



PRIVACY POLICY

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PT SOLUSI IDENTITAS GLOBAL NET

OFFICE



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This document is approved electronically.

Approved,

Aries Handoko
Director as *Policy Authority*



DOCUMENT CHANGE RECORDS

REV.	DATE	REASON
00	August 16 th , 2022	Document Initiation
01	March 7 th , 2023	e Sign branding
02	April 5 th , 2023	<ul style="list-style-type: none">• Correction of foreign language absorption.• Addition of definitions of electronic transaction, and electronic information.• Changes in the definition of electronic certificate, <i>Certification Practice Statement (CPS)</i>, and <i>Electronic Certificate Owner</i>.• Deletion of laws and regulations that no longer apply.• Adjustment of personal data in accordance with the Identity Verification Standard.• Addition of information on the location of personal data storage.
03	June 30 th , 2023	<ul style="list-style-type: none">• Adds the term Quota in point 1.• Adding corporation/organization personal data in point 8.• Changing the conditions for storing personal data in point 12.• Adding a statement regarding the deletion of personal data in point 14.
04	November 4 th , 2024	<ul style="list-style-type: none">• Editorial improvement.• Compliance with the Personal Data Protection Law.• Change of e Sign branding to ezSign.



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PRIVACY POLICY (FM-CA-049)

Please read the contents of this Privacy Policy (hereinafter "Policy") carefully and thoroughly before using the **ezSign** service from PT Solusi Identitas Global Net (SIGN).

If you do not agree to this Policy, then you are prohibited from continuing to use the **ezSign** service. If you continue to use the **ezSign** service and/or use the Electronic Certificate issued to you, then you are deemed to agree to be bound by the terms of this Policy.

This Policy applies to Personal Data processed by ezSign from Applicants or Electronic Certificate Owners. This policy contains information on how ezSign obtains, processes, stores, uses, and secures Personal Data obtained from you as a Data Subject.

ezSign may amend this Privacy Policy from time to time and it is effective from the time it is published on the ezSign repository site at <https://repository.esign.id>. Please visit the ezSign repository site periodically for changes to this Privacy Policy. If after the changes are published and you continue to use ezSign services, then you are deemed to agree to the changes in question.

1. Definition

The following terms and definitions are used in this Policy:

- a. ***"We" is PT Solusi Identitas Global Net (SIGN) which is a Limited Liability Company authorized to carry out the operation of the Non-Institutional Indonesian Electronic Certificate (PSrE) based on the Decree of the Director General of Informatics Applications of the Ministry of Communication and Information Technology Number 954 of 2023.***
- b. ***"ezSign" is an application owned by PT SIGN for the provision of services for issuing and managing Electronic Certificates and the use of other Electronic Certificate features.***
- c. ***"Electronic Certificate" or "Certificate" is an electronic Certificate containing an electronic signature and identity indicating the legal subject status of the parties to an electronic transaction issued by ezSign.***
- d. ***"Personal Data" s any data about a person whether identified and/or identifiable separately or in combination with other information either directly or indirectly through electronic and/or non-electronic systems.***
- e. ***"Data Subject" is the person identified by the Personal Data.***
- f. ***"Personal Data Controller" means any person, public entity and international organization acting singly or jointly in determining the purposes and exercising control of the processing of Personal Data.***
- g. ***"Applicant" is a legal person or corporation that applies for the issuance of an Electronic Certificate through ezSign.***
- h. ***"Electronic Certificate Owner", "Certificate Owner", atau "Owner" is the party whose identity is stated in the Electronic Certificate issued through ezSign and has gone through the verification process. If the Owner uses the ezSign service, the Owner is also a "User" or "You".***
- i. ***"Registration Authority", or shortened as RA is a part of PT Solusi Identitas Global Net (SIGN) that performs identification and authentication of Applicant's and Owner's Personal Data, acceptance of Certificate application, revocation of Certificate, re-issuance, and/or renewal of Certificate. The Registration Authority receives Personal Data and is responsible under Personal Data protection policies and/or agreements.***



- j. **“Reliant” is any person, organization, business entity, or entity that relies on the validity of Electronic Certificates and services that utilize Electronic Certificates.**
- k. **“Certification Practice Statement” or shortened to CPS is a public document that describes the governance of the implementation of ezSign Electronic Certificate services as required by the laws and regulations and global standards.**

2. **Goals**

This policy governs **ezSign**’s service delivery relating to **Personal Data** of Applicant and Electronic Certificate Owners. This policy is intended to provide information on how ezSign collects, uses, shares, processes, protects, and secure User Personal Data when using **ezSign** services.

