

**PRIVACY POLICY
PT OCBC NISP VENTURA**

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INTRODUCTION

To enhance the services provided by PT OCBC NISP Ventura (“OCBC Ventura”/“We”/“Our”/“Us”) and as part of Our commitment to safeguarding and maintaining the privacy and security of Your data when You apply for or use Our Products and Services, as well as when You visit and use the Company websites, we implement best practices and policies aimed at protecting and preserving Your personal data related to Personal Data Protection, for the processing of data related to the use of the Company’s products and/or services (“Privacy Policy”). We are constantly improving Our services to You and are always updating Our services to protect the privacy and security of Your personal data as Our customer.

DEFINISI

1. **Personal Data** means data about an individual that is identified or can be identified directly or indirectly, either alone or in combination with other information, through electronic or non-electronic means.
2. **Personal Data Subject** means an individual to whom Personal Data is attached.
3. **General Personal Data** means full name, gender, nationality, religion, marital status and or combination of Personal Data used to identify an individual.
4. **Spesific Personal Data** means health data and information, biometric data, genetic data, criminal records, child data, personal financial data, other data as specified by laws and regulations.
5. **Personal Data Controller** means any Person, Public Body, and International Organization that acts independently or jointly in determining the purposes and exercising control over the processing of Personal Data.
6. **Personal Data Processor** means any Person, Public Body, and International Organization that acts independently or jointly in Processing Personal Data to ensure the constitutional rights of the Personal Data subject.
7. **Personal Data Protection** means the comprehensive effort to protect Personal Data during the processing of Personal Data to ensure the constitutional rights of the Personal Data subject.
8. **Information** means data, statements, ideas, and symbols that contain value, meaning, and messages, including data, facts, and explanations that can be seen, heard, and read, presented in various packages and formats in accordance with the development of information and communication technology, both electronically and non-electronically.
9. **Processing** is defined as retrieving and collecting, processing and analyzing, storing, correcting and updating, displaying, announcing, transferring, disseminating, or disclosing; and/or deleting or destroying and can involve automated or manual operations.
10. **Customer** are parties including investee or potential investee, and client or potential client of OCBC Ventura.
11. **Person** is an individual or Corporation.
12. **Corporation** means a group of individuals and/or assets that are organized either with or without a legal entity.
13. **Public Body** are executive, legislative, judiciary, and other bodies whose functions and duties principally related to state administration, whose part or all funds sourced from state revenue and expenditure budget and/or regional revenue and expenditure budget, or non-governmental organizations to the extent some or all funds sourced from the state budget revenue and expenditures, local community and/or foreign donations.
14. **International Organization** is an organization that is recognized as a subject of international law and has the capacity to make international agreements.
15. **The Central Government** referred to as the Government, is the President of the Republic of Indonesia who holds the powers of government of the Republic of Indonesia as referred to in the Constitution of the Republic of Indonesia year 1945.

SCOPE OF PERSONAL DATA

Personal Data collected by OCBC Ventura in connection with the provision of products and services includes the following personal data:

- a. Full name,
- b. National Identification Number (NIK) or Passport and immigration documents,
- c. Telephone number,
- d. Gender,
- e. Nationality,
- f. Region,
- g. Marital status,
- h. Address,
- i. Place and date of birth,
- j. Occupation,
- k. Photo
- l. Criminal records (including pending trials)
- m. Taxpayer Identification Number (NPWP) or corporate tax identification documents
- n. Company's internet protocol address and email address
- o. Company's and employees' assets and data, as well as beneficial owners
- p. Other data as may be regulated and changed from time to time in accordance with applicable laws and regulations.

