

Privacy Policy
PT Bank OCBC NISP Tbk (“OCBC”)
(Effective as of 26 January 2026)

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1. Introduction

To improve the services provided by PT Bank OCBC NISP Tbk (“OCBC”/“We”) and as part of Our commitment to safeguarding Your privacy and the security of Your data when you apply for or use Our products and/or services, as well as when You interact with Us, or visit and use OCBC’s applications or websites (“Platform”), We implement best practices and policies in order to protect and maintain the privacy and security of Your Personal Data, in accordance with applicable laws and regulations regarding Personal Data Protection.

Please read this Privacy Policy carefully to ensure that You understand how We conduct the Processing of Your Personal Data.

2. Definitions

With reference to the Law No. 27 on Personal Data Protection (“PDP Law”):

- **Personal Data** refers to any data about an individual who is identified or can be identified separately or in combination with other information, either directly or indirectly, through electronic or non-electronic systems.
- **Personal Data Subject** or **Data Subject** means the individual to whom the Personal Data relates.
- **General Personal Data** includes full name, gender, nationality, religion, marital status, and/or combined Personal Data to identify an individual.
- **Specific Personal Data** includes health data and information, biometric data, genetic data, criminal records, children’s data, personal financial data, and/or other data as regulated by applicable laws and regulations.
- **Personal Data Controller** refers to any Person, Public Body, or International Organization that individually or jointly determines the purpose and exercises control over the Processing of Personal Data.
- **Personal Data Processor** refers to any Person, Public Body, or International Organization that individually or jointly processes Personal Data on behalf of the Personal Data Controller.
- **Personal Data Protection** means the entirety of efforts to protect Personal Data during its Processing to ensure the constitutional rights of the Personal Data Subject.
- **Information** means details, statements, ideas, and signs that contain value, meaning, and messages, whether data, facts, or explanations, that can be viewed, heard, and read, presented in various formats according to developments in information and communication technology, either electronic or non-electronic.
- **Processing** is defined as the act of obtaining and collecting; processing and analyzing; storing; correcting and updating; displaying, announcing, transferring, disseminating, or disclosing; and/or deleting or destroying, and may involve either automated or manual operations.
- **Person** means an individual or corporation.
- **Company/Corporation** refers to a group of people and/or organized assets, whether incorporated or not.
- **Public Body** refers to executive, legislative, and judicial institutions and other bodies whose primary functions and duties relate to the administration of the state, that are funded partly or wholly by the state or regional budgets, or non-governmental

organizations so long as they are funded partly or wholly by the state or regional budgets, community and/or foreign donations.

- **International Organization** means an organization recognized as a subject of international law with the capacity to enter into international agreements.

3. Legal Basis for Processing

With reference to the PDP Law, OCBC may conduct the Processing of Your Personal Data based on one or more of the following legal grounds:

- **Contractual obligations between OCBC and You:** OCBC may process Your Personal Data to fulfil its obligations under any agreement between You and OCBC, or when OCBC is about to enter into an agreement with You;
- **Compliance with legal obligations:** OCBC may process Your Personal Data to fulfil its legal obligations in accordance with the prevailing laws and regulations;
- **Vital interests:** OCBC may process Your Personal Data to protect Your vital interests, for instance in emergency situations that threaten to Your life;
- **Public interest:** OCBC may process Your Personal Data to serve the public interest, public services, or to fulfil its obligations as required by the law;
- **Legitimate interests:** OCBC may process Your Personal Data to pursue its other legitimate interests by considering the purpose, necessity, and interest of OCBC without overriding Your rights as a Personal Data Subject;
- **Your consent:** OCBC may process Your Personal Data for specific purposes based on Your consent or the consent of Your authorized representative.

4. Personal Data We Collect

We only collect Personal Data that is specifically relevant to the necessity and purpose of Processing Your Personal Data.

The types and sources of Personal Data We collect, among others:

A. General and Specific Personal Data that We collected directly when You:

- a) Register or apply for services and/or products, through physical forms, websites, mobile applications, digital platforms, or by visiting our branch office. The Personal Data that can be collected include, among others:
 - Personal information: full name, place and/or date of birth, mother's maiden name, religion, nationality, education, marital status, and gender.
 - Contact information: residential/correspondence address, email address, mobile phone number, home phone number, and emergency contact details.
 - Identification details: copy of ID card (e-KTP/Passport), National Identity Number (NIK), Taxpayer Identification Number (NPWP), and immigration documents.
 - Employment details: occupation, position, office address, and office phone number.
 - Financial information: income and source of funds, salary/income slips, asset information, loan history including credit card details and other credit or loan obligations.

