

## **Overview on Data Privacy & Cybersecurity Policy**

## I. General Overview

### A. Background

The Republic of Indonesia has issued regulations on Personal Data Protection as a legal basis to ensure citizens' rights to Personal Data protection. The enactment of Law No. 27 of 2022 on Personal Data Protection (PDP Law) further strengthens the protection that must be provided for Personal Data. Personal Data refers to data about an individual that is identified or can be identified independently or in combination with other information, either directly or indirectly, through electronic or non-electronic systems.

Under the PDP Law, Personal Data Protection (PDP) encompasses all efforts to protect Personal Data in the processing of such data to guarantee the constitutional rights of Personal Data Subjects. The purpose of PDP is to ensure citizens' rights to personal self-protection, foster public awareness, and guarantee recognition and respect for the importance of Personal Data protection.

The implementation of PDP within Bank Mandiri is governed in the Personal Data Protection Procedure Memorandum. (herein after referred to as "Memorandum Prosedur Pelindungan Data Pribadi"). Memorandum Prosedur Pelindungan Data Pribadi serves as an internal regulation within Bank Mandiri. As an internal regulation, it applies to all work units within Bank Mandiri, including regional offices and branches. As for Bank Mandiri subsidiaries, they shall refer to the Mandiri Subsidiary Management Principles Guideline Guideline, (MSMPG) or which also includes provisions related to Personal Data.

### B. Objective

This document serves as a summary and high-level overview of Bank Mandiri's Privacy and Data security practices, broader commitments, and supporting information from relevant internal policies. Its purpose is to provide a comprehensive understanding of how Bank Mandiri manages, protects, and governs data, ensuring alignment with compliance standards, data protection regulations, and industry best practices.

This document acts as a guideline for the responsible collection, processing, storage, and sharing of data, reinforcing our commitment to transparency, security, and ethical data management. Additionally, this policy ensures that the implementation and governance of data security measures adhere to applicable laws, regulatory requirements, and ESG-related privacy and security standards.

### C. Scope

This policy overview applies to **all business units, employees, contractors, and third-party partners** handling data within Bank Mandiri across all operations and locations. Additionally, this document may serve as a **reference/complimentary** for subsidiaries (from MSMPG) or affiliated entities to maintain consistency in privacy and security governance.

All policies and procedures related to information security and data protection are internally available for all employees. To support this, Bank Mandiri provides internal access through its POPCORN (Policy

*In cases of mergers, demergers, acquisitions, consolidations, and/or dissolution of legal entities resulting in changes to the control of personal data, the Bank must notify Data Subjects and relevant authorities and provide transparency regarding the impact of the corporate action on personal data processing.*

## **2. Protect:**

### **a. Lawful Basis for Processing and Consent Management**

*Management of the legal basis for processing personal data in compliance with applicable laws and regulations, including obtaining Data Subjects' consent for processing their personal data.*

### **b. Privacy Governance**

*Establishment of internal policies regarding personal data protection and alignment of existing policies with applicable data protection laws and regulations.*

### **c. Information Security**

*Ensuring the security of processed personal data through mechanisms such as pseudonymization, encryption, and/or data masking, along with regular testing and review of security controls to maintain effectiveness and sustainability.*

### **d. Data Classification**

*Implementation of data classification mechanisms to protect sensitive data (including personal data) from unauthorized access.*

### **e. Data Retention Restriction**

*Strategies for the deletion/destruction of personal data that has exceeded its retention period.*

### **f. Cross-Border Transfer Restriction**

*Policies governing the transfer of personal data outside the jurisdiction of the Republic of Indonesia.*

## **3. Sustain:**

### **a. Training & Awareness**

*Dissemination, awareness programs, and mandatory personal data protection training, taking into account the roles of each Business Unit in personal data processing activities. Establishment of internal regulations for employees to comply with data protection laws, including guidelines on the do's and don'ts of personal data protection implementation.*

### **b. Data Protection Report**

*Periodic reports to management, including updates on the implementation of personal data protection measures.*

### **c. Audit**

*Independent audits, conducted internally or externally, to assess compliance and alignment of personal data protection implementation with applicable laws and regulations.*

## **4. Respond:**

### **a. Data Subject Requests**

*The Bank's response and follow-up procedures to accommodate Data Subjects' rights in accordance with legal procedures and prescribed timeframes.*

### **b. Data Breach Management & Recovery**

*Handling personal data protection failures, reporting incidents to the relevant authorities, and notifying Data Subjects within the timeframe stipulated by applicable laws and regulations.*

Bank Mandiri also implemented Privacy by Design to ensure that Data Privacy is embedded in every product and process that involve Personal Data processing. The Personal Data Protection Procedure Memorandum will be refined into a Standard Procedure, which shall be updated and reviewed periodically, at least once every year.

## **II. Data Privacy Overview and Framework**

As stipulated in PDP Law, Personal Data defined as data about an individual who is identified or can be identified, either independently or in combination with other information, directly or indirectly, through electronic and/or non-electronic systems. PDP law classifies Personal Data into two categories:

- General Personal Data (e.g., name, email, phone number, address)
- Specific Personal Data (e.g., health records, biometric data, religious beliefs, political views, financial data, sexual orientation)

## **III. Data Privacy Policy & Governance**

The Data Privacy Governance framework established by Bank Mandiri shall, at a minimum, include the elements summarized in the following section.

### **A. Related Parties to Personal Data Processing**

Bank Mandiri processes Personal Data and implements Data Privacy measures for Data Subjects, including customers, employees, and vendors/third parties. In carrying out personal data processing activities, Bank Mandiri may act as both a Data Controller and a Data Processor.

