

## Privacy Policy

1. The purpose of this policy is to establish the principles by which DLI will recognise and respect the importance of personal data protection.
2. This Policy applies to all processing by DLI of the Personal Data of its staff, students and persons with whom DLI interacts.
3. DLI will process Personal Data lawfully, transparently, and for the purpose for which it is expressly collected or as otherwise authorised or permitted by law.
4. When collecting Personal Data from an individual, whether by verbal, written or electronic means, all reasonable steps must be taken to ensure that the Personal Data Subject is made aware of:
  - (a) the legality of the processing of Personal Data;
  - (b) the purpose of processing the Personal Data;
  - (c) the type and relevance of the Personal Data to be processed;
  - (d) retention period of documents containing Personal Data;
  - (e) details regarding the information collected;
  - (f) the period for which the Personal Data is processed; and
  - (g) the rights of Personal Data Subjects.
5. Personal Data must be processed only to the extent necessary and relevant to DLI's functions and activities and where there is a specific and immediate need to do so.
6. All staff of DLI must, in performing the duties of their employment, appointment or engagement, respect the privacy of personal data they process and must comply with all applicable personal data protection laws, including without limitation Law No. 27 of 2022 on Personal Data Protection of the Republic of Indonesia (**PDP Law**), this policy, and its related procedures.
7. DLI will take reasonable steps to ensure that the Personal Data that it holds is accurate and complete.
8. DLI will establish processes to enable a Personal Data Subject to exercise their rights under Chapter IV of the PDP Law.
9. Technical and organisational measures will be put in place to ensure that Personal Data held by DLI is
  - (a) kept secure and protected from unauthorised processing, whether deliberate or inadvertent; and
  - (b) subject to obligations under public record-keeping and other legislation, destroyed or permanently de-identified when it is no longer needed.

<b>Status</b>	Current
<b>Effective Date</b>	7 May 2024
<b>Review Date</b>	7 May 2026
<b>Approval Authority</b>	Yayasan Governing Board
<b>Approval Date</b>	7 May 2024
<b>Expiry Date</b>	To Be Advised

10. A Personal Data Protection Officer may be appointed as required under Article 53 of the PDP Law and will undertake the duties set out in that Article.
11. DLI will not transfer Personal Data out of Indonesia unless
  - (a) it has first ensured that the country to which the Personal Data is transferred has a level of Personal Data Protection equivalent to or higher than that provided in the PDP Law; or
  - (b) it has entered into an agreement with the recipient of the Personal Data to ensure that there is adequate and binding Personal Data Protection.
12. DLI may share Personal Data with its University partners, which may involve a transfer of Personal Data out of Indonesia, specifically in accordance with relevant legislation in each jurisdiction.
13. A Personal Data Subject is entitled to make a complaint about unauthorised processing of their Personal Data by DLI.
14. DLI will establish a personal data protection training program to be provided to staff at induction and at least every two years thereafter.
15. Definitions:
  - (a) **Personal Data** means data about natural persons who are identified or can be identified separately or combined with other information either directly or indirectly through electronic or non-electronic systems.
  - (b) **Personal Data Subject** means a natural person to whom Personal Data is attached
  - (c) **Process or Processing** includes collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, and without limiting the scope of this definition processing includes storing Personal Data in a cloud-based environment, whether by way of primary storage or redundancy.

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