3. **Privacy Policy Statement**

We attempt to comply with applicable Laws and standards regarding the security of Your Personal Data. Regardless of Your method of using Our Service, We will protect Your Personal Data in accordance with this Privacy Policy by referring to the applicable Laws and Regulations.

This Policy applies to Personal Data received and processed by ezSign from Applicants and Electronic Certificate Owners. This Policy provides for Your rights and the rights of other Users, while taking into account the requirements of personal data protection based on the applicable Laws and Regulations.

ezSign may issue Electronic Certificates to Owners either directly or through third parties acting as Registration Authorities, such as partners or technology platforms. If the User obtains a Digital Certificate from a third party, the terms of the Privacy Policy of that third party shall also apply to the User. Users are allowed to contact the third party directly if they require further explanation/questions.

The purpose of issuing on Electronic Certificate is, among other things, to provide access to certain information to the party relying on the Electronic Certificate (The Relying Party). Therefore, any information stored in the Electronic Certificate, or instruction to revoke, validation requests, validation responses, or lists of revoked certificates (collectively, “Credential Documents”) are not considered confidential information that cannot be accessed by other parties. Third parties may access and view or otherwise rely on such Credentials Documents for the purpose for which the Electronic Certificate was issued and used. The Relying Party cannot access information other than the information contained in the Electronic Certificate.

4. **Personal Data**

The Personal Data that you provide to us to use the Electronic Certificate service is also stated in the CPS document that you can access through the ezSign repository at <https://repository.esign.id>. We encourage You to periodically access, read, and learn more.

As an individual User, Your Personal Data that We obtain, store, and, process related to the needs of ezSign Electronic Certificate services in the form of

- a. **National Identity Number (NIK);**
- b. **Full Name;**
- c. **Date of Birth;**
- d. **Place of Birth;**
- e. **Email;**
- f. **Cellular Phone Number (Mobile Phone);**
- g. **Image of Indonesian Identity Card; and**
- h. **Biometric data in the form of facial images.**



You may be asked for additional information if you register your corporation to use the ezSign service specifically for corporations:

- a. A deed of incorporation or latest deed of amendment of the corporation**
- b. A corporate legalization decision letter from a state institution that by law and applicable law is entitled to issue legalization and administration decision letters for legal entities.**
- c. Corporate Business Identification Number (NIB);**
- d. Corporate taxpayer identification number (NPWP);**
- e. Address of the corporation;**
- f. The email address of the corporate representative;**
- g. Phone number of the corporate representative;**
- h. Position of the corporate representative; and**
- i. Email address of the System Administrator (sysadmin) appointed by the corporate representative as the employee.**

We do not collect Personal Data other than information obtained from the Registration Authority and provided to Us.

We may also obtained and store your contact information if you correspond with us, contact our Helpdesk or Support team, or consent to our offers.

We protect your Personal Data in accordance with this Privacy Policy Document, regardless of whether you decide to stop or continue using ezSign services.

5. Purpose of Use of Personal Data

The Personal Data that You provide will be used by Us in accordance with the purposes related to the management and utilization of Electronic Certificates, including:

- a. Processing and issuance of Electronic Certificates;**
- b. Identify verification or authentication of You;**
- c. Management of Electronic Certificates such as issuance, renewal or revocation;**
- d. Providing services that utilize Electronic Certificates;**
- e. Providing transaction settlement related to Electronic Certificates;**
- f. Support for ezSign services, including problem solving, testing, service improvement, analysis, and fraud prevention;**
- g. Implementation of ezSign business process, including but not limited to audit, reporting, and payment processing;**
- h. Providing responses to your questions or requests related to ezSign services; and**
- i. Providing promotional materials related to ezSign's product and activities.**

If you proceed with identity verification as part of the issuance of an Electronic Certificate, the data may be retained in whole or in part for a period of time and apply to both successfully and failed verifications with reference to the operational needs and requirements of the PsrE.