As a Data Controller, Bank Mandiri determines the purposes of and exercises control over personal data processing. Meanwhile, as a Data Processor, Bank Mandiri processes personal data on behalf of and under the instructions of another Data Controller while ensuring compliance with Data Privacy regulations.

### **B. Personal Data Processing**

The processing of Personal Data at Bank Mandiri encompasses six stages of Personal Data processing, including collection, analysis, storing, use & disclosure, updating, and erasure & deletion.

#### **1. Types of Data Collected**

Bank Mandiri collects limited types of Personal Data necessary for its operations, tailored to the services, products, and assistance provided. The types of data collected include:

- Personal Profile and Identity Data: Full name, National Identity Number (ID for both Indonesian and foreign citizens), Tax Identification Number (TIN), immigration data, gender, citizenship, place and date of birth, aliases/nicknames, religion, voice recordings, photos, signatures (wet and electronic), and biometric data.
- Correspondence Data: Address (as per ID and domicile), email address, telephone, and fax numbers.
- Education and Occupation Data: Educational background, occupation, business field, position, division, years of employment/business, workplace details (name, address, employment status), and contact information of colleagues.

- Family Data: Marital status, spouse details, number of children, and dependents.
- Financial Data: Account ownership details, account numbers, income sources, financial transactions, credit/financing details, asset-related data, collateral information, taxation records, and other financial service data (e.g., insurance, custodianship).
- Digital Activity Data: Geolocation, IP addresses, activities within Bank Mandiri's applications or websites, and interactions between Bank Mandiri applications and other apps.
- Personal Preference Data: Communication preferences.

This data may be collected directly from the customer or via legitimate source(s) (such as civil registration agency) and is processed in alignment with the specified purpose of the services provided, ensuring compliance with relevant data protection laws and regulations.

## **2. Usage of Personal Data**

Bank Mandiri processes Personal Data with a clear focus on ensuring data accuracy, quality, and compliance with regulatory requirements. Personal Data is used to deliver high-quality services, support operational needs, and fulfill legal obligations. The company adheres to strict mechanisms and standards to ensure that all Personal Data processed is accurate, complete, and relevant to its purpose. Customers are informed if their data is processed beyond the initially agreed purpose or for additional objectives, maintaining transparency throughout the process.

The purposes of Personal Data processing depend on the status of the Personal Data subject as a customer, employee, or third party. All processing purposes by Bank Mandiri are transparently communicated to the Personal Data Subject through the Privacy Policy. These purposes include:

1. Management of Bank Mandiri's Products, Services, and/or Assistance: This includes activities such as scoring and profiling, among others, conducted through Credit Information Management Agencies, with the objectives of improving services and managing Bank Mandiri's risks.
2. Provision of Promotions or Programs: This may involve collaborations with other parties for the enhancement of products and/or services that the data subject currently holds.
3. Marketing and Offering of Products, Services, and/or Assistance: This pertains to products, services, and/or assistance offered by Bank Mandiri, other companies within the Mandiri Group, and/or third parties in cooperation with Bank Mandiri, which the data subject has not yet acquired.
4. Offering and/or Transfer of Collateral: This includes the possibility of assigning collateral to third parties.
5. Compliance with Legal and Regulatory Obligations: This encompasses adherence to applicable laws, regulations, and directives issued by regulators, law enforcement agencies, or other competent authorities.

Additionally, Bank Mandiri allows customers to request the postponement or limitation of data processing when applicable, ensuring flexibility while balancing legal and operational conditions. Automated processing objections are addressed through robust mechanisms that ensure fairness and

accountability. By adhering to these principles, Bank Mandiri responsibly uses Personal Data to meet customer needs, comply with regulations, and safeguard privacy.

### **C. Lawful Basis for Processing**

Bank Mandiri ensures that every Personal Data Processing activity is based on a valid legal basis, which may include consent, contractual necessity, legal obligations, legitimate interests, or other lawful grounds.

Specifically for Consent, Bank Mandiri guarantees that consent collection complies with the Personal Data Protection (PDP) Law, including maintaining proper records or documentation of the data subject's consent.

### **D. Mandatory Information to Data Subject**

#### **1. Privacy Policy**

Bank Mandiri Privacy Policy informs Data Subjects regarding the implementation of Personal Data Protection in the Bank. It outlines how the Bank obtains, collects, manages, analyzes, stores, rectifies, updates, displays, announces, transfers, disseminates, discloses, deletes, or destroys Personal Data, and explains the rights of Data Subjects under Law No. 27 of 2022 on Personal Data Protection, including any amendments, implementing regulations, and other relevant and applicable laws and regulations.

Bank Mandiri Privacy Policy separately prepared for customers, employee, vendors or partner. It is publicly accessible and available on the Bank Mandiri corporate website, and other Bank channels/applications.

The Bank's Privacy Policy includes, at a minimum, the following:

1. Legality of Personal Data Processing;
2. Purposes of Personal Data Processing;
3. Types and relevance of Personal Data to be processed;
4. Retention period for documents containing Personal Data;
5. Details of the information collected;
6. Duration of Personal Data Processing; and
7. Rights of Data Subjects.

Customer Privacy Policy can be accessed on [bmri.id/KebijakanPrivasi](https://bmri.id/KebijakanPrivasi) or as attached (see Appendix 1 and Appendix 2)

#### **2. Notification of Changes to Privacy Policy**

In the event of changes to the Privacy Policy, the Bank is required to notify the Data Subject before the changes become effective, under the following conditions:



1. Notification Method

Notification must be conducted through channels that are accessible and commonly used by the targeted Data Subjects.

