



**PT PERTAMINA ROSNEFT
PENGOLAHAN & PETROKIMIA**

POLICY ON PERSONAL DATA PROCESSING

No. PED-006/PRPP-130/2021-S0

Revision Number 0 1 2 3 4

**COMPLIANCE
PT PERTAMINA ROSNEFT PENGOLAHAN DAN PETROKIMIA**

Fungsi/Function	Compliance	No.	PED-006/PRPP-130/2021-S0
		Rev.	0
Judul/Title	Policy on Personal Data Processing	Berlaku TMT/ Effective Date	August 24, 2021
		Halaman/Page	2 of 11

Approval & Stipulation Sheet

Approved

Board of Commissioners

No.	Title	Name	Signature
1	President Commissioner/ Independent Commissioner	Alexander Romanov	
2	Vice President Commissioner	Budi Santoso Syarif	
3	Commissioner	Amir Hamzah Siagian	
4	Commissioner	Alexander Zubchenko	
5	Commissioner	Beni Syarif Hidayat	

Stipulated

Board of Directors

No.	Title	Name	Signature
1	President Director	Kadek Ambara Jaya	
2	Director of Finance	Pavel Vagero	
3	Director of Development	Eriyadi	

Fungsi/Function	Compliance	No.	PED-006/PRPP-130/2021-S0
		Rev.	0
Judul/Title	Policy on Personal Data Processing	Berlaku TMT/ Effective Date	August 24, 2021
		Halaman/Page	3 of 11

CONTENTS

INTRODUCTORY PROVISIONS.....	4
PURPOSE	4
SCOPE	4
VALIDITY AND MANAGEMENT OF CHANGE	4
1.0 TERMS AND DEFINITIONS.....	4
2.0 PERSONAL DATA PROCESSING ACTIVITIES	6
2.1 PRINCIPLES AND OBJECTIVES	6
2.2 SUBJECTS OF THE PROCESSED PERSONAL DATA	7
2.3 PROCESSED PERSONAL DATA.....	7
2.4 CONDITIONS FOR PERSONAL DATA PROCESSING.....	8
2.5 TIME AND PERIOD OF PROCESSING, STORING AND DESTRUCTION	8
2.6 CROSS-BORDER TRANSFER.....	9
2.7 PROCESSING METHODS.....	9
2.8 RIGHTS AND OBLIGATIONS	9
2.9 MEASURES FOR PERSONAL DATA PROCESSING	10
3.0 REFERENCES.....	11

Fungsi/Function	Compliance	No.	PED-006/PRPP-130/2021-S0
		Rev.	0
Judul/Title	Policy on Personal Data Processing	Berlaku TMT/ Effective Date	August 24, 2021
		Halaman/Page	4 of 11

INTRODUCTORY PROVISIONS

PURPOSE

Policy on Personal Data Processing (“Policy”) is a framework document, regulating the activities related to processing of personal data in PT Pertamina Rosneft Pengolahan dan Petrokimia (“PRPP”, “Company”).

This Policy:

- was developed with consideration of the requirements of the laws of Indonesia;
- describes the objectives, conditions and methods of personal data processing, list of subjects of personal data, list of personal data that may be processed by the Company, functions of the Company in personal data processing, personal data subjects’ rights, and requirements to personal data protection.

SCOPE

This Policy shall be binding upon the employees of the Company, involved in personal data processing.

No administrative documents or other internal regulations shall contain provisions that would be inconsistent with the provisions of this Policy.

This Policy applies to any processing of the personal data in the Company, conducted prior to and after adoption of this Policy.

VALIDITY AND MANAGEMENT OF CHANGE

This Policy constitutes a permanent local regulatory document.

This Policy shall be approved, amended or revoked by the resolution of the Board of Directors after approval by the Board of Commissioners.

Introduction of amendments to the present Regulation may be initiated by the heads of the Company’s HR or Compliance Functions, as well as other Company’s business units subject to an approval with the Company’s HR and Compliance Functions.

