# **EBARA** Group Personal Information Protection Policy (Privacy Policy)

EBARA CORPORATION and its affiliated companies (hereinafter referred to as the "Group") recognize that it is their social responsibility as a company to appropriately protect the personal information they hold, and in acquiring, using and providing personal information, they will comply with the "Act on the Protection of Personal Information" and other applicable laws and regulations concerning the protection of personal information and privacy protection, as well as generally accepted practices as fair and appropriate and guidelines, etc., for the handling of personal information, and will handle personal information appropriately.

In addition, our Group will clarify the rules and regulations concerning the handling of personal information, and will make every effort to ensure that all employees are aware of them so that they handle personal information appropriately.

Personal information refers to address, name, telephone number, and other information that can identify the person as a particular individual (including information that falls under "Personal information" as defined in Article 4 of the EU General Data Protection Rules (hereinafter referred to as "GDPR")).

# Chapter 1. Handling of Personal Information in Our Group

- 1 Purpose of Use and Legal Basis
- Our Group uses personal information for the following purposes based on the following legal basis.
- (1) Business Partner Information
  - (Name, address, phone number, e-mail address, place of work, address of work, department, position, etc.)
    - Processing is necessary for the performance of a contract to which the data subject is party
      - For execution and performance of agreements, including provision of goods and services and management after execution of agreements
      - For maintenance, management and aftersales service of provided goods and services
      - For communication necessary to provide goods and services and shipment of goods, etc.
      - For provision of information related to goods and services and information related to any other business activities of our Group
      - For invoice and acceptance of charges for goods and services and preservation of claims
      - For responses to enquiries and opinions to our Group
      - For execution and performance of agreements with business partners, management after execution of agreements and any other necessary communication to business partners
      - For implementation of various measures to construct and maintain smooth relationships with business partners and provision of various accommodations
      - For reimbursement of business partners' expenses
      - For cases where it is necessary to perform the business operations of our Group
  - 2 Processing is necessary for the purposes of the legitimate interests pursued by our Group or by a third party
    - For provision of information and advertisement delivery on goods and services by e-mail through analysis of browsing history and trading history, etc.
    - For provision of information and advertisement delivery on goods and services by e-mail through analysis of opening history of e-mails and website browsing history, etc., of business partners in Japan
    - For market research and other research and studies through analysis of trading history, etc.
    - For promotion of prizes and campaigns, etc.
    - For provision of information on meetings, etc., of organizations which our Group hosts or belongs to and any other necessary communication
    - For activities related to CSR (corporate social responsibility)
    - For management of the utilization status of the facilities and equipment
    - For audits (including internal control audits)
    - For other purposes as described in "5. Sharing of Personal Information"

3 Based on the consent of the data subject

• For improvement of goods and services through analysis of browsing history of our Group website

# (2) Shareholder information

(Name, address, number of shares held, acquisition date, etc.)

- Processing is necessary for compliance with a legal obligation to which our Group is subject;
  - For exercising of rights and performing obligations under the Companies Act
  - For management of shareholders, including preparation of data of shareholders in accordance with the standards specified under various laws
- 2 Processing is necessary for the purposes of the legitimate interests pursued by our Group or by a third party
  - To provide facilities to those who hold the status of a shareholder
  - To implement various measures in order to promote a smooth relationship with our shareholders

# (3) Recruitment information

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(Name, address, gender, date of birth, etc.)

- Processing is necessary for the purposes of the legitimate interests pursued by our Group or by a third party
  - For internship and recruitment selection services (including use in questionnaires for reference in future recruitment activities)
  - For provision of corporate information and necessary contact with applicants and candidates for employment with our Group
  - For processing information on applicants who have been hired as a result of the recruitment screening as personnel information for us after joining our Group
  - For using as basic data for the determination of hiring/rejection
  - For sending information on our Group's events, etc. to prospective employees
  - For reference in making hiring/rejection decisions through AI analysis of interview results

If a supplier does not wish to provide personal information to our group, the supplier may not provide personal information to our group; provided, however, that if personal information is not provided, it may interfere with the provision of our Group's services or the performance of the contract.

# 2 Storage Period of Personal Information

Our Group stores recruitment information for a maximum of seven years after retirement and that of rejected applicants for a maximum of one year after completion of recruitment activities. Other personal information shall be stored only for the period necessary to achieve the above-listed purposes of acquisition and use. The specific retention period will be determined in consideration of the purpose for which personal information is acquired and used, the nature of personal information, and the legal or operational necessity to maintain personal information.

