



Title :	Data Protection Policy for Consumers/Vendors	Revision No :	1
Document Ref :	PDPA	Date :	12 December 2022

1.0 INTRODUCTION

1.1 This Personal Data Protection Notice and Policy (“**Policy**”) describes how the Company (as defined in the Schedule), including its subsidiaries, associated companies, affiliates, successors, assigns, and licensees uses Personal Data of its customers and vendors.

1.2 The Company is committed to using and safeguarding the privacy of Personal Data of its customers and vendors respectively in compliance with the requirements of applicable data protection laws including the Data Protection Legislation (as defined in the Schedule) (“**Applicable Law**”). The Policy is to be read together with the Schedule(s) and Appendix annexed to it, and any other policies and such terms and conditions as may be prescribed by the Company from time to time, and any other agreements entered into by the Company with its customers and vendors, respectively (if any).

1.3 We may make changes to this Policy from time to time for any reason. We will publish those changes on our website. If at any point we decide to use personal information in a manner materially different from that stated at the time it was collected, we will notify you by email or via a prominent notice on our website, and where necessary we will seek your prior consent.

1.4 For the purposes of this Policy:

“**Personal Data**” means all information and expressions of opinions that is directly or indirectly relating to a person, who is identified or identifiable from that information or expressions of opinions, including but without limitation, information and expressions of opinions in respect of physical or mental health, racial or ethnic origin, religious or similar beliefs, in respect of criminal or civil proceedings, personal details which you have submitted to the Company, and any information and/or expressions of opinions which may identify you that has been or may be collected, stored, used and Processed by the Company or the Company’s stakeholders, associated companies, subsidiaries, affiliates, related corporations, agents, independent contractors and other third parties that the Company is associated with from time to time, and any other information which may identify you which you have provided to the Company and/or are incidental from such Personal Data.

“**Process**”, “**Processed**” or “**Processing**” all means the collection, usage, recording, storing, retention, disclosure, and other operation or set of operations relating to Personal Data as described in Applicable Law.

“**Website**” means the website of the Company (<https://edgepointinfra.com>).



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2.0 CONSENT

- 2.1 By signing the consent form, you consent to the Processing of your Personal Data by the Company.
- 2.2 Provision of your Personal Data is voluntary. However, if you do not provide your Personal Data, where essential, or do not consent to the Processing of your Personal Data by the Company, the Company may not be able to communicate with you; (in the case of consumers) provide you the services you require or allow access to certain sections of the Website; and (in the case of vendors) enable you to provide services to the Company, transact with the Company or receive information from the Company.

3.0 COLLECTION OF PERSONAL DATA

- 3.1 The Company may collect your Personal Data related to and/or in order for us to render our services, carry out our transactions, or otherwise perform our legitimate business functions towards you, which Personal Data includes but are not limited to:
- **Identity data**, such as first name, last name, citizenship, gender, birth date, national identification card / number, passport details, company name, photos, job title or designation;
 - **Contact data** such as residential and/or business address, telephone number, mobile number, email address;
 - **Financial data**, such as bank account details, particularly in relation to our payment-related functions;
 - **Other relevant data**, such educational history, knowledge; skill and abilities; professional and other work-related licences, permits and certifications held; work history and experiences; and
 - Any information of similar nature that is necessary for us to manage our working relationship.
- 3.2 In addition to the Personal Data you provide to the Company directly, the Company may also collect your Personal Data from a variety of sources, including without limitation from: the visitation of or entry at our place of business / premises owned and/or occupied by us; events, activities or otherwise; the use of the Company's facilities; registration or attendance at any event or otherwise organised or sponsored by the Company, whether solely or in association/partnership with any third parties; persons that you have appointed and authorised the Company to communicate with such as representatives or liaison, and emergency contacts; regulatory and governmental authorities; such other sources which



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you have given your consent and authorisation; and/or cookies used on the Website and/or the Company's LinkedIn page.

3.3 We use "cookies" on our Website to track website visitorship and experience, which are small data files containing information you have supplied yourself, which will assist in improving your experience and navigation in the Website, and may enable features in the Website to fully function.

If you do not wish to receive any cookies, you may set your browser to disable it.

3.4 However, if you do not provide your Personal Data, where essential, or disable cookies, the Company may not be able to: (a) communicate with you; (b) process your requests; (c) provide to you the services that you may require, or (d) enable all features in the Website to function.