We will also use your email contact regarding changes to the terms and conditions of the agreement and/or use of ezSign services, including changes to this Privacy Policy. You may decide not to receive any offers or information by contacting Us via email helpdesk@ezsign.id and this will not have any effect on the status of your Electronic Certificate or ezSign account.

We, PT Solusi Identitas Global Net (SIGN), will act as the Personal Data Controller to fulfill our obligations as a Non-Institutional Indonesian PSrE.



6. Acquisition of Personal Data

We collect and process Personal Data required in order to provide services to Users. We collect and process Personal Data as part of our responsibilities as a provider of Electronic Certificates as stipulated in the provisions of the Law regarding information and electronic transactions.

We can obtain requests for issuance or processing of Electronic Certificates from Users either directly or through third parties who are Registration Authorities or Trustees who are our partners.

If You apply for Electronic Certificate processing directly from ezSign that We Provide, then We will obtain Personal Data directly from You.

We will ask You for Personal Data processing consent to process Your Personal Data in accordance with this Privacy Policy. We will also confirm the accuracy of the data provided by You and We may conduct verification through Registration Authorities or other means of checking.

If We obtain Personal Data from other parties such as Registration Authorities or Verifiers who become Our partners or because You use the platform/application belonging to such parties, then such parties are required to obtain Your consent to the processing of Personal Data by Us before the application is forwarded to Us so that We can obtain, exercise control over Your Personal Data, conduct the issuance or management of Electronic Certificates or provide utilization services. We will rely on such parties to ensure that You have provided appropriate consent. In this case, such third party's Privacy Policy may also apply to Users. You should read such party's privacy policy regarding the acquisition, use, distribution and disclosure ("Processing") of Your Personal Data. In this case, both We and the party may act as Data Controller responsible for the control of the processing, management and security of Your Personal Data in accordance with the processing carried out by each party or as a joint Controller. The relationship between Us and the party is further stated in the cooperation agreement. Users are welcome to contact the third party directly if there are further questions regarding the third party's Privacy Policy or contact US if there are other questions.

7. Disclosure of Personal Data

By continuing to fulfill the agreed confidentiality obligations, We may disclose Personal Data if required to disclose Your Personal Data by law, court order, subpoena, request from authorized government institutions or law enforcement in accordance with the provisions of the applicable laws and regulations.

If You provide Your Personal Data through a third party such as a Registration Authority or a Verifier, We recommend that You understand the Personal Data protection provisions of such third party in relation to the acquisition, use and disclosure of Personal Data. We may be required to disclose Your Personal Data pursuant to instructions or agreements with such parties.

We may disclose and share Your Personal Data to third parties such as business partners, vendors or service providers (e.g. payment system service providers, data center facility providers), subcontractors, external experts, consultants, auditors, or advocates that We appoint to provide ezSign services to Users, conduct business operations, or fulfill Our obligations to applicable laws and regulations. The relationship between us and third parties is further realized in a cooperation agreement.

If a third party receiving Personal Data from Us acts as a Data Processor appointed by Us, the Data Processor shall agree to:

- a. Process Personal Data for the purposes, interests, and mechanisms agreed in the cooperation agreement.**



- b. **Protect Personal Data during the processing by applying adequate security protection as We apply or better security.**
- c. **Restore, delete, and/or destroy Personal Data as soon as there is no need or according to Our instruction.**

In the event of a corporate action for merger or takeover from another party over Us which then becomes Our successor to continue Our obligations related to the management of Your Personal Data, the sharing of Your Personal Data to that party can be carried out in accordance with further provisions that will be conveyed later.

8. Biometric Data Usage

When User uses ezSign service, User will provide biometric data (face photo/video) through certain hardware and software. The biometric data will be sent to us through a secure communication channel and we will check its accuracy. If the biometric data is accurate and in accordance with the actual situation, User can continue to use ezSign services.

