

# Telin Data Protection Policy

The purpose of this document ("Data Protection Policy") is to inform you of how Telekomunikasi Indonesia International Pte Ltd ("TELIN") manages Personal Data (as defined below) which is subject to the Singapore Personal Data Protection Act (No. 26 of 2012) ("the Act"). Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us, or signing up for any products or services offered by us, you agree and consent to TELIN and its related corporations (collectively, the "Companies"), as well as their respective representatives and/or agents ("Representatives") (the Companies and Representatives collectively referred to herein as "TELIN", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Companies' authorised service providers and relevant third parties, in the manner set forth in this Data Protection Policy.

This Data Protection Policy supplements but does not supersede nor replace any other consents you may have previously provided to TELIN in respect of your Personal Data, and your consents herein are additional to any rights which any of the Companies may have at law to collect, use or disclose your Personal Data.

## 1 Personal Data

- 1.1 In this Data Protection Policy, "Personal Data" refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.
- 1.2 Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address, transactional data and any other information relating to any individuals which you have provided us in any forms you may have submitted to us (including in the form of biometric data), or via other forms of interaction with you.

## 2 Collection of Personal Data

- 2.1 Generally, we collect Personal Data in the following ways:

- a. when you submit any form, including but not limited to application for service, tender or survey forms;
- b. when you enter into any agreement or provide other documentation or information in respect of your interactions and transactions with us, or when you use our services;
- c. when you interact with our staff, including customer service officers, account managers and other representatives, for example, via telephone calls (which may be recorded), letters, fax, face-to-face meetings and email;
- d. when your images are captured by us via CCTV cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you attend events hosted by us;
- e. when you use our services provided through online and other technology platforms, such as websites and apps, including when you establish any online accounts with us;
- f. when you request that we contact you, be included in an email or other mailing list; or when you respond to our request for additional Personal Data, our promotions and other initiatives;
- g. when you are contacted by, and respond to, our marketing representatives and agents and other service providers;
- h. when you submit an employment application or when you provide documents or information including your resume and/or curriculum vitae in connection with any appointment as an officer, director, representative or any other position;
- i. when you use our electronic services, or interact with us via our websites or use services on our websites, including requesting for and/or downloading any information such as our product brochures;
- j. when we seek information about you and receive your Personal Data in connection with your relationship with us or job applications, for example, from business partners, public agencies, your ex-employer and the relevant authorities; and/or
- k. when you submit your Personal Data to us for any other reason.

- 2.2 When you browse our website, you generally do so anonymously but please see the section below on cookies. We do not, at our website, automatically collect Personal Data, including your email address, unless you provide such information or log in with your account credentials.
- 2.3 If you provide us with any Personal Data relating to a third party (e.g. information on your customers, spouse, children, parents, and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of such third party to you providing us with their Personal Data for the respective purposes.
- 2.4 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with products and services you have requested.

### 3 Purposes for Collection, Use and Disclosure of Personal Data

- 3.1 Depending on the services which you subscribe to, your Personal Data may be collected, used and/or disclosed for the following purposes:
  - a. To verify your identity, so as to grant access to our premise and to process orders and applications for services;
  - b. To provide the services and to facilitate interconnection and interoperability between service providers including telecommunications licensees in providing the services;
  - c. To respond and deal with enquiries or complaints and for other customer-care activities, including to provide you with any product brochures or other information requested;
  - d. To generate bills, facilitate the payment of bills, manage accounts and for debt-recovery functions;
  - e. To carry out credit checks and for the evaluation of creditworthiness;
  - f. To manage, develop and improve our business and operations to serve you better;
  - g. To provide complementary or value added services;
  - h. To administer customer loyalty benefits, reward benefits, contests and lucky draws;

- i. To provide self-service channels for customer-care and account management activities;
  - j. To carry out market research and customer surveys;
  - k. To conduct investigations or take action in relation to bad debts, crime and fraud prevention, detection or prosecution, risk management, or to prevent you or the Companies from harm, illegal or unlawful activities;
  - l. To conduct investigations or take action in relation to any violation of any of our terms and conditions;
  - m. For matters connected with the provision of services, including your compliance with our General Terms and Conditions, or our Acceptable Use Policies;
  - n. To third parties who perform Services on our behalf, but only to the extent necessary for the services to be performed;
  - o. To protect and maintain the Personal Data, and to have access to it including for making corrections to the Personal Data;
  - p. To comply with legal and regulatory requirements imposed by any public agency, and otherwise with any applicable laws;
  - q. Any other purpose necessary, ancillary or consequential to the above specified purposes.
- 3.2 Your Personal Data will be disclosed for the purposes indicated above to our officers and employees, third parties, service providers, advisors, which include without limitation, the following persons or entities:
- a. External service engineers, contractors, service providers and third parties for service installation, and maintenance and support of the services;
  - b. Banks, credit card companies, and payment vendors for the processing of payment related to the services;
  - c. Vendors for provision of services including document storage and printing of bills;
  - d. Debt collection agencies;
  - e. Credit information companies;
  - f. Courier services companies;
  - g. Channel partners;
  - h. Public Agencies;
  - i. Advisors, including auditors and lawyers who advise us;
  - j. Any data intermediaries appointed by us to enable us to provide the services; and

