

PT. Arupa Cloud Nusantara

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Privacy Notice

PT Arupa Cloud Nusantara

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1. Introduction

The privacy and confidentiality of your Personal Data as a user of Our Services ("User") is a matter of great importance to Us. This Privacy Notice governs and/or explains to you how We collect, use, store, disclose, and process the Personal Data of customers, prospective customers, partners, and visitors to the **arupa.id** and **zettagrid.id** websites in connection with the provision of the Services to you.

In maintaining your trust, We are committed to continuously protecting and safeguarding the confidentiality of your Personal Data in accordance with this Privacy Notice and applicable laws and regulations.

PT Arupa Cloud Nusantara ("Arupa", "We", "Our") is a limited liability company established under the laws of the Republic of Indonesia, engaged in the business of providing information technology and **Cloud Provider** services, and has been operating in Indonesia since 2017.

In the context of this Privacy Notice, We act as the **Data Controller** with respect to the Personal Data collected and processed by Arupa in connection with the provision of the Services, including for purposes of account management, communication, administration, and other activities related to the Services.

This Privacy Notice does not apply to content, data, or information stored, uploaded, or processed by customers within Our infrastructure in connection with their use of the Services ("**Customer Data**"). Such content, data, or information remains the property of and/or under the control of the customer and is not considered Personal Data collected and processed by Us under this Privacy Notice. Where Customer Data contains Personal Data processed by Us for and on behalf of a customer, We act as the **Data Processor** in accordance with the nature of the Services and the terms of the applicable agreement between the customer and Arupa.

This Privacy Notice has been prepared to maintain the security of and protect your Personal Data. Before using Our Services, you are expected to carefully read and understand all provisions of this Privacy Notice and to give your consent to the applicable terms.

2. Applicability and Scope of the Privacy Notice

This Privacy Notice applies to customers, prospective customers, partners, and visitors to the **arupa.id** and **zettagrid.id** websites, as well as other parties who interact with Us in obtaining or using the Services.

By using Our Services, the User represents that they have read, acknowledged, and understood all provisions of this Privacy Notice, and confirms that they are a lawful and authorized party to provide the User's Personal Data to Us through Arupa's Service channels.

This Privacy Notice may be changed, updated, and/or adjusted from time to time in accordance with developments in the Services, Arupa's business needs, and applicable laws and regulations. Any change, update, and/or adjustment to this Privacy Notice will be notified to the User in accordance with the notification procedure set out in Section 11 of this Privacy Notice.

3. Collection and Acquisition of Personal Data

Under this Privacy Notice, We obtain and collect Personal Data through several means, including Personal Data that you provide directly, Data collected automatically when you access or use the Services, and Personal Data obtained from lawful third parties.

Such Personal Data may be obtained through Our official channels, including forms and interactions on the website, the account registration and contract signing process, use of the Services, and through official partners who register you as a customer. Each channel is used solely to obtain and collect Personal Data relevant to its processing purpose and only to the extent necessary for the provision and management of the Services.

3.1 Data You Provide Directly to Us

a. Identity and Contact Data

Your full name, position, and contact information, as well as that of the company where you work.

b. Account and Portal Data

Credentials and account settings you use to access the Services.

c. Commercial and Contractual Data

Company data, billing data, and transaction and service contract history.

d. Support and Communication Data

The content of your communications with the Arupa team, including support tickets, feedback, and surveys.

3.2 Data We Collect Automatically

a. Website

When you access or use the **arupa.id** and **zettagrid.id** websites, Arupa may collect technical information, including data regarding your device, browser, and connection, as well as information about your visits to pages on Our website.

b. Cloud Service Log Data

In providing Cloud Services, Arupa may collect log data related to the use and security of the Services, including access records, Service usage activity, security logs, and audit trails.

3.3 Data We Receive from Third Parties

Arupa may receive Personal Data from lawful third parties, including:

- Data from Arupa's reseller or channel partners when they register you as a customer; and
- Data from social media platforms when you interact with Arupa's official accounts, to the extent such data is publicly available or provided to Arupa in accordance with applicable terms.

