

A. Introduction

This Privacy Notice is effective as of October 17, 2024, and is intended to explain the processing of data and personal information by PT Bank BTPN Syariah Tbk. (hereinafter referred to as "**BTPNS**" or "**We**") as mandated in the Personal Data Protection Law ("**PDP Law**") No. 27 of 2022 including its future amendments (if any) and its implementing regulations. Therefore, We are committed to fully complying with the provisions of the PDP Law to safeguard the confidentiality and security of your Personal Data. This step is taken to ensure that your personal information is protected in accordance with applicable laws and regulations. We will continue to update our policies and procedures to always be in line with the latest regulations, ensuring the protection of your Personal Data remains guaranteed.

This Privacy Notice defines "**Personal Data**" as information that can be used to identify you as an individual, whether identified separately or combined with other information, through electronic or non-electronic means based on the PDP Law and its implementing regulations, which include but are not limited to individual data listed on identity cards (including your photo), personal financial data (including account information, transaction data, and debit card data), phone numbers, email addresses, mother's maiden name, biometric data, place and date of birth, and other personal data as outlined in section C of this Privacy Notice.

This Privacy Notice, including any changes made from time to time, explains how We process your Personal Data. This process encompasses various activities such as acquisition, collection, filtering, analysis, storage, fixes, updates, display, announcement, transfer, dissemination, disclosure, deletion, and/or destruction of your Personal Data (hereinafter referred to as "**Personal Data Processing**"). This processing is carried out through the use of our banking services or products, access to our websites and/or applications, as well as participation in certain promotional programs or activities organized by us and/or third parties who collaborate or have legal relationships with us ("**Third Parties**"). This processing applies both online and offline, and includes various activities, services, products, and other features provided on our websites and/or applications (**if any**) (collectively referred to as "**Services**").

This Privacy Notice will apply when you interact with us through any of the following actions:

1. Using our Services and becoming a legitimate customer/client, including visiting any websites or applications linked to this Privacy Notice.
2. Requesting or receiving any form of information related to our Services through any means of communication such as email, newsletters, calls, online messaging services, or text/SMS.
3. Becoming a business partner, contractor, agent, supplier, and/or having any other legally binding cooperation with us for specific purposes.

You are required to read and understand this Privacy Notice thoroughly so that you can be aware of and understand the practices of Personal Data Processing and the protections We implement for your Personal Data.

B. Your Statement and Warranties Regarding the Provision of Personal Data

By accessing and/or using the Services, you declare and warrant that:

1. You have read and understood all the provisions of this Privacy Notice, including how We implement Personal Data Processing; and
2. The accuracy, authenticity, and completeness of all Personal Data that you provide to us.

In certain circumstances, you may be asked to provide the Personal Data of others (such as the Personal Data of a lawful spouse, family members, beneficial owners, or other parties including those you represent) to us.

If you submit the Personal Data belonging to others to be processed by us, you declare and guarantee that you have lawfully obtained explicit consent from the individuals as the subjects of the Personal Data. You also understand that We rely on your declaration and guarantee to conduct Personal Data Processing of the relevant individuals or related parties. We will not be responsible if the Personal Data you provide, especially Personal Data belonging to other individuals, is obtained unlawfully or if your declarations and guarantees proven to be untrue. We reserve the right to request evidence of such consent from you at any time as necessary.

C. Types of Your Personal Data We Collect and the Methods of Collection

Depending on the type of Service, We collect your Personal Data based on the types of data listed below:

1. **Identity data**, including name, photo, place and date of birth, gender, identity card along with the Personal Data contained therein (such as Citizenship Identification Number (NIK) and/or passport number), Taxpayer Identification Number (NPWP), nationality, mother's maiden name, biometric data, signature (wet and/or electronic), and/or voice/image recordings;
2. **Contact data**, including address as per ID card, domicile address, email address, and phone/mobile number and emergency contact.
3. **Financial data**, including data related to bank accounts and/or payment instruments used in transactions for the provision of Services, financial scoring data, sources of income, average annual income, Beneficial Owner, data related to assets and collateral, tax data, financial history, and other financial data (such as insurance).
4. **Family data**, including spouse's name, number of children and dependents, and marital status.
5. **Education and employment data**, including type of job, business field, year of starting work/business, employment status, position, and level of education.

