

## PRIVACY POLICY

This privacy notice discloses the privacy practices (the “**Privacy Policy**”) of PT Zillion Tech Indonesia (“**Zilingo**”), and applies solely to the information collected on the Zilingo website or application. The Privacy Policy describes how Zilingo uses and protects the information that you give while using this website or application and intends to provide visitors to Zilingo website and application with clear and complete information about the data and information that is collected and the way that data and information is stored and used. Zilingo values the privacy of its users and confirms that this Privacy Policy is in compliance with the Information and Electronic Transaction Law (the “**ITE Law**”) and other applicable laws. Before using Zilingo website and application, we advise you to read this Privacy Policy and contact us at the email address or phone numbers mentioned below if you have any questions or concerns.

### Information Collected:

Zilingo only collects information, which is essential to us and relevant to our Contract and operations so as to be able to provide you with the best experience and service, consisting of:

- **Identification Information:** name, gender, age, nationality, country of residence, date of birth, photo, identification number, work details, passport number, other government-issued identification information, marital status, family details, authentication credentials and any other identification information with the similar nature;
- **Transactional Information:** details of products purchased and services used by you, payment history, transaction details, feedback and correspondence and other transactional details with the similar nature;
- **Contact Details:** address, phone number, email address, facsimile number and other contact details (e.g. Line, WeChat, Facebook, WhatsApp and Instagram);
- **Financial Information:** credit or debit card details, bank account details, fund remittance details and source of fund;
- **Investigation Information:** due diligence checks (e.g. information related to Know Your Client (KYC) and Customer Due Diligence (CDD)), Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) checks and other investigation information with similar nature;
- **Login Information:** login information for using website and application;
- **Technical Data:** cookies, IP address, log files, device details, location, mobile network data, hardware model; operation system and other technical data with the similar nature;
- **Public Information:** information publicly available on both online and offline channels such as social media information (e.g. photos, posts, locations, friend list and liked pages); and
- **Correspondence Information:** any correspondence and other communications between Zilingo and you, in whatever manner or form.

(Collectively, referred as the “**Personal Information**”).

Zilingo promises to only collect, use and disclose your Personal Information for the purposes mentioned below:

- For Product delivery
- For delivery updates provided to you
- For customer support
- For provision of relevant product information
- For Order processing
- For provision of invoice financing services and/or other financial services provided by ZILINGO’s business partners and/or service providers through ZILINGO platform
- To administer your Zilingo account with us
- To audit the downloading of data from Zilingo Website/App
- To improve/modify/customize website/application layout and/or design for the purpose of

- customization for better user experience
- To identify our users and visitors and carry out research on our users' demographics
- In the event that you accept that you have no objection to being provided with this information to send you information based on your interests and usage which we think you may find useful or which you may have requested from us, regarding our products and services.

**For as long as either required to us by law or as relevant for the purpose stated above:**

- Browsing the Zilingo application or website will not require you to provide any personal details. You may remain anonymous and we will not be able to identify you unless you register and create an account with Zilingo using the process mentioned on the application.
- Zilingo will not sell, share or trade your Personal Information collected online with third parties, except in the following cases:
  1. In case of relevant information being passed onto our third-party logistics partners or third-party payment partners or third-party financial service partners as necessary, to process your order, payments, trade credit facility and delivery.
  2. In order to personalize the website/application for you and to be able to perform behavioural analytics.
- The Personal Information collected online will be disclosed within our corporate group for internal use only and in accordance with the above purposes.
- We may also send you marketing and/or promotional materials which you can unsubscribe from at any time.

By accepting these Terms and Conditions, you agree and accept that all information provided by you will be true and accurate and will be kept up to date and that you will inform us of any changes in the same, which you can do by accessing your Zilingo Account. Information related to your orders is stored with us, but for security reasons, cannot be retrieved directly by us. However, you may access this and other account related/marketing/promotional information by logging into your Account on the application.

**User Undertaking:**

User undertakes to treat the personal access data confidentially and not make it available to unauthorised third parties. User accepts and agrees that Zilingo cannot be held liable for misuse of passwords, unless such misuse is a result of our actions.

**ZILINGO's Undertaking:**

Zilingo will endeavour to ensure that all information collected from you is safely and securely stored against unlawful and unauthorized access, misuse, loss or destruction, which include control access, encrypted storage and storage with lock.

We will protect your Personal Information by:

- Restricting third party access to your personal information unless it is absolutely necessary and permitted under the ITE Law and other applicable laws; and
- Not retaining your Personal Information for any time period longer than required to fulfill the above purpose. All payment related data is encrypted as per our third- party payment partners' policies, for further information, please contact our customer care team as detailed below.

