

BEMEUP PRIVACY POLICY

Article 1 (Purpose of the Privacy Policy)

bemeup global, Inc. (hereinafter referred to as the "Company") values the personal information of its users during the operation of the bemeup service (hereinafter referred to as the "Service") and makes every effort to comply with relevant Indonesian laws, including the **Law No. 27 of 2022 on Personal Data Protection (UU PDP)** and the **Law No. 11 of 2008 on Electronic Information and Transactions (UU ITE)** (as amended). This Privacy Policy informs users about the personal information collected, the purpose of its collection and use, the processing and retention period, its provision to third parties, and other matters related to the protection of users' personal information.

Article 2 (Items and Method of Personal Information Collection)

1. Items of Personal Information Collected

- **Information collected upon member registration:**
 - **Mandatory information:** Date of birth, gender, mobile phone number, email address, password, social media account information (when registering with a social media account).
 - **Optional information:** Area of interest for treatment, area of interest for beauty, region.
- **Information collected when sending a request to a medical institution:**
 - **Request sender's information:** Name, email address, mobile phone numbers.
 - **Request-related information:** Name of the requested medical institution, desired consultation/treatment information, images, service price, special information (optional).
- **Information generated during the use of the service:**
 - Service usage history, access logs, IP address information, cookies, mobile device information (device identifier, OS information, etc.), location information (optional).
- **Additional information collected for medical institution members:**
 - **Medical institution information:** Name of the medical institution, business registration number (NIB), medical institution establishment license, representative's name, business address, phone numbers.
 - **Person-in-charge information:** Name, department, position, email, mobile phone number.

2. Method of Personal Information Collection

The Company collects personal information through the following methods:

- Collection through the user's active participation, such as member registration, service

- use, event participation, and request submission.
- Provision from affiliated partners and medical institutions.
- Automatic collection through generated information collection tools (log analysis programs, cookies, etc.).

Article 3 (Purpose of Personal Information Collection and Use)

The Company uses the collected personal information for the following purposes:

1. Service Provision and Contract Fulfillment

- Member management and service provision.
- Provision of the request reception service for medical institutions.
- Content provision.
- User identification and identity verification.

2. Service Improvement and Development

- Statistical analysis of service usage.
- Service improvement and new service development.
- Determination of access frequency and usage statistics.

3. Marketing and Advertising

- Provision of event information and participation opportunities.
- Notification of new services and personalized services.
- Provision of advertising information (when agreeing to receive marketing information).

4. Legal Compliance

- Fulfillment of obligations under relevant laws.
- Dispute resolution and complaint handling.

Article 4 (Personal Information Retention and Use Period)

In principle, the Company will destroy a user's personal information immediately when the purpose of its collection and use has been achieved. However, some information may be retained for a specific period due to the reasons stated below:

1. Retention of information according to the Company's internal policy:

- Record of improper use: 1 year after member withdrawal.
- Record of complaint handling and dispute resolution: 3 years after member withdrawal.

2. Retention of information in accordance with relevant Indonesian laws:

- The Company retains personal data as long as necessary to fulfill the purpose for which it

was collected, as required by law, or for legitimate business purposes in compliance with the **Law No. 27 of 2022 on Personal Data Protection**.

- Electronic system logs and transaction records may be retained for a minimum period of 5 years (for financial transactions) or in accordance with the applicable regulations under the **Law on Electronic Information and Transactions**.

Article 5 (Personal Information Destruction Process and Method)

1. Destruction Process

The Company will immediately destroy personal information that has exceeded its retention period or for which the processing purpose has been achieved. The destruction process is as follows:

- Information entered by the user for member registration, service requests, etc., will be transferred to a separate database after the purpose is achieved, stored for a certain period in accordance with internal policy and relevant laws, and then destroyed.
- Personal information transferred to a separate database will not be used for purposes other than retention, except as required by law.

2. Destruction Method

The Company will securely erase personal information recorded and stored in electronic files so that it cannot be recovered. Personal information recorded and stored on paper documents will be destroyed by shredding or incineration.

Article 6 (Provision of Personal Information to Third Parties)

1. General Principle

In principle, the Company does not provide a user's personal information to external parties. However, the following cases are exceptions:

- **When the user has given prior consent:**
 - **Recipient:** The medical institution to which the user sent a request.
 - **Provided items:** Name, gender, date of birth, mobile phone number, request content, etc.
 - **Purpose of provision:** Medical service consultation and information provision.
 - **Retention and use period:** According to the medical institution's personal information processing policy.
- **When required by law:** When required by law or a lawful order from a government authority for investigation purposes according to legally prescribed procedures and methods.

2. Withdrawal of Consent for Personal Information Provision

Users can withdraw their consent to the provision of personal information at any time.

Consent withdrawal can be done through the "Settings" menu in the service or by contacting

customer service via email. However, withdrawing consent may restrict the use of services that require consent to be provided.

Article 7 (Delegation of Personal Information Processing)

1. Delegation Status

The Company delegates the processing of personal information as follows to provide and improve the Service:

Recipient	Delegated Task	Retention and Use Period
Messaging Service Provider	Sending notification messages	Until member withdrawal or termination of the delegation contract
Email Service Provider	Sending notification emails	Until member withdrawal or termination of the delegation contract
Cloud Service Provider	Server and infrastructure operation	Until member withdrawal or termination of the delegation contract

2. Management of Delegated Tasks

When entering into a delegation contract, the Company clearly specifies in the contract or document the prohibition of processing personal information beyond the purpose of the delegated task, technical and managerial protection measures, restrictions on re-delegation, management and supervision of the recipient, and liability for damages, in accordance with the Law No. 27 of 2022 on Personal Data Protection. The Company supervises the recipient to ensure safe processing of personal information.