3.5 When you visit the Website, the Company may record certain information in relation to your visit such as your IP or proxy server IP address; basic domain information; internet service provider; the date and time of Website visitation; the length of your session; the pages which you have accessed; the number of times you access the Website; the size of files you view; the website which referred you to the Website; and your computer's operating system.

3.6 The Company is not responsible for the privacy practices and conduct of third party websites or such other sites which may link or direct you to the Website, and vice versa. Third party websites may have their own privacy policies which are unrelated to the Company's, and which may be separately agreed to by you.

3.7 You are responsible for the accuracy of your personal data provided to the Company. You are also required to update the Company promptly if there are any changes to your personal data.

3.8 If you provide the Company with personal data of other parties, you are responsible for the accuracy of such data and confirm that you have obtained any necessary consent(s) for providing the Company with such personal data. You agree to indemnify, release and hold the Company harmless from any damages and/or losses caused by the provision and the use of such personal data to/by the Company.

4.0 PURPOSES OF PROCESSING

4.1 The Company may use and Process your data for purposes related to the services we render to, the transactions we carry out with, and/or the business functions we perform towards you, which shall include, without limitation: communicating with you and/or such



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other persons as may be required for the purposes connected thereto; contacting the persons you have provided Personal Data of, such as emergency contacts; verification and identification; general administrative and record-keeping; conducting investigations; providing information to regulatory and governmental authorities for compliance with statutory and government requirements; for compliance with the law and such other purposes that is required or permitted by any law, regulations, guidelines, and/or circulars; legal proceedings or anticipated legal proceedings; establishing, exercising or defending the Company's rights; complying with health and safety legislation; to protect the vital interests (e.g. life, death, health and/or security) of another person; and/or for the purposes of disaster recovery.

- 4.2 The Company will ask for your consent before Processing your Personal Data for purposes other than those that are set out in this Policy, Applicable Law, and the terms of your contracts with the Company. If you do not consent to the Company Processing your Personal Data, please notify the Company using the contact details stated below.

5.0 MANNER OF PROCESSING PERSONAL DATA

- 5.1. The Company collects and processes the Personal Data you provide through our website, by electronic mail or when you provide the Company physical documents containing the data. Personal Data that the Company collects throughout your engagement and through your business with the Company may be recorded and stored in digital or electronic format and physical copies. Digital and electronic copies of your Personal Data are stored in our servers, while physical copies are stored in secured cabinets within the offices of our operations department and/or relevant department. Access to information is limited to our operations and relevant department personnel and other authorized officers of the Company, to the extent that they require your Personal Data for the purposes above indicated.
- 5.2. The Company may organize or consolidate your Personal Data to allow the Company to use the data for the purposes above stated. The Company can also retrieve any of your stored data for the same purposes, as well as to update, modify or correct your data upon your request.

6.0 TRANSFER OF PERSONAL DATA & DISCLOSURE TO THIRD PARTIES

- 6.1 As the Company's information technology storage facilities and servers may be located in other jurisdictions, your Personal Data may be collected in one country and transferred to, stored, used and Processed in another jurisdiction, including Indonesia, Malaysia, Singapore, Philippines, the United Kingdom and the United States, for the purposes as



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described above. By signing, and providing a signed copy of, the consent form, you understand and consent to such transfer of your Personal Data.

- 6.2 The Company may engage other companies, service providers or individuals to perform functions on the Company's behalf (including but not limited to the purposes set out in paragraph 4.1 above and any other functions to be performed in the ordinary course of business of the Company, and consequently may provide access to or disclose your Personal Data to the third parties in accordance with this Policy, including but not limited to other business partners, industry associations, sponsors, service providers, the Company's professional advisers, other individuals performing the Company's functions on its behalf, persons whose vital interests (e.g. life, death, health, and/or security) may be jeopardised by virtue of close contact and/or proximity with you; and/or other third parties authorised by yourself.
- 6.3 The Company may provide access to or disclose your Personal Data to regulatory and governmental authorities in order to comply with statutory and government requirements; specific parties that the Company was ordered or directed to disclose pursuant to an order of court, tribunal or authority, whether governmental or quasi-governmental with jurisdiction over the Company.
- 6.4 If the Company transfers Personal Data outside the country, it will comply with our legal and regulatory obligations in relation to personal data, including having a lawful basis for transferring personal data and it shall implement safeguards required under applicable laws and regulations.
- 6.5 This Policy only applies to the Processing of Personal Data by the Company for the purposes specified in this Policy. It does not cover the privacy policies and conduct of any third parties, or third party websites, even if such third parties are related to the Company.