6. **Digital activity data**, including device data that encompasses the type/model of the device you use to access the Services, internet protocol (IP) address, and geographical location data (geolocation, as necessary for the provision of Services), and cookies (to personalize any information that includes Personal Data used to access the Services, and as you can manage your cookies through your browser settings which may limit the speed/quality of the Services).
7. **Other personal data** in accordance with the provisions of the applicable laws and regulations.

We collect your Personal Data when:

- a. You use our Services by filling out forms either offline and/or registering online using our mobile or web application.
- b. You show interest in our Services.
- c. You voluntarily fill out surveys either online or offline.
- d. You participate in programs that We organize.
- e. You contact us to interact, inquire, and/or report issues through phone, email, social media, forms available on the web, mobile applications, online messaging services, text messaging/SMS, and/or face-to-face meetings.
- f. Video recordings from Closed-Circuit Television (CCTV) controlled/operated by Us.
- g. Through other activities, services, products, and/or features as well as from Third Parties, for instance, third parties related to the execution of the Customer Due Diligence (CDD) process or in other contexts to achieve the purposes of Personal Data Processing (including from data sources available to the public or provided by authorized government institutions).

D. Processing of Your Personal Data

We will process your Personal Data for purposes including but not limited to:

1. **Processing related to the Services you choose**, such as:
 - a. Provision, personalization, evaluation, improvement, and/or updating of Services features.
 - b. Compliance with applicable legal provisions including but not limited to Anti-Money Laundering, Terrorism Financing Prevention, and Prevention of Proliferation Financing of Weapons of Mass Destruction, and the implementation of Customer Due Diligence (CDD) principles.
 - c. Addressing and resolving any complaints regarding your access to Our Services or Third Parties that cooperate with us.
 - d. Provision of advertisements/promotions and marketing for Our Services and Services of Third Parties that cooperate with Us, as well as the organization of loyalty programs.
 - e. Other purposes in accordance with applicable legal provisions.

2. **Implementation of operational activities and their improvements, as well as compliance with applicable regulations**, such as:
 - a. Processing payments and billing for the provision of services.
 - b. Prevention, detection, and investigation of transactions deemed suspicious or activities prohibited by applicable laws.
 - c. Conducting studies and surveys on the provision of Services, including generating analytical data for analysis, product development, and research purposes, and for improving the quality of Our operational activities.
 - d. Carrying out various internal activities needed to provide Services, such as resolving software issues, operational problems, data analysis, testing, and research, as well as monitoring and analyzing usage patterns and activities.
 - e. Performing financial, accounting, tax, and reconciliation tasks to comply with applicable regulations, and assisting our internal administrative processes with the aim of protecting both our rights and yours, as well as fulfilling obligations under agreements with you and/or related Third Parties (e.g., vendors and partners).
 - f. Fulfilling any other needs as deemed necessary.

3. **Product and Promotion Offers**, including offers for Services, products, competitions, prize draws, events, and any other forms of promotion tailored to your needs and profile. We may also provide offers for Our Services or the Services of Third Parties that cooperate with Us through various channels, such as push notifications, electronic messaging services (e.g., chat messenger), SMS, phone calls, emails, as well as other relevant electronic and non-electronic media in accordance with the applicable regulations ("**Other Offers**").

4. We may process Personal Data if We conduct corporate actions such as mergers, separations, acquisitions, consolidations, restructurings, and/or other activities involving the transfer of intellectual property rights, which require the processing of Personal Data.

E. Basis for Processing Personal Data

The processing of Personal Data is carried out as long as We have met one or more of the following bases for processing, namely:

1. Explicit lawful consent from you.
2. Fulfillment of contractual obligations to provide Services to you and for other necessary needs.
3. Compliance with legal obligations based on applicable laws and regulations.
4. Performance of tasks in the public interest, public service, or the exercise of Our authority based on laws and regulations.