2. Contents of the Notification

The notification of changes to the Privacy Policy must include at least the following information:

- a. A summary of the sections of the Privacy Policy that have been revised.
- b. The reasons for the changes to the Privacy Policy.
- c. The implications of the revised Privacy Policy on the processing of Personal Data.
- d. The effective date of the revised Privacy Policy.
- e. Attachments, links, or access to the updated Privacy Policy document.
- f. Contact information for the Bank's representative who can address inquiries regarding the changes to the Privacy Policy.

3. Notification Timeline

The notification must be carried out within the timeframe stipulated by applicable laws and regulations.

## **E. Data Subject Rights**

### **1. Commitment to Data Access, Correction, and Erasure Rights**

Bank Mandiri is dedicated to accommodate the rights of data subjects by providing secure and efficient channels for requesting access, correction, and erasure of their Personal Data. These rights are designed to ensure transparency and empower individuals to maintain control over their information. Requests can be submitted directly by the data subject, their legal guardian (for minors or individuals with disabilities), or an authorized representative, following legal requirements.

Data subjects have specific rights that include:

- Access to Information: Understanding the identity, purpose, and legal basis for the processing of their data.
- Data Correction and Updates: Ensuring their Personal Data is accurate, complete, and up-to-date.
- Access and Copies of Data: Receiving copies of their Personal Data as permitted by regulations.
- Data Portability: Transferring their data in a commonly used, machine-readable format.
- Withdrawal of Consent: Modifying or revoking previously granted consent for data processing, opt-out from optional processing purposes (marketing via direct channels).
- Data Deletion and Erasure: Requesting the cessation, deletion, or destruction of their data where legally permissible.
- Objections to Automated Processing: Challenging decisions made through automated processes.
- Processing Restrictions: Proposing temporary or proportional limitations to data processing activities.

Bank Mandiri commits to responding to such requests promptly, within 3x24 hours, with robust verification measures to ensure the legitimacy of the requester. The Bank also records all requests and informs data subjects of the potential implications of their actions.

## **2. Mechanisms for Raising Data Privacy Concerns**

In addition to enabling data access, correction, and erasure rights, Bank Mandiri provides dedicated mechanisms for data subjects to raise concerns about data privacy. These mechanisms are designed to address broader issues related to Personal Data handling and ensure compliance with privacy standards.

Concerns can be raised by data subjects, their legal guardians, or authorized representatives through Data Subject Request mechanism. The scope of these mechanisms includes, but is not limited to:

- Clarifying Data Handling: Inquiring about data usage, processing parties, and accountability.
- Requesting Action on Data: Raising issues regarding inaccuracies, unauthorized processing, or improper disclosures.
- Objecting to Automated Decisions: Highlighting concerns about decisions made without human intervention.
- Monitoring Compliance: Ensuring data processing aligns with agreed-upon purposes and privacy laws.
- Withdrawing Consent: Revocation of consent in cases where the individual is no longer willing to allow processing for a specific purpose.

## **F. Third Party Contract Management**

### **1. Disclosure of Personal Data and Its Purpose**

Bank Mandiri has a strict policy governing customer data disclosure to ensure compliance with regulations and protect customer privacy, as regulated in the *Memorandum Prosedur PDP*. This policy permits data disclosure only for legitimate purposes, such as fulfilling legal and regulatory obligations or supporting banking transactions or services.

Bank Mandiri will not disclose Personal Data (including sharing, selling, or conducting any action that makes Personal Data available to third parties) unless prior consent has been obtained from the Data Subject and/or there is another lawful basis for processing.

Bank Mandiri discloses Personal Data responsibly and transparently for purposes aligned with legal and operational requirements, ensuring compliance with data protection regulations. Data disclosure involves secure transfers to external parties, local or across jurisdictions, governed by strict agreements such as Non-Disclosure Agreements (NDAs) and clauses in partnership contracts to maintain confidentiality. Transfers outside Indonesia are conducted only to jurisdictions with equivalent or higher data protection standards, or under binding agreements or customer consent. The company limits disclosures to purposes explicitly agreed upon by data subjects, implements robust security controls, and ensures compliance with regulatory guidelines.

### **2. Ensuring Third Party Accountability for Data Protection**

In establishing cooperation with third parties related to Personal Data processing, Bank Mandiri provides clauses that regulate Personal Data protection in accordance with its relationship with the

respective third parties. In the event of cooperation with a third party (including subsidiaries) as a Personal Data Processor, Bank Mandiri is committed to require the third party to protect Personal Data at a level consistent with Bank Mandiri's privacy policy by implementing PDP clauses, Partnership Assessment Criteria, and data safeguards.

Bank Mandiri applies Personal Data protection clauses with third parties based on the criteria of the relationship as either a Personal Data Controller or a Personal Data Processor. These Personal Data protection clauses can be utilized for collaborations with third parties both within and outside the territory of the Republic of Indonesia.