7.0 ACCESS & CORRECTION REQUESTS AND ENQUIRIES

- 7.1 The provision of your Personal Data is voluntary. Subject to any exceptions under Applicable Law, you may at any time hereafter request for (a) access to your Personal Data, (b) correction of your Personal Data, (c) withdraw your consent to the Processing of your Personal Data, and (d) seek further information by contacting the following email: privacy@edgepointinfra.com.
- 7.2 You are entitled to request access and/or make any correction to your Personal Data unless there are grounds to reject your request under Applicable Law.



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8.0 RETENTION OF PERSONAL DATA

8.1 The Company will only retain Personal Data as long as it is necessary to achieve the purposes specified in this Policy and subject always to Applicable Law, your contract with the Company, and for such period as may be necessary for legal or business purposes of the Company.

9.0 STORAGE AND RETENTION OF PERSONAL DATA

9.1 You shall immediately inform the Company of any changes to the Personal Data which you have provided to the Company to such extent necessary in order to enable the Company to remain in compliance with Applicable Law. The Company will use reasonable efforts but shall not be obligated to procure updates from you on a regular periodic basis.

9.2 The Company has established adequate and appropriate security measures to protect the personal data provided to the Company. These security measures are regularly reviewed to protect against unauthorized access, disclosure, and improper use of your Personal Data, and to maintain the accuracy and integrity of the Personal Data. The Company will adapt and implement the necessary changes for security measures to ensure the continuous security of your Personal Data. However, no method of storing or transmitting Personal Data is completely secure. As a result, although the Company has adequate security measures and strives to protect your Personal Data, the Company cannot guarantee absolute security of any information you provide to the Company.

9.3 We also cannot guarantee absolute protection from unauthorized access or processing of Personal Data. For the avoidance of doubt, you agree that the Company shall not be liable for any costs, damages, fines, losses, liabilities and/or penalties that you and/or third parties (including but not limited to an individual or competent authority) have incurred or suffered as a result, whether directly or indirectly, from the breach of any terms, conditions, representations, warranties, and/or obligations detailed in this Policy by yourself and/or by anyone acting on your behalf, instructions, and/or of such confirmation.

9.4 You further agree to indemnify and hold the Company harmless against any actions, claims and/or demands brought against the Company by any third parties (including but not limited to an individual or competent authority) and any costs, damages, fines, losses, liabilities and/or penalties (including but not limited to legal costs) which the Company may incur or suffer, as a result, whether directly or indirectly, from the breach of any terms, conditions, representations, warranties, and/or obligations detailed in this Policy by yourself and/or by anyone acting on your behalf, instructions, particularly where the Company was provided with false, incomplete or inaccurate Personal Data, failure to update the Company of any changes to Personal Data, and/or the necessary consent and authorisation was not obtained or maintained from relevant third parties.

Notwithstanding anything contained herein, the liability of the Company (if any) shall be limited to the fullest extent permitted by the applicable law. In no event shall the Company be liable for any consequential, incidental, indirect, punitive or special damages, or loss of



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profits, loss of anticipated profits, data, business or goodwill, regardless of whether such liability (if any) is based on breach of contract, tort, strict liability, or otherwise, and even if the Company has been informed or advised of the possibility thereof.

10.0 RIGHTS OF THE DATA SUBJECT

- 10.1 The Company is committed to upholding your data privacy rights under the Data Protection Legislation. You may request access to your Personal Data, request for correction, and, to the extent that your consent is our basis for processing your Personal Data, object to processing of your Personal Data.
- 10.2 To exercise your data privacy rights, you may contact our Data Protection Officer through the following:

Data Protection Officer	Country	Contact info	Email
Eddie Lim	Malaysia & Singapore	+603-2201 1132	privacy@edgepointinfra.com
Aditya Masno	Indonesia	N/A	
Jeifan Ira-Dizon	Philippines	+632 7211-6529	

- 10.3 Please clearly indicate the information that you wish to review, correct, update or modify. The Company will endeavor to comply with your request as soon as reasonably possible. If the Company is unable to uphold your data privacy rights, you have the right to lodge a complaint.



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Consent Form

_____ (the “**Company**”) requires your consent to process your Personal Data in connection with your engagement by/or the Company, as the case may be, and for the purposes as described in greater detail in the Company’s Personal Data Protection Notice and Policy (“**Policy**”). In order for us to do so, we kindly ask you to indicate your agreement and consent to all of the below by signing this Consent Form at the indicated space.