5. Fulfillment of obligations and consideration of business needs on the basis of other legitimate interests while considering the purpose, necessity, and balance of interests between us as the controller of Personal Data and your rights as the subject of Personal Data.
6. Other processing basis as regulated in applicable laws and regulations.

F. Disclosure and Transfer of Personal Data to Third Parties

We may disclose and transfer your Personal Data to Third Parties in connection with the provision of our Services in accordance with the basis for Personal Data Processing that We use.

You hereby understand that the Processing of Personal Data carried out by us may be done by Third Parties under our instructions. The processing by Third Parties aims to fulfill the processing basis or consent that you have provided.

In this case, the Third Parties receiving your Personal Data include but are not limited to:

1. Banking industry regulatory agencies
2. Government agencies/institutions
3. Insurance partners
4. Data analysis providers
5. Document storage and management providers
6. IT service/system providers
7. Collection service partners
8. External auditors, consultants, lawyers, notaries, and other professional advisors
9. Employment service providers
10. Public accountants
11. Our affiliates (PT Bank SMBC Indonesia Tbk and PT BTPN Syariah Ventura)
12. Educational institution partners
13. Cash waqf management partners/nazhir

In addition, We also disclose your Personal Data to Third Parties to fulfill legal obligations stipulated by laws and regulations, such as requests from government authorities to handle legal processes, reporting to regulators, and other necessary requirements.

We ensure that every Third Party that in cooperation with us complies with security and confidentiality standards to protect your Personal Data. Any Personal Data Processing by Third Parties will only be carried out as necessary for specific purposes and in accordance with applicable legal provisions.

G. Storing, Retaining, and Securing

We will store your Personal Data only for the purposes described in section D of this Privacy Notice at Data Centers located in Indonesia in compliance with internal regulations and legal provisions governing data retention periods, especially those applicable in the banking sector/industry.

After the retention period ends, or if We no longer require your Personal Data for the specified purposes, or upon your request to delete your Personal Data, We will take the necessary steps to delete your Personal Data from our systems or anonymize the information. This process will be carried out in accordance with applicable laws and regulations, ensuring that your Personal Data cannot be accessed or used again for any purpose.

We will also ensure that all actions of deletion or anonymization of Personal Data are conducted securely and in accordance with high-security standards to protect your Personal Data from unauthorized access, loss, or misuse. We are committed to maintaining the privacy and security of your Personal Data throughout the storage, deletion, or anonymization process.

Additionally, please be aware that some of your Personal Data may still be stored or managed by related Third Parties, including government agencies, in accordance with the purposes of Personal Data Processing outlined in this Privacy Notice. If We disclose your Personal Data to authorized government agencies and/or other institutions designated by the government or that collaborate with us, you must understand that the storage of your Personal Data by these agencies will follow the data storage/retention policies of each respective institution.

We implement effective organizational safeguards and security protocols to prevent the loss, unauthorized access, misuse, alteration, or disclosure of your Personal Data. Whenever your Personal Data is involved in interactions conducted on our mobile or web applications, such communications are secured through encrypted connections.

Third Parties (excluding regulators) that collaborate with us and handle your Personal Data under our instructions must implement appropriate security measures to protect your Personal Data and comply with applicable legal requirements. However, We are not responsible for unauthorized use of Personal Data by external parties beyond our control or for theft/misuse of Personal Data resulting from force majeure events such as illegal hacking, electronic system manipulation/breaches, cyber attacks/incidents, and the like.

In the event of a Personal Data breach, We are committed to notifying you and the relevant regulatory authorities in accordance with applicable legal obligations.

H. Cross-Border Data Transfer

If We transfer your Personal Data outside of Indonesia, We will ensure that the destination country has a level of Personal Data protection that is equivalent to or higher than that applied in Indonesia. This step is taken to guarantee that the security and confidentiality of your Personal Data remain protected in accordance with the standards applicable in Indonesia.

