

PRIVACY NOTICE

PT BANK ANZ INDONESIA
AUSTRALIA AND NEW ZEALAND BANKING GROUP LIMITED
ANZ BANK NEW ZEALAND LTD
AUSTRALIA AND NEW ZEALAND BANK (CHINA) COMPANY LTD
ANZ BANK (KIRIBATI) LTD
AUSTRALIA AND NEW ZEALAND BANKING GROUP (PNG) LTD
ANZ BANK (SAMOA) LTD
ANZ BANK (VANUATU) LTD
ANZ BANK (VIETNAM) LTD
AND RELATED ENTITIES

October 2024



Protecting your privacy and the confidentiality of your Personal Data is fundamental to the way ANZ does business.

The purpose of this Privacy Notice ("**Notice**") is to make the Personal Data Subject aware of how we will collect, use, disclose and/or otherwise process (collectively, "**process**") (i.e., any acts impacting Personal Data) your Personal Data (i.e. information which identifies an individual directly or indirectly through an electronic or non-electronic system) and the measures and processes we have put in place in order to ensure that we comply with the applicable Law No. 27 of 2022 on Personal Data Protection and other applicable regulations in relation to the Personal Data protection ("**Indonesian PDP Regulations**").

1. SCOPE

This Notice is given by PT Bank ANZ Indonesia, Australia and New Zealand Banking Group Limited, ANZ Bank New Zealand Ltd and all subsidiaries, branches and related entities (collectively "**ANZ**", "**we**" or "**us**", "**our**") to you ("**you**" or "**your**"). We act as a Controller for the Personal Data we collect about you or during the course of our dealings with you as our customer or vendor, and about your founders, beneficial owners, directors, legal and authorized representatives, employees, agents, consultants, contractors, payers, intended payees and those of associated entities such as employees of (your "**Personal Data**"). This means that we determine the purposes for and the manner in which we or our Processors process your Personal Data.

If you provide ANZ Personal Data about you, your founders, beneficial owners, directors, authorized representatives, employees, agents, contractors, consultants, and those of your associated entities such as employees, and authorized representatives of your group companies, subsidiaries, or partnerships or if you direct someone else to give their Personal Data to ANZ you warrant to us that you have shown each such person a copy of this Notice and have an appropriate legal basis under the applicable laws to provide us with the relevant Personal Data so that they understand and consent to the manner in which their Personal Data may be used, disclosed or processed.

The terms 'Controller', 'Processor', 'Personal Data Subject', and 'Personal Data' are as defined in the Indonesian PDP Regulations.

For the purpose of processing your Personal Data, upon our reasonable request, you agree to assist us in relation to any matter related to the processing of your Personal Data for the purpose of ensuring compliance with applicable laws. You hereby indemnify and agree to keep indemnified us, our group companies, our employees, agents, consultants, contractors or other personnel and non-ANZ personnel/ individuals (such as employees of our clients) against any loss any of those indemnified suffers or incurs in connection with or as a result of any breach by you of this Notice.

2. WHAT THIS PRIVACY NOTICE COVERS

This notice covers:

- (a) **What Personal Data we collect about you;**
- (b) **How we obtain Personal Data**
- (c) **Processing purposes and Legal Bases;**
- (d) **Recording communications with you;**
- (e) **International Transfers of Personal Data;**
- (f) **When we may disclose your Personal Data;**
- (g) **Protecting your Personal Data;**
- (h) **Your rights in relation to the Personal Data we collect;**
- (i) **How long we will hold and process your Personal Data for;**
- (j) **How we update or change this Notice; and**
- (k) **How you can contact us.**

3. WHAT PERSONAL DATA WE COLLECT ABOUT YOU

3.1 We may process the following types of Personal Data which we collect about your founders, beneficial owners, directors, authorized representatives, employees, agents, consultants, contractors and those of your associated entities such employees and authorized representatives of your group companies, subsidiaries or partnerships (as is appropriate from time to time):

- (a) First and last name, middle name, email address, home address and other contact details;
- (b) Date of birth;
- (c) Place of work;

- (d) Place of birth and nationality;
- (e) Residential address, address of permanent residence registration and other current place of residence (if any);
- (f) Occupation and position;
- (g) Phone number;
- (h) Identification documentation, such as copy of the passport, driving license, ID card or such other documentation as is required by local law. Copies of these documents may include a photograph of their face and shoulders;
- (i) Transaction, account and other financial information;
- (j) Details of preferences for types of products or services, marketing events or materials in the context of their employment with you;
- (k) Details of access to our websites and applications including, but not limited to, traffic data, location data and other communication data (such as IP addresses), and the resources that are accessed;
- (l) Authorized signatory lists including facsimiles of the signatures of your founders, beneficial owners, directors, authorized representatives, employees, agents, consultants, contractors and those of your associated entities such employees and authorized representatives of your group companies, subsidiaries or partnerships (as is appropriate from time to time).

