



PERSONAL DATA UTILIZATION POLICY

This Personal Data Utilization Policy ("Policy") is an agreement from the Owner of Personal Data as stated below so that his personal data can be processed and utilized, among others, by PT Bumi Parama Wisesa and the subsidiaries, associated companies and related companies of Hongkong Land Holdings Limited (Hongkong Land), Jardine Matheson Holdings Limited, as well as PT Bumi Serpong Damai, Tbk (Sinarmas Land), hereinafter referred to entirely as "Group" and the terms "us", "we" or "our" in this policy refer to the Group.

We take your privacy very seriously and have in place policies and practices dealing with data protection. We ask that you read this Policy carefully as it contains important information about our collection, use, processing and disclosure of personal data in our possession or under our control.

I. COLLECTION OF PERSONAL DATA

1. Personal data that the Group collects refers to data or information about you from which you can be identified either (a) from that data alone; or (b) from that data combined with other information and may be collected by us directly or indirectly. Personal data which you may provide to us for example name, domicile address, email address, phone number or mailing address.
2. Examples of personal data which you may provide to us include:
 - (i) your name, national registration identification number, passport number or other identification number, date of birth, gender, nationality, telephone number(s), residential and/or mailing address, email address, facial images in a photograph or video recording, fingerprint and any other information relating to you which you have provided to us in any form you have submitted to us, or in other forms of interaction with you;
 - (ii) information about your use of our websites and services, including cookies, IP addresses, subscription account details and membership details;
 - (iii) employment details, education background and income levels; and
 - (iv) your payment related information, such as your bank account or credit card information and your credit history.
3. Personal data may be collected by us, directly or indirectly, for instance:
 - (i) when you respond to our promotions and other initiatives, subscribe to our mailing lists or mobile applications, or respond to our market surveys;
 - (ii) when you use or purchase our products or services or when you submit forms relating to any of our products or services;
 - (iii) when you attend events organised by us or participate in promotional activities or lucky draws at any of the properties owned, managed or operated by us;
 - (iv) when you visit our websites or showflats and/or when you register for or use any of our services on websites owned or operated by us or when you register as a member on any of our websites owned and/or operated by us;



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- (v) when you enter into transactions with us, or express any interest in doing so, including in relation to all properties we own, manage or operate;
 - (vi) when you submit your personal data to us for any reason.
4. We also collect personal data from third party sources, for example:
- (i) from real estate agents, real estate lawyers, our business partners and also from third party service providers who provide advertising, marketing or promotional services to the Group;
 - (ii) from your family members or friends who provide your personal data to the Group on your behalf; and/or
 - (iii) from public agencies or other public sources
5. In certain circumstances, you may also provide us with personal data of persons other than yourself. If you do so, you warrant that you have informed him/her of the purposes for which we are collecting his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes, including all purposes as set out in this Policy. You agree to indemnify and hold us harmless from and against any and all claims by such individuals relating to our collection, use and disclosure of such personal data in accordance with the terms of this Policy.

II. PURPOSES OF COLLECTION, USE OR DISCLOSURE

1. We may collect, use, process, store and/or disclose personal data for one or more of the following purposes:
- a. to conduct and complete transactions (e.g. processing orders and payments; providing products or services that have been requested), performing our obligations or exercising our rights as set out in binding contractual terms, and otherwise to manage your relationship with us;
 - b. to provide customer service (e.g. providing information on status and updates including to our policies, terms and other administrative information);
 - c. to process your application for a membership account or subscription to a mailing list or mobile application of the Group and maintain such account;
 - d. to manage your stay in properties owned or operated by the Group and to process your participation in our in-mall promotions, redemptions, contests and other marketing and promotional events and to provide you with shopper benefits (including voucher, gift and other value-added services)
 - e. to invite any customers or potential customers to events, including coordinating property and/or showflat viewings and other marketing and promotional events;
 - f. to administer the sale process including verification of identity, facilitating viewings, preparation of legal documentation, co-ordinating addition and alteration work, defect rectification and handing over possession;
 - g. to update your bank account details and business records to facilitate follow-ups on outstanding arrears or other payment obligations;
 - h. to deliver correspondences or notices as may be required, under the sales documentation, binding contracts between us, or as you may have requested or agreed to;
 - i. to prevent, detect and investigate crime, including fraud and money-laundering, to analyse and manage other commercial risks, to manage the operations of the Group and to comply with internal policies and procedures;