PURPOSES OF PERSONAL DATA PROCESSING

OCBC Ventura will process Personal Data for the following purposes:

- a. To respond to Your complaints, questions, requests, responses, feedback, participation, and suggestions.
- b. To register, identify, and verify You, and to conduct Know Your Customer (KYC) procedures in connection with Your application as a customer or user of Our products/services.
- c. To manage Our administrative and business operations.
- d. To correct or update any Personal Data related to You for any purpose as set forth in this Privacy Policy.
- e. To prevent, detect and investigate suspected or indications of illegal or criminal acts (including but not limited to fraud, money laundering, and terrorist financing).
- f. To manage Your safety and health at Our premises, as required by applicable law.
- g. For contact tracing related to the implementation of security settings and emergency response measures.
- h. To follow up on Your requests and/or transactions for products/services of third parties with whom We cooperate.
- i. To prepare and maintain internal and external records, as required by accounting systems and applicable laws.
- j. To enable Us to comply with all obligations set forth in applicable laws and regulations.
- k. For any other purpose related to or reasonably necessary for the foregoing.

We will not disclose, transfer or inform Your Personal Data in any way to other parties, outside of the purposes as set out in this Privacy Policy, unless it is required by law and/or in accordance with the prevailing laws and regulations. OCBC Ventura always strives to maintain the security of Your Personal Data from all forms of manipulation, forgery, unauthorized access and disclosure.

If We need to collect and process Your Personal Data based on applicable laws and regulations, or based on the consent You have given, or based on the terms of an agreement

We have with You, We will use it in accordance with the prevailing laws and regulations or approvals or agreements. However, if You choose not to provide such Personal Data, or if the Personal Data We receive is incomplete, or You withdraw the consent that has been given to us, then We may not be able to carry out the agreement or may not be able to process the product/service request that You submit, or cannot continue the product/service You are currently using.

HOW DOES OCBC VENTURA OBTAIN AND COLLECT PERSONAL DATA

We obtain and collect Personal Data through various means and activities, including:

- a. all forms including applications, statements, proposals or referral forms.
- b. signing any agreements, providing documentation or information in connection with Your interactions and transactions with us, or when You use Our products/services.
- c. when You interact with us directly with Our staff, including but not limited to telephone calls (which may be recorded), website, letters, online chat, facsimile, and email.
- d. when We ask for Your information in connection with Your relationship with Us, or in the event that We receive Your Personal Data from relevant third parties (such as work partners, public agents, previous employers), subject to applicable laws and regulations.
- e. We may obtain and collect Your personal data from Our affiliated parties or other parties who collaborate with us, or from other sources as possible in accordance with applicable law.
- f. when You send Personal Data to us for any other reason.

SOURCING OF PERSONAL DATA FROM THIRD PARTY

OCBC Ventura may either collect or seek verification of Personal Data from third parties lawfully, transparently, and with due diligence, ensuring its relevance, accuracy, and security while respecting individual privacy rights, inter alia:

1. Third parties with whom bank has partnership/cooperation; and/or
2. Public Body or regulatory bodies

DISCLOSURE OF PERSONAL DATA

We take the confidentiality and disclosure of Your Personal Data very seriously. We will only disclose Your Personal Data for the purposes set forth in this Privacy Policy to the following relevant and necessary entities or parties, in accordance with those purposes:

- a. to Our affiliated entities, to the extent permitted by applicable law in connection with the provision of products/services to You or for the purpose of data processing on Our behalf. All of Our affiliates are committed to Processing and storing Personal Data they receive from us in accordance with this Privacy Policy and applicable laws and regulations.
- b. Any Person that provides electronic or other services to us for the purposes as set forth in Our collaboration with such person or entity, which are necessary to process Your application or transaction or to provide products/services to You.
- c. vendors or other third-party service providers in connection with the marketing and promotion of Our products/services.
- d. Our professional advisors, including but not limited to Our auditors and legal counsel, for the purposes as set forth in Our collaboration with them, which are necessary to process Your application or transaction or to provide products/services to You.
- e. law enforcement agencies, authorities who rules and supervise venture capital company, and/or other competent authorities under applicable laws and regulations
- f. any other person or entity that You have authorized us to disclose Your Personal Data to or that You have consented to the disclosure of Your Personal Data to.