Criteria for Personal Data Controller and Processor as follow:

Aspect	Personal Data Controller	Personal Data Processor
<b>Definition</b>	Any individual, public entity, or international organization acting independently or jointly to determine the purposes and control the processing of Personal Data.	Any individual, public entity, or international organization acting independently or jointly to process Personal Data on behalf of the Personal Data Controller.
<b>Acquisition and Collection of Personal Data</b>	Obtains and collects Personal Data directly from the Data Subject.	Obtains Personal Data from the Personal Data Controller.
<b>Request for Consent from Data Subject</b>	Requests written or recorded consent from the Data Subject.	Ensures that the Personal Data obtained from the Personal Data Controller has already received consent from the Data Subject.
<b>Determination of Basic Information Before Processing Personal Data</b>	<p>Determines the following basic information prior to collecting and obtaining Personal Data:</p> <ul style="list-style-type: none"> <li>a. legality of Personal Data processing;</li> <li>b. purpose of Personal Data processing;</li> <li>c. type and relevance of Personal Data to be processed;</li> <li>d. retention period of documents containing Personal Data;</li> <li>e. details of collected information;</li> <li>f. duration of Personal Data processing; and</li> <li>g. rights of the Data Subject.</li> </ul>	Processes Personal Data according to the basic information established by the Personal Data Controller.
<b>Purpose of Personal Data Processing</b>	Establishes the purpose for processing Personal Data collected from the Data Subject.	Processes Personal Data according to the instructions of the Personal Data Controller, including the

Aspect	Personal Data Controller	Personal Data Processor
		purposes determined by the Controller.
<b>General Responsibilities</b>	Responsible for the processing of Personal Data conducted by both the Personal Data Controller and, where applicable, the Personal Data Processor.	

In the event of cooperation with third parties which involve personal data processing, standard clause shall be implemented to ensure personal data protection. These Personal Data protection clauses may be adjusted by the relevant Unit based on the nature and requirements of the cooperation, with input from the Legal Unit, as long as such adjustments comply with internal provisions, consistent with Bank Mandiri Privacy Policy (if third party act as Personal Data processor for Bank Mandiri), and applicable regulations regarding Personal Data Protection. The standard clause applies to:

1. Cooperation Agreement Between Bank Mandiri as a Personal Data Controller and a Third Party as Another Personal Data Controller (Joint Controller)
2. Cooperation Agreement Between Bank Mandiri as a Personal Data Controller and a Third Party as a Personal Data Processor
3. Cooperation Agreement Between Bank Mandiri as a Personal Data Processor and a Counterparty as a Personal Data Controller
4. Cooperation Agreement Between Bank Mandiri and Vendors/Partners (Non-Specific to Personal Data Processing).

#### G. Comprehensive Application Across Company Operations

1. The **Personal Data Protection Officer (PPDP)** oversees compliance, provides guidance, and manages breach notifications.
2. Units are designated for **data acquisition and collection**, to ensure consent and lawful processing;
3. Units are designated for **processing and analysis**, to maintain accuracy and legal adherence;
4. Units are designated for **storage**, to securing data retention and access;
5. Units are designated for **updates**, to handle corrections;
6. Units are designated for **display, disclosure, transfer, or distribution**, to ensure data sharing conducted according to legal and security standards;
7. Units are designated for **deletion or destruction**, to manage data removal per regulations;
8. Units are designated for **liaison**, to coordinate with Data Subjects, Controllers, and Authorities.
9. Additionally, **risk reviewers, data ownership, and business process management units** ensure data governance aligns with operational and regulatory standards.

## **H. Record of Processing Activities and Data Protection Impact Assessment**

Bank Mandiri maintains a Record of Processing Activities (RoPA) for every personal data processing activity. These records are retained as an inventory to ensure that all ongoing processes within Bank Mandiri comply with Personal Data Protection (PDP) regulations.

High-risk data processing activities undergo protection impact assessments to mitigate potential risks to data subjects. The company also facilitates customer rights by enabling them to raise objections or concerns over decisions made solely through automated processing and offering alternatives or corrective measures where necessary. Access to Personal Data and requests for modifications are handled securely and efficiently, with clear communication provided to customers regarding these processes.

## **I. Disciplinary Action**

All units and employees of Bank Mandiri are required to comply with the provisions of the Personal Data Protection Procedure Memorandum. In the event of any violation of these provisions, including those resulting in Personal Data Protection failures and/or Data Breach, Bank Mandiri may impose sanctions on employees in accordance with the applicable internal regulations of Bank Mandiri.

## **J. Data Retention Practices**

Bank Mandiri has implemented comprehensive data retention practices to ensure the efficient, secure, and compliant handling of customer data in accordance with Reference: applicable regulations and internal policies. Key components of the company's data retention practices are as follows:

- **Data Retention Periods**
  - a. 0-10 Years from End of Business: Data is actively stored and maintained in the operational system and Bank unable to accommodate any requests for data deletion or destruction from customers.
  - b. 10–30 Years from End of Business: Data is actively stored and maintained in the operational system and Bank can accommodate customer requests for data deletion.
  - c. Over 30 Years from End of Business: Data exceeding 30 years is destroyed, following strict guidelines.
- **Data Deletion Criteria**
  - a. There is deletion request from customer.
  - b. Customer has no active products and no business relationship with Bank for over 10 years.
  - c. Data deletion is properly documented through an official report.
- **Data Destruction Criteria**
  - a. Customer has no active products and no business relationship with Bank for over 30 years.
  - b. Data destruction is properly documented through an official report.
- **Protection of Personal Data**

All retention, deletion and destruction processes are conducted in compliance with internal policies and data protection regulations to safeguard against unauthorized access, modification, or misuse of Personal Data.

- **Accountability and Documentation**

Detailed procedures for data retention, deletion and destruction are documented, including deletion requests, verification processes and activity reports such as data deletion/destruction records.