- j. to conduct research and analysis to review, develop, manage and improve products and/or services of the Group;
 - k. to protect and enforce our contractual and legal rights and obligations and to handle disputes and conduct and facilitate investigations and proceedings;
 - l. security and safety purposes relating to premises or events of the Group, including background checks, security screening and issuance of access passes;
 - m. to facilitate a proposed or actual business assignment, transfer, participation or sub participation of our rights and obligations in respect of your relationship with the Group;
 - n. any other reasonable purposes related to the aforesaid or for which you have provided any information to us; and/or
2. We may also collect, use, process, store and/or disclose personal data for other legitimate purposes related to our business and which are not incompatible with the original purposes for which you have provided the personal data, and also in circumstances other than set out in this policy where required, or permitted, by laws applicable in any relevant jurisdiction, including overseas.
 3. Group intends to use your personal data to conduct direct marketing in relation to the products and/or services that may be provided by the Group and the business partners and selected third party providers chosen by the Group. The use of your personal data for direct marketing purposes, will only be applicable to market products located outside Republic of Indonesia.

III. TRANSFER OR DISCLOSURE OF PERSONAL DATA

We may disclose your personal data to the following parties, whether located within or outside your country of residence, for the purposes set out in this Policy:

- a. members of the Group and their respective affiliates, associated companies, business partners, joint venture partners, agents, contractors, third party service providers, auditors, consultants, lawyers and advisors;
- b. third parties to whom you authorise disclosure of your personal data;
- c. insurers, credit providers, courts, tribunals and other regulatory authorities as authorised by law;
- d. credit reporting agencies or investigators, credit bureau and in the event of default or disputes, debt collection agencies or dispute resolution centres;
- e. any business partner, investor, assignee or transferee to facilitate business asset transactions involving the Group; and
- f. banks, credit card companies and their respective service providers.

IV. ACCURACY

We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data in writing.

V. SECURITY AND RETENTION

1. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate



administrative, physical and technical measures, including to protect personal data from unintended access.

2. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure, and HKL cannot and does not guarantee that our systems or applications are invulnerable to security breaches. HKL makes no warranty, guarantee, or representation that your use of our systems or applications is safe and protected from viruses, worms, Trojan horses, and other vulnerabilities.
3. We keep your personal data only for so long as we need the personal data to fulfil the purposes we collected it for, and to satisfy our business and/or legal purposes, including audit, accounting or reporting requirements. In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case we are entitled to retain and use such data without restriction.

VI. **YOUR RIGHTS**

1. You may access (including requesting for copies of) and/or correct your personal data by contacting us.
2. You may also exercise the following rights by contacting our Officer:
 - a. you may object to the collection, use, or disclosure of personal data concerning you at any time;
 - b. you may restrict the use of your personal data;

VII. **CHANGES TO THIS POLICY**

1. We keep this Policy under regular review. If we change this Policy we will post the changes on www.navapark.id so that you may be aware of the information we collect and how we use it at all times.
2. Where you continue to provide personal data to us as described in this Policy, or continue to use our products or services, this will constitute your acknowledgement and acceptance of a revised Policy. Where required by applicable data protection laws, you will be given the choice at that time to consent to the use of your personal data in accordance with the revised Policy. If you do not agree with the revised Policy, this may affect the delivery of our products and/or services to you.

VIII. **HOW TO CONTACT US**

If you have any queries or comments on this Policy or the use of your personal data, or if you wish to lodge a privacy-related complaint, please contact our officer at Email address: yohanes.hasiando@bpw.sinarmasland.com

We will investigate your queries, comments or complaint, and will use reasonable endeavours to respond, in accordance with applicable laws.

IX. **WAIVER**

All parties expressly agree to waive and set aside our respective rights and obligations under any applicable law in the event of any termination of this Policy to the extent that such law requires any judicial pronouncement for the termination of this Policy.



X. **GOVERNING LAW**

This Policy is governed by the laws of Indonesia. For the avoidance of doubt, all applicable data protection laws will apply to the processing of your personal data.