- Biometric data: fingerprints or facial images collected for identification and verification purposes, including its copies or scanned results stored on Your device or other system or lawful resources that apply in Indonesia..
 - Health information: records or notes related to physical health, mental health and/or medical services, including health history.
 - Other information as required or mandated by the prevailing laws and regulations.
- b) Participate in events organized by OCBC or third parties in cooperation with OCBC, such as webinars or surveys;
 - c) Enter into agreements or arrangements or other documents with Us or third parties in cooperation with Us;
 - d) Communicate with Us or third parties representing or cooperating with Us via face-to-face meetings, phone calls, emails, social media, or other media of communication;
 - e) Submit your Personal Data to Us for other purposes.
- B. Data automatically collected from Your device when using Platform, including but not limited to:
- a) Location data provided through the Platform using details such as IP address or GPS sensors, based on the settings permitted on your device;
 - b) Time log data from each of Your activity related to Platform usage including registration, login, and transaction times;
 - c) Information collected via *cookies*, *pixel tags*, or similar technologies when You are accessing Platform (e.g., third-party websites You visited prior to interacting with Platform, search results and browsing history, online behaviour, interests and preferences, selected settings);
 - d) Device data such as hardware model, operating system and its version, software, IP address, Wi-Fi or mobile network information used to access or connected to the Platform;
 - e) Photos, audio, contacts, call logs, biometric data (fingerprints or facial recognition for authentication) information in Your device, in accordance with the prevailing law and regulation and subject to Your instruction or permission when using Platform.
- C. Data collected or provided in relation to the use of Our products and/or services, including but not limited to:
- a) Financial information: account balances, transaction history, products and services used, loan history, transaction behaviour, and obligation settlement records.
 - b) Data identification: signature, account numbers, and other information required to verify identity and compliance to the prevailing laws and regulation.
 - c) Communication records: interactions via email, letters, live chat, social media, telephone recordings, or other interactions.
 - d) Data verification results: evaluations in relation to fraud prevention, anti-money laundering and counter-terrorism financing prevention, and risk assessments.
 - e) Credit risk analysis: ratings and creditworthiness assessments.

- f) CCTV recordings and event documentation: images or videos taken or recorded at Our premises or during events organized by OCBC or other parties in cooperation with OCBC.
- g) Other information required for compliance with the prevailing laws and regulations.

D. Data collected from third parties

We may obtain Your relevant Personal Data from third parties who collaborate or cooperate with us or as permitted by law as well as subject to applicable regulations, including but not limited to:

- a) Entities within Our affiliates/group of companies or Our Financial Conglomerates members¹.

(For further details on the entities, please read information in Our website links: <https://www.ocbc.id/en/tentang-ocbc/hubungan-investor/kepemilikan-saham> dan <https://www.ocbc.id/en/tentang-ocbc/tata-kelola/tata-kelola-terintegrasi>.)

- b) Business partners and vendors.
- c) Credit-related information providers such as credit bureaus, credit information management agencies, credit analyser/scoring companies.
- d) Regulators and government agencies for data identification and verification, such as the Financial Information Services System (SLIK), Directorate General of Population and Civil Registration (Dukcapil), and other government bodies.
- e) Third-party service providers, e.g., fraud detection services, anti-money laundering and prevention of Proliferation of Weapons of Mass Destruction Financing (PPSPM), customer due diligence, and data identification/verification.
- f) Government bodies or institutions, related to the data utilized in fulfilling obligations to the prevailing laws and regulations or other public policies e.g. BPJS, Jamsostek, and Directorate General of Taxes.
- g) Family or Your acquaintances or other parties who recommended You to use Our products and services.
- h) Company where You work that registered You to use Our products and/or services.
- i) Your Company's authorized representative who provided Your Personal Data to fulfil the Know Your Customer (KYC) procedures during registration for products and/or services/Platform.

E. Personal Data of other individuals You provide to Us

You may provide Us with Personal Data of other individuals including but not limited to, Your spouse, family members, friends, employees, beneficiaries, or other individuals whom You legally represent. For this purpose, You declare yourself liable and warrant Us that You have obtained the approval from the individual owner of related Personal Data for Us to collect, utilize, disclose and process. Therefore, We and/or the third parties who represent Us are released from any risks, claims, fees as well as losses from any parties related to the Processing of Personal Data of the individual whose data You provide.

¹ Definition and enactment of Financial Conglomerates shall refer to applicable Otoritas Jasa Keuangan regulation.