By signing this Consent Form you hereby:

- (a) consent and grant to the Company and its officers, employees and agents the right to collect your Personal Data and to process and make use of all of your Personal Data, which is held by the Company or will be collected in the future, for the purposes set out in the Policy. For further details and information, you may contact the Data Privacy Officer;
- (b) grant to the Company your consent to transfer or disclose some or all of your Personal Data held now or in the future by the Company to the jurisdictions and to the third parties described in the Policy, in connection with the purposes mentioned in the Policy;
- (c) confirm and agree that the consent you have given in this document does not replace any other consents which you already provided to any member of the Company, and are in addition to any rights the Company has by law in connection with the collection, use and distribution of your Personal Data; and
- (d) unless otherwise required by Applicable Law, agree that the Company shall have the right to modify, update or amend the terms of the Policy at any time by notification to you in such manner deemed fit by the Company, and you shall be deemed to have agreed to and accepted such modifications, updates or amendments following such notification.

You can withdraw some or all of your above consent at any time. For further information please refer to the Policy as stated above. “Personal Data” shall have the meaning specified in the Policy.

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By signing this Consent Form you hereby also confirm your agreement with all of the above and that you have read and agree with all terms and conditions of the Policy.

Date : _____
Company: _____
Position: _____
Name : _____



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NRIC No. : _____
Address : _____
Telephone No. : _____
E-mail Address : _____
Signature : _____



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SCHEDULE 1 –Malaysia-specific requirements

For the purposes of the processing of any Personal Data in Malaysia, the following provisions shall apply:

1. **“Company”** means the Malaysian incorporated companies within / of EdgePoint Group (which includes but not limited to EdgePoint Malaysia Holdings Sdn. Bhd., EdgePoint Infrastructure Sdn. Bhd., EdgePoint Towers Sdn. Bhd. and GTP Network Sdn. Bhd.).
2. **“Data Protection Legislation”** means the Personal Data Protection Act 2010 including its subsidiary legislations, codes and guidelines.
3. **“EdgePoint Group”** means EdgePoint Holdco Pte. Ltd. and its group of companies, subsidiaries, associated companies, affiliates, successors and assigns.
4. In relation to paragraph 7.1 of the Policy, subject to any exceptions under Applicable Law, you may also request for the Company to limit the Processing of your Personal Data.
5. This Policy is governed by and shall be construed in accordance with the laws of Malaysia. You hereby submit to the non-exclusive jurisdiction of the Malaysian courts.
6. The Bahasa Malaysia version of this Policy is appended in the Appendix. In the event of any conflict between the English and other language versions of this Policy, the English version shall prevail.



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SCHEDULE 2 – Indonesia-specific requirements

For the purposes of the processing of any Personal Data in Indonesia, the following provisions shall apply:

1. **“Company”** means PT Centratama Telekomunikasi Indonesia Tbk including its subsidiaries, associated companies, affiliates, successors, assigns, and licensees.
2. **“Data Protection Legislation”** means: (i) Law No. 27 of 2022 on Personal Data Protection (**“Law No. 27”**); (ii) Law No 11 of 2008 on Electronic Information and Transaction, as amended by Law No. 19 of 2016; (iii) Government Regulation No. 71 of 2019 on Implementation of Electronic Systems and Transaction; (iv) Ministry of Communications and Informatics Regulation No. 20 of 2016 on Protection of Personal Data in Electronic Systems, and (v) any laws and regulations as may be issued from time to time regulating the matters on protection of personal data, including any amendment, supplement or replacement of (i) to (iv).
3. In relation to Paragraph 1.4 of the Policy, the definition of Personal Data according to the Law No. 27 shall also consist of (i) Personal Data of a specific nature; and (ii) General Personal Data.

Personal Data of specific nature as referred to above shall include:

- (a) health data and information;
- (b) biometric data;
- (c) genetic data;
- (d) crime records;
- (e) child data;
- (f) personal work data; and/or
- (g) other data in accordance with the provisions of the regulations legislation.

General Personal Data as referred to above shall include:

- (a) full name;
 - (b) gender;
 - (c) citizenship;
 - (d) religion;
 - (e) marital status; and/or
 - (f) personal data combined to identify a person.
4. If certain Personal Data is categorized as Personal Data of a specific nature, the Law No. 27 could indicate that the processing of that Personal Data carries a high potential risk, which would require us as the data controller to prepare a data protection impact assessment.
 5. In relation to Paragraph 2.0 of the Policy, consent is not the only legal basis for us to process your data. The Law No. 27 has provided other legal bases for Personal Data processing: (i) contractual necessity; (ii) compliance with a data controller’s legal obligations; (iii) protection of the vital interests of the data subject; (iv) public interest, for the provision of public services or for the exercise of lawful authority; and (v) legitimate interest.