#### 3 Provision to Third Parties

Our Group will not provide personal information to any third party except under any of the following conditions; provided, however, the provision as a result of joint use or consignment does not fall under the category of disclosure or provision to a third party:

- (1) With the consent of the data subject;
- (2) In accordance with laws and regulations of each country;
- (3) When it is necessary for the protection of life, body, or property of a person and it is difficult to obtain the consent of the data subject;
- (4) In cases in which it is particularly necessary for the improvement of public health or the promotion of the sound upbringing of children and in which it is difficult to obtain the consent of the data subject;
- (5) In cases in which cooperation is necessary for the State or local public entities, etc. to conduct public affairs and in which the consent of the data subject may hinder the execution of such affairs; or
- (6) Provision upon succession of business due to merger, company split, transfer of business or for other reasons.

# 4 Handling of Entrustment

Our Group may entrust part of its business activities and provide personal information to subcontractors to the extent necessary to achieve the purpose of use. In this case, our Group shall properly manage and supervise the outsourcees, including the conclusion of contracts for the handling of personal information with these outsourcees.

Types of outsourcees obtaining personal information are, for example, consultants, recruitment agents, cloud service companies, and training companies.

# 5 Sharing of Personal Information

Our group will share personal information as follows:

(1) Sharing by Group Companies

In order to comprehensively provide goods and services relating to the business handled by our Group (hereinafter simply referred to as "goods and services") throughout our Group, we will share personal information obtained by our Group as follows only when necessary for business and permitted by law within our Group.

1 Scope of Sharers

Our Group (including overseas group companies)

\*Please refer to this <u>link</u> for group companies in Japan and to this <u>link</u> for overseas group companies.

- 2 Purpose of Use by Sharers
  - For comprehensive provision of goods and services throughout our Group
  - For execution and performance of agreements, including provision of goods and services and management after execution of agreements
  - For execution and performance of agreements with business partners, management after execution of agreements and any other necessary communication to business partners
  - For implementation of various measures to construct and maintain smooth relationships with business partners and provision of various accommodations
  - For reimbursement of business partners' expenses
  - For audits (including internal control audits)
  - For our Group as a whole to implement activities related to CSR (corporate social responsibility)
  - For provision of information related to goods and services and information related to any other business activities of our Group
  - For provision of information and advertisement delivery on goods and services by e-mail through analysis of browsing history and trading history, etc.
  - For provision of information and advertisement delivery on goods and services by e-mail through analysis of opening history of e-mails and website browsing history, etc., of business partners in Japan
  - For processing information on applicants who have been hired as a result of the recruitment screening as personnel information for us after joining our Group
  - For provision of corporate information and necessary contact with applicants and candidates for employment with our Group
  - For responses to enquiries and opinions to our Group
  - For improvement of goods and services through analysis of browsing history of our Group website
  - For cases where it is necessary to perform the business operations of our Group
- 3 Items of Personal Information to be Shared
  - Name
  - Contact information (address, phone/fax number, e-mail address, etc.)
  - Work address information (company name, representative name, department name, position, address, phone/fax number, e-mail address, etc.)
  - School information (school name, address, phone and fax number, e-mail address, etc.)
  - Contents of inquiries, requests, goods and services and other purchasing histories, information on contract details, information on goods uses, etc.
    - Private business partner's expense payment account (bank, account, name holder)
- Person Responsible for the Management of Personal Information EBARA CORPORATION
   Address: 11-1 Haneda-Asahi-cho, Ota-ku, Tokyo
   Representative: Masao Asami, President and CEO
- (2) Sharing of Contact Information such as Business Cards by Group Companies Our Group will share the following personal information, such as business cards exchanged between our business partners and our Group employees and contact information in e-mail signature block obtained by our Group employees, with our domestic and overseas group companies.
  - 1 Scope of Sharers
    - Our Group (including overseas group companies)

\*Please refer to this <u>link</u> for group companies in Japan and to this <u>link</u> for overseas group companies.