Amendments to this Policy may be introduced in case of changes in applicable laws of Indonesia concerning personal data processing, alteration of organizational structure or authorities of the Company’s top management.

1.0 TERMS AND DEFINITIONS

ELECTRONIC PROCESSING OF PERSONAL DATA – processing of personal data electronically (or by other digital means of data processing).

BLOCKING OF PERSONAL DATA – temporary suspension of personal data processing (except for cases, where processing is required for verification of personal data).

Fungsi/Function	Compliance	No.	PED-006/PRPP-130/2021-S0
		Rev.	0
Judul/Title	Policy on Personal Data Processing	Berlaku TMT/ Effective Date	August 24, 2021
		Halaman/Page	5 of 11

BUSINESS UNIT – a structural unit or function of PT Pertamina Rosneft Pengolahan dan Petrokimia with individual functions, tasks and responsibilities within its competencies.

COUNTERPARTY – any local or foreign legal entity or individual, with which/whom the Company enters into contractual relationship, except for employer-employee relations.

CONFIDENTIALITY OF PERSONAL DATA – mandatory requirements, binding upon the Company or other persons, obtaining access to personal data, preventing disclosure thereof without prior consent of the individual or on other legitimate grounds.

COMBINED PROCESSING OF PERSONAL DATA – processing of personal data, combining both the electronic and manual processing methods

DEPERSONALIZATION OF PERSONAL DATA - activities, resulting in impracticability of defining the association of personal data with certain individual without the use of additional information.

DISCLOSURE OF PERSONAL DATA – activities aimed at disclosing any personal data to the public at large.

DESTRUCTION OF PERSONAL DATA – activities, resulting in impracticability of restoring the content of personal data in a data system and/or in destruction of material mediums / media, containing the personal data.

EMPLOYEE – an individual, who has entered into employer-employee relationship.

SUBJECT OF PERSONAL DATA – an individual, that is directly or indirectly identified with the help of the personal data.

INFORMATION – information (communications, data) regardless of the form of its presentation.

MANUAL PROCESSING OF PERSONAL DATA – processing of personal data, contained in the personal data system or retrieved from such system, performed with direct human involvement.

Note: *Processing of personal data shall not be considered electronic solely on the grounds that such personal data is contained in the personal data system or is retrieved therefrom.*

OPERATOR – PT Pertamina Rosneft Pengolahan dan Petrokimia, performing personal data processing, and determining the objectives of personal data processing, contents of personal data to be processed, activities/operations performed with personal data.

PERSONAL DATA ELECTRONIC SYSTEM – a combination of personal data contained in databases, information technologies and hardware facilities utilized for processing thereof.

PROCESSING OF PERSONAL DATA – any activity (operation) or a combination of activities (operations) with personal data, performed with the use of automation

Fungsi/Function	Compliance	No.	PED-006/PRPP-130/2021-S0
		Rev.	0
Judul/Title	Policy on Personal Data Processing	Berlaku TMT/ Effective Date	August 24, 2021
		Halaman/Page	6 of 11

equipment or without thereof, including collection, recording, classification, accumulation, storing, rectification (updating, alteration), retrieval, use, transfer (disclosure, provision, access), depersonalization, blocking, deletion and destruction of personal data

PERSONAL DATA – any information, related directly or indirectly to certain or identifiable individuals.

PROVISION OF PERSONAL DATA – activities aimed at disclosing any personal data to certain person or group of certain persons.

TOP MANAGEMENT – President Director, members of the Company’s Board of Directors (BoD), Deputy Directors, Vice Presidents, Managers directly reporting to the BoD, Chiefs of corporate functions, heads of the Company’s business units.

