

Insight App Privacy Policy

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Version: 1.0

This Privacy Policy governs the manner in which Insight App collects, uses, maintains, and discloses personally identifiable information collected from users (each, a "User") of the Insight App mobile app registered on the App Store and Google Play Store (the "Service").

By creating an account or using the Service, you acknowledge that you have read and understood this Privacy Policy and agree to the collection and processing of your personal data as described herein.

Insight App reserves the right to update this Privacy Policy from time to time to remain relevant and up-to-date with changes in technology, applicable laws, and evolving user needs. We recommend you check this page periodically to ensure you are aware of any changes.

This Privacy Policy is prepared in accordance with applicable laws and regulations in the Republic of Indonesia, including Law No. 27 of 2022 concerning Personal Data Protection (Undang-Undang Perlindungan Data Pribadi). Where relevant, we also comply with other applicable regulations governing electronic systems and digital services in Indonesia.

Information Collection

Insight App collects User data with the aim of managing and improving the experience of using the Site and/or Service. The User data collected is as follows:

Information you give us

Data submitted directly by the User. Users must provide accurate data, including but not limited to data submitted when the User:

- Creates or updates a Insight App account, including username, email address, phone number, password, and profile photo

- Contacts Insight App, including through customer service or feedback forms
- Uses features that require permission to access the User's device (e.g., camera for profile photo)
- Provides information in the course of using the Service, including content uploaded or published on the Site or app
- Sends any other information they choose to submit to us

Information we collect automatically

When you use our Service, we automatically collect certain information about your device and usage, including:

- IP address, geographical location, browser type, and device type
- Referral source, length of visit, and number of page views
- Stock categories, screens, and groupings you browse or save
- Search queries and filters you apply within the app
- Features and pages you access, and how frequently

Information from third-party sources

We may also receive information from third-party sources, including:

- Marketing and notification service providers
- Publicly available sources
- Market data providers who supply the financial data displayed within Insight App. These providers supply financial and market information to Insight App for display within the Service. We do not share your personal data with these providers. They provide data to us and do not receive your personal information in return.

Account Deletion

You may request to delete your account at any time. When your account is deleted:

- Your profile, saved screens, watchlists, and other content you have added will be deleted
- You will not be able to retrieve content you have added
- You will not be able to reactivate your account

- Your email address and phone number can no longer be used for future registration
- Your username cannot be used for future registration

Please note:

- Information shared by other users about you is not part of your account and will not be deleted when you delete your account
- Deleting your Insight App account will not remove information indexed by search engines (such as Google or Bing), as we have no control over those platforms
- Some information may be retained in our systems as required by applicable law or for legitimate business purposes such as fraud prevention

To request account deletion, go to: Account > Profile Settings > Delete Account, or contact our customer support team at support@insightapp.id.

Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

Specifically:

- Account data (e.g., name, email, phone number) is retained for the duration of your account and deleted within 30 days of account deletion.
- Usage and activity data (e.g., search history, browsing behavior within the app) is retained for up to 12 months.
- Subscription and payment-related data will be retained for up to 10 years in accordance with applicable tax and accounting regulations.
- Data retained for fraud prevention or legal compliance will be kept only as long as necessary for those purposes.

Your Data Rights

As a user of Insight App, you have the following rights regarding your personal data:

- **Right to Access** — You have the right to request a copy of the personal data we hold about you.

- **Right to Correct** — You have the right to request correction of any inaccurate or incomplete personal data we hold about you.
- **Right to Delete** — You have the right to request deletion of your personal data, subject to certain legal obligations that may require us to retain some information.
- **Right to Restrict Processing** — You have the right to request that we limit how we use your personal data in certain circumstances.
- **Right to Data Portability** — You have the right to request a copy of your personal data in a structured, commonly used, and machine-readable format.
- **Right to Object** — You have the right to object to the processing of your personal data for direct marketing or other purposes based on legitimate interest.

To exercise any of these rights, please contact us at support@insightapp.id. We will respond to your request within 14 (fourteen) working days or within the timeframe required under applicable laws and regulations.

International Data Transfer

Insight App is operated by PT Integrasi Informasi Investasi, a company based in Indonesia. Your personal data is primarily stored and processed in Indonesia.

