

TelkomGroup's Personal Data Protection Guidelines

TelkomGroup has developed guidelines and procedures derived from TelkomGroup's Personal Data Protection Governance Policy. The guidelines adopt a framework that integrates the mitigation of administrative sanctions and criminal sanctions from personal data protection regulations in Indonesia and international best practices. [SASB TC-TL-220a.1, TC-SI-220a.1, TC-IM-220a.1]

This guidelines covers:

1. Fundamental Guidelines for Personal Data Processing
2. Guidelines for Personal Data Access Control
3. Guidelines for Accuracy, Security, and Confidentiality of Personal Data
4. Guidelines for Personal Data Processing Control
5. Guidelines for Personal Data Protection Oversight

Data Protection Strategy

TelkomGroup actively educates employees through socialization, training, and certification programs related to data management, data security, and privacy.

TelkomGroup conducts a Data Governance Maturity Level Assessment to determine data governance development and optimization strategies in the company. The Data Governance Maturity Level Assessment activity is conducted within Patuh PDP.

Throughout 2025, TelkomGroup has also undertaken measures to protect personal data, Including mandatory e-learning sessions for employees in relevant functions. The privacy awareness policy and program are established to uphold robust data governance and security throughout the TelkomGroup ecosystem.

Figure 98. TelkomGroup Personal Data Protection Measures

POLICY & COMPLIANCE



Version updates to 2 Procedures to adjust with the Company's risk-matrix and IA feedback

(totaling in **5 Guidelines and 19 Procedures** to support PDP compliance)



Consultation assistance with compliance case concerning the PDP aspect for each directorate



Monitoring and oversight of regulatory developments



ISO 27701:2019 Privacy Information Management Systems surveillance process assistance

ARCHITECTURE, CONTROL & PROCESSING



Application Utilization

USER : 623 (Up 85%) Case : 120 (Up 185%) Activity : 7643 (Up 116%)

Maturity Level TelkomGroup

Maturity improvement:
1.97 > 2.98
On-track towards defined level (3)



Data Protection Platform Encryption

- 32 Critical Database (containing PII)
- 17 Application
- 11 Operating System Updated
- 2 Encryption Platform



- **Red Teaming Exercise**
During Q3-Q4 2025 involved CYS and DIT

- **PET Exploration UEBA:**
12 Tech Providers Demo & PoC (IBM, Securit, Exabeam, BeyondRisk, Securonix, etc.)