**K. Audit and Risk Management Related to Data Privacy**

Bank Mandiri has conducted periodic reviews of the implementation of Personal Data Protection and the security of Personal Data and information through Control Testing activities, security controls, and Internal Audit activities. The procedures related to the implementation of periodic reviews are further regulated in the internal provisions concerning control testing and internal audit.

## IV. Cybersecurity Overview

### General Provisions of Security Safeguards

The Security Safeguards outlines the general policies, guidelines, and requirements are internally available and applied to all employees of Bank Mandiri. It is designed to ensure the confidentiality, integrity and availability aspect of information technology within the Bank. All employees are required to familiarize themselves with and adhere to the internal policies. The implementation of the security safeguards must comply with the following general provisions:

1. All IT initiatives, including application development and IT infrastructure (servers, network devices, endpoints), must undergo security assessments and comply with end-to-end security measures for both Production and Non-Production environments in accordance with the internal information security policies. Security measures, including data protection mechanisms, must comply and regularly reviewed to align with evolving security standards and best practices.
2. Data custodian must determine the classification and labelling of electronic data/information. Data Loss Prevention solutions monitor and restrict data transmitted outside the Bank network in accordance with the DLP rules.
3. All IT application systems and infrastructure must adhere to the internal policy regarding standards for Disaster Recovery Planning.
4. Cybersecurity incident response and escalation process related to Personal Data refers to internal policy, notified and reported in accordance with applicable laws.
5. Annual Security Awareness Training Program is developed, conducted for Senior Management, employees, and third parties to improve knowledge and awareness of the importance of information security so that stakeholders are aware of their role in maintaining and protecting company assets, both physical and non-physical (information). The implementation of Security Awareness program is evaluated and reported to Senior Managements.
6. The performance evaluation of cybersecurity mitigation controls related to the risk of cyber-attacks is measured and evaluated through Control Testing process periodically. Control testing result, action plan and target date are monitored and reported to Senior Managements.

## Appendix 1

### INDIVIDUAL CUSTOMER PRIVACY POLICY PT BANK MANDIRI (PERSERO) Tbk

Welcome to our Privacy Policy. We want to provide you with clarity and certainty about how we collect, use, and protect your personal information. By reading this privacy policy, we hope that you feel calm and confident that your privacy is our top priority.

In this Privacy Policy, we state that PT Bank Mandiri (Persero) Tbk (hereinafter referred to as "Bank Mandiri") as the Personal Data Controller, will strive to provide security and protection for your convenience in transactions.

We highly prioritize the security of your Personal Data. With full responsibility, this Privacy Policy explains in detail the definition, type, legality, and purpose of processing Personal Data. In addition, we explain the control and transfer of Personal Data, the processing period, and the procedure for change in the Privacy Policy. We take all these steps with reference to Law Number 27 of 2022 concerning Personal Data Protection and its amendments, better known as the "PDP Law," as well as the applicable and relevant laws and regulations, so that you feel comfortable and confident in providing your Personal Data to us.

To clarify, the type, basis for processing, and purpose of processing your Personal Data may vary depending on the products, facilities, and/or services you use.

#### **A. Definition of Personal Data**

Personal Data is any data concerning an individual that is identified or can be identified independently or by combining it with other information directly or indirectly through electronic or non-electronic systems. The Personal Data processed includes Personal Data that you have provided and will provide to Bank Mandiri.

#### **B. Types of Personal Data**

Bank Mandiri realizes that it is important for you to know what categories and types of Personal Data you can process. The types of data include:

- (a) Personal profile identification data, i.e. full name, National Identity Number (NIK) for Indonesian Citizen (WNI) and Foreign Citizen (WNA) ID Cards, Taxpayer Identification Number (TIN), immigration documents, sex, nationality, place and date of birth, mother's maiden name, alias name/nickname, religion, voice recording, image recording, photograph, signature form (wet and/or electronic), and/or biometric data;
- (b) Correspondence data, i.e. address according to ID Card, address and domicile status, electronic mail address (email), telephone/mobile phone number, and emergency contact consisting of name, type of relationship with you, address, telephone/mobile phone number, and email;
- (c) Education and employment data, i.e. education level, type of employment, field of business, position, division, year of commencement of work/business, name of company/agency of workplace, address of workplace, employment status, and name, position, and telephone number of co-workers;
- (d) Family data, i.e. marital status, name of spouse, number of children, and number of dependents;



- (e) Financial data, i.e. account number, source of income, total income per month/year, total expenditure per month/year, transactional data, credit/financing data, data related to assets, data related to collateral, and taxation data) and service data from other financial services that you receive (i.e. insurance and custodians);
  - (f) Digital activity data, i.e. geolocation, IP address, your activity in the Bank Mandiri application, and the interaction of the Bank Mandiri application with other applications on your electronic device; and/or
  - (g) Data related to personal preferences, i.e. communication preferences, hobbies, and interests.
- The Personal Data processed may be received by Bank Mandiri directly from you or through the third party.

### **C. Types of Personal Data**

#### Basis for Processing

Personal Data processing is carried out as long as Bank Mandiri has fulfilled one or more of the following bases for processing:

- (a) Bank Mandiri has explicitly and legally obtained your consent;
- (b) Bank Mandiri exercises its rights and obligations under the agreement with you;
- (c) Bank Mandiri needs to exercise its authority or fulfill its obligations pursuant to the laws and regulations/orders from the authorized agencies;
- (d) Bank Mandiri needs to fulfill your vital interest;
- (e) Bank Mandiri needs to perform its duties for public interest and/or public services;
- (f) Bank Mandiri needs to fulfill other legitimate interests, by observing the balance between Bank Mandiri's interests and your rights.