However, if the destination country does not have a level of protection that is equivalent to or higher than Indonesia, We will still conduct the transfer of Personal Data only if We can meet all applicable legal requirements, including obtaining your explicit consent, implementing additional protective measures, and/or using legally binding contracts to ensure that your Personal Data is treated securely and in accordance with the standards applied in Indonesia.

We will also conduct a comprehensive risk assessment before transferring Personal Data abroad and will take necessary steps to mitigate any potential risks. This includes monitoring the recipient's compliance with Personal Data protection requirements and taking corrective actions if necessary. We are committed to maintaining the security of your Personal Data, both within and outside Indonesia, and ensuring that any transfer of Personal Data is conducted with transparency and full compliance with applicable laws.

I. Rights of Personal Data Subjects

As a Personal Data subject, you have rights governed by applicable laws and regulations regarding Personal Data Protection. To the extent that information collected through the use of Our Services/products can be considered Personal Data, you have the right to access, update, and other rights related to the Processing of your Personal Data in connection with the use of Our Services/products.

If you wish to submit a request to exercise your rights related to Personal Data, you are allowed to make such a request through the channels or contact details listed in Section K of this Privacy Notice. We encourage you to provide clear and detailed information about your request to ensure it can be processed quickly and efficiently. This is done to obtain more information about how your Personal Data is used and processed, as well as to fulfill your rights.

Upon receiving your request, our team will review and verify the information provided to ensure the validity and completeness of the request. We may contact you for additional information or clarification if necessary. This process aims to ensure that your rights can be exercised in accordance with applicable legal provisions and Our Privacy Notice.

We are committed to handling every request seriously and will strive to provide a response as soon as possible. However, please be aware that the time needed to process your request may vary depending on the complexity and type of request submitted. We will notify you of the status of the request and the steps taken to fulfill your rights.

However, We reserve the right to deny your request, particularly if the request to delete Personal Data is not permitted under applicable law or if your request conflicts with existing legal interests, especially if the request may impact the following:

- a. National defense and security interests;
- b. Law enforcement process interests;
- c. Public interests in the context of state administration;

- d. Financial services sector supervision interests, monetary, payment system, and financial system stability supervision interests carried out in the context of state administration;
- e. Statistical and scientific research interests;
- f. Requirements to implement applicable laws and regulations, such as related to the implementation of the Customer Due Diligence (CDD) process and/or preventing criminal acts;
- g. The reason for the request is not relevant to the Personal Data Processing activities We conduct or to you as the Personal Data subject;
- h. Endangering the safety, physical health, or mental health of the Personal Data subject and/or others; and/or
- i. Impacting the disclosure of another person's Personal Data.

If there are administrative fees for each request you make to exercise your rights as a Personal Data subject, We will inform you in advance, referring to the provisions of applicable laws and regulations.

J. Cookie Settings

Our websites, Services, and mobile applications use cookies, some of which are necessary to operate our Services. Additionally, cookies help Us remember how you prefer to use the Services and serve as analytical data to improve Our Services and products.

You can set your web browser to block cookies and disable pixel tags from tracking your website visits. You can also delete stored cookies from your computer or mobile device. However, if you block cookies and pixel tags, you may not be able to use certain features and functions.

K. Contact Us

We are ready to assist and answer any questions you may have regarding this Privacy Notice. Our team is committed to providing clarifications, additional information, and explanations that you need related to this policy. If you intend to exercise your rights as a Personal Data Subject, you can contact Us through our 24-Hour Service at 1500 300, or via email at tanya@btpnsyariah.com.

L. Language

This Privacy Notice may be translated into languages other than Indonesian. However, if there are differences or inconsistencies between the Indonesian version and versions in other languages, the Indonesian version shall prevail.

M. Governing Law

This Privacy Notice is subject to and entirely governed by the laws of the Republic of Indonesia.

N. Changes or Updates to the Privacy Notice

As part of Our efforts to manage, protect, and process your Personal Data, We will regularly review and evaluate Our policies, procedures, and processes, and We may amend these terms to comply with regulatory changes. We reserve the right to make changes to this Privacy Notice.

Any changes will be communicated to you, and We advise you to periodically check Our website or Services to stay informed about the latest updates to Our Privacy Notice.