2.0 PERSONAL DATA PROCESSING ACTIVITIES

2.1 PRINCIPLES AND OBJECTIVES

The Operator processes the personal data to achieve the below objectives:

- complying with the provisions of the Constitution of Indonesia, laws and regulations of Indonesia;
- performing functions, exercising powers and duties, placed by the laws of Indonesia upon the Operator, including in regards to disclosure of personal data to the social security and health insurance organizations, and other public authorities;
- regulating the employment relations with the Operator’s employees (assistance to the employees and candidates in training and evaluation, control over the volume and quality of performed work, compliance with the Indonesia’s Law on Manpower);
- providing the Operator’s employees and their family members with additional guarantees and compensations, privileges, including voluntary health insurance, medical treatment and other social welfare benefits;
- protecting life, health or other expressive interests of the personal data subjects;
- drafting, signing, executing and terminating agreements with counterparties;
- executing or signing agreements, where the subject is a party or beneficiary thereunder, including the Operator’s right to assign rights under such agreements;
- securing access control in the Operator’s facilities;
- developing reference materials for internal information support to the Operator’s activities;
- enforcement of court rulings, including other authorities’ or officials’ instructions, enforceable under the applicable laws of Indonesia
- securing the rights and legitimate interests of the Operator in performance of activities, specified in the Joint Venture Agreement, Articles of Association and other internal regulations of the Operator or third parties, or achieving socially important objectives;
- for other legitimate purposes.

The Operator processes the personal data adhering to the below principles:

Fungsi/Function	Compliance	No.	PED-006/PRPP-130/2021-S0
		Rev.	0
Judul/Title	Policy on Personal Data Processing	Berlaku TMT/ Effective Date	August 24, 2021
		Halaman/Page	7 of 11

- Personal data shall be treated as strictly confidential.
- Personal data shall be processed on a fair and legitimate basis.
- Personal data processing shall be limited to achieving specific, predetermined and legitimate objectives.
- Personal data processing, in any way inconsistent with the purpose of personal data collection, shall be disallowed.
- Integration of databases, containing personal data, and processing thereof for conflicting purposes shall be disallowed.
- Personal data may be processed only for the intended purposes.
- The contents and extent of the processed personal data shall correspond to the stated processing purposes.
- Redundancy of processed personal data in relation to the stated processing objectives shall be avoided.
- Personal data processing shall ensure accuracy of personal data, its reliability and, if necessary, relevance in relation to the processing objectives.
- The Operator shall take measures or ensure that appropriate measures, aimed at deletion or updating any incomplete or inaccurate personal data, are taken
- Personal data shall be stored in a form, ensuring identification of the subject, for a period not exceeding the time sufficient and adequate for the processing objectives, unless exact time for storing of personal data is prescribed by the laws of Indonesia or contractual provisions, where the subject is a party, beneficiary or guarantor thereunder.
- Processed personal data shall be destroyed or depersonalized upon achieving the processing objectives or in cases, where achieving such objectives is no longer needed, unless otherwise prescribed by the laws of Indonesia.

2.2 SUBJECTS OF THE PROCESSED PERSONAL DATA

The Operator processes the personal data of below categories of subjects:

- Operator's employees and their families;
- members of the Board of Commissioners and the Board of Directors of PT Pertamina Rosneft Pengolahan dan Petrokimia, candidates to the Board of Commissioners and the Board of Directors;
- candidates to relevant positions in the Company;
- subjects whose personal data processing is associated with execution of agreements, where such subjects are parties or beneficiaries thereunder;
- attorneys, engaged with the Operator;
- initiators of communication, addressed to the Operator;
- other subjects of personal data (in achievement of the objectives described herein).

2.3 PROCESSED PERSONAL DATA

The list of personal data, processed by the Operator, is determined in compliance with the laws of Indonesia concerning personal data and specified in the Operator's Guidelines concerning personal data management in accordance with objectives, given in Item 2.1

Fungsi/Function	Compliance	No.	PED-006/PRPP-130/2021-S0
		Rev.	0
Judul/Title	Policy on Personal Data Processing	Berlaku TMT/ Effective Date	August 24, 2021
		Halaman/Page	8 of 11

herein.

Processing of specific categories of personal data relating to ethnicity, political views, religious or philosophical beliefs, intimate life is not allowed.

