

Indonesia Resident Privacy Notice

EFFECTIVE: October 2024

Introduction

This Indonesia Resident Privacy Notice (“Notice”) provides an overview of how Bank of America legal entities that utilize the names of Bank of America, Private Bank, and Merrill, as well as their related affiliates (“we,” “our” or “us”) comply with the requirements of the Indonesia Personal Data Protection Law (“PDPL”). This Notice explains how we collect, use, and disclose personal data (defined below) about residents of Indonesia (“you” or “your”) to whom we provide financial services (“Services”).

Keeping your personal information secure is a top priority. Consistent and in accordance with applicable laws and regulations, we maintain physical, technical, electronic, procedural, and organizational safeguards and security measures designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access.

Updates to This Notice

This Notice is subject to change. We update this Notice periodically to comply with the most recent applicable laws and regulations. If we modify or amend this Notice, it will be available on the privacy page of our website with the updated date.

Information We Collect

We collect information about you that identifies you as an individual or relates to an identifiable individual. We limit the collection of this information to only the necessary information needed to provide our Services, and to support legal and risk requirements. We may receive information about you from you or third-party providers in support of due diligence activities we undertake to satisfy legal and regulatory requirements.

If sharing information with us about an individual residing in Indonesia, please provide them a copy of this Notice and obtain their permission to share it with us. Should the individual have any questions, please refer them to the Contact Us section on this Notice.

The following is a list of information we may collect.

Types of Information	Description	Examples of Information Collected <i>(Not a comprehensive list)</i>
Account Activity	Transaction information from a personal or business account	Account and transaction details, loan number, Internal Identifier
Business Contact Data	An employee or customer’s corporate contact information	Name, company, business address, business phone number, business email address
Compensation Information	Employment status and income sources	Employer name, business address, business phone number, business email address, salary, or other source of income
Images / Videos / Audio	The collection of video and audio recordings at Bank of America facilities or ATMs	Security video, photographs and telephone recordings of customers’ and clients’ interactions with the Services we provide
Legal Transactions	Information from judiciary bodies about an individual’s legal matters	Legal documents or decisions
Online Activity	A person’s activity online or through mobile apps	User or device Identification; PIN or Password; Internet Protocol (IP) address; Internet history including purchasing, browsing, or search; Internet interactions including cookies and pixel tags; Smart device information including phone number and network information

Types of Information	Description	Examples of Information Collected <i>(Not a comprehensive list)</i>
Personal Data	Information relating to an identified or identifiable person	Name, address, telephone number, email address, gender, national identifier, Social Security number, date of birth, government issued ID numbers, demographic information, signature (digital and written), political or philosophical belief
Sensitive Personal Data (Referred to as Specific Personal Data under the PDPL)	Data identified by the PDPL as identifiable information that may have a greater impact on a person if combined with other Personal Data	Biometric data, personal financial information, race, ethnicity, medical information, criminal records, genetic, children's data

Purpose for Processing Activities

We collect and process information for the purpose of providing the requested Services or for legal obligations. The following is a summary of our activities which require the processing of your information (identified above).

Purpose	Reasons for Processing	Types of Information
Account Management	To provide processing and account support	Account Activity, Business Contact Data, Images/Videos/Audio, Personal Data, Sensitive Personal Data
Account Opening	To obtain all requirements for the opening and expansion of service, including trading or other activities	Business Contact Data, Compensation Information, Personal Data
Analytics and Modeling	To provide modeling and analytical insights about our consumers	Account Activity, Business Contact Data, Compensation Information, Online Activity, Personal Data, Sensitive Personal Data
Anti-Money Laundering/ Know-Your-Customer	To follow applicable Anti-Money Laundering (AML) / Know-Your-Customer (KYC) laws and regulations, including identifying beneficial owners, conducting background checks, monitoring, and performing other checks to meet anti-terrorism financing legal requirements	Business Contact Data, Personal Data, Sensitive Personal Data
Communications	To speak with you about your account	Personal Data
Digital Services	To facilitate sending of digital messages using our Services including enabling a customer to send their account information, with consent and by request, to a third-party application	Account Activity, Business Contact Data, Images/Videos/Audio, Online Activity, Personal Data
Legal, Regulatory and Banking Compliance	To follow applicable laws and regulations, sanctions, and non-financial regulatory reporting requirements	Business Contact Data, Personal Data, Sensitive Personal Data
Monetary Transactions	To enable the movement of money in/out of your account	Business Contact Data, Personal Data
Risk Analysis	To manage our internal risk and analyze our client portfolio	Account Activity, Business Contact Data, Compensation Information, Online Activity, Personal Data, Sensitive Personal Data