9. Personal Data Processing and Storage Locations

Your Personal Data is processed and stored in Indonesia in secure processing and storage facilities at the Power Center and Disaster Recovery Center. The processing and storage facilities are only accessible by designated and authorized PT Solusi Identitas Global Net personnel. Sensitive information is masked or stored in our database in an encrypted manner. Backup and archive data is also encrypted and stored in secure processing and storage facilities. We do not label the contents of the storage media to avoid disclosure of Personal Data by unauthorized parties. We do not transfer your Personal Data outside of Indonesia.

10. Personal Data Retention Period

We keep your Personal Data to the extent necessary to fulfill the purposes of processing Personal Data as stated in this Policy document. The period of time needed to store and maintain Personal Data is based on the following this conditions:

- a. **As long as User or You are still using the ezSign service;**
- b. **As long as your Electronic Certificate is still valid;**
- c. **According to the data or archive retention period described in the CPS document; and/or**
- d. **Retention period in accordance with our business operational needs.**

11. Improvement and Updating of Personal Data

You are responsible for maintaining and informing Us that the Personal Data You submit is accurate, reliable and up-to-date for lawful use as intended.

We strive to provide the best and most reliable and secure services to provide services to correct Your Personal Data. However, not all of Your Personal Data can be changed because it will have an impact on the status of Your Electronic Certificate or changes in services to You. In some instances, changes and updates to Personal Data may require revocation and replacement of your Electronic Certificate.

If you need to change your Personal Data or you find errors in your Personal Data, you can use the data change feature available on the ezSign application. If you need further assistance, you can contact us via email helpdesk@ezsign.id by telling us the problems you are experiencing. Do not provide confidential or sensitive information to our officers.



We implement standard verification and authentication measures, such as authenticating the applicant for data changes, to ensure that the person requesting the change is authorized to do so before the change is implemented.

If you obtained your Electronic Certificate through a Registration Authority that we partner with, you are expected to contact that Registration Authority to request a data change following the applicable requirements. If You are not sure where Your Electronic Certificate originated, You can send a sample electronic document that has been signed with Your Electronic Certificate to email helpdesk@ezsign.id for Us to identify the source of Your Electronic Certificate.

12. Your Rights Under International Best Practice on Personal Data Protection

We can support You in exercising your rights as a data subject. However, We also have the authority to exercise control over Your Personal Data such as considering whether Your application is eligible, granting approval or refusal, stopping the processing of Your Personal Data, and so forth of Your Personal Data in accordance with the requirements of the applicable laws and regulations.

Given the nature of the Electronic Certificate itself, we cannot delete data related to the Electronic Certificate without assessing the eligibility and requirements of the application. Also, we cannot send the Electronic Certificate to another PSrE.

13. Deletion or Disposal of Personal Data

You as an ezSign application User can delete or destroy Personal Data through the features available in the application. We will remind you of the impacts that occur if you continue to delete or destroy Personal Data, especially for the use of Electronic Certificates and services related to Electronic Certificates.

We will perform deletion if the data is no longer needed followed by shredding Personal Data after the archive storage and retention period is fulfilled as stated in the CPS document.

For operational and business needs, we store Personal Data of ezSign Users in the form of:

- a. Indonesian Identity Number (NIK) with encrypted condition;**
- b. Full Name; and**
- c. Email.**

14. Force Majeure

We are not responsible for failures, delays in service provision, or performance degradation caused by matters beyond our reasonable control (force majeure), including but not limited to acts of civil or military authorities, natural disasters, epidemics, fires, floods, earthquakes, riots, wars, equipment failures, power outages and communication network failures, sabotage, terrorism, or other unforeseen events.

15. Contact Us

For questions or assistance regarding Personal Data or Electronic Certificates, please contact Us via email helpdesk@ezsign.id including if:

- a. You believe there has been a breach of Your Personal Data;**
- b. You want to report any unauthorized use of Your Personal Data and Electronic Certificates; and/or**
- c. You want to get help with Your Personal Data.**

To follow up on your request, here is some information that we will ask:

- a. Your full name;**
- b. Your contact information;**




- c. ***The applications and devices you use; and***
- d. ***The serial number of your Electronic Certificate.***



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