#### Purpose of Processing Your Personal Data

The processing of your Personal Data is carried out by Bank Mandiri for the following purposes:

- (a) Management of Bank Mandiri products, facilities, and/or services, including profiling and scoring, to improve services for you and Bank Mandiri risk management.
- (b) Provision of Bank Mandiri promotions or programs that can collaborate with other parties for products and/or services that you already have.
- (c) Marketing and/or offer of products, facilities, and/or services of Bank Mandiri and/or other companies within the Mandiri Group and/or third parties that cooperate with Bank Mandiri, for products and/or services that you do not yet have.
- (d) Compliance with the laws and regulations and the orders from the regulators, the law enforcement officers, and other authorized agencies.

### **D. Control and Transfer of Personal Data**

In processing your Personal Data, Bank Mandiri may involve third parties as joint controllers and/or processors of your Personal Data both within and/or outside Indonesia. In such cases, Bank Mandiri will protect your Personal Data in accordance with the laws and regulations.

If Bank Mandiri transfers your Personal Data outside Indonesia, Bank Mandiri will reasonably ensure that the destination country of the transfer has an equal (or higher) level of Personal Data protection than the Personal Data protection in Indonesia.

In the event that the destination country of the Personal Data transfer does not have an equal (or higher) protection level, Bank Mandiri may continue to transfer your Personal Data as long as it complies with the laws and regulations.

#### **E. Your Rights as a Personal Data Subject**

Bank Mandiri certainly realizes that Personal Data is the most important asset for you. Therefore, here we inform you of the rights you have as a Personal Data Subject:

##### **1. Right to 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. Bank Mandiri will provide access to this information through official Bank Mandiri means, such as Bank Mandiri branches or other channels, in accordance with the provisions of the laws and regulations and Bank Mandiri's policies.

You understand that in the event that you request a copy of your Personal Data information and/or details of the processing of your Personal Data, you may be charged by Bank Mandiri.

##### **2. Right to Data Rectification**

You have the right to complete, update and/or rectify any incorrect or inaccurate Personal Data.

##### **3. Right to Obtain, Use and/or Send Personal Data to Other Parties**

You have the right to obtain, utilize, or provide your Personal Data held by Bank Mandiri to third parties, as long as the communication system used by Bank Mandiri and the concerned Third Party is secure.

##### **4. Right to Terminate the Processing, Delete and/or Destroy Personal Data**

You have the right to terminate the processing, delete and/or destroy your Personal Data. You agree to give Bank Mandiri time to process the termination of processing, deletion and/or destruction of your Personal Data to the extent that Bank Mandiri requires. To exercise the right to terminate the processing, deletion and/or destruction of Personal Data, you can contact Bank Mandiri through the communication means set out in point H of this Privacy Policy.

To be understood, termination of processing, deletion and/or destruction of Personal Data may affect Bank Mandiri's ability to provide products, facilities, and services to you as well as the contractual relationship that has been made between Bank Mandiri and you or between Bank Mandiri and other third parties, including possibly resulting in the cessation of services you receive and/or termination of one or more of your agreements with Bank Mandiri and/or violation of one or more of your obligations under the agreement with Bank Mandiri.

In this regard, termination of processing, deletion and/or destruction of Personal Data results in you giving Bank Mandiri the right to block your savings account, and/or declare that your debt and/or obligation to Bank Mandiri is due and collectible. Any losses arising from the implementation of your right to terminate processing, deletion and/or destruction of Personal Data are your responsibility.

Bank Mandiri's obligation to delete and destroy your Personal Data is excluded for:

- a. National defense and security interests;
- b. Law enforcement interests;
- c. Public interests in the context of state administration; or
- d. Interests in supervising the financial services sector, monetary, payment systems, and financial system stability carried out in the context of state administration.

#### **5. Right to Withdraw Consent**

You have the right to withdraw your consent for the processing of Personal Data that you have given to Bank Mandiri, and you agree to give Bank Mandiri additional time to process the termination of the processing of your Personal Data to the extent that Bank Mandiri requires. To exercise the right to withdraw consent, you can contact Bank Mandiri through the communication means set out in point H of this Privacy Policy.

You need to understand that the withdrawal of consent may affect Bank Mandiri's ability to provide products, facilities, and services to you and manage the contractual relationship that has been made between Bank Mandiri and you or between Bank Mandiri and other third parties, including possibly resulting in the cessation of services you receive and/or the termination of one or more of your agreements with Bank Mandiri and/or a violation of one or more of your obligations under the agreement with Bank Mandiri.

In this regard, the withdrawal of consent for the processing of Personal Data results in you giving Bank Mandiri the right to block your savings account, and/or state that your debt and/or obligations to Bank Mandiri are due and collectible. Any losses arising from the implementation of your right to withdraw consent for the processing of Personal Data are your responsibility.

#### **6. Right to File an Objection Against the Results of Automatic Processing**

You have the right to file an objection against the results of automatic processing of your Personal Data that has legal consequences or has a significant impact on you, including profiling and/or credit scoring.

#### **7. Right to Suspend or Restrict Processing**

You have the right to suspend or restrict the processing of your Personal Data in proportion to the purposes for which your Personal Data is processed. For the exercise of this right, you may contact Bank Mandiri through the communication means set out in point H of this Privacy Policy. You should understand that such request for delay or restriction of processing may affect Bank Mandiri's ability to provide products, services and services to you, as well as the contractual relationship that has been made between Bank Mandiri and you or between Bank Mandiri and other third parties including possibly resulting in the cessation of services you receive and/or the termination of one or more of your agreements with Bank Mandiri and/or the breach of one or more of your obligations under the agreement with Bank Mandiri.

