicate when cookies may be sent. However, if you do not consent to Cookies, you may not be able to use some or all of the services in Our Electronic Systems.

If you choose to use the Electronic System without blocking or disabling cookies, you agree to the use of these cookies and also the use by us of your information or data that we collect through Cookies.

In addition to our own cookies, we also cooperate with other companies in placing cookies on our services to collect information for us. These companies cannot use these cookies for their internal purposes or share the collected information with anyone, in accordance with the terms of the contract or agreement with us.

For more information about Cookies, you can access aboutCookies.org, or www.allaboutCookies.org

M. Children's Privacy

Our Services are not directed to anyone under the age of 18 ("Children"). If you are a parent or guardian and you are aware that your children has provided Personal Data to us, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we will take steps we deem necessary to delete such information from our servers.

N. Privacy of Persons with Disabilities

We pay special attention in carrying out the processing of Personal Data of persons with disabilities. We are committed to conducting appropriate communication with persons with disabilities and/or guardians, as well as obtaining consent from the party concerned before processing Personal Data which is carried out with reference to the provisions of applicable laws and regulations.

O. Privacy Notice Change

We are always committed to maintaining the security and privacy of your Personal Data. Therefore, we may update this Privacy Notice from time to time in accordance with the development of Our practices in processing Personal Data and in accordance with applicable laws and regulations. You can access the latest version of this Privacy Notice through Our website at <https://www.trimegah.com/en/site/corporate-governance/policies>. With the enactment of this Privacy Notice in accordance with the date listed at the beginning, it abolishes the previous Privacy Policy that has existed.

P. Contact Us

If you have any questions or require further information regarding this Privacy Notice, you may contact our Call Center at +62-21 2924 9000 or via email callcenter@trimegah.com or you may also visit our nearest office.