- 2 Purpose of Use by Sharers
  - For execution and performance of agreements, including provision of goods and services and management after execution of agreements
  - For execution and performance of agreements with business partners, management after execution of agreements and any other necessary communication to business partners
  - For implementation of various measures to construct and maintain smooth relationships with business partners and provision of various accommodations
  - For provision of information related to goods and services and information related to any other business activities of our Group
  - For provision of information and advertisement delivery on goods and services by e-mail through analysis of opening history of e-mails and website browsing history, etc. of business partners in Japan
  - For responses to enquiries and opinions to our Group
  - For cases where it is necessary to perform the business operations of our Group
  - Items of Personal Information to be Shares
  - Name

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- Phone Number
- Address
- E-mail address
- Workplace information (company name, department/section, position, address, phone number, fax number)
- Contents of business transactions (information contained in transactions with business partners, inquiries, requests, and opinions)
- Information on how our business partners, including cookies and action logs on our website, used our Group website
- Person Responsible for the Management of Personal Information EBARA CORPORATION Address: 11-1 Haneda-Asahi-cho, Ota-ku, Tokyo

Representative: Masao Asami, President and CEO

(3) Share by our Group partner companies

In order to provide goods and services promptly, we will share personal information obtained by our Group with our Group and our partner companies to which our Group outsources sales, maintenance, aftersales services, and other services related to the provision of goods and services, only as required by business and permitted by law.

- 1 Scope of Sharers Our Group and cooperating companies to whom we entrust business related to the provision of goods and services
- 2 Purpose of Use by Sharers
  - For the prompt provision of goods and services
  - For concluding and fulfilling contracts for goods and services, management after-contract, and otherwise communicating as required
  - For provision of information on goods and services and other information related to business activities handled by our Group
  - For response to inquiries regarding goods and services
  - In the event it is required for the performance of business handled by our Group
  - Items of Personal Information to be Shared
    - Name

3

- Contact information (address, phone/fax number, e-mail address, etc.)
- Workplace information (company name, department name, title, address, phone/fax number, e-mail address, etc.)
- Contents of inquiries, requests, goods and services and other purchasing histories, information on contract details, information on goods uses, etc.
- 4 Person Responsible for the Management of Personal Information EBARA CORPORATION

Address: 11-1 Haneda-Asahi-cho, Ota-ku, Tokyo Representative: Masao Asami, President and CEO

6 Transfer Outside of Japan

Our Group may provide personal information to Group companies overseas. In this case, our Group company will take the necessary measures for the transfer outside the country in accordance with the laws and regulations of each country.

Some of the overseas Group companies that receive personal information are located in third countries that are not sufficiently certified by the Japan Personal Information Protection Commission or the European Commission, but our Group has concluded data transfer agreements with group companies that share such information in order to protect Personal information at an adequate level.

In this case, our Group will take the appropriate safeguards necessary for international data transfer such as the EU standard contractual clauses.

Please refer to this <u>link</u> for the EU standard contractual clauses.

# 7 Matters Concerning Safety Management Measures

Our Group has taken measures to prevent leakage, loss, or destruction of personal information and other appropriate management measures as follows:

- (1) Formulation of the Privacy Policy
  - This Privacy Policy has been established to ensure proper handling of personal information and to notify the contact point for questions and complaint handling.
- (2) Development of Disciplines Regarding the Handling of Personal Data
  - Formulate personal information protection rules for handling methods, managers/staff in charge, and their duties at each stage of acquisition, use, storage, provision, deletion, disposal, etc.
- (3) Systematic Security Control Measures

• Appointed a person responsible for the handling of personal data (Personal Information Protection Supervisor).

- · Clarify the extent of personal data to be handled by the employee handling personal data and the employee.
- Establishment of a system to notify the Personal Information Protection Supervisor of any fact or sign of violation of laws or internal regulations
- Conduct periodic self-inspections of the status of the handling of personal information, and conduct audits by other departments and outside parties as necessary.
- (4) Human security control measures
  - Conduct periodical training for the employees regarding issues to be noted concerning processing of personal information
  - Describe provision about obligation of confidentiality regarding personal information on internal rules
- (5) Physical security control measures
  - In areas where personal information is handled, measures are implemented to control the entry and exit of employees and to restrict equipments etc., brought in, and to prevent unauthorized persons from accessing personal information.
  - Take measures to prevent theft or loss of equipment, electronic media, documents, etc., handling personal information.
  - Take measures to prevent personal information from being easily identified when carrying equipments, electronic media, etc., that handle personal information, including moving within the business office.
- (6) Technical security control measure
  - · Implement access control to limit the extent of personnel in charge and personal information handled
  - Introduced a mechanism to protect information systems that handle personal information from unauthorized access from outside or from unauthorized software.
- (7) Grasping the external environment
  - Our Group implements safety management measures after understanding the system for protecting personal information in foreign countries where cloud servers that store a portion of personal information are located.