In this regard, the delay or restriction of the processing of Personal Data results in you giving Bank Mandiri the right to block your savings account, and/or state that your debt and/or

obligations to Bank Mandiri are due and collectible. Any losses arising from the implementation of your right to delay or restrict the processing of Personal Data are your responsibility.

#### **8. Other rights under the laws and regulations**

You have the right to submit other rights related to the processing of Personal Data as long as it is regulated in the applicable laws and regulations.

#### **F. Period of Personal Data Processing**

Bank Mandiri will process Personal Data since Bank Mandiri obtains the basis for processing. Bank Mandiri will continue to process it as long as you still use Bank Mandiri's products, facilities, and/or services or in accordance with the provisions of the applicable laws and regulations. Bank Mandiri may store your Personal Data after you end the use of Bank Mandiri's products, facilities, and/or services for the period required by referring to the laws and regulations.

#### **G. Amendment to the Privacy Policy**

We are always committed to maintaining the security and privacy of your information. Therefore, we can update this Privacy Policy in accordance with the development of our practices in processing Personal Data and in accordance with the applicable laws and regulations. You can access the latest version of this Privacy Policy through our website at [www.bankmandiri.co.id/kebijakan-privasi](http://www.bankmandiri.co.id/kebijakan-privasi).

If there is an amendment to this Privacy Policy, we will provide information through Bank Mandiri's official communication means. Bank Mandiri is committed to ensuring that you feel safe and always informed about the protection of your privacy.

In addition, if any part of this Privacy Policy becomes unusable, it shall not affect the validity and enforceability of the remaining provisions. Thank you for your trust in Bank Mandiri.

#### **H. Contact Bank Mandiri**

Bank Mandiri is ready to assist and answer all questions you may have regarding this Privacy Policy.

Please contact our customer service team via Mandiri Call 14000, Bank Mandiri WhatsApp number 081-184-14000, via email to [mandiricare@bankmandiri.co.id](mailto:mandiricare@bankmandiri.co.id), or you can also visit the nearest Bank Mandiri branch office.

## Appendix 2

### PRIVACY POLICY ON CUSTOMER OF ENTITY PT BANK MANDIRI (PERSERO) Tbk

Welcome to our Privacy Policy. We want to provide you with clarity and certainty about how we collect, use, and protect your personal information. By reading this privacy policy, we hope that you feel calm and confident that your privacy is our top priority.

In this Privacy Policy, we state that PT Bank Mandiri (Persero) Tbk (hereinafter referred to as "Bank Mandiri") as the Personal Data Controller, will strive to provide security and protection for your convenience in transactions.

We highly prioritize the security of your Personal Data. With full responsibility, this Privacy Policy explains in detail the definition, type, legality, and purpose of processing Personal Data. In addition, we explain the control and transfer of Personal Data, the processing period, and the procedure for change in the privacy policy. We take all these steps with reference to Law Number 27 of 2022 concerning Personal Data Protection and its amendments, better known as the "PDP Law," as well as the applicable and relevant laws and regulations, so that you feel comfortable and confident in providing your Personal Data to us.

To clarify, the type, basis for processing, and purpose of processing your Personal Data may vary depending on the products, facilities, and/or services you use.

#### A. Definition of Personal Data

Personal Data is any data concerning an individual that is identified or can be identified independently or by combining it with other information directly or indirectly through electronic or non-electronic systems.

The Personal Data processed includes Personal Data that you have provided and will provide to Bank Mandiri.

#### B. Types of Personal Data

Bank Mandiri realizes that it is important for you to know what categories and types of Personal Data you can process. The types of Personal Data processed by Bank Mandiri are data that are relevant according to the respective processing purposes, i.e.:

- a. Personal profile identification data i.e. full name, National Identity Number (NIK) for Indonesian Citizen (WNI) and Foreign Citizen (WNA) ID Cards, Taxpayer Identification Number (TIN), immigration documents, sex, nationality, place and date of birth, alias name/nickname, religion, voice recording, image recording, photograph, signature form (wet and/or electronic), and/or biometric data;
- b. Correspondence data, i.e. address according to ID Card, address and domicile status, electronic mail address (email), telephone/mobile phone number and fax;
- c. Education and employment data, i.e. education level, type of employment, field of business, position, division, year of commencement of work/business, name of company/agency of workplace, address of workplace, employment status, and name, position, and telephone

number of co-workers;

- d. Family data, i.e. marital status, name of spouse, number of children, and number of dependents;
- e. Financial data, i.e. account owner name, account number, source of income, total income per month/year, total expenditure per month/year, transactional data, credit/financing data, data related to assets, data related to collateral, and taxation data) and service data from other financial services that you receive (i.e. insurance and custodians);
- f. Digital activity data, i.e. geolocation, IP address, your activity in the application and/or site of Bank Mandiri, and the interaction of the Bank Mandiri application with other applications on your electronic device; and/or
- g. Data related to personal preferences, i.e. communication preferences.

The Personal Data processed may be received by Bank Mandiri directly from you or through third parties.

