

Privacy Policy

[Version/Last Updated]: 11 January 2024

Soewito Suhardiman Eddymurthy Kardono (“**SSEK**”) Law Firm recognizes the importance of privacy and the sensitivity of personal information. As lawyers we have a professional obligation to keep confidential all information we receive within a lawyer-client relationship. We are committed to protecting any Personal Data we hold. This Privacy Policy outlines how we manage your personal information and safeguard your privacy.

1. Scope

This Privacy Policy applies to all contractors and third parties whose Personal Data is processed by SSEK Law Firm. The scope of this Data Processing encompasses a range of activities and sources, including but not limited to information collected through contracts, our website, data acquired during the provision of legal services, and Personal Data gathered from other channels or interactions with our firm.

2. Definitions

- a. **Personal Data:** Any data concerning a person whether identified or may be identified independently or combined with other information, either directly or indirectly, through an electronic or non-electronic system.
- b. **Data Subject:** Any individual to whom the Personal Data is attached.
- c. **Data Processing:** Any operation performed on personal data, including acquisition and collection; processing and analyzing; storage; correction and updates; display, announcement, transfer, dissemination, or disclosure; and/or deletion or destruction.

3. Data Collection

SSEK Law Firm collects personal information through lawful and fair means, ensuring the process is not overly intrusive. The types of Personal Data we gather include your name, nationality, contact details, bank and credit card information, email address, image, government-issued identification numbers, date of birth, marital status, religion, health information, as well as vehicle, insurance, employment, and financial details.

We may also collect specific Personal Data, which includes details about your race, national ID, religious beliefs, background information (such as financial and criminal records where legally permissible), and marital status. This sensitive data is collected only with your consent and in strict compliance with the law. If you need to provide us with documentation containing sensitive data not necessary for our purposes, we request that you redact this information before submission.

Generally, we collect personal information directly from you at the start and throughout our representation. In some cases, we may also obtain information from other sources, for instance, a government agency or registry, or from your employer if we are representing you at their request.

In our commitment to responsible data collection, we aim to:

- a. Obtain clear permission for using personal data when necessary and feasible, ensuring clarity on why it is needed.
- b. Transparently communicate the purpose of data collection and its intended use.

- c. Limit data collection to what is strictly necessary for our stated purposes, avoiding extraneous data gathering.
- d. Inform individuals about their rights concerning their personal data, including options for access, correction, or deletion, and provide guidance on exercising these rights.

4. Data Use and Processing

We use and process Personal Data only for legitimate purposes, such as: a. Providing requested services;

- b. Fulfilling contractual obligations;
- c. Safeguarding the vital interests of Data Subjects;
- d. Complying with legal requirements;
- e. Performing our tasks in the context of public interest, where required by the relevant laws and regulation; and/or
- f. Pursuing our legitimate interests, provided they do not override Data Subjects' rights.

We use your personal information to provide legal advice and services to you, to administer our client (time and billing databases) and to include you in any direct marketing activities. If you tell us that you no longer wish to receive information about our services, or about new developments in the law, we will not send any further material.

SSEK Law Firm does not disclose your personal information to any third party to enable them to market their products and services. For example, we do not provide our client mailing lists to other law firms.

5. User Access & Policy

Only legitimate users can access and use the data. To log in and access the data, a user must use his/her username and password and be Authenticated by Microsoft MFA (Multi-Factor Authenticated). They must use a strong password that is at least 8 characters long and contains capital and small letters, numbers, and special characters.

6. Data Protection Measures

We implement appropriate technical and organizational measures to protect Personal Data from unauthorized access, disclosure, alteration, and destruction. These measures include:

- a. Data encryption.
- b. Data processing recording.
- c. Access controls.
- d. Regular security assessments.
- e. Employee training on data protection.

7. Data Retention

We maintain Personal Data strictly for the duration necessary to fulfil the purposes for which it was originally collected. Upon the completion of these purposes, or when the data is no longer required, we ensure its secure and responsible disposal.

8. Data Subject Rights

Individuals whose data is processed by SSEK Law Firm have rights under the Indonesian personal data laws and regulations, including but not limited to Law No. 27 of 2022 regarding Personal Data Protection and its implementing regulation. These rights encompass the right to access, rectify, erase, or restrict the processing of their data. Data Subjects can exercise their rights by contacting the SSEK's Law Firm IT Department.

9. Disclosure of Personal Data

SSEK Law Firm may disclose collected Personal Data under specific conditions, including:

- a. when legally required, such as in response to a court subpoena;
- b. when you have consented to the disclosure;
- c. as part of our legal services that necessitate sharing your information with third parties, such as lenders in real estate transactions, where your consent is assumed unless otherwise specified;
- d. for the purpose of fee establishment or collection.
- e. when using third-party services for administrative tasks (e.g., data backup or file storage), where these parties adhere to our privacy standards; and/or
- f. if engaging expert witnesses or other law firms on your behalf, as per your request and for your representation.

Any disclosure of Personal Data will be carried out in strict compliance with applicable personal data laws and regulations. This includes compliance with the specific requirements for cross-border data transfers, should such disclosures occur on an international basis.

10. Update of Personal Data

To ensure the effectiveness of our legal services, it is crucial that the personal information we hold for you is accurate and current. Please notify us promptly of any changes to your information during our engagement, allowing us to update our records accordingly.

11. Data Breach Response

Data Breach shall include any failure to protect an individual's Personal Data in terms of confidentiality, integrity, and availability of Personal Data, including violations of security, whether intentional or unintentional, leading to the destruction, loss, alteration, disclosure, or unauthorized access to Personal Data being transferred, stored, or processed.

In the event of a data breach, we have established procedures to:

- a. Identify and contain the breach.

- b. Assess the impact on personal data.
- c. Notify affected individuals and regulatory authorities as required.
- d. Take steps to prevent future breaches.

12. Accountability and Compliance

We appoint a Data Protection Officer (DPO), a member of our IT Department, to oversee our data protection efforts, ensure compliance with this policy, and respond to data protection inquiries.

13. Updates and Review

This policy will be reviewed and updated regularly to comply with applicable laws and regulations.

14. Contact Information

For questions or concerns regarding this Privacy Policy, including to exercise your rights, please contact SSEK Law Firm's IT Department at yulcandra@ssek.com or 02129532000.