4. Use of Personal Data

Arupa uses Personal Data for purposes related to the provision, management, and development of the Services, as well as other purposes described in this Privacy Notice or permitted under applicable laws and regulations.

4.1 Provision and Management of Services

Arupa uses Personal Data to:

- Create and manage Cloud Service accounts;
- Provide access to Arupa's customer portal and cloud services;
- Process payments and issue invoices;
- Provide technical support and managed services; and
- Send important operational notifications, including regarding scheduled downtime, security updates, and changes to the Services.

4.2 Business Communications

Arupa uses Personal Data to:

- Respond to your questions, requests, and communications;
- Convey information regarding changes to contracts, policies, or the Services; and
- Process contract renewals and communications relating to negotiations.

4.3 Marketing and Promotion

Arupa uses Personal Data to:

- Send newsletters, technical articles, and information regarding Arupa's products or Services;

- Inform you of relevant offers, webinars, or events; and
- Carry out personalized marketing communications in accordance with applicable terms;

4.4 Security and Compliance

- Detect and prevent fraud, misuse, or unauthorized access;
- Fulfill tax, audit, and reporting obligations under applicable provisions;
- Respond to lawful requests or legal process from authorized authorities; and
- Protect Arupa's rights, interests, assets, and legal interests.

4.5 Service Improvement

Arupa uses Personal Data to:

- Analyze Service usage patterns in aggregate and, to the extent possible, in a form that does not identify individuals, in order to improve the quality and development of products and Services;
- Conduct customer satisfaction surveys and research; and
- Optimize the performance, security, and reliability of the infrastructure and Services.

5. Legal Basis for Processing

In accordance with Law Number 27 of 2022 on Personal Data Protection (“**PDP Law**”), Arupa will only process Personal Data based on a lawful basis for processing that is consistent with the purpose and nature of the Personal Data processing. The lawful bases that may be relied upon by Arupa include:

Legal Basis	When Used	Concrete Example
Consent	Where the processing is carried out based on your consent for a specific purpose.	Sending newsletters, marketing communications, and use of certain <i>cookies</i> .
Performance of a Contractual Obligation	Where the processing is carried out to perform an agreement with you or to fulfill your request prior to entering into an agreement.	Account creation and management, provision of Services, billing, technical support.
Compliance with a Legal Obligation	Where the processing is necessary for Arupa to comply with an obligation under applicable laws and regulations.	Reporting and tax obligations, audits, records retention.

Legal Basis	When Used	Concrete Example
Protection of Vital Interests	Where the processing is necessary to protect your vital interests or those of another person.	Action necessary to address circumstances that threaten a person's safety or security.
Public Interest or Exercise of Official Authority	Where the processing is necessary for the performance of a task carried out in the public interest, public service, or authority granted under applicable laws and regulations.	Processing required or carried out to fulfill authority granted under applicable laws and regulations.
Legitimate Interest	Where the processing is necessary to fulfill the legitimate interests of Arupa or a third party, while continuing to have regard to the purpose, necessity, and balance with your rights.	System security, fraud prevention, and analysis of aggregate Service usage.

6. Management and Retention of Personal Data

Arupa stores and retains Personal Data only for as long as necessary to fulfill the processing purposes described in this Privacy Notice, or for the period required under applicable laws and regulations, including for tax, accounting, archiving, and dispute resolution purposes.

Retention periods are determined by taking into account the type and sensitivity of the data, the purpose of processing, the duration of the business relationship, Arupa's applicable legal obligations, and whether any dispute or legal proceeding is ongoing.

Details of the retention periods for each category of Personal Data are set out in Arupa's internal Data Retention Policy and may be adjusted from time to time based on operational needs and applicable laws and regulations.

Once the retention period has ended and there is no longer a lawful basis for retaining the Personal Data, We will permanently delete or destroy such Personal Data, or anonymize it so that it can no longer be linked to your identity.