**Retention Period:**

Zilingo will retain your Personal Information as long as there are relationships between you and Zilingo and within the period appropriate and necessary for each type of Personal Information (approximately of 10 (ten) years following termination the contractual relationships). The period which Zilingo keeps the Personal Information will be in line with statute of limitations under the ITE Law and other

applicable laws (e.g. laws in relation to accounting, tax and labour and other laws to which Zilingo is subject to both in Indonesia and in other countries).

Nevertheless, Zilingo may continue to retain your Personal Information as long as (i) it is permitted under the ITE Law and/or other applicable laws, (ii) Zilingo is under certain contracts with you, (iii) Zilingo is under legal obligation to retain your Personal Information, (iv) the consent granted to Zilingo has not been revoked or (v) it is deemed necessary to complete the objectives of this Privacy Policy.

**Exceptions:**

Zilingo is committed in its endeavor to comply with the ITE Law and other applicable laws governing the protection of personal data. However, in exceptional circumstances, if Zilingo is required by law to disclose the Personal Information, specifically if the disclosure is deemed essential to prevent a threat to life or health, or for other law enforcement purposes, it will do so.

**Minors:**

The minor refers to each 20-year-old persons. Zilingo may not know the age of you visiting Zilingo's website and application. The parents of the minors providing the Personal Information through Zilingo's website and application may request Zilingo to delete the Personal Information of such persons. If Zilingo is aware that there is Personal Information of minors, Zilingo will therefore proceed to obtain consent from the parents without delay, if required by the ITE Law and/or other applicable laws.

**Your Rights:**

Zilingo respects your rights in relation to the Personal Information as follows:

- you can withdraw your consent at any time, but it shall not affect Zilingo's collecting, using or disclosing your Personal Information that has already been consented by you;
- you can access to and obtain copy of your Personal Information held by Zilingo or request Zilingo to disclose the acquisition of your Personal Information without your consent;
- you can receive your Personal Information held by Zilingo and request Zilingo to transfer your Personal Information to other data controller and send you such transferred Personal Information;
- you can request Zilingo to erase, destroy, anonymize or restrict the use of your Personal Information upon circumstances of (i) your Personal Information being no longer necessary in relation to the purposes specified in this Privacy Policy, (ii) withdrawal of your consent or (iii) collection, use or disclosure of your Personal Information being incompliant with the ITE Law and other applicable laws; and
- you can file a complaint with the relevant authorities in the event that Zilingo or Zilingo' personal violates or does not comply with the ITE Law.

**Miscellaneous:**

When User visits Zilingo, the company's servers will automatically record the information that your browser sends whenever you visit our website. This information is collected to help us customize and/or improve our website/app and the services and experience we provide and will not be used in association or conjunction with any other personal information.

ZILINGO may also choose to use Google Analytics features of Display Advertising, including but not restricted to the following: Remarketing, Google Display Network Impression Reporting, DoubleClick Campaign Manager integration, and Google Analytics Demographics and Interest Reporting. However, you can use the Google Ads Settings (<https://www.google.com/settings/ads>), to opt out of Google Analytics for Display Advertising and customize Google Display Network ads. Further, ZILINGO may choose to use Remarketing with Google Analytics to advertise online; third-party vendors, including Google, may show ZILINGO ads on sites across the Internet. ZILINGO and Third-Party vendors, which

may include Google, use first party cookies (such as the Google Analytics cookie) and third party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on visitors' past visits to ZILINGO, as well as report how ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to Zilingo website and application.

Should you have any query or concern arising from this Privacy Policy or Zilingo's activities with respect to your Personal Information, Zilingo as the Data Controller can be contacted at the below address:

To: PT Zillion Tech Indonesia  
Address: Gama Tower 30<sup>th</sup> floor  
Jl. H. R. Rasuna Said Kav. C-22, Karet Kuningan, Setiabudi, Jakarta Selatan  
12940  
Tel: [+62 21 3110 6910]  
Email: [\[ztrade+id@zilingo.com\]](mailto:ztrade+id@zilingo.com)

By accepting these Terms and Conditions you accept that ZILINGO reserves the right to modify and change this Privacy Policy at any time to be in accordance with the ITE Law and other applicable laws. We will endeavor to ensure that any changes to this policy will be made available immediately on the website and/or mobile application; however, if such changes or amendments are considered specially causing significant effect to you, such amendment shall be directly notified to you without delay. Our Privacy Policy complies with the ITE Law and other applicable laws governing the protection of personal data and represents the industry's best practices.

You likewise acknowledge that you have read this Privacy Policy, understood its contents and consent to the collection, recording, organisation, storage, updating or modification, retrieval, use, blocking, erasure or destruction ("**Processing**") of your Personal Information pursuant to the purposes described above. By accepting this Privacy Policy, you agree that your consent does not preclude the existence of other criteria for lawful Processing of personal data, and does not waive any of the rights under the ITE Law and other applicable laws.