- k. Any other party to whom you authorize us to disclose Personal Data to.
- 3.3 Unless permitted by any applicable laws, TELIN shall not use, process or disclose the Personal Data for any other purpose, without first identifying and documenting the other purpose and obtaining the consent of the Person to whom such Personal Data belongs to.

## 4 Use of Cookies

- 4.1 A cookie is a small piece of information that is placed on your computer when you visit certain websites.
- 4.2 TELIN uses cookies on its websites for the following purposes:
- a. enabling certain features and functions on our websites, eg. remembering your user-id, browsing and other service preferences;
  - b. building up a profile of how you and other users use the website;
  - c. improving the efficiency of our website;
  - d. administering services to you and to advertisers; and
  - e. establishing usage statistics.

- 4.3 Most internet browsers provide you the option of turning off the processing of cookies (please see the “help” section of your browser), but this may result in the loss of functionality, restrict your use of the website and/or delay or affect the way in which it operates.
- 4.4 Advertisements on the TELIN website may be provided by third party advertisers and their agencies. These may generate cookies to track how many people have seen a particular advertisement (or use the services of third parties to do this), and to track how many people have seen it more than once. TELIN does not control these third parties and their cookie policies and if you have questions about their cookie policies, please contact TELIN and we will try our best to assist by providing you information about these third party advertising agencies.
- 4.5 TELIN is not responsible for the Personal Data policies (including Personal Data protection and cookies), content or security of any third party websites linked to the TELIN website.

## 5 Data Security

- 5.1 TELIN will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any Personal Data we may have collected from or about you, or that for example no harmful code will enter our website (for example viruses, bugs, trojan horses, spyware or adware). You should be aware of the risks associated with using websites.
- 5.2 While we strive to protect your Personal Data, we cannot ensure the security of the information you transmit to us via the Internet or when you use our service portal; and we urge you to take every precaution to protect your Personal Data when you use such platforms. We recommend that you change your passwords often, use a combination of letters and numbers, and ensure that you use a secure browser.

- 5.3 If applicable, you undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorised person, and to inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way or that actual or possible unauthorised transactions have taken place. We are not liable for any damages resulting from any security breaches, on unauthorised and/or fraudulent use of your username and password.

## 6 Data Transfer

- 6.1 In the event that we transfer your Personal Data outside Singapore to a Company, Representative or any third parties as specified in this Data Protection Policy, we shall ensure that such entities are bound by legally enforceable obligations to provide a standard of protection to your Personal Data comparable to the standard of protection as set out in the Act.

## 7 Feedback, Withdrawal of Consent, Access and Correction of your Personal Data

- 7.1 If you:
- a. have any questions or feedback relating to your Personal Data or our Data Protection Policy;
  - b. would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or
  - c. would like to obtain access and make corrections to your Personal Data records, you can approach us via the following channels:
    - I. Email us at [dpo@Telin.sg](mailto:dpo@Telin.sg)
    - II. You may also write to our Data Protection Officer as follows:

Data Protection Officer  
Telekomunikasi Indonesia International Pte Ltd  
1 Maritime Square,  
HarbourFront Centre #09-63  
Singapore 099253
  - d. Please note that if your Personal Data has been provided to us by a third party (e.g. Our reseller), you should contact such party directly to make any

queries, feedback, and access and correction requests to TELIN on your behalf.

- 7.2 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, TELIN may not be in a position to continue to provide its products or services to you, administer any contractual relationship already in place. This may also result in the termination of any agreements you have with TELIN, and your being in breach of your contractual obligations or undertakings. TELIN's legal rights and remedies in such event are expressly reserved.

## 8 Governing Law

- 8.1 This Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore. Any dispute or claim arising hereunder shall be submitted to the non-exclusive jurisdiction of Singapore courts.