Purpose	Reasons for Processing	Types of Information
Third-party/Affiliates	To facilitate and support third-party requests and service delivery, as well as referrals to and from specialists, including Bank of America affiliates.	Business Contact Data, Compensation Information, Personal Data, Sensitive Personal Data
Wealth Management	To provide overall support to individuals in connection with existing or former accounts, including Trust services which may involve account transition and termination	Business Contact Data, Legal Transactions, Online Activity, Personal Data, Sensitive Personal Data

Cookies and Similar Technologies

We may collect information about you through our use of cookies, software development kits and other tracking technologies when you use our Websites and Mobile Apps. Read our [Cookie Policy](#) to learn more.

Third-Party Providers

We may use third-party providers to process your personal information for business purposes on our behalf. We require third-party providers to follow our policies to protect information we share with them, or they collect on our behalf. The inclusion of a link does not imply endorsement of the linked site or service by us or our affiliates.

We may use, disclose, or transfer your personal data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock as requested by clients or their representatives.

Data Retention

We keep your personal information as long as needed or permitted by applicable laws and regulations. The retention period may vary between regions and is determined by the reason for which we collected it. The criteria we use to determine our retention periods include: (i) the length of time we have a relationship with our client and Services we provide; (ii) whether there is a legal obligation; and (iii) whether retention is advisable for legal purposes such as statutes of limitations, litigation, or regulatory investigations.

Data Security

We use security measures that comply with applicable federal and state laws to protect your personal information from unauthorized access and use. These measures may include device safeguards, secured files and buildings, as well as oversight of our third-party providers to ensure your personal information remains confidential and secure. In the event of a data breach, we provide notification per applicable laws and regulations.

Individual Rights

As a resident of Indonesia, you have certain individual rights under the PDPL regarding the collection, sharing and processing of your information. These rights include, where allowed under applicable law and subject to certain exceptions:

- The right to obtain a copy of the personal data we process and why.
- The right to know how we use, collect, and share your personal information.
- The right to have your personal information corrected or amended, if incorrect.
- The right to ask for a copy of your personal information in a commonly used machine-readable format.
- The right to restrict further processing of your personal data of a specific data processing activity in proportion to the purpose for which it is processed.
- The right to withdraw your consent if the processing of your personal information is based on your consent.
- The right to request deletion of your personal information under certain circumstances.
- The right to seek compensation if you have suffered harm due to the unlawful processing of your personal information.
- The right to receive a copy of this Notice translated into Bahasa Indonesia.

Use of Services by Children

We do not direct our Services to individuals under the age of 18 (“Child”). For our Services that allow parents or guardians to authorize access to their Child, we will obtain all consents required by law. We will collect, use, and disclose only that information of such Child as reasonably necessary to provide Services and only for the intended purpose.

Cross-Border Transfer

We may store and process your personal information in any country where we have facilities or in which we engage service providers, or use of cloud services to transfer and store personal data. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may have access to your personal information.

For transfers from Indonesia to countries with unsatisfactory controls, we have put adequate measures in place. Transfers may take place pursuant to contracts in your interest or at your request.

Contact Us

For questions about this Notice

If you have any questions about this Notice, please contact our Data Protection Officer at dpo@bofa.com.

To exercise your individual rights

If you would like to exercise any of your individual rights listed above, email individualrightsrequests@bofa.com with the following information:

- Full name as it appears on your account.
- The Bank of America product or service processing your personal information, if known.
- Reference number provided by a Bank of America representative, if available.
- Clearly explain your request. If requesting a change or removal of your personal information, please specify which data you are referencing.

We will respond to your request consistent with the applicable law. For your protection, requests for changes to your personal information may require further verification before processing.

Some of our Notices are available in additional languages. In the event of a discrepancy in the translated version, the English text shall govern.