### **C. Legality of Personal Data Processing**

#### Basis for Processing

Personal Data processing is carried out as long as Bank Mandiri has fulfilled one or more of the following bases for processing:

- a. Bank Mandiri has explicitly and legally obtained your consent;
- b. Bank Mandiri exercises its rights and obligations under the agreement with you;
- c. Bank Mandiri needs to exercise its authority or fulfill its obligations pursuant to the laws and regulations/the orders from the authorized agencies;
- d. Bank Mandiri needs to fulfill your vital interest;
- e. Bank Mandiri needs to perform its duties for public interest and/or public services;
- f. Bank Mandiri needs to fulfill other legitimate interests, by observing the balance between Bank Mandiri's interests and your rights.

#### Purpose of Processing Your Personal Data

The processing of your Personal Data is carried out by Bank Mandiri for the following purposes:

- a. Management of Bank Mandiri products, facilities, and/or services (including scoring and profiling among others through the Credit Information Management Agency) to improve the services for me and Bank Mandiri risk management.
- b. Provision of Bank Mandiri promotions or programs that can collaborate with other parties for products and/or services that you already have.
- c. Marketing and/or offer of products, facilities, and/or services of Bank Mandiri and/or other companies within the Mandiri Group and/or third parties that cooperate with Bank Mandiri, for products and/or services that you do not yet have.
- d. Offer and/or transfer of collateral to another party.
- e. Compliance with the laws and regulations and the orders from the regulators, the law enforcement officers, and other authorized agencies.

### **D. Control and Transfer of Personal Data**

In processing your Personal Data, Bank Mandiri may involve third parties as joint controllers and/or processors of your Personal Data both within and/or outside Indonesia. In such cases, Bank Mandiri will protect your Personal Data in accordance with the laws and regulations.

If Bank Mandiri transfers your Personal Data outside Indonesia, Bank Mandiri will reasonably ensure that the destination country of the transfer has an equal (or higher) level of Personal Data protection than Indonesian Personal Data protection.

In the event that the destination country of the Personal Data transfer does not have an equal (or higher) protection level, Bank Mandiri may continue to transfer your Personal Data as long as it complies with the laws and regulations.

#### **E. Your Rights as a Personal Data Subject**

Bank Mandiri certainly realizes that Personal Data is the most important asset for you. Therefore, here we inform you of the rights you have as a Personal Data Subject:

##### **1. Right to 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. Bank Mandiri will provide access to this information through official Bank Mandiri means, such as Bank Mandiri branches or other channels, in accordance with the provisions of the laws and regulations and Bank Mandiri's policies.

You understand that in the event that you request a copy of your Personal Data information and/or details of the processing of your Personal Data, you may be charged by Bank Mandiri.

##### **2. Right to Data Rectification**

You have the right to complete, update and/or rectify any incorrect or inaccurate Personal Data.

##### **3. Right to Obtain, Use and/or Send Personal Data to Other Parties**

You have the right to obtain, utilize, or provide your Personal Data held by Bank Mandiri to third parties, as long as the communication system used by Bank Mandiri and the concerned Third Party is secure.

##### **4. Right to Terminate the Processing, Delete and/or Destroy Personal Data**

You have the right to terminate the processing, delete and/or destroy your Personal Data. You agree to give Bank Mandiri time to process the termination of processing, deletion and/or destruction of your Personal Data to the extent that Bank Mandiri requires. To exercise the right to terminate the processing, deletion and/or destruction of Personal Data, you can contact Bank Mandiri through the communication means set out in point H of this Privacy Policy.

To be understood, termination of processing, deletion and/or destruction of Personal Data may affect Bank Mandiri's ability to provide products, facilities, and services to you as well as the contractual relationship that has been made between Bank Mandiri and you or between Bank Mandiri and other third parties, including possibly resulting in the cessation of services you receive and/or termination of one or more of your agreements with Bank Mandiri and/or violation of one or more of your obligations under the agreement with Bank Mandiri.

In this regard, termination of processing, deletion and/or destruction of Personal Data results in you giving Bank Mandiri the right to block your savings account, and/or declare that your debt and/or obligation to Bank Mandiri is due and collectible. Any losses arising from the implementation of your right to terminate processing, deletion and/or destruction of Personal Data are your responsibility.

Bank Mandiri's obligation to delete and destroy your Personal Data is excluded for:

- a. National defense and security interests;
- b. Law enforcement interests;
- c. Public interests in the context of state administration; or
- d. Interests in supervising the financial services sector, monetary, payment systems, and financial system stability carried out in the context of state administration.

#### **5. Right to Withdraw Consent**

You have the right to withdraw your consent for the processing of Personal Data that you have given to Bank Mandiri, and you agree to give Bank Mandiri additional time to process the termination of the processing of your Personal Data to the extent that Bank Mandiri requires. To exercise the right to withdraw consent, you can contact Bank Mandiri through the communication means set out in point H of this Privacy Policy.

You need to understand that the withdrawal of consent may affect Bank Mandiri's ability to provide products, facilities, and services to you and manage the contractual relationship that has been made between Bank Mandiri and you or between Bank Mandiri and other third parties, including possibly resulting in the cessation of services you receive and/or the termination of one or more of your agreements with Bank Mandiri and/or a violation of one or more of your obligations under the agreement with Bank Mandiri.

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contractual relationship that has been made between Bank Mandiri and you or between Bank Mandiri and other third parties including possibly resulting in the cessation of services you receive and/or the termination of one or more of your agreements with Bank Mandiri and/or the breach of one or more of your obligations under the agreement with Bank Mandiri.

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#### **8. Other rights under the laws and regulations**

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#### **F. Period of Personal Data Processing**

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