3.2 We may collect and process Personal Data (as set out above) that could include "Specific Personal Data" as defined in PDP Regulations. Specific Personal Data under PDP Regulations is Personal Data which can have a greater impact on the Personal Data Subject, including acts of discrimination and greater loss to the Personal Data Subject. Specific Personal Data we collect and process might include personal financial data and account information, biometric data (such as a photograph of an individual's fingerprints as available on the back of their ID card)

We will only process Specific Personal Data to enable us to provide products or services to you or to comply with our legal or contractual obligations or where it is necessary for reasons of substantial public interest, such as anti-money laundering and for fraud and crime detection and prevention purposes. We have suitable and specific measures in place to safeguard the fundamental rights and the interests of the Personal Data Subject and if there is any change to the collection or processing of any Specific Personal Data that we may collect or process in relation to you, we will obtain your express consent or rely on another legal basis under PDP Regulations, unless exceptions apply.

3.3 In certain circumstances it may be necessary for you to provide us with your Personal Data, for example, to enable us to provide services to you or to comply with our legal and contractual obligations. In other circumstances, it will be at your discretion whether you provide us with Personal Data or not. However, failure to supply any of the Personal Data we may request may mean that we are unable to maintain or provide services or products to you. Your Personal Data will only be processed to the extent that it is necessary for the specific purposes notified to you.

3.4 We make every effort to maintain the accuracy and completeness of your Personal Data which we store and to ensure all of your Personal Data is up to date. However, you can assist us with this by promptly contacting us if there are any changes to your Personal Data or if you become aware that we have Personal Data relating to any of your founders, beneficial owners, directors, authorized representatives, employees, agents, consultants and contractors and those of your associated entities such as employees and authorized representatives of your group companies, subsidiaries, or partnerships which is inaccurate (see section 10 below). We shall not be responsible for any losses you suffer arising from any inaccurate, inauthentic, deficient or incomplete Personal Data that you provide to us.

4. HOW WE OBTAIN PERSONAL DATA

4.1 We collect your Personal Data from the information you provide or permit to process your request or in the course of, managing or administering, a transaction, product or service or in the course of providing, managing or administering such, and any additional information provided by you or others during the course of us providing or are receiving our banking and investment services including:

- (A) in requests, documentation, emails and letters, during telephone calls and conversations, for example, when registering for services, entering into terms and conditions, when conducting "know your customer" ("**KYC**") or other similar checks under all applicable laws and regulations, through our group company websites, in meetings and at corporate events and during financial reviews and interviews;
- (B) from analysis (for example, the amount frequency, location, origin, and recipient) of your payments and other transactions, and your use of products and services involving other of our group companies and what they know as a result of operating your account, managing a transaction entered into with you, or providing you a product or service which are used to help us combat fraud and other illegal activity; and
- (C) information our group companies receive from each other, from or through other third party

organisations (for example, credit reference agencies, insurance companies, brokers, social networks, and fraud prevention agencies) whether in the course of providing products and services to you or otherwise, and from information we gather from your use of and interaction with our applications, systems and platforms for banking and investment services and the devices you use to access them.

4.2 We will also collect information about you that is publicly available.

5. PROCESSING PURPOSES AND LEGAL BASES

5.1 We will only process your Personal Data where:

- (a) the processing is necessary to comply with our legal or contractual obligations including:
 - (i) to carry out money laundering, financial and credit checks and for fraud and crime prevention, detection and investigation purposes. This includes the processing of biometric information;
 - (ii) to comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies; and
 - (iii) to comply with court orders and exercise and/or defend our legal contractual rights, as otherwise permitted or required by any applicable law or regulation;
 - (iv) process and response to requests, queries, complaints and/or comments received from you; or
 - (v) for administrative purposes in relation to the security and access of our systems, offices, platforms, and secure websites and applications.
- (b) the processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into such contract, including:
 - (i) for our client onboarding purposes, such as to collect and verify KYC information of your founders, beneficial owners, directors, authorized representatives, employees, agents, consultants, contractors, and those of your associated entities such as employees and authorized representatives of your group companies, subsidiaries, or partnerships ; to capture information of the above individuals for the purpose of screening before entering into a contractual relationship with you and/or before opening your account with us; to capture information of signatories, eBanking users in relevant systems to facilitate your account operation;
 - (ii) for account maintenance purposes, such as to collect and capture information of your new signatories, agents, and eBanking users; to update changes to Personal Data of your existing signatories, agents, and eBanking users;
 - (iii) for KYC review, such as to review your KYC information to ensure the information is up to date; to collect updated Personal Data and make relevant updates to KYC records accordingly;
 - (iv) for delivering products and/or services to you, including processing, assessing and determining any applications or requests made by you in connection with our products and/or services.
- (c) the processing is necessary for our legitimate interests or the legitimate interests of others (except where such interests are overridden by the interests or rights of your employees, agents and contractors and those of your associated entities requiring the protection of their Personal Data) including:
 - (i) for monitoring and assessing compliance with ANZ's policies and standards;
 - (ii) for promotional and marketing materials and activities;
 - (iii) facilitate our internal business operations;
 - (iv) to comply with court orders and exercise and/or defend our legal or contractual rights, as otherwise permitted or required by any applicable law or regulation;
 - (v) to identify persons authorized to trade on behalf of our clients;
 - (vi) for administrative purposes in relation to the security and access of our systems, offices, platforms and secure websites and applications;
 - (vii) maintain and develop our relationships with you, including to contact you about the services and products we offer;
 - (viii) for any other legitimate business purpose including the reasons set out in section 8 below; or
 - (ix) to carry out internal investigation complaints or misconduct and suspected suspicious activities.
- (d) you confirm and warrant that your founders, beneficial owners, directors, authorized representatives, employees, agents, consultants and contractors and those of your associated