For Personal Data processed based on consent, such as *newsletter* subscriptions and the use of analytics *cookies*, Personal Data may be retained until you withdraw consent or unsubscribe, while having regard to Arupa's needs and obligations to retain information relating to such withdrawal of consent.

If you submit a request to delete your Personal Data before the retention period ends, We will process such request in accordance with applicable provisions. Deletion may be carried out to the extent there is no legal obligation, legitimate interest, or other basis requiring Arupa to retain such Personal Data.

7. Sharing and Disclosure of Personal Data

Arupa may share and/or disclose Personal Data to third parties to the extent necessary for the provision and management of the Services, to fulfill legal obligations, or for other purposes permitted under applicable laws and regulations.

7.1 Technical Service Providers (Sub-Processors)

Arupa works with third-party technology service providers to support its operations and the provision of the Services, including in the provision of infrastructure and virtualization, billing systems, communication and collaboration, and website analytics.

Such service providers may only access Personal Data to the extent necessary to perform the functions and services provided to Us, and are required to maintain the confidentiality of and protect Personal Data in accordance with applicable provisions and the agreement binding them to Arupa.

7.2 Reseller and Channel Partners

If you obtain or use Arupa's Services through a reseller or channel partner, Arupa may share Personal Data necessary for the registration, provision, management, and support of the Services.

Such partners are required to maintain confidentiality and protect Personal Data in accordance with applicable provisions and the agreement binding them to Arupa.

7.3 Legal Authorities

Arupa may disclose Personal Data to government agencies, law enforcement officials, or other authorized parties where such disclosure is required or permitted under applicable laws and regulations, pursuant to a lawful order or request from an authorized authority, or where necessary to protect a person's life and safety. To the extent permitted under applicable laws and regulations, We will endeavor to notify you before making such disclosure.

7.4 Business Transfer

In the event of a merger, acquisition, restructuring, sale, or transfer of part or all of Arupa's business, your Personal Data may be transferred to the parties involved in such transaction to the extent necessary for the purpose of the transaction and in accordance with applicable laws and regulations.

We will take reasonable steps to ensure that the recipient of the Personal Data applies a level of protection for Personal Data consistent with applicable provisions. We will also provide you with notice of such transfer to the extent required or permitted under applicable laws and regulations.

8. Security of Personal Data

Arupa implements reasonable technical and organizational security measures appropriate to the nature and risk of the processing to protect your Personal Data from unauthorized access, use, disclosure, alteration, loss, or destruction.

The systems supporting Our business operations and the provision of Our Services are designed and managed with regard to applicable information security practices and relevant security standards.

Technical Security

- Communications between your device and Arupa's systems are protected using encryption protocols consistent with applicable security standards;
- Data stored on Arupa's systems is protected using encryption mechanisms consistent with applicable security standards;
- Arupa employees' access to Personal Data is restricted based on job requirements and granted authorization;
- Access to certain accounts and systems is protected with additional security mechanisms according to security needs.

Organizational Security

To support the security of Personal Data, We implement organizational measures that may include:

- Training and raising employee awareness of information security and Personal Data protection;
- Restricting access to Personal Data based on the principles of least privilege and need-to-know;
- Implementing procedures to deactivate or revoke access when employees no longer have authorization to access systems or Personal Data;
- Conducting periodic security testing and evaluation according to needs and risk; and
- Applying appropriate security and Personal Data protection requirements to vendors and Sub-Processors that work with Arupa.

9. Your Rights as a Personal Data Subject

In accordance with Law Number 27 of 2022 on Personal Data Protection ("**PDP Law**"), and other applicable laws and regulations, you have rights as a Personal Data Subject whose data is processed by Arupa. Arupa is committed to respecting and facilitating the exercise of such rights in accordance with applicable provisions.

9.1 Right to Obtain Information

You have the right to obtain information regarding the processing of your Personal Data, including the purpose of processing, the types of Personal Data processed, and other relevant information as required under applicable laws and regulations.

This Privacy Notice constitutes one form of the information Arupa provides regarding its Data processing activities.