3. Changes to Recipient

When there are changes to the content of the delegated task or the recipient, the Company will announce them immediately through this Privacy Policy.

Article 8 (Rights, Obligations, and Exercising Methods for Users and Legal Representatives)

1. User Rights and Exercising Methods

Users can exercise their rights to view, correct, delete, or request suspension of personal information processing at any time.

- **Viewing, correcting personal information:** Can be done in the 'Settings' > 'Personal Information Management' menu within the service.

- **Deleting, requesting suspension of personal information processing:** Can be requested through the customer service center.

However, the Company may deny a request if it is necessary to fulfill obligations under relevant laws or when there is a risk of infringing on the rights of a third party.

2. Rights and Exercising Methods of Legal Representatives

A legal representative of a child under 18 can exercise the rights to view, correct, delete, or request suspension of the child's personal information processing. The request can be made by submitting a document proving that they are the legal representative, and the Company will process it immediately.

3. User Obligations

Users must keep their personal information in the most current state and are responsible for any issues arising from inaccurate information entry. In addition, users must not infringe on or disclose the personal information of other users and may be penalized under relevant laws if they violate this.

Article 9 (Installation, Operation, and Rejection of Automatic Personal Information Collection Devices)

1. Purpose of Using Cookies and Other Tools

The Company uses cookies to make it convenient for users. A cookie is a small amount of information sent by a website to a user's computer browser and stored on the user's device.

The Company uses cookies for the following purposes:

- Maintaining the user's login status.
- Providing personalized services by analyzing user behavior and preferences.
- Improving the service and performing statistical usage analysis.

2. Method of Rejecting Cookie Installation

Users have the right to choose whether to install cookies. Cookies can be rejected through the settings menu in the web browser.

- **Chrome:** Settings > Privacy and security > Cookies and other site data > Select block cookies.
- **Internet Explorer / Edge:** Tools > Internet Options > Privacy Tab > Advanced > Select block cookies.
- **Safari:** Preferences > Privacy > Cookies and website data > Select always block.

However, rejecting the installation of cookies may lead to restrictions on the use of services that require a login.

Article 10 (Measures to Ensure Personal Information Safety)

The Company implements the following technical, managerial, and physical measures to

securely process users' personal information:

1. Technical Measures

- **Personal information encryption:** Important information like passwords is encrypted for storage and management.
- **Installation of security programs:** Security programs are installed and operated to counter viruses, cyberattacks, etc.
- **Network security:** Network access is controlled by using an intrusion prevention system (firewall).
- **Access control:** Access rights are managed, and access to the personal information processing system is controlled.

2. Managerial Measures

- **Minimization of personal information handlers:** The number of employees handling personal information is minimized, and regular training is conducted.
- **Establishment and implementation of internal management plan:** An internal management plan is established and implemented to protect personal information.
- **Periodic self-audits:** Periodic audits are conducted to ensure the safety of personal information processing.

3. Physical Measures

- **Physical access restriction:** Entry and exit are controlled for the physical space where personal information is stored.
- **Document security:** Access is controlled for documents, auxiliary storage media, etc. that contain personal information.

Article 11 (Data Protection Officer and Complaint Handling)

1. Data Protection Officer

The Company designates a Data Protection Officer as follows to take overall responsibility for tasks related to personal information processing and to handle user complaints and compensation for damages related to personal information processing.

- **Data Protection Officer:** [Name of Data Protection Officer]
- **Position:** [Position]
- **Contact Information:** [Phone Number], [Email]

2. Department in Charge of Personal Information Protection

- **Department Name:** [Department in charge of personal information protection]
- **Person-in-charge:** [Name of person in charge]
- **Contact Information:** [Phone Number], [Email]

3. Complaint Handling and Compensation for Damages

Users can contact the following agencies if they need to report or consult about a personal

information violation in Indonesia:

- **Ministry of Communication and Informatics (Kementerian Komunikasi dan Informatika / KOMINFO)**
 - Website: <https://www.google.com/search?q=https://kominfo.go.id>
 - Contact: 159
- **Directorate of Cyber Crime, Indonesian National Police (Direktorat Tindak Pidana Siber Bareskrim Polri)**
 - Website: <https://patrolisiber.id>

Article 12 (Changes to the Privacy Policy)

1. Effective Date

This Privacy Policy is effective from December 15, 2025.

2. Privacy Policy Change Process

The Company may change this Privacy Policy in accordance with changes in relevant laws, policies, or security technology. When the Privacy Policy is changed, the Company will notify the user through a notice on the homepage (or a separate pop-up window) at least 7 days before the effective date of the change. However, for significant changes concerning user rights, the Company will provide separate notice to each individual via email, SMS, etc., at least 30 days in advance, if necessary.

Article 13 (Sending Advertising Information)

1. Information on Sending Advertisements

The Company sends advertising information only after receiving prior consent from the user.

The advertising information sent by the Company may include the following content:

- Information on the services, events, and promotions of the Company and affiliated partners.
- Information on special events, promotions, and discounts from medical institutions.
- Personalized health and beauty information.

2. Withdrawal of Consent to Receive Advertising Information

Users can withdraw their consent to receive advertising information at any time. Consent to receive advertising information can be withdrawn by the following methods:

- Canceling consent in the service.
- Withdrawing through the rejection method displayed in the advertising information.
- Requesting withdrawal by contacting customer service via email.

bemeup global, Inc.