

## Privacy Policy

PT. Interspace Indonesia (hereinafter the “ACCESSTRADE”) operates a wide variety of information provision services. The Company has instituted a privacy management system, and hereby stipulates the privacy policy set out below for the purpose of protecting and proper handling of personal data received from users through the different services the Company operates. The Company makes this policy known to all officers and employees serving the Company, and will endeavor to properly protect personal data in accordance with this policy.

The Company reserves the right at any time and at its sole discretion to update this Privacy Policy. Be sure to return to this page periodically to review the most current version of the Privacy Policy. Your continued access or use of the Company’s website (“[acesstrade.co.id](http://acesstrade.co.id)”) signifies your acceptance of the updated or modified Privacy Policy.

### 1. Establishment of the privacy protection management system

The Company will maintain a management system for the protection of personal data received in the course of its business activities.

### 2. Acquisition, use and provision of personal data

When obtaining personal data in the course of its business, the Company will inform the user of (i) the type of personal data sought, (ii) the purpose(s) for which such personal data is sought and (iii) the intended recipients of the processed personal data. The Company will handle such personal data in an appropriate manner. The Company prohibits the use of personal data without statutory grounds for any purpose other than those specified, and implements measures for enforcing this prohibition.

### 3. Compliance with laws, regulations and norms

The Company will comply with laws and regulations, guidelines set up by the national government and other norms pertaining to the handling of personal data, and will harmonize its privacy management rules with these laws, regulations, guidelines and other norms.

### 4. Implementation of security controls

While no Website can guarantee 100% security, the Company has implemented appropriate administrative, technical, and physical security procedures to help protect the personal data the Users provide to us. To ensure the accuracy and security of personal data, the Company controls access to, and implements

restrictions on the taking out of, personal data from the Company's premises. The Company has adopted measures to prevent unauthorized access to personal data, using reasonable measures commensurate with the presumed risks in an effort to prevent any personal data from being leaked, lost or damaged. The Company will regularly review and adjust these security measures.

#### 5. Disclosure of personal data and response to complaints and inquiries

If a user, in accordance with the procedures announced by the Company and in connection with the user's own personal data, makes a request for the disclosure, correction, addition, deletion, discontinuation of use or provision of the data, or makes a complaint or inquiry, the Company will carry out proper user identification and respond promptly to the matter.

#### 6. Formulation, implementation, maintenance and continuous enhancement of the personal data management system

The Company makes its employees aware of the importance of personal data protection. The Company shall formulate a personal data management system on the proper use and adequate protection of personal data, and shall implement, monitor, maintain and continuously enhance it in a consistent manner.

Established on 2<sup>nd</sup> July 2013

PT. Interspace Indonesia

CEO Prayudho Rahardjo

\*For any complaint or inquiry regarding personal data received by the Company, please use the following e-mail address or postal address.

Privacy Committee Office, PT. Interspace Indonesia

E-mail: [support@accesstrade.co.id](mailto:support@accesstrade.co.id)

Postal Address:

Menara Anugrah 20th Floor - Jl. Dr. Ide Anak Agung Gde Agung Lot 8.6-8.7.

Kawasan Mega Kuningan Jakarta Selatan 12950. Indonesia

Handling of Personal data

1. Business operator handling personal data PT. Interspace Indonesia

Contact: Privacy Committee Office

E-mail: [support@accesstrade.co.id](mailto:support@accesstrade.co.id)

2. Matters pertaining to the public announcement of the purpose of utilization of personal data and matters to be placed in an accessible condition for the person concerned with the retained personal data

No.

