

INDONESIA
CLIENT CIRCULAR RELATING TO THE PERSONAL DATA PROTECTION LAW
(FOR CORPORATE AND INSTITUTIONAL CLIENTS)
(“PRIVACY CIRCULAR”)

This Circular has been prepared pursuant to the Personal Data Protection Law No.27 of 2022 on Personal Data Protection of Indonesia and its implementing regulations (the “**PDP Law**”), to explain what personal data (as defined in the PDP Law) (i) **Citibank, N.A., Indonesia** and/or (ii) another branch, subsidiary, representative office, affiliate or agent of Citibank, N.A. (collectively, “**Citi**”) may collect, use or disclose, and how Citi protects such personal data.

The PDP Law applies to all Personal Data (as defined below) that is collected, used or disclosed: (i) in Indonesia, and/or (ii) outside of Indonesia to the extent that the Personal Data is owned by the Indonesian citizen, or the collection of Personal Data has legal consequences within Indonesia (**Scope of Applicability**).

This Circular is intended to provide individuals, whose Personal Data is processed within the Scope of Applicability in relation to Citi's activities of collection, use, and disclosure of personal data, with sufficient and required information in accordance with the PDP Law.

This Circular must be read together with, and serves as a supplement to the “Global Privacy Notice for Institutional Clients,” specifically addressing the requirements of the PDP Law. In the event of a conflict between the “Global Privacy Notice for Institutional Clients” and this Circular, the provisions of this Circular shall prevail.

If a Data Subject (as defined below) fails to provide necessary information, consent or legal basis for Personal Data processing, or withdraws consent for the use and/or disclosure of information as described in this Circular and Global Privacy Notice for Institutional Clients, Citi may be unable to provide services.

Definitions

The terms in this Circular are defined as follows:

“**Data Controller**” is Citi (as defined above).

“**Data Processor**” means a third party appointed by Citi to carry out personal data processing (on behalf of Citi).

“**Data Subject**” means individuals with whom the personal data are associated, including the institutional clients.

“**Personal Data**” means any data concerning individuals who are identified or identifiable (either separately or collectively when combined with other information), either directly or indirectly through an electronic or non-electronic system.

Personal Data are categorised into:

(a) Specific personal data, includes (but not limited to):

- (i) health data and information;
- (ii) biometric data;
- (iii) genetic data;
- (iv) crime records;
- (v) child data; and/or
- (vi) personal financial data.

(collectively, **Sensitive Personal Data**)

(b) General personal data, includes (but not limited to):

- (i) full name;
- (ii) gender;
- (iii) citizenship;
- (iv) religion;
- (v) marital status; and/or
- (vi) combined personal data to identify a person.

When collecting and/or processing any Sensitive Personal Data or conducting Personal Data processing which may limit Data Subject rights (as mentioned below), Citi will conduct an impact analysis as required under the PDP Law. Subject to the PDP Law, the impact analysis may include: (a) an assessment of the necessity and proportionality of the objective and data processing activity; (b) a risk assessment of the impact on the data subject; and (c) measures to protect the data subject from potential risks.

Rights of Data Subject

Below are the rights granted to the Data Subject:

- (a) right to obtain information regarding identity clarity, the basis of legal interest, the purpose of requesting and using personal data, and accountability of parties requesting personal data;
- (b) right to complete, update and/or correct errors and/or inaccuracies in personal data regarding themselves in accordance with the purpose of the personal data processing
- (c) right to access and obtain a copy of personal data regarding themselves in accordance with the provisions of laws and regulations;
- (d) right to stop processing, deleting, and/or destroying personal data regarding themselves in accordance with the provisions of laws and regulations.
- (e) right to withdraw consent to the processing of personal data regarding themselves that has been given to a personal data controller;
- (f) right to object to a decision-making action that is based solely on automated processing, including profiling, which has legal consequences or has a significant impact on data subjects;
- (g) right to delay or limit personal data processing proportionally for the purpose of personal data processing;
- (h) right to sue and receive compensation for violations of personal data processing regarding themselves in accordance with the provisions of laws and regulations; and
- (i) right to obtain and/or use personal data regarding themselves from a personal data

controller in a form that is in accordance with the structure and/or formats commonly used or readable by an electronic system as long as the systems used can communicate with each other securely in accordance with personal data protection principles set out under the PDP Law.

To exercise data subject rights or submit inquiries regarding these rights or any matters stipulated herein, please use the [Contact Us](#) link or contact us at the email address provided below:

Indonesia.Privacy@citi.com

Lawful Basis of Data Processing

Depending on the situation and circumstances, Citi will rely on one of the following legal bases for data processing (without limitation to the extent that the legal basis is allowed under the PDP Law):

- (a) express written consent from the Data Subject (electronically or non-electronically), which Citi will request in writing or in a manner that allows the consent to be recorded (electronically), in Indonesian or in a bilingual format.
- (b) obligations under contracts in which the Data Subject is a party and the contract(s) contains explicit consent from the Data Subject to process his/her Personal Data;
- (c) legal obligations of Citi under the applicable laws and regulations. This may include (without limitation): (i) providing information on request to government and regulatory bodies to the extent that the request has been made in accordance with the applicable law; and (ii) regulatory compliance activities; and/or
- (d) protection of the Data Subject's vital interests. This may include circumstances where Citi has to disclose the Personal Data for Data Subject's safety.

Information Citi Collects and Uses

Please refer to the Global Privacy Notice for Institutional Clients.

Purposes and uses of data personal for which Information is Used and Disclosed

Please refer to the Global Privacy Notice for Institutional Clients.

Cross-border Transfer

In transferring Personal Data to a place outside Indonesia (whether to affiliated parties or non-affiliated parties), Citi will take appropriate measures (including submitting necessary reports to the governmental authorities if applicable) to protect such Personal Data and ensure compliance with the PDP Law.

Disclosure of Personal Data

For the purposes providing banking and financial services, Citi may disclose Personal Data to third parties (including our affiliates). Any disclosure will be conducted in accordance with the following principles:

- (a) Citi will ensure that there is an appropriate legal basis as stipulated herein and under the PDP Law for such a disclosure, display, and/or transfer of Data;
- (b) Citi will take appropriate measures to comply with the requirements on offshore data transfer under the PDP Law;
- (c) Citi will ensure that the disclosure or transfer shall be conducted in a manner that maintain the security aspect implemented by Citi in accordance with the applicable law;
- (d) Citi will ensure that the disclosure of Personal Data shall be made in confidential manner and limited to the purposes that have been consented by the Data Subject or aligns with the relevant legal basis; and
- (e) Citi shall implement the principles of processing Personal Data under the PDP Law which includes lawfulness, confidentiality, accountability, proportionality, and precautionary.

Processing Personal Data of person with disabilities

Citi's products and financial services are intended for corporate, government and institutional clients, and are not designed for persons who cannot enter into business transactions in their own name.

Clients will notify Citi if there is any Personal Data restricted by the PDP Law, including Personal Data of persons with disabilities.

Citi may process Personal Data relating to person with disabilities with prior consent from the relevant individual and/or guardians, if they are named beneficiaries of trusts, wills or insurance policies, and for similar uses permitted by law.

Nothing in this Circular limit or seeks to limit the institutional client's rights under the PDP Law.

Last Modified Date

This Privacy Circular was last modified on 2 September 2024