entities consent to the processing of their Personal Data on the basis set out in this Notice including in relation to the processing of Personal Data.

6. RECORDING COMMUNICATIONS

- 6.1 We and persons acting on our behalf may record and/or monitor communications (including telephone conversations over landlines and mobile phones, emails, instant messaging (including provided by Microsoft), chat rooms, fax and other electronic communications) between your founders, beneficial owners, directors, authorized representatives, employees, agents, consultants, and contractors and those of your associated entities such as employees, authorized representatives, founders, beneficial owners, directors, authorized representatives, employees, agents, consultants, contractors or other personnel and non- ANZ personnel/ individuals (such as employees of our clients). We only do this to the extent permitted by applicable laws for legitimate business purposes or other purposes permitted or required by applicable laws. We collect this type of Personal Data for several reasons including but not limited to:
- (a) recording fact;
 - (b) complying with applicable law and regulation and contractual obligations;
 - (c) complying with internal procedures and policies;
 - (d) facilitating administration and support;
 - (e) assisting with security, crime prevention and fraud purposes; and
 - (f) investigating or detecting unauthorized use, wrongful use or abuse of our services, systems or other materials.

7. INTERNATIONAL TRANSFERS OF PERSONAL DATA

- 7.1 Because we are a global organisation, your Personal Data may be shared with, transferred to and processed by entities (i) within our group of companies, (ii) within and outside your current country or territory by an entity other than the entity that collected the Personal Data, and (ii) which are service providers of one of ANZ entities.
- 7.2 Where permitted by applicable laws, your Personal Data will be shared with, transferred to and processed in (including accessed in or stored in), for the purposes set out in clause 5 above, in country or territory outside Indonesia, which may not offer the same level of protection of Personal Data as may be enjoyed within Indonesia. You agree to this processing and sharing and transfer of your Personal Data. We will ensure that we have adequate safeguards in place so that your Personal Data is treated securely and in accordance with applicable laws and regulation and with our policies and standards. If you would like a copy of the safeguards we have put in place, please write to us at the address set out in Section 13 below.
- 7.3 In accordance with the local regulations, your Personal Data will be shared where required in compliance with the law, or necessary for the performance of a contract to which you are a party, or with your consent, or when other exceptions apply.
- 7.4 The most common reason for us disclosing information overseas is because we use service providers to perform some functions on our behalf, and some of these service providers are located outside Indonesia. We only disclose your information to these organisations when it is necessary for the services they provide to us. For the most part, these service providers are entities related to us which perform a range of technology, operational and customer service functions for us. In some countries the local laws may require sharing Personal Data with the local tax or other governmental authorities. Even in these cases, we will only share the Personal Data with authorities which are authorized to access such data and limited to the purpose of the request.

8. WHEN WE MAY DISCLOSE YOUR PERSONAL DATA

We do not and will not sell, rent or trade your Personal Data. We will only disclose your Personal Data in the ways set out in this Notice and in the following circumstances:

- (a) to any entity within the ANZ group of companies;
- (b) to third parties who process your Personal Data on our behalf (such as our systems providers);
- (c) to third parties who process your Personal Data on their own behalf but through providing us or you with a service on our behalf (such as our agents, contractors, professional advisers, service providers that we engage to carry out or assist with our functions and activities including participants in payment systems and credit reference agencies);

- (d) to any provider of a guarantee, security or other credit support for obligations to us;
- (e) to financial institutions or regulatory bodies with whom information is shared for money laundering checks, credit risk reduction and other fraud and crime prevention purposes;
- (f) to any third party to whom we assign or novate any of our rights or obligations;
- (g) to any prospective buyer in the event we sell any part of our business or its assets or if substantially all of our assets are acquired by a third party, in which case your Personal Data could form part of one of the assets we sell; and
- (h) to any government, regulatory agency, enforcement or exchange body or court where we reasonably believe that we are required to do so by applicable law or regulation or by any court or tribunal order or at their request where it is legal to do so.