5. Purposes of Personal Data Processing

OCBC conduct the Processing of Personal Data that OCBC has obtained or collected for purposes, among others:

A. Providing products and/or services, including among others:

- i. To register, identify, and verify You, as well as for credit scoring purposes, in connection to Your application as a Customer or user of Our products and/or services, and to verify, manage, or close Your accounts or the products and/or services You use.
- ii. To correct or update Your Personal Data.
- iii. To carry out Your instructions and transactions, as well as to fulfil Your requests.
- iv. To provide You with information regarding Your transactions or activities related to the products and/or services You use, whether conducted at Our offices or via Platform, or other systems connected to Platform.
- v. To follow up on Your complaints, questions, feedback, participation, and suggestions.
- vi. To follow up on Your requests or transactions with Our business partners or third parties in cooperation with Us.
- vii. To resolve disputes, overdue credit issues including collection, and other related matters.
- viii. To provide information or explanation regarding terms and conditions, features and benefits of Our products and/or services, promote financial literacy on risks and mitigation, as well as information on current banking/financial issues that are relevant to You.

B. Business operations and OCBC's legitimate interests, including among others:

- i. To communicate with You in relation to the products and/or services You apply or currently are using or transactions You perform.
- ii. To register You on the Platform and manage the security of Your transactions and Platform.
- iii. To manage Your security, safety and health at Our premises.
- iv. To perform contact tracing related to the implementation of safety measures and emergency responses as required by applicable laws.
- v. To prepare and maintain internal and external records as required by accounting standards and applicable law.
- vi. To generate statistical information and analytical data for the purpose of testing, research, reliability analysis, development, quality improvement, risk management, or for business partnership and collaboration in connection with OCBC's products and/or services.
- vii. To conduct regular audits, performed whether by internal or external auditors.
- viii. To monitor the provision and use of the products and/or services that You use.
- ix. Information transparency necessities in accordance with the applicable laws related to business transactions such as mergers, acquisitions, asset sales, or other corporate actions involving Us and/or Our affiliates/group of companies or Our Financial Conglomerates members.

- x. Other purposes related to or reasonably required related to Our products and/or services/Platform or those of Our business partners which may be further provided in specific terms and conditions.
- C. Compliance with legal obligations, including among others:
- i. To implement Know Your Customer (KYC) and Customer Due Diligence (CDD) principles, and other actions in compliance with the applicable Anti-Money Laundering and Counter-Terrorism Financing and Financing of the Proliferation of Weapons of Mass Destruction regulations.
 - ii. To prevent, detect, and investigate suspected or indications of illegal or criminal acts as required by applicable laws and regulations.
 - iii. To submit reports and carry out other obligations as required by the Financial Services Authority (OJK), Bank Indonesia, the Deposit Insurance Corporation, tax authorities (LPS), Financial Transaction Reports and Analysis Center (PPATK), the Corruption Eradication Commission (KPK), and other competent authorities.
 - iv. To implement the orders issued by law enforcement agencies.
 - v. To implement and comply with the prevailing laws and regulations.
- D. Marketing and promotion, with consideration of Your prior consent as required by the applicable laws and regulations, including among others:
- i. Inviting and involving You in events, loyalty programs, and draws organized by Us or Our business partners, or Our affiliates/group of companies or Our Financial Conglomerates members.
 - ii. Providing offers/promotions for products and/or services from OCBC or Our business partners or our affiliates/group of companies or or Our Financial Conglomerates members.
 - iii. Disclosing your Personal Data to Our business partners or affiliates/group of companies or Our Financial Conglomerates members for the purpose of recommending products and/or services, events, activities, and other promotional efforts carried out by such business partners or affiliates/group of companies or Our Financial Conglomerates members.

If You have terminated Your banking relationship with Us, or We have rejected Your application for Our products and/or services, or You have withdrawn Your application for Our products and/or services, to the extent permitted and/or required by applicable laws and regulations We may continue to conduct the Processing of Your Personal Data for relevant Purposes of Personal Data Processing as set out in this Privacy Policy.

6. Children's Data

The Processing of Personal Data related to children will only be carried out with the consent of their parent or legal guardian in accordance with the applicable laws, only if relevant and necessary for the Purposes of Personal Data Processing as set out in this Privacy Policy.

7. Persons with Disabilities

The Processing of Personal Data of persons with disabilities will be carried out through relevant mechanisms in compliance with the applicable laws. By taking into account the type and condition of the disability, consent for the Processing of Personal Data of persons

with disabilities may be obtained from a legal guardian prior to the Processing of such Personal Data performed by Us.

8. Automated Processing

Your Personal Data may be subject to profiling and automated decision-making processes relevant to the products and/or services You apply for or use. This may involve the use of applications or software to analyse Your information and automatically generate assessments, such as risk levels, transaction profiles, product and/or service suitability, and Your application eligibility.

