# **Privacy Policy**

MailApp is an integrated application to manage and handle electronic documents such as mails, contracts, memos, forms developed by PT Multipolar Technology, Tbk. MailApp is designed to help any organization to create current paperless office by minimizing or even eliminating hardcopy document circulation. Document processing from drafting, reviewing, signing, distributing, archiving, searching, and tracking can easily be done online at anytime and anywhere by using MailApp which is available in web base and mobile application versions. MailApp is available in English and Bahasa Indonesia versions.

This Privacy Policy applies to the Site and all products and services offered by PT Multipolar Technology Tbk ("MLPT"), it governs how MLPT collects, uses, maintains and discloses information collected from users ("Users").

The effective date of the policy is the date when you provide your personal information or create an account at the Site or when you use the service provided by MLPT, whichever is earlier.

#### 1. Personal Information

Personal Information is information about you that is personally identifiable, such as your name, username, password, address, email address, phone number, which is not otherwise publicly available ("Personal Information"). We collect Personal Information to provide better services to Users.

Users may be asked for Personal Information, including without limitation, when Users visit our Site, register on the Site, and in connection with other activities, services, features, or resources made available on our Site. Users may, however, visit our Site anonymously. We will collect Personal Information from Users only if they voluntarily submit such information to us. In the event that Users refuse to provide Personal Information, please note that it may prevent Users from engaging in certain Site-related activities.

We collect various types of Personal Information for the following services:

- 1. User registration: name, email address, mobile phone, job title, company name, company address, company telephone.
- 2. Newsletter and/or product updates: name, email address, and company name.
- 3. Purchasing or trial use of MLPT's products or services: name, email address, mobile phone, job title, company name, company address, company telephone, and credit card details.
- 4. MLPT cloud services: Name, email, mobile phone, job title, company name, company address, company telephone, IP address, unique device identifiers, and device attributes.
- 5. Other services or marketing events: name, email, mobile phone, job title, company name, company address, company telephone, country origin, and other related information.
- 6. Other MLPT products or services that do not require user sign up: name, email, IP address, or unique device identifiers and device attributes.

#### 2. Non-Personal Information

We may collect non-personally identifiable information about Users in the course of the interaction with our Site. Non-personally identifiable information is information that is not personally identifiable about the Users, including without limitation the type of computer and technical information about User's means of connection to our Site, such as the operating system and the internet service providers utilized and other similar information.

#### 3. Web Browser Cookies

Certain information may also be collected, such as your Internet protocol address, device event information including but not limited to browser type, crashes, system activity and other server log information. Our Site use "cookies" to enhance User experience. User's web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may disable cookies on their web browser, or set the browser to alert you when cookies are being sent. In the event that the web browser is set to refuse cookies, please note that some parts of the Site may not function properly.

# 4. How We Process and Use Collected Information

MLPT may process and use User's Personal Information by mail, phone call and other reasonable legal means for the following purposes ("Purposes") within the territories and during the period necessary to carry out the Purposes:

#### 1. To serve as a data processor on behalf of our Users

We collect, process, and store certain personal information on behalf of Users as a data processor. The Users is the data controller and is responsible for most aspects of the processing of the personal information.

#### 2. To communicate with users

In the event that Users send to us any comments or inquires on the Site, we will reply to such Users via the contact information provided by Users.

#### 3. To personalize user experience

We may use information in the aggregate to understand how our Users as a group use the services and resources provided on our Site.

#### 4. To provide reliable services

We may record details about electronic documents and electronic signature workflows, such as who viewed or signed, the devices used and when the events occur.

#### 5. To send newsletters and marketing materials upon subscription

If User subscribes our newsletter on the Site, we will send emails to the subscribers for information related to our Company, such as occasional company news, upcoming events, updates, and related product or service information. Detailed instructions to unsubscribe the newsletter are provided at the bottom of such emails. User may unsubscribe from such newsletters at any time. Upon receiving User's request to unsubscribe from receiving future emails, we will immediately remove User's email address from our mailing list and stop sending future emails to such User.

#### 6. To administer any features on the site

If Users enter into a sweepstake, contest, survey, promotion, or activities on the Site, we may use the information provided by Users to administer such features.

#### 5. How We Protect Your Information

We adopt appropriate data collection, storage and processing practices and information security measures to guard against unauthorized access, alteration, disclosure or destruction of your Personal Information, transaction information and data processed and stored on our Site.

Our Site is in compliance with PCI (*Payment Card Industry*) vulnerability standards in order to create as secure of an environment as possible for Users. We comply with the regulations of Indonesia regarding to Data Protection.