In some cases, your data may be transferred to and processed in countries outside Indonesia, for example when we use third-party service providers such as cloud storage, analytics, or marketing platforms that operate internationally.

When transferring your data internationally, we ensure that:

- The receiving country has an adequate level of data protection recognized by applicable law, or
- Appropriate safeguards are in place, such as contractual agreements that require the recipient to protect your data to the same standard as required under Indonesian law.

By using Insight App, you consent to your data being transferred and processed as described above. If you have any concerns about international data transfers, please contact us at support@insightapp.id.

Legal Basis for Processing

We process your personal data based on the following legal grounds:

- **Consent** — Where you have given us explicit consent to process your data for a specific purpose, such as receiving marketing communications, enabling camera access for profile photos, or importing contacts to find friends. You may withdraw your consent at any time by contacting us at support@insightapp.id or adjusting your device settings.
- **Contractual Necessity** — Where processing is necessary to provide you with the Service you have requested, such as creating and managing your account, enabling app features, and delivering financial market data.
- **Legal Obligation** — Where we are required to process your data to comply with applicable laws and regulations, such as retaining financial data for the period required by Indonesian financial regulations.
- **Legitimate Interest** — Where processing is necessary for our legitimate business interests, such as improving the app, preventing fraud, ensuring security, and analyzing usage patterns to enhance user experience. We ensure that our legitimate interests are not overridden by your rights and interests.

If you have any questions about the legal basis on which we process your personal data, please contact our Data Protection Officer at support@insightapp.id.

No Automated Decision-Making

Insight App does not use your personal data to make automated decisions that produce legal effects or similarly significant effects concerning you.

While we may use analytics to personalize content, market data displays, or feature recommendations, such processing does not involve automated decision-making that materially impacts your legal rights or financial status.

Push Notifications

Insight App may send you push notifications to keep you informed about market updates, account activity, and other relevant information. You can manage your push notification preferences at any time through:

- The Settings feature within the Insight App, under Notifications, or
- Your device settings (iOS: Settings > Notifications > Insight App, Android: Settings > Apps > Insight App > Notifications)

Please note that disabling push notifications may mean you miss important updates related to your account or the market data you follow.

User Choice and Transparency

Mobile devices (iOS, Android, etc.) have settings that prevent the app from accessing certain data without your consent. iOS devices will notify you when the app first requests access to certain data, while Android devices will notify you when the app is first loaded. By using the app and granting access, you have given your consent to this Privacy Policy.

You can access and update your information — including email address, phone number, date of birth, gender, and profile photo — at any time through the Settings feature in the app.

Phone Number and Contacts

We will never scan or import your contacts unless you explicitly ask us to. If you choose to do so, we will only use your contact information to help you find friends or other users on Insight App.

Information Disclosure

In addition to disclosures reasonably necessary for the purposes identified elsewhere in this Privacy Policy, we may disclose information about you:

- To the extent that we are required to do so by law
- In connection with any legal proceedings or prospective legal proceedings
- In order to establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention
- To the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling

Minors

Insight App is only available to persons who are at least 18 (eighteen) years old. By creating an account or subscribing to paid features, you represent and warrant that you are at least 18 years old.

We do not knowingly collect personal data from anyone under the age of 18. If we discover that a user is under 18, we will immediately suspend and delete their account and associated data. If you believe we may have collected data from an underage individual, please contact us at support@insightapp.id.

Security

We will take reasonable precautions to prevent the loss, misuse, or unauthorized alteration of your personal information. Our security measures include:

- Encryption of data in transit and at rest
- Two-factor authentication (2FA) available for your account
- Regular security reviews and access controls
- Restricted access to personal data — only authorized personnel can access it

If you choose to publish information about yourself in your public profile or in posts you publish on the Site (both optional), this information will be publicly available on the internet.

Data transmission over the internet is inherently not fully secure, and we cannot guarantee the security of data sent over the internet. You are responsible for keeping your password and account details confidential. We will never ask you for your password (except when you log in).

Data Breach Notification

In the event of a data breach that results in unauthorized access, disclosure, alteration, or destruction of your personal data, we will take immediate steps to contain and assess the incident.

