

RCM External Data Privacy Consent

Privacy Notice for Employees

Document No.: EMP-PN-002

PT XL Axiata Tbk. is a part of Axiata Group Berhad (hereinafter shall be referred to as “XL Axiata”) is committed to protecting its employee’s personal data.

Our Privacy Position can be summarized by our below guiding Privacy and Data Protection principles:

TRANSPARENT: We are TRANSPARENT about what, why and how we collect and protect YOUR PERSONAL DATA so that YOU can make informed decisions.

RIGHTS: We respect YOUR RIGHTS as individuals, so YOU are in control of YOUR PERSONAL DATA.

USE: We USE YOUR PERSONAL DATA for specific and stated purposes and keep it for as long as required only.

SECURITY: We have established robust CYBER SECURITY PRACTICES in line with leading industry standards to protect YOUR PERSONAL DATA that YOU have shared with us.

TRANSFER: We take due care when TRANSFERRING YOUR PERSONAL DATA to third parties such as vendors, contractors, business partners and government authorities.

This Employee Privacy Notice (“**Privacy Notice**”) is aimed to explain how we handle and protect our employee’s personal data and what are our data protection obligations along with your rights are. “Employee” for the purpose of this Privacy Policy shall include both permanent and temporary employees and Personal Data includes any information about an identifiable individual.

What personal data do we collect?

Axiata may collect and store your personal data in electronic or physical form, depending upon the requirement. Information may be stored at Axiata and third-party premises within IT Systems (HR Management system, e-mail, database, hard drives), document warehouses etc.

Information we collect includes, but is not limited to:

- Ø Identification data – such as your name, gender, photograph, date of birth, Employee identification number, biometric data.
- Ø Contact details – such as your home address, telephone number, email addresses, beneficiaries, and emergency contact details.
- Ø Employment details – such as your job title, office location, hire date, employment contracts, performance and disciplinary records, grievance procedures, and sickness and holiday records.

Ø Educational and professional background – such as your academic and professional qualifications, education, CV or résumé, reference letters and interview notes, and criminal records data (only for vetting purposes, where permissible and in accordance with applicable law).

Ø National identifiers – such as your social security number, national ID or passport, immigration status and documentation, visas, and insurance numbers.

Ø Mandatory policy acknowledgements (such as pay wage notice acknowledgement forms).

Ø Wage and payroll information, including but not limited to social security and national insurance numbers and direct deposit information.

Ø Benefit information and any forms related to applications for, or changes to Employee health and welfare benefits (including short-term and long-term disability, medical and dental care).

Ø Spouse & dependent information – such as name, age, gender

Ø Financial information – such as bank account number, tax information, payroll information, withholdings, salary, benefits, and company allowances.

Ø IT information – information required to provide access to Axiata's IT systems and networks, such as IP addresses, log files, login information, and software/hardware inventories.

Ø Security information -- such as access card usage (to enter Axiata's offices) and closed-circuit televisions ("CCTV") footage.

Ø Other information you choose to share with us – such as your hobbies and social preferences etc.

We may also collect certain demographic data that qualifies as sensitive Employee Data, such as race, ethnicity, sexual orientation, and disability to help us understand the diversity of our workforce, provide work-related accommodations, manage absences from work, or conduct background checks necessary for the Employee's role in advance of employment. This information, when collected, is generally done so on a voluntary, consensual basis, and Employees are not required to provide this information, unless it is necessary for us to collect such information to comply with our legal obligations.

If you provide us with personal data of other individuals as part of the information, it is your responsibility to obtain consent from that individual prior to providing the information to us. By providing that personal information, you are affirming that you have obtained such consent for us to process their information and contact them, as deemed necessary.

How do we collect your personal data?

Generally, we collect Employee Data directly from our Employees. However, in some cases,

we may collect Personal Data about Employees from trusted third parties, social media, government organization and others. In most circumstances, we will obtain your permission before we collect any Personal Data about you from a third party.

Who can access your personal data?

Following persons/entities can access your personal data:

- Ø Internal functions/teams of Axiata and those of its affiliated entities, under the terms of your employment relationship with us, or
- Ø Third parties, for legal or business purposes, or
- Ø Recipients in other countries, for legal or business purposes.

These other countries may have different data protection laws than the laws of your home country. Rest assured, Axiata only transfers Employee Data to another country (including to a company within the Axiata Group) in accordance with applicable privacy laws, and where there are adequate data protections in place. We will ensure that your personal data is treated in accordance with this Privacy Notice, wherever we process it.

How do we use your personal data?