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6. In relation to paragraph 7.1 of the Policy, we note that subject to any exceptions under Applicable Law, you may also request for the Company to limit the Processing of, or to delete your Personal Data.
7. As the data controller, if we are intending to do a merger, consolidation, acquisition, spin-off, or dissolution, we will notify you on the transfer of your personal data twice, i.e., before and after the corporate action according to the Law No. 27.
8. This Policy is governed by and shall be construed in accordance with the laws of Indonesia. You hereby submit to the non-exclusive jurisdiction of the Indonesian courts.
9. The Bahasa Indonesia version of this Policy is appended in the Appendix. In the event of any conflict between the English and Bahasa Indonesia versions of this Policy, the Bahasa Indonesia version shall prevail.



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SCHEDULE 3 – Singapore-specific requirements

For the purposes of the processing of any Personal Data in Singapore, the following provisions shall apply:

1. **“Company”** means the Singaporean incorporated companies within / of the EdgePoint Group (which includes but not limited to Edgepoint Infrastructure SG Pte Ltd, Edgepoint Holdco Pte Ltd and EP ID Holdings Pte. Ltd.).
2. **“Data Protection Legislation”** means the Personal Data Protection Act 2012.
3. **“EdgePoint Group”** means EdgePoint Holdco Pte. Ltd. and its group of companies, subsidiaries, associated companies, affiliates, successors and assigns.
4. For the purposes of paragraph 6.1 of the Policy, the Company notes that the data protection laws in the countries to which your Personal Data is transferred may not be comparable to those in Singapore. However, when the Company transfers your Personal Data outside Singapore, it will take steps to ensure that the recipient of your Personal Data will take appropriate security measures to protect the Personal Data. By signing the consent form, you understand and consent to such transfer of your Personal Data.
5. This Policy is governed by and shall be construed in accordance with the laws of Singapore. You hereby submit to the non-exclusive jurisdiction of the Singapore courts.



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SCHEDULE 4 – Philippine-specific Requirements

For the purposes of the processing of any Personal Data in Philippines, the following provisions shall apply together with Republic Act No. 10173 or the Data Privacy Act of 2012 and other issuances of the National Privacy Commission:

1. **“Company”** means the Philippines incorporated companies within / of the EdgePoint Group (which includes but not limited to EdgePoint Infrastructure Inc. and Edgepoint Towers Inc. (formerly: Comworks Infratech Corp.).
2. **“Data Protection Legislation”** means the Republic Act No. 10173 or the Data Privacy Act of 2012 and other issuance of the National Privacy Commission.
3. **“EdgePoint Group”** means EdgePoint Holdco Pte. Ltd. and its group of companies, subsidiaries, associated companies, affiliates, successors and assigns.
4. **“Personal Data”** or **“Personal information”** refers to any information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual;
5. In relation to Clause 6.2 above, **“personal information controller”** refers to a person or organization who controls the collection, holding, processing or use of personal information, including a person or organization who instructs another person or organization to collect, hold, process, use, transfer or disclose personal information on his or her behalf. While **“personal information processor”** refers to any natural or juridical person qualified to act as such to whom a personal information controller may outsource the processing of personal data pertaining to a data subject.
6. **“Sensitive personal information”** refers to personal information:
 - (a) About an individual’s race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;
 - (b) About an individual’s health, education, genetic or sexual life of a person, or to any proceeding for any offense committed or alleged to have been committed by such person, the disposal of such proceedings, or the sentence of any court in such proceedings;
 - (c) Issued by government agencies peculiar to an individual which includes, but not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and
 - (d) Specifically established by an executive order or an act of Congress to be kept classified.
7. **Processing** refers to any operation or any set of operations performed upon personal information including, but not limited to, the collection, recording, organization, storage, updating or modifications, retrieval, consultation, blocking, erasure or destruction of data.
8. For the purposes of paragraph 10.2, you may also contact the Data Protection Officer through the following contact information:



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The Data Protection Officer
Edgepoint Towers Inc.
26/F Robinsons Summit Center
6783 Ayala Avenue, Makati City
Tel No. 7211-6529
Email: privacy@edgepointinfra.com