INTERNATIONAL DATA TRANSFER

Personal Data may be transferred to, and processed in countries outside of the Republic of Indonesia. These countries may have data protection laws that are different from Indonesia. We will take reasonable steps to ensure that Your Personal Data is treated securely and in accordance with applicable Personal Data Protection laws and regulations in Indonesia.

RETENTION OF PERSONAL DATA

OCBC Ventura will retain Your Personal Data in accordance with this Privacy Policy and the terms & conditions of products/services and/or Your agreements with the Company for as long as You have a relationship with Us. We may also retain Your information afterwards as needed to fulfil Our obligations to You, protect or defend the interests of the Company and its customers, or as required by applicable laws.

You have the right to ask Us to destroy Personal Data in certain circumstances. Nevertheless, please be informed that We are legally required to retain Your Personal Data, for example for tax and accounting purposes.

Please note that there is still a possibility that some of Your Personal Data is stored by other parties, including government institutions in certain ways. In the event that We share Your Personal Data with authorized Public Body and/or other institutions that may be appointed by the Central Government or have collaboration with us, You agree and acknowledge that the storage of Your Personal Data by the relevant institutions will follow their respective data storage policies.

PERSONAL DATA SUBJECT RIGHTS

OCBC Ventura is always committed to fulfilling Your rights as a Personal Data Subject to obtain Information about Your Personal Data that has been collected and processed by OCBC Ventura. You may request OCBC Ventura to correct, complete, update, or delete Your Personal Data that is under the control of OCBC Ventura while still complying with applicable laws and regulations. However, OCBC Ventura may reject Your request in accordance with applicable laws and regulations, or if such request is contrary to applicable legal interests.

As a Personal Data Subject, You may submit Data Subject Access Right (“DSAR”) request to Us. It is mandatory to make a DSAR request in writing, using the form available on the Company website (www.ocbcventura.com) to the Data Protection Officer (“DPO”) further explanation are covered in next section.

1. Data Subject Rights

Personal Data Protection Law has provided the rights given to You as Personal Data Subject.

All the below rights refers to Personal Data Protection Law, that can be exercised by submitting DSAR form in digital format to Data Protection Officer, except the Article 6 in below where Customers’ Data update procedures needs to be followed.

No.	Article Reference	Hak
1.	Article 5	Data subject's Right to Access His/Her Data Personal Data Subjects are entitled to obtain information regarding clarity of identity, basis of legal interest, purpose of requesting and using Personal Data, and accountability of the party requesting Personal Data.
2.	Article 6	Data Subjects/Individuals Right to Rectification

		The Personal Data subject has the right to complete, update and/or correct errors and/or inaccuracies in Personal Data about himself in accordance with the purpose of processing Personal Data.
3.	Article 7	Data Subjects/Individuals Right to Information The subject of Personal Data has the right to get access and obtain a copy of Personal Data about himself in accordance with laws and regulations
4.	Article 8	Data Subjects/Individuals Right to Restriction of Processing, Delete or Destroy The Personal Data subject has the right to end processing, delete and/or destroy Personal Data about himself in accordance with laws and regulations.
5.	Article 9	Data Subjects/Individuals Right to Withdraw Consent The Personal Data Subject has the right to withdraw the consent to process Personal Data about himself that has been given to the Personal Data Controller.
6.	Article 11	Data Subjects/Individuals Right to Object The Personal Data Subject has the right to suspend or limit the processing of Personal Data proportionally according to the purposes for which the Personal Data is processed.
7.	Article 12	Data Subjects/Individuals Right to Lodge a Complaint Personal Data Subjects have the right to sue and receive compensation for violations of processing Personal Data about themselves in accordance with laws and regulations.
8.	Article 13	Data Subjects/Individuals Right to Data Portability Personal Data Subjects have the right to obtain and/or use Personal Data about themselves from the Personal Data Controller in a form that conforms to the structure and/or format commonly used or can be read by electronic systems.