9. PROTECTING YOUR PERSONAL DATA

- 9.1 We are committed to safeguarding and protecting your Personal Data and we maintain appropriate security measures to protect your Personal Data from improper, unauthorized, unlawful or accidental disclosure, destruction, alteration, use, access, loss or damage.
- 9.2 Although we endeavour to secure your Personal Data, we may not be able to prevent unauthorized, unlawful use, access, loss or damage of Personal Data by third parties such as hackers, or unauthorized or unlawful processing at third party's premises. In case of a data event we will comply with all reporting and remedial obligations under PDP Regulations.

10. YOUR RIGHTS IN RELATION TO THE PERSONAL DATA WE COLLECT

- 10.1 The Personal Data Subject has the following rights in relation to Personal Data processed by ANZ under PDP Regulations:
 - a. Right to Information: This enables Personal Data Subject to obtain information on the details of information collected, basis of legal interest, purpose of collection and processing of Personal Data, and accountability of the party requesting such Personal Data, unless otherwise provided by the laws of Indonesia.
 - b. Right to Rectification: This enables Personal Data Subject to request completion, update, and/or correction of errors or inaccuracies in their Personal Data, unless otherwise provided by the laws of Indonesia.
 - c. Right to Access: This enables the Personal Data Subject to access and obtain a copy of their Personal Data in accordance of the laws and regulations of Indonesia.
 - d. Right to Erasure: This enables the Personal Data Subject to request end of processing, deletion and/or destruction of their Personal Data, unless otherwise provided by the laws of Indonesia.
 - e. Right to Withdraw Consent: This enables the Personal Data Subject to withdraw their consent to our processing of Personal Data that has been provided to the Controller. We may continue to process the Personal Data if we have another legitimate reason to do so.
 - f. Right to Object to Automated Decision making: This enables the Personal Data Subject to object a decision making action by us if it based solely on automated processing, including profiling which has legal consequences or have significant impact on the Personal Data Subject, subject to the laws of Indonesia.
 - g. Right to Restrict: This enables the Personal Data Subject to restrict or delay the processing of their Personal Data proportionally with the purpose of Personal Data processing, unless otherwise provided by the laws of Indonesia.
 - h. Right to claim Compensation: This enables the Personal Data Subject compensation when there is a violation of their Personal Data processing in accordance with the applicable laws and regulations.
 - i. Right to Data Portability: This enables the Personal Data Subject to request the Controller to provide Personal Data to another organisation in machine readable format.
- 10.2 If the Personal Data Subject (or an authorized person) wishes to exercise any of the Data Subject rights provided under PDP Regulations, request can be made in writing to us at the address set out in section 13 below. We will respond to your request within the time prescribed by applicable laws. If such changes are made pursuant to your request(s) this may affect our ability to continue to provide our services to you and in such circumstance, we may exercise our rights to terminate under any agreement we may have with you.
- 10.3 In any of the situations listed above, in order for us to comply with our security obligations and to prevent

unauthorized disclosure of data, we may request that you provide us with a copy of a valid means of identification and verification of the identity of the individual whose Personal Data is the subject of such a request, together with a valid authorization letter.

- 10.4 If you receive any correspondence, complaint or request from any of your employees, agents and contractors, or those of associate entities whose Personal Data have been provided to us, you must immediately notify us, and in any event by no later than 24 hours upon receiving any such correspondence, complaint or request.

11. HOW LONG WE WILL PROCESS AND HOLD YOUR PERSONAL DATA FOR

We will only process and retain your Personal Data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory, contractual or internal policy requirements. Subject to any legal or regulatory requirements, we will then delete this information (to the extent technically practicable).

12. HOW WE UPDATE OR CHANGE THIS NOTICE

- 12.1 We may change or update parts of this Notice in order to maintain our compliance with applicable laws and regulation or following an update to our internal practices. We will do this by updating the relevant location sites on www.anz.com. If it is required by applicable laws, we will notify you and/or request you to obtain valid consents from relevant Personal Data Subjects to any updated to the updated Privacy Notice.
- 12.2 This Notice was last updated in October 2024,

13. HOW YOU CAN CONTACT US

If you would like to contact us in relation to this Notice or anything else in connection with the Personal Data we collect about you, including, without limitation, where you would like to update your Personal Data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below.

Non-Indonesian Contact

Email: PDPIndonesia@anz.com

Indonesian Contact

E-mail: PDPIndonesia@anz.com

Alternatively, contact your ANZ representative, explaining that your communication is in relation to data protection.