Your personal information may be utilized for various purposes, including but not limited to:

- Ø Career progression and personal development
- Ø Administration and management of salary and employment benefits
- Ø Short term and Long-Term Incentive Plan
- Ø Analytics, as required by governmental bodies or other agencies
- Ø Employment and industrial relations disputes, including but not limited to litigation
- Ø Corporate Exercises undertaken by the Group
- Ø Management of Performance
- Ø Application of Work Permits and Immigration Requirements
- Ø Loans, insurance, medical purposes
- Ø Disciplinary actions or terminations
- Ø Ensure health and safety in the workplace
- Ø Accounting, financial reporting, and business planning
- Ø Monitor Axiata's premises and communication facilities, including closed circuit televisions ("CCTV") cameras
- Ø Organize team-building activities and other Axiata-hosted events
- Ø Other legitimate purposes reasonably required for day-to-day operations
- Ø Internal or external investigations

Ø Research, salary surveys, auditing

Ø Comply with reasons as stated in your contract of employment with the Company.

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We may also use your Employee Data for other lawful purposes that may arise and other legal requirements like responding to notices, defending against claims, etc. We will inform you of any such purpose, and will obtain your consent to that use, if required by law to do so.

What is the legal basis for processing your personal data?

We will normally collect Employee Data from you:

Ø Where we have your consent to do so

Ø Where we need the Employee Data to carry out our employment contract with you

Ø Where we need the Employee Data to comply with our legal obligations or exercise rights in the field of employment.

Disclosure

We keep your personal data confidential and do not share it with non-affiliated companies, except when we have your consent or under the following circumstances:

Ø We may share your personal data to meet our legal obligations

Ø We may share your personal data to prevent and detect crime as per the law

Ø When we believe it is necessary to share the information or enforce Axiata's rights, usage terms, intellectual or physical property or for safety of Axiata or associated parties

Ø We may share your information if Axiata is acquired by or merged with another company or for any legal claim where Axiata is required to do so.

How do we protect your personal data?

We endeavor to process your information in a safe environment by preventing any unauthorized or unlawful processing of personal data or accidental loss or destruction of, or damage to such information. We have implemented various physical, technical and administrative security measures to protect your personal data and our network from unauthorized access. These measures include:

Ø Encryption of data in transit or at rest

Ø Strict adherence to privacy and security practices

Ø Restriction of access to such data to personnel who have a need to know such data.

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How long do we retain your personal data?

Axiata will retain your personal data only for as long as such information is necessary for the purposes it was collected for and in accordance with its Data Retention Procedure

We determine the retention period for personal data based on local law requirements for record retention and any retention in excess to such legal requirement is based on due consideration to amount, nature and sensitivity of the personal data, risk assessment of various processes within Axiata and purposes for which your personal data is processed.

We ensure that your personal data is securely disposed / deleted / de-identified post expiry of the defined retention period.

Know your Rights

During and post your employment with us, as applicable, you may choose to exercise any of the following rights available to you:

- Ø You can access and obtain a copy of your personal data on request
- Ø You can update / modify your personal data
- Ø You can withdraw your consent where the processing is based on your consent
- Ø You can ask to suspend / restrict processing operations pertaining to your personal data.

Know your responsibilities

During your employment with us, you must update your personal data. Failure to update or provide accurate information about your personal data could result in termination of your employment with us.

By submitting your personal data to us, you acknowledge that:

- Ø You have read and understood this Privacy Notice and agree to the use of your personal data as set out herein
- Ø Your personal data may be transferred and processed worldwide, including countries that may not be deemed to provide the same level of data protection as your home country, for the purposes and in the manner specified in this Privacy Notice
- Ø You failing to provide personal data when requested, may hinder the organization's ability to administer the rights and obligations arising as a result of the employment relationship efficiently
- Ø All your representations are true and correct to the best of your knowledge, and you have not knowingly omitted any related information of adverse nature. Providing any inaccurate information may make you ineligible for candidature / employment.

How to Contact Us/Complaints

When you choose to exercise any of these rights, you will be required to contact us at privacy@xl.co.id

You have the option to file a complaint against Axiata for suspected/actual violations of your data protection rights. You have the right to lodge a complaint with the relevant regulatory authority in the jurisdiction for your residence, place of work or of an alleged infringement of the applicable laws and regulations. However, should

you choose to refrain from providing your personal data, we will not be able to process your data for complying with the obligations under our contract with you.

Updates to the Privacy Notice

Axiata reserves the right to update this privacy notice, as and when need arises. This notice shall prevail over any of its previous versions. We highly recommend that you check back here from time to time to stay informed of any changes.

Version Info

This notice was last updated on 16th June 2020.