# 6.Information Sharing and Disclosure

- 1. We'll share personal information outside of us when we have your consent.
- We may use third-party service providers to help us operate our business and the Site or administer activities on our behalf, such as sending out newsletters or surveys. We may share your information with these third parties for those limited purposes, based on our instructions, and in compliance with this policy and any other appropriate confidentiality and security measures.
- 3. We may share generic aggregated demographic information with our business partners, trusted affiliates and advertisers for the foregoing purposes.
- 4. We may share non-personal information that is aggregated or de-identified so that it cannot reasonably be used to identify an individual.
- 5. If we are involved in a merger, acquisition, or sale of assets, we will continue to take measures to protect the confidentiality of personal information and give affected users notice before transferring any personal information to a new entity.
- 6. We may disclose or otherwise sell, trade, or rent generic aggregated demographic information that non-personal information that is aggregated or de-identified and may include, but is not limited to App package name, install date and time, uninstall date and time and locale (Country) to any third party.

# 7. Advertising

Advertisements may appear on our products and services that are delivered to Users by third-party advertisers, who may set cookies. These cookies allow the advertiser's server to recognize your computer each time they send you an online advertisement and to compile non-personal information about you or whoever use your computer. This information allows advertisers to, among other purposes, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy does not cover the use of cookies or any practices by such advertisers. You have a number of options to control or limit how we and third parties use cookies and similar technologies, including for advertising. You may remove these targeted and advertising cookies from your browser at any time.

# 8.Intellectual Property Rights Disclaimer

MailApp with its Intellectual Property Rights ("IPR") are solely belonging to us. We release the Users from any indemnity that may arise from third party regarding to IPR. The detail of our IPR is inside our website at this link <a href="https://www.multipolar.com/wp-content/uploads/2023/05/Sertifikat-Pencatatan-Hak-Cipta-MailApp-No.-000101438">https://www.multipolar.com/wp-content/uploads/2023/05/Sertifikat-Pencatatan-Hak-Cipta-MailApp-No.-000101438</a> .pdf..

### 9. Third-Party Sites

Hyperlinks or service content provided by third parties on MLPT's website or via its services are not managed or operated by MLPT. Users are advised to gain a clear understanding of said websites or service providers, relevant user terms and conditions, and privacy policies before they view, access, or use these websites or services which do not lie within the application scope of this Policy. MLPT does not collect personal information of users for third-party websites or services and bears no legal responsibility for relevant contents. MLPT uses including but not limited to the following third-party services for member registration or sharing content:

Microsoft Privacy https://privacy.microsoft.com/

Peruri Privacy <a href="https://peruri.co.id/korporasi/legal-download/6">https://peruri.co.id/korporasi/legal-download/6</a>

Privyld Privacy Privacy Policy | PrivylD

Adobe Privacy Adobe Privacy Center

DocuSign Privacy Policy Privacy Notice | DocuSign

### 10. Changes to Our Privacy Policy

We regularly review our Privacy Policy and our compliance therewith. Our Privacy Policy may change from time to time. We will update our Privacy Policy on this page of our Site if there may be any changes and a notice will be posted along with the update in case of any material change. We encourage Users to frequently check this page for any changes. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically.

### 11. Your Consent to the Privacy Policy

By using this service, you agree to our latest privacy policy. If you do not agree with the privacy policy or refuse to provide your personal data, you may discontinue using the services provided, otherwise, MLPT will not be able to provide you with a fully functional service. In addition, if we believe that our privacy policy has not been complied with or your personal data have not been provided in full, MLPT reserves the right to terminate or suspend the provision of your services.

# 12. Online Privacy Policy Only

This online Privacy Policy applies only to information collected through the Site, all online products and services, and not to information collected offline.

### 13. Commitment to Your Privacy

To ensure the security of your information and the enforcement of the Privacy Policy, we communicate our policies and regulations and administer supervision to our employees.

### 14. Your Rights

With respect to your Personal Information provided to us, you may make the following request through contacting MLPT's Customer Service at <a href="https://www.multipolar.com/contact">https://www.multipolar.com/contact</a> at any time:

- a. Make inquiry or request to review your Personal Information
- b. Access and export data
- Edit and delete data
  - 1. You can change and delete your personal information. For instance, you can edit or delete the profile data you provide and delete your account if you wish.
  - 2. In some cases, we retain data for limited periods when it needs to be kept for legitimate business or legal purposes.
- d. Objecting to data use You have a general right to object to the use of your information for direct marketing purposes.
- f. Request to make supplement or correction of your Personal Information.
- g. Request to suspend the collection, processing or using of your Personal Information.

#### 15. Data Retention

We keep your account information because we need it to operate your account. We keep information about you and your use for as long as necessary for our legitimate business interests, for legal reasons, and to prevent harm.

### 16. Data Transfers

Your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this policy.

# 17. Contacting Us

If you have any questions about this Privacy Policy, the data processing, or the operation of this Site, please contact us at:

- 1. PT Multipolar Technology Tbk.
- 2. <a href="https://www.multipolar.com/contact">https://www.multipolar.com/contact</a>

This Privacy Policy was last updated on July 20th, 2023.