Type of personal data

Purpose of use

(1) Information on customers:

Personal identification for the login process, distribution of information via e-mail magazine and other formats, provision of services through the Websites, response to inquiries from customers, and use as materials for the preparation of statistical data and the development of the Company's new services after processing into a form in which the individual cannot be identified

(2) Information acquired through business activities and from information available to the public:

Business activities, credit management and business communications

(3) Information on shareholders:

Dispatch of investor relations information, business communications and responses to inquiries

(4) Information on entrants in prize draws and campaigns: Communications with entrants and the dispatch of prizes

(5) Information on employees (including temporary workers, part-time workers and retired employees):

Business communications and personnel management

(6) Information on job applicants:

Screening for recruitment by the Company and its subsidiaries, communications with applicants and entry procedures for successful applicants

3. Matters pertaining to the provision of personal data to a third party

The Company shall place the personal data acquired under proper control and shall not provide any personal data to any third party without the consent of the person concerned, except in the following cases:

- Cases where the provision of personal data is based on law or regulation
- Cases where the provision of personal data is necessary for the protection of the life, body or property of an individual and where it is difficult to obtain the person's consent
- Cases where the provision of personal data is particularly necessary for improving public health or promoting the sound growth of children, and where it is difficult to obtain the consent of the person
- Cases where the provision of personal data is necessary for cooperating with a state organization, a local government, or an individual or business operator assigned to execute the affairs prescribed by law or regulation and where obtaining the consent of the person is likely to impede the execution of the affairs

4. Procedures to meet requests for notice of the purpose of use, for disclosure, correction, addition, deletion and discontinuation of use, and for erasure or discontinuation of provision of personal data subject to disclosure (hereinafter "Certain Requests")

#### (1) Address for filing Certain Requests

To file Certain Requests, please fill in the application form designated by the Company with the necessary information and send it by mail to:

Privacy Committee Office  
 Menara Anugrah 20th Floor - Jl. Dr. Ide Anak Agung Gde Agung Lot 8.6-8.7.  
 Kawasan Mega Kuningan Jakarta Selatan 12950. Indonesia

Documents and forms to be submitted for filing Certain Requests Please supply the documents specified in A and B below.

A. An application form for Certain Requests regarding personal data (please request the application form by an e-mail to [support@acesstrade.co.id](mailto:support@acesstrade.co.id)) Print out the form and fill in the required information.

B. A document for personal identification (such as a photocopy of the applicant's driving license, passport, student identification card and health insurance certificate)

#### (Filing Certain Requests by proxy)

When filing Certain Requests by proxy, please enclose the documents specified below in addition to those specified in A and B above.

(Filing with a letter of proxy)

i) A copy of the letter of proxy (please request the application form by an e-mail to support@accesstrade.co.id)

This copy must bear the signature and registered seal of the person associated with the personal data.

ii) A copy of the certificate of seal registration

iii) A document for personal identification of the proxy (such as a photocopy of the proxy's driving license, passport and health insurance certificate)

(Filing by legal representative)

i) A document certifying that the legal representative has the authority of statutory representation (such as an abstract of the family register)

ii) A personal identification document of the legal representative (such as a photocopy of his or her driving license, passport and health insurance certificate)

(3) Fee concerning Certain Requests

No fee is required for a request for notification of the purpose of use or a request for disclosure.

(4) Method of responding to Certain Requests

The Company will respond in writing to the applicant's postal or email address as specified on the application form.

(5) Purpose of utilization of personal data acquired from Certain Requests

The Company will use personal data acquired through requests for investigation for the application process, personal identification, response to applications and other purposes to the extent necessary.

5. Conditions for rejection of Certain Requests

The Company might not meet Certain Requests in the following cases. In this event, the Company will respond accordingly.

- (1) Cases in which the applicant or his or her due proxy cannot be identified
- (2) Cases in which there is any deficiency in the documents submitted
- (3) Cases in which the statutory requirements for Certain Requests are not met
- (4) Cases in which it is statutorily unnecessary to meet Certain Requests

## 6. Contact details for complaints

The Company's contact for complaints

Privacy Committee Office

PT. Interspace Indonesia

E-mail: [support@accesstrade.co.id](mailto:support@accesstrade.co.id)

Menara Anugrah 20th Floor - Jl. Dr. Ide Anak Agung Gde Agung Lot 8.6-8.7.  
Kawasan Mega Kuningan Jakarta Selatan 12950. Indonesia

Contact us at the above e-mail address and postal address.

\* The Company will not accept any request submitted in person.