You may withdraw Your consent for collecting, using and disclosing Your Personal Data. If You withdraw Your consent, We will inform You about the possible consequences of such withdrawal so that You can decide whether You still wish to withdraw the consent. You understand and agree that withdrawing Your consent may result in You no longer being able to use Our products/services, and/or the Company may not administer any contractual relationship already in place or perform or conclude an existing or prospective agreement or products/services. This may result in the termination of any agreements You have with the Company and Your breach of contractual obligations or undertakings, including the termination of product/services. In any of such an events, We reserve Our legal rights and remedies.

You understand and agree that when You withdraw Your consent:

- (i) It will not necessarily affect all the processes that We have carried out before We accept and follow up on the withdrawal, so that some of the processes that We have carried out before We receive the withdrawal of consent may remain continues due to time or system or resource limitations until Your withdrawal of consent can become effective.
- (ii) The withdrawal may not be processed in part or in full if it is violating laws and regulations.

Please note that if a third party provided Your personal data to us, You should contact such third party directly to make any queries, feedback, and access and correction requests to us on Your behalf.

Should You require to exercise any of the rights as or on behalf of a Personal Data Subject, kindly submit a request in DSAR form available on OCBC Ventura website (www.ocbcventura.com).

2. Exception to Data Subject Rights

You agree and acknowledge that We may refuse to exercise Your rights under and subject to prevailing laws and regulation.

DATA SECURITY

OCBC Ventura will take reasonable steps to protect the Personal Data that We possess or control. OCBC Ventura has also implemented safeguards to prevent unauthorized access, collection, use, disclosure, copying, modification, deletion, or other similar risks to Your Personal Data. This includes a data protection management program to ensure data protection compliance and risk management.

However, We cannot fully guarantee the security of any Personal Data that We may have collected from or about You, although We will make Our best effort to protect Your Personal Data. Accordingly, You acknowledge that We cannot guarantee the completeness and accuracy of any Personal Data that You submit through the internet or guarantee that such Personal Data will not be intercepted, accessed, disclosed, modified, or destroyed by unauthorized third parties, due to factors beyond Our control.

We encourage You to take all necessary precautions and personal safeguards to protect Your Personal Data, make sure You use a secure browser when accessing Our website.

You agree to maintain the security and confidentiality of Your username and password, and not to disclose or allow them to be disclosed to any unauthorized person or party, and to notify Us as soon as possible if You know or suspect that another person knows Your username and password or You believe that the confidentiality of Your username and password has been breached, or stolen in any way, or that actual or potential unauthorized transactions have occurred.

We are not responsible for any losses or damages arising from or related to any security breach, unauthorized use, and/or other unauthorized incidents involving Your username and password.

OBLIGATION OF OCBC VENTURA IN CASE OF DATA BREACH

Notification must be delivered to the Data Subject in writing within 3 x 24 hours if there is a breach or a failure to protect a Person's Personal Data in terms of confidentiality, integrity, and availability of Personal Data. These breaches include breaches of security, whether intentional or unintentional, which lead to destruction, loss, alteration, disclosure, or unauthorized access to Personal Data sent, stored or processed. Further implementation of this obligations shall be subject to prevailing laws and regulations.

STATEMENT OF CHANGES

OCBC Ventura may change or update this Privacy Policy from time to time to ensure the Personal Data Protection and to remain updated with the latest laws and regulation developments. We will notify You of any changes to this Privacy Policy through any means We deem appropriate, and You agree to review Our Privacy Policy whenever You need to.

DPO REACHABILITY

For inquiries regarding Your data privacy rights or how Your Information is used, You can contact Our Data Protection Officer (DPO):

e-mail: dpo@ocbcventura.com

HUKUM YANG MENGATUR

This Privacy Policy is governed by and subject to the laws and regulations of the Republic of Indonesia.