2.4 CONDITIONS FOR PERSONAL DATA PROCESSING

Personal data are processed by the Operator with the consent of the subject of such personal data, obtained in written or electronic form, unless otherwise is provided for in the laws of Indonesia concerning personal data.

The Operator has no right to distribute and/or disclose personal data to any third parties without the consent of the subject of such personal data, unless otherwise is provided for in the laws of Indonesia concerning personal data.

In case of disclosure of the personal data as required by the laws of Indonesia the Operator shall notify the respective personal data subject in writing, stating the reason or cause of such disclosure. The notification shall be sent to the personal data subject no later than 14 (fourteen) days of the disclosure. The Operator shall ensure that the notification is received by the personal data subject.

The Operator shall have the right to assign processing of personal data to a third party with the consent of the subject of such personal data, and under an agreement, signed with such third party. Such agreement shall specify a list of actions/operations to be executed by the party in processing of the personal data, objectives of the processing, obligation of this third party to maintain confidentiality of the personal data, protection thereof, in compliance with the laws of Indonesia.

To arrange internal information purposes the Operator may create publicly accessible internal reference materials, which, with consent of the subject of the personal data, can specify his/her last name, first name, other given names, patronymics, position, telephone number, e-mail address, other personal data, provided by subject thereof.

2.5 TIME AND PERIOD OF PROCESSING, STORING AND DESTRUCTION

Period of personal data processing shall be compliant with the requirements of the laws of Indonesia, and shall be specified in the written consent for processing of personal data, signed by the subject thereof.

Personal data may be processed without the consent of the subject thereof only in cases, provided for by the laws.

Processing of the personal data shall commence upon creation of a legal basis for such processing.

Processing of personal data shall cease upon achieving the processing objectives, loss of legal basis for processing, withdrawal of consent for processing by the subject of the personal data.

Fungsi/Function	Compliance	No.	PED-006/PRPP-130/2021-S0
		Rev.	0
Judul/Title	Policy on Personal Data Processing	Berlaku TMT/ Effective Date	August 24, 2021
		Halaman/Page	9 of 11

Upon expiry of processing period the personal data shall be destroyed or depersonalized to be used for the statistical or research purposes.

2.6 CROSS-BORDER TRANSFER

The Operator shall have the right to transfer the personal data across borders in compliance with applicable laws and in lawful purposes under following conditions:

- The jurisdiction of the overseas data operator or international organization receiving the transferred personal data has an equal or higher level of personal data protection as provided in the laws of Indonesia;
- There is an international treaty between Indonesia and respective overseas jurisdiction;
- There is an agreement between the Company and the overseas data operator(s), specifying the personal data protection requirement compliant with the terms of the laws of Indonesia; and/or
- The concerned personal data subject has provided his/her consent to the transfer.

Personal data may be transferred to the countries, not providing adequate protection of the personal data subjects' rights with the purpose of protection of life, health, other vital interests of the personal data subject or other parties, when the subject's consent can't be obtained.

Prior to transferring the personal data across any borders, the Operator shall verify that the country, where the personal data is transferred to, provides adequate protection of the personal data subjects' rights.

Subject to the processing objectives and categories of personal data, and with consideration of the above restrictions, the personal data can be transferred across the entire territories where the Company carries out activities.

2.7 PROCESSING METHODS

Personal data processing shall be performed by the Operator applying the following methods:

- manual processing;
- electronic processing;
- combined processing.

Processing of personal data, contained in data system, or retrieved from such data system, shall be considered manual (performed with no computer aid) when such actions with personal data as using, updating, distributing, destroying, are performed with direct human involvement.

