



# INDONESIA NOTICE RELATING TO THE PERSONAL DATA PROTECTION LAW FOR JOB APPLICANTS

ISSUED: OCTOBER 24, 2024

VERSION: 1.0

**INDONESIA**

**NOTICE RELATING TO THE PERSONAL DATA PROTECTION LAW**

**FOR JOB APPLICANTS**

**(“Notice”)**

This Notice must be read together with and serves as a supplement to the “**Careers Privacy Notice for Job Applicants**” available [here](#) (“**Global Notice**”). This Notice has been prepared pursuant to Law No.27 of 2022 on Personal Data Protection of Indonesia and its implementing regulations (the “**PDP Law**”) to provide additional guidelines over and above those described in the Global Notice that govern the collection, use and disclosure of the personal data of **job applicants**, individually addressed as “**you**”, of (i) Citibank Indonesia and/or (ii) another branch, subsidiary, representative office, or affiliate of Citibank Indonesia (collectively, “**Citi**”).

**Definitions**

The terms in this Notice are defined as follows:

“**Data Controller**” is Citi (as defined above).

“**Data Subject**” means individuals associated with personal data, including any persons or job applicants submitting documents and/or information through Citi’s website for the purpose of job applications.

“**Personal Data**” means any data concerning individuals who are identified or identifiable (either separately or collectively when combined with other information), either directly or indirectly through an electronic or non-electronic system.

**Lawful Basis of Data Processing**

Citi will rely on one of the following legal bases for processing your Personal Data as permitted under the PDP Law:

- (a) express written consent from the Data Subject – by submitting your application to Citi, you are deemed to have provided express consent for Citi to collect and process your personal data. Thus, your application will be recorded in compliance with the requirements of the PDP Law. In this regard, this Notice and Global Notice serve as notification, outlining the mandatory information that must be provided to you under the PDP Law and continuing with the recruitment process will be considered as your acknowledgment of these terms.
- (b) fulfilling obligations under contracts in which the Data Subject is a party – when continuing your recruitment process, you may be required to execute some documents which contain provisions allowing Citi to process your Personal Data. Citi may also collect some Personal Data based on pre-contractual processes as permitted by law. To the extent permitted by law, this Notice also serves as an agreement between Citi and the Data Subject in relation to the collection and processing of your personal data in addition to the terms and conditions under the relevant recruitment documents.

- (c) legal obligations of Citi under the applicable laws and regulations – this may include (without limitation): (i) providing information on request to government and regulatory bodies to the extent that the request has been made in accordance with the applicable law; and (ii) regulatory compliance activities;
- (d) protection of the Data Subject's vital interests - this may include circumstances where Citi must disclose the Personal Data for Data Subject's safety; and/or
- (e) any legitimate reasons or interests in relation to your recruitment process. This Notice would serve as notification to you in relation to the usage of legitimate interest basis to collect and process your Personal Data, as required by law.

### **Rights of Data Subject**

Below are the general rights granted to the Data Subject under the PDP Law. Therefore, some may be irrelevant to the processing of your Personal Data in the context of your job application:

- (a) the right to obtain information regarding clarity of identity, the basis of legal interest, the purpose of requesting and using personal data, and accountability of parties requesting personal data;
- (b) the right to complete, update and/or correct errors and/or inaccuracies in the Data Subject's own personal data in accordance with the purpose of the personal data processing;
- (c) the right to access and obtain a copy of the Data Subject's own personal data in accordance with the provisions of laws and regulations;
- (d) the right to stop processing, deleting, and/or destroying the Data Subject's own personal data in accordance with the provisions of laws and regulations;
- (e) the right to withdraw consent to the processing of the Data Subject's own personal data that has been given to a personal Data Controller;
- (f) the right to object to a decision-making action that is based solely on automated processing, including profiling, which has legal consequences or has a significant impact on data subjects;
- (g) the right to delay or limit personal data processing proportionally for the purpose of personal data processing;
- (h) the right to claim and receive compensation for violations of personal data processing regarding themselves in accordance with the provisions of laws and regulations; and
- (i) the right to obtain and/or use the Data Subject's own personal data from a personal Data Controller in a form that is in accordance with the structure and/or formats commonly used or readable by an electronic system as long as the systems used can communicate with each other securely in accordance with personal data protection principles set out under the PDP Law.

### **Collection and Use of Personal Data**

Please refer to the Global Notice.

### **Disclosure of Personal Data**



Citi may disclose Personal Data to third parties (including our affiliates). Any disclosure will be conducted in accordance with the following principles:

- (a) Citi will ensure that there is an appropriate legal basis as stipulated herein and under the PDP Law for such a disclosure, display, and/or transfer of Data;
- (b) Citi will take appropriate measures to comply with the requirements on offshore data transfer under the PDP Law;
- (c) Citi will ensure that the disclosure or transfer shall be conducted in a manner that maintain the security aspect implemented by Citi in accordance with the applicable law;
- (d) Citi will ensure that the disclosure of Personal Data shall be made in confidential manner and limited to the purposes that the Data Subject has consented to or aligns with the relevant legal basis; and
- (e) Citi shall implement the principles of processing Personal Data under the PDP Law which includes lawfulness, confidentiality, accountability, proportionality, and precautionary.

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To exercise data subject rights or submit inquiries regarding these rights or any matters stipulated herein, please use the [Contact Us](#) link or contact us at the email address provided below:

[hrdataprivacy@citi.com](mailto:hrdataprivacy@citi.com)

If you have any concerns about the use of your personal data, questions about this Notice including any requests to exercise your legal rights under the law, please contact our DPO using the email address: **Indonesia.Privacy@citi.com**

This Notice was last modified on **24 October 2024**