9.2 Right of Access

You have the right to request access to your Personal Data processed by Arupa and to obtain a copy of such Personal Data in accordance with applicable laws and regulations.

To fulfill such request, We may verify your identity to ensure that access to Personal Data and/or copies of Personal Data is provided only to you or to another authorized party.

9.3 Right to Rectification

You have the right to request the correction and/or updating of Personal Data that is inaccurate, incomplete, or does not reflect the actual circumstances.

For certain Personal Data that can be updated independently through Arupa's customer portal, you may make such changes directly on Arupa's customer portal.

9.4 Right to Erasure

You have the right to request the deletion and/or destruction of Personal Data in accordance with applicable provisions, including where such Personal Data is no longer used for its processing purpose or where there is another basis giving you the right to request deletion and/or destruction.

Such request may not be fulfilled where Arupa has a lawful basis to retain the Personal Data, including where there is a legal obligation, a need to resolve a dispute, or another interest permitted under applicable laws and regulations.

9.5 Right to Restrict Processing

You have the right to request restriction of the processing of Personal Data in certain circumstances in accordance with applicable laws and regulations, including where there is an objection or dispute regarding the accuracy of the Personal Data or the lawfulness of its processing.

9.6 Right to Data Portability

In certain circumstances in accordance with applicable laws and regulations, you have the right to obtain the Personal Data you have provided to Us in a structured, commonly used format, or to request that such Personal Data be transmitted to another Data Controller.

The exercise of this right depends on the nature of the Personal Data, its basis for processing, and applicable laws and regulations.

9.7 Right to Object to Processing / Opt-Out

In certain circumstances, you have the right to object to the processing of your Personal Data in accordance with applicable laws and regulations.

For marketing communications, you may stop receiving marketing communications by using the *unsubscribe* link provided in such communications. Opting out of marketing communications does not affect the provision of Services you are currently using.

9.8 Right Not to Be Subject to Decisions Based Solely on Automated Processing

You have the right not to be subject to a decision based solely on automated processing that produces legal effects concerning you or similarly significantly affects you.

9.9 How to Exercise Your Rights

To exercise your rights as a Personal Data Subject, you may submit your request to Arupa via privacy@arupa.id including:

1. Email subject: [Personal Data] - *The title of your request*
2. Email body:
 - a. Your full name and the email address registered with Arupa's Services;
 - b. The type of right you wish to exercise; and
 - c. An explanation of the request you are submitting.

Arupa may request additional information or carry out identity verification where necessary to ensure security and to prevent requests from being submitted by unauthorized parties.

10. Special Policy: Data of Minors

Arupa's Services are intended for **business (B2B)** customers and individuals who are **18 (eighteen) years of age or older**. We do not knowingly collect Personal Data from minors.

If you know or believe that a minor has provided Personal Data to Us without the consent of a parent or lawful guardian, you may promptly contact Us in accordance with the provisions of Section 9.9. We will take reasonable steps to verify this and, where necessary, delete or destroy such Personal Data in accordance with applicable laws and regulations.

11. Changes to This Privacy Notice

Arupa may change, update, or adjust this Privacy Notice from time to time to reflect changes to the Services, technology, Personal Data processing activities, or applicable laws and regulations.

Any change will be published in the latest version of this Privacy Notice, indicating the date of the change or revision. We will provide access to the latest version of the Privacy Notice through Arupa's website.

Where such change materially affects your rights or the processing of your Personal Data, We will provide notice in accordance with applicable laws and regulations.

12. How to Submit Questions or Complaints

If you have any questions, concerns, requests, or complaints regarding this Privacy Notice or Arupa's processing of your Personal Data, you may contact Us by mail to Our head office address or by email as set out below:

PT Arupa Cloud Nusantara

EightyEight@Kasablanka Tower A 18th Floor

Jl. Casablanca Raya Kav. 88

Jakarta 12870

e: privacy@arupa.id

We will endeavor to ensure that any complaint you submit is handled and resolved in a timely manner and in accordance with applicable provisions.