2.8 RIGHTS AND OBLIGATIONS

Subject of the personal data, processed by the Operator, shall have the right to:

- obtain full information on processing of his/her personal data by the Operator;
- update, block or destroy his/her personal data, when such data are incomplete,

Fungsi/Function	Compliance	No.	PED-006/PRPP-130/2021-S0
		Rev.	0
Judul/Title	Policy on Personal Data Processing	Berlaku TMT/ Effective Date	August 24, 2021
		Halaman/Page	10 of 11

outdated, incorrect, obtained illegally and/or not required for the stated processing objective;

- withdraw the consent for personal data processing by making a withdrawal request in written or electronically under a form specified in the Guidelines on Personal Data Management;
- challenge the Operator's actions or failure to act, which is in breach of the requirements of the laws of Indonesia concerning personal data, in court or in a body, authorized to protect the rights of personal data subjects;
- protect his/her rights and lawful interests, including right for indemnity and/or compensation for moral harm in court;
- exercise other rights in accordance with the laws of Indonesia concerning personal data.

The Operator shall have the right to:

- obtain documents, containing personal data, directly from the subjects thereof or their representatives;
- request the subject to timely update the provided personal data;
- in case the subject withdraws his/her consent, keep processing the personal data without the subject's consent on the grounds provided for in the laws of Indonesia.

The Operator shall be obliged to:

- process the personal data in compliance with the principles and rules, provided for in the laws of Indonesia and the Operator's internal regulations concerning personal data;
- at the request by the subject of personal data or his/her authorized representative, advise him/her of availability of such subject's personal data at the Operator's disposal;
- advise the subjects of personal data prior to commencement of processing thereof in case such data were obtained from a source other than the subject thereof;
- at personal data subject's request, provide the subject or his/her authorized representative with a possibility to familiarize with his/her personal data at no charge;
- at lawful and reasonable request by the personal data subject or his/her authorized representative, update or destroy such personal data.

2.9 MEASURES FOR PERSONAL DATA PROCESSING

To secure the fulfillment of the Operator's obligations under the laws of Indonesia concerning personal data the Company shall take below measures, but not limited to:

- appointing a person responsible for arrangement of personal data processing in the Company;
- adopting internal documents regulating the matters of personal data processing;
- making this Policy available to all Company's employees;
- taking legal, administrative and technical measures to protect personal data against illegal or accidental access thereto, destruction, alteration, blocking, copying, disclosure, distribution of personal data, and against any other illegal actions with personal data;

Fungsi/Function	Compliance	No.	PED-006/PRPP-130/2021-S0
		Rev.	0
Judul/Title	Policy on Personal Data Processing	Berlaku TMT/ Effective Date	August 24, 2021
		Halaman/Page	11 of 11

- arranging internal control of personal data processing compliance with requirements of the laws of Indonesia concerning personal data, provisions of this Policy and other internal regulations;
- assessing the damage, that can be inflicted to personal data subjects in case of violation by the Operator of the laws of Indonesia concerning personal data, and developing measures to ensure personal data security based on the performed assessment;
- familiarization of the Operators employees, directly involved in personal data processing, with requirements of the laws of Indonesia concerning personal data and the Operator's internal regulations;
- depersonalizing personal data, processed in electronic systems, processing termination and destruction of personal data in cases, provided for in the laws of Indonesia concerning personal data;

3.0 REFERENCES

- Constitution of the Republic of Indonesia;
- Law No. 11/2008 on Electronic Information and Transactions (April 21, 2008) as amended by Law No. 19/2016 (November 25, 2016) (collectively, the "Electronic Information Law", EIT Law);
- Regulation No. 20/2016 on Protection of Personal Data in Electronic Systems by the Ministry of Communications and Informatics (MoCI) (December 01, 2016);
- Government Regulation No.71/2019 on the Implementation of Electronic Systems and Transactions (October 10, 2019);
- Law No. 39/1999 on Human Rights (September 23, 1999);
- Law No. 14/2008 on Transparency of Public Information (April 30, 2008);
- MoCI Regulation No. 4 of 2016 on the Information Security Management System (MoCI Regulation 4) (April 11, 2016);
- Law No. 13 of 2003 on Manpower.

Prepared by:	Approved by:
Compliance Manager	President Director
Vladislav Smetanin	Kadek Ambara Jaya
Dated: 15/04/2021	Dated: 15/04/2021