The major systems for protecting personal information in foreign countries can be found on the website of the Personal Information Protection Committee below.

https://www.ppc.go.jp/personalinfo/legal/kaiseihogohou/#gaikoku

#### 8 For Automated Decision Making

Our Group will not use personal information provided to make automated decisions, including profiling.

9 Handling of Personal Information for Persons under the Age of 16

Personal information for those under the age of 16 must be provided with the consent of their guardians.

10 Request for Disclosure

You may have the following rights under applicable laws and regulations with respect to your personal information in the possession of our Group:

- (1) Request for withdrawal of consent;
- (2) Request for disclosure, correction, addition, or deletion of personal information;
- (3) Request for suspension of use or deletion of personal information or suspension of provision to a third party;
- (4) Request for data portability.

If you would like to make the above-listed request for our holding personal information, please contact us at the contact address listed in 11 below. Our Group will comply with the applicable laws and regulations to the extent reasonable after confirming the identity of the requesting party.

11 Request for inquiry and complaint

For inquiries or complaints about the handling of personal information of our Group, please contact us here.

12 Appeals to Supervisors

You have the right to object to the data protection authority having jurisdiction over your place of residence with respect to the processing of the relevant personal information in accordance with applicable laws and regulations. Data protection agencies in EU countries can be found at the following URL: (https://edpb.europa.eu/about-edpb/about-edpb/members\_en)

Contacts for Personal Information Manager and Data Protection Officer
 EBARA CORPORATION
 Address: 11-1 Haneda-Asahi-cho, Ota-ku, Tokyo
 Representative: Masao Asami, President and CEO
 DPO/ Personal Information Protection Supervisor: Toru Nakayama, Executive Officer of Ebara Corporation,
 Email: contact\_privacy@ebara.com
 Contact: Contact us here.

Our Group may revise this Personal Information Protection Policies in whole or in part if deemed necessary by our Group due to revision of laws and regulations, etc.

The revised contents will be effective when posted on our group's website, etc.

# Chapter 2. Handling of Personal Information for People Resident in the State of California, U.S.A.

In addition to Chapter 1, the provisions of Chapter 2 apply to the handling of personal information of persons residing in the State of California, U.S.A., in accordance with the California Consumer Privacy Act (California Consumer Privacy Act of 2018). In the event the contents stipulated in Chapter 1 conflict with those stipulated in Chapter 2, the provisions of Chapter 2 shall prevail.

By submitting information and/or engaging our services, you agree to let us collect and use your personal information as described in this Policy. Therefore, before you provide us with any Personal Information, you should read through this Policy in its entirety and understand its terms. We may update the Policy from time to time, so please check it occasionally.

# 1 Personal information obtained in the past 12 months

Our Group collects information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to any individual or a household ("Personal Information"). Our Group also collects non-Personal Information that cannot be linked or associated with any individual person or household. When non-Personal Information is combined with other information so that it does identify an individual person, we treat that combination as Personal Information. Our Group may collect, use, store and transfer different kinds of Personal Information about you.

The categories of personal information obtained by our Group in the past 12 months are as follows:

- Name, phone Number, address, E-mail address
- Workplace information (company name, representative name, department/section, position, address, phone number, fax number, E-mail address, etc.)
- School information (school name, address, phone and fax number, e-mail address, etc.)
- Contents of business transactions (information contained in transactions with business partners, goods and services and other purchasing histories, inquiries, requests, and opinions, information on goods uses)
- Private business partner's expense payment account (bank, account, name holder)
- Information on how our business partners, including cookies and action logs on our website, used our Group website

Our Group will not collect and use your information of a sensitive nature ("sensitive information"), such as concerning (a) social security number or other state identification number; (b) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (c) specific geolocation; (d) racial or ethnic origin, religious or philosophical beliefs, or union membership; (e) the contents of the individual's mail, email, or text messages, unless the business is the intended recipient of the communication; (f) genetic data; and (g) biometric data.

**Information You Provide to a Third Party.** Our Group does not control any websites operated by third parties and is not responsible for any information they may collect. The information collection practices of a third-party website are governed by its privacy policy. It is your choice to enter any such website. We recommend that you read the third-party's privacy policy if you choose to do so.

**Children's Privacy.** The website and other Group platforms are intended for adult use only and is not directed towards children, minors, or anyone under the age of 18. If you are under the age of 13, you are not authorized to provide us with any Personal Information. If the parent or guardian of a child under 13 believes that the child has provided us with any Personal Information, the parent or guardian of that child should contact us at this <u>link</u> to have this Personal Information deleted from our files.

**If You Do Not Provide Personal Information.** Where we need to collect Personal Information by law