

Data Protection Policy

1. Introduction / Scope

Socfindo has established the Data Protection Policy with the purpose define, establish and maintain an adequate level of privacy in the collection, processing, transfer, disclosure and cross border transfer of Personal Data.

The policy relates to Personal Data from current, past and prospective Socfindo employees, trainees, clients, suppliers, contractors, business associates, consultants and visitors.

The Data Protection policy applies to all Socfindo employees, trainees, temporary workers, job applicants and business associates working with or for Socfindo

2. Definition

Personal Data:	Personally identifiable data such as name, address, phone number, birth date, etc.
Sensitive Data:	Confidential data such as bank account details, medical records, biometric data, genetic data, etc.
Data Subject:	Individual owner of the Personal and/or Sensitive Data, collected, stored or otherwise processed by Socfindo
Data Processing:	Includes any form of data handling such as collection, treatment, storage, transfer, modification or erasing.

3. Collecting Confidential or Personal Information

Where Socfindo and/or its approved agent(s) receives personal or confidential data from a Data Subject or a third party, it shall:

- Inform the Data Subject on the purpose of the data collection, its intended use, to whom it will be communicated and the time during which it will be kept;
- Keep personal information and data confidential and secure, and only disclose such information to the agents having a legitimate business reason to access such information or to public authorities in accordance with the applicable legislation;
- Establish additional security measures and/or disclosure restrictions at the Data Subject's specific request; and
- Obtain the approval of the Data Subject to process the data, share it with other Socfindo entities, including those outside de European Economic Space, and selected third parties (such as salary payment, insurance or pension plan providers).

4. Use of Personal Data

Socfindo collects and processes Personal Data for a specific purpose and only process the Personal Data necessary and relevant to achieving that specific purpose.

In particular, Socfindo will process Personal Data for the following purposes, always in accordance with the nature of Socfindo's relationship with the Data Subject as well as the applicable laws, rules and regulations:

- Perform Socfindo's contractual obligations towards the Data Subject or to take pre-contractual steps at the Data Subject's request and/or with his/her consent;

- Manage Socfindo's suppliers and sub-contractors;
- Monitor activities in Socfindo's facilities, including compliance with applicable policies and HSE rules that are in place;
- Manage Socfindo's IT resources, including infrastructure management and business continuity;
- Preserve Socfindo's economic interests;
- Ensure compliance and reporting obligations, such as complying with (local) legal and policy requirements, tax and compulsory retentions, managing cases of alleged misconduct or fraud, conducting audits and defending litigations);
- Archiving and record-keeping;
- Billing and invoicing; and
- Any other purpose imposed by law or the authorities.

5. How Socfindo Uses Personal Data

Socfindo will not process a Data Subject's personal information without approval or if there is no legal justification. Therefore, Socfindo will only process personal information if there is a basis (the Data Subject's approval or law) authorising Socfindo to do so, such as:

- Performance of a contract: when processing a Data Subject's personal information is necessary to perform Socfindo's obligations under the contract;
- Legal obligation: when Socfindo is required to process personal data to comply with legal obligations, such as keeping records for tax purposes or providing information to a public body or law enforcement agency;
- Legitimate interest: Socfindo will process personal data where it is in the company's legitimate interest, provided it does not outweigh the Data Subject's interests and freedoms;
- Vital interest: if the processing of personal data is necessary to protect the vital interest of the Data Subject or that of another natural person;
- Public interest: when the processing of personal data is necessary for a task carried out in the public interest; or
- The Data Subject's consent: in some cases, in addition to contractual reasons, Socfindo will ask for specific authorisation to process some personal information and will only do so if the Data Subject has agreed for Socfindo to do so.

A Data Subject may withdraw his/her consent at any time by contacting Socfindo.

6. Who Has Access to Personal Data and Whom Are They Transferred?

Socfindo does not share data with third parties, except as necessary for their legitimate professional and business needs to carry out the Data Subject's requests, and/or as required or required by law or generally accepted professional standards.

Socfindo shall ensure that external service providers, that have access to confidential or personal data, are bound by contractual obligations and Third-Party Data Processing Agreement to maintain the confidentiality and security of the information they have been given. Socfindo may further include a confidentiality clause in the General Terms of Business, and confidentiality of non-disclosure agreements may be signed from time to time with third parties (i.e. external service providers that have access to personal or confidential data).

7. Protection of Personal Data

The Data Subject's information shall be subject to appropriate organisational and technical measures to provide a high level of privacy and security for personal data against accidental or unlawful destruction or alteration, theft, accidental loss, unauthorised disclosure or access, and any other forms of illegal or unauthorised processing.

Socfindo incorporates the protection of personal data as an integral part of its business operations by design and by default, so as to protect the rights of Data Subjects. Socfindo's business operations include management policies, distinction of roles and responsibilities, backups, physical security measures, policy for the destruction or erasing of personal data, cyber security policy.

8. Privacy Right

The Data Subject's rights include the right of access to the individual's data, its rectification, the erasure or right of deletion, restrictions to data processing, the right of objection against personal data processing, data portability, the right to withdraw consent at any time (where processing is based on consent). The Data Subjects has the right to file a complaint with the relevant authorities in case Socfindo does not comply with the individual's privacy rights.

9. Contact for Any Queries

The Company has appointed a DPO responsible for overseeing Socfindo's data protection strategy and its implementation to ensure compliance with legal requirements:

Location : PT. Socfin Indonesia, Jl. K. L. Yos Sudarso 106, Kota Medan
Phone : +62 61 661 60666
Email : head_office@socfindo.co.id

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