9. Disclosure of Personal Data

We are always committed to maintaining the confidentiality of Your Personal Data and will only disclose relevant and necessary information to relevant parties in accordance with the Purposes of Personal Data Processing provided in this Privacy Policy.

Subject to applicable laws and regulations and limited to type of Personal Data necessary for the Processing purposes, disclosures may be made to the following parties:

- A. Our affiliates/group of Companies or Our Financial Conglomerates members:
 - For data analysis, promotions, or offers of their products and/or services, subject to the consent You have provided;
 - For the provision of their products and/or services that You use or apply for;
 - For fulfilment of and compliance with the prevailing laws and regulations.
- B. Service Providers/Vendors:
 - Third parties who provide services to Us in connection with the provision of Our products and/or services to You, including but not limited to electronic and IT services, payment services, remittance, data identification and verification, account statement or billing report preparation and delivery, cash handling, complaint handling, customer service, investigation of illegal activities indication, surveyors, appraisers, credit collection and settlement, and processing of applications and transactions.
 - Vendors or service providers involved in the marketing and promotion of Our products and/or services or those of third parties in cooperation with Us, subject to Your prior consent.
 - Analytics providers, customer research services, survey providers, and other parties who help Us improve the experience of Our products and/or services/Platforms.
- C. Consultants and Professional Advisors/Institutions:
 - Auditors, Public Accounting Firms, legal consultants, notaries, Land Deed Officials (PPAT), credit bureaus, credit rating agencies, and other professionals who provide consulting or advisory services in accordance with Our or Our affiliates/group of Companies' or Our Financial Conglomerates members' business interests and to comply with the prevailing laws and regulations.
- D. Business partners:
 - Financial Institutions or other entities that work directly or indirectly with Us as Our business partners, in relation to offering or providing Our or their products

and/or services or a combination of both to You or a person/entity You refer, subject to Your or their consent and in accordance with the prevailing laws and regulations;

- Businesses or other entities that collaborate with Us in providing added features and values to the products and/or services You use, such as airport pickup/drop-off services, concierge services, hotel reservations, ticket booking, health consultation or examination, and education planning consulting services.

E. Government bodies or competent authorities:

- Law enforcement agencies, tax authorities, banking regulators (such as the Financial Services Authority (OJK) and Bank Indonesia), the Deposit Insurance Corporation (LPS), the Financial Transaction Reports and Analysis Center (PPATK), the Corruption Eradication Commission (KPK), and other agencies that has authority under applicable laws and regulations.

F. Other parties based on Your consent or authorization:

- Any individual or entity to whom You have given explicit authorization or consent to receive disclosures of Your Personal Data.

We ensure that Our affiliates/group of companies or Our Financial Conglomerates members, service providers/vendors, consultants/professionals, and business partners who receive Your Personal Data are obligated to maintain the security and confidentiality of such Personal Data, and that each of them has understood and committed to complying with the PDP Law and applicable Personal Data Protection laws in their respective jurisdictions.

If in addition to being Our customer You are also a customer or user of a business partner or one of our affiliates/group of companies or Our Financial Conglomerates members, please note that We and the respective business partner or affiliate/group of companies or Our Financial Conglomerates members may act as joint Personal Data Controller in protecting your Personal Data as required by PDP Law. Therefore, We encourage You to read and understand the privacy policy or other documentation related to Personal Data Protection provided by each of them to understand the purpose and legal basis of the Personal Data Processing they carry out.

10. International Data Transfers

Subject to applicable banking laws and regulations, We may transfer and process Your Personal Data outside the territory of the Republic of Indonesia, provided that:

- a) Such transfer is limited to the types of Personal Data that are relevant and necessary for the Purposes of Personal Data Processing outlined in this Privacy Policy.
- b) The destination country has a level of Personal Data Protection equivalent to Indonesia.
- c) The transfer is performed in accordance with PDP Law requirements as well as the applicable Personal Data Protection laws in the destination country.

11. Use, Retention, and Destruction of Personal Data

Your Personal Data will be utilized for as long as necessary in accordance with the Purposes for Personal Data Processing and for as long as You are Our customer or using our products and/or services/Platform.

The retention and destruction of Personal Data will be carried out in accordance with Our document retention and archiving policies/procedures, and in compliance with the prevailing laws and regulations.

We may retain Your Personal Data beyond the defined retention period if required by laws and regulations, or upon request/instruction from law enforcement agency or other competent authority, or required for the protection of Our legal interests in accordance with the applicable laws, or in relation to the resolution of legal disputes or other matters.