Where required by applicable law, we will notify affected users and the relevant regulatory authorities within the legally prescribed timeframe.

We will also provide guidance on steps you may take to protect yourself where appropriate.

Third-Party Services and Websites

Users may find links to third-party sites and services within our platform. We do not control the content or links on those sites and are not responsible for the practices of websites linked to or from our Site. Those sites may have their own privacy policies and terms of service, and your use of them is subject to their own terms.

Insight App works with third-party data providers to display market data, financial information, and other content within the app. This data is provided under agreements with those providers and is displayed with their approval. We do not independently verify the accuracy of all third-party data and are not responsible for errors or omissions in third-party content.

When using any third-party services accessible through our Service, you must agree to comply with the terms of service and privacy policies of those third-party providers.

The financial and market data provided within Insight App is for informational purposes only and does not constitute investment advice, financial advice, or a recommendation to buy or sell any financial instrument.

Users are solely responsible for their investment decisions, and Insight App is not liable for any losses arising from reliance on information provided through the Service.

Cookies

Cookies are small files that are automatically saved to your device when you visit our Site. They help us manage and improve your experience while using the Service.

We use the following types of cookies:

- **Essential Cookies** — Required for the app and website to function properly. These cannot be disabled as they are necessary for core features such as login and security.
- **Analytics Cookies** — Used to understand how users interact with our Service, including which pages are visited most and how users navigate the app. We use Google Analytics for this purpose.
- **Preference Cookies** — Used to remember your settings and preferences, such as language or display settings, to personalize your experience.
- **Marketing Cookies** — Used to deliver relevant advertisements and track the effectiveness of our marketing campaigns. These are only activated if you consent.

When you first visit our Site, you will be asked to consent to the use of non-essential cookies. You may withdraw your consent at any time by adjusting your browser or device settings. Please note that disabling certain cookies may affect the functionality of some features.

If you do not want your data tracked by Google Analytics, you can use the Google Analytics Browser Add-On Opt-Out available at tools.google.com/dlpage/gaoptout.

In-App Analytics Opt-Out

In addition to web-based analytics, we also collect usage data within the Insight App mobile app to help us understand how users interact with our features and improve the overall experience.

You can opt out of in-app analytics tracking at any time through:

- The Settings feature within the Insight App, under Privacy > Analytics, or
- Your device settings:
 - iOS: Settings > Privacy & Security > Tracking, then disable tracking for Insight App

- Android: Settings > Google > Ads > Opt out of Ads Personalization

Please note that opting out of analytics does not affect your ability to use the app, but it does limit our ability to personalize and improve your experience.

Changes to This Policy

Insight App reserves the right to update this Privacy Policy from time to time to remain relevant and current with changes in technology, applicable laws, and the evolving needs of our users. We recommend checking this page periodically to stay informed of any updates.

We consider the following to be significant changes that will be communicated via in-app notification or email at least 30 days before they take effect:

- Changes to the types of personal data we collect
- Changes to how we share or disclose your data to third parties
- Changes to your data rights or how you can exercise them
- Changes to our data retention periods
- Changes to the legal basis on which we process your data
- Changes to our international data transfer practices

For minor changes such as clarifications, corrections, or formatting updates, we will update the policy on this page without prior notice. The date of the latest update will always be displayed at the top of this policy.

Your continued use of the Service after any changes to this Privacy Policy constitutes your acceptance of the updated policy.

Data Protection Officer

PT Integrasi Informasi Investasi has designated a Data Protection Officer (DPO) to oversee compliance with applicable data protection laws and to handle any data-related complaints or inquiries.

If you have any concerns about how your personal data is being collected, used, or stored, or if you wish to exercise any of your data rights as outlined in this Privacy Policy, you may contact our DPO directly:

Data Protection Officer

PT Integrasi Informasi Investasi

Email: support@insightapp.id

We are committed to resolving any data-related complaints promptly and fairly. If you are not satisfied with our response, you may have the right to lodge a complaint with the relevant data protection authority in your country.

Contact Us

If you have any questions about this Privacy Policy or wish to exercise your rights over your personal data, please contact us:

PT Integrasi Informasi Investasi

Sampoerna Strategic Square, 24th Floor,
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