In the event that We are required to share Your Personal Data with competent Public Bodies and/or other institutions appointed by the Government or in cooperation with Us, You hereby acknowledge and agree that the retention of Your Personal Data by such institutions shall be subject to their respective data retention policies.

12. Request related of Your Rights as Personal Data Subject

OCBC is committed to honour and fulfil Your request of Personal Data Subject rights as required and guaranteed by the PDP Law, including the right to:

- a. Complete, update, or correct any errors in your Personal Data.
- b. Access and obtain a copy of your Personal Data.
- c. Terminate the Processing and request the deletion or destruction of Your Personal Data.
- d. Withdraw Your consent to the Processing of your Personal Data.
- e. Object to decisions made solely based on automated Processing of Your Personal Data.
- f. Suspend or restrict the Processing of Your Personal Data in line with the relevant Purposes of Personal Data Processing.

Before fulfilling Your request, We will need to verify and validate Your identity to ensure that You are a legitimate person and rightful by law.

For Data Subjects who are children, persons with disabilities, or where a Data Subject right request is submitted by individuals/parties other than the Data Subject itself, We will process the request once We are able to verify that the request is valid and the individuals/parties who requested have the authority to act for and on behalf of the Data Subject.

We will follow up requests related to Data Subject rights in accordance with the applicable laws. However, it is important to understand that we may legally reject the request if:

- It conflicts with legal obligations that OCBC must fulfil.
- We are unable to verify Your/parties who represent the Data Subject or if We consider that the request is invalid or irrelevant.
- There are reasons to reject or other provisions that prohibit Us to fulfil the requests under the prevailing laws and regulations.

Please also note that in the event that a Data Subject right request might resulted in:

- termination of Our communication with you; and/or

- disruption or inability to process or provide Our or Our partners' products and/or services/Platform; and/or
- Our inability to fulfil contractual relationships with You or with relevant Personal Data Subject,

then such request may lead to (whichever is relevant): (i) cancellation of Your application/use of Our products and/or services/Platform, and/or (ii) termination of Your banking relationship with Us, and/or (iii) termination of Our relevant contractual relationship with You or the Data Subject that You represent. In the event during termination there are remaining obligations that You or the Data Subject that You represent have not fulfilled to Us, then We may require You to fulfill each of the obligations to Us at Our prompt notice.

13. Personal Data Security

OCBC will take reasonable actions to safeguard the Personal Data that We control. We have implemented security measures to prevent unauthorized access, collection, use, disclosure, copying, alteration, unlawful deletion, or other potential risks of Your Personal Data. These measures are included in Our data protection management program to ensure the data protection compliance and risk mitigation.

It is important to understand that due to the rapid development of information technology, despite Our best endeavour to protect Your Personal Data, there are factors beyond Our control that may create loopholes to be exploited by unauthorized parties to perform illegal actions by accessing and utilizing Personal Data. Therefore, We encourage You to take all necessary precautionary and protective measures to protect Your Personal Data when accessing and using Our product and/or services/Platform.

To help You understand fraud/criminal schemes and how to take appropriate protection, please visit Our security portal at: <https://www.ocbc.id/en/digisecure>, which We may update from time to time.

14. Change Statement

OCBC may modify and/or update this Privacy Policy from time to time to ensure that the ongoing Personal Data Protection remains inline and relevant with the current business development and legal updates. We will notify You of any changes and/or updates to this Privacy Policy through any method and media that We deem appropriate subject the applicable laws and regulations.

By continuing to access and use Our products and/or services, and/or Platform, You are deemed to have read and understood as well as agreed to this Privacy Policy; and agreed to review any future changes to this Privacy Policy which will be published on Our website or other media that We deem appropriate.

15. Contacting Us

- a. For inquiries and to exercise Personal Data Subject rights as outlined in Section 12 of this Privacy Policy, You may contact Us through:
 - Phone: 1500-999 (from within Indonesia) or +62-21-2650-6300 (from abroad), or
 - Email: tanya@ocbc.id, or
 - Nearest OCBC branch office.
- b. For other questions or further explanations regarding this Privacy Policy, You may contact OCBC's Data Protection Officer via email at: dpo@ocbc.id during business days excluding Saturday, Sunday, or national holidays as determined by the Government decree.

16. Governing Law

This Privacy Policy is governed by, construed in accordance with, and subject to the laws of the Republic of Indonesia.

17. Language

This Privacy Policy is prepared and published in both Indonesian and English. If there is any discrepancy or dispute in interpretation between the Indonesian and English versions, the Indonesian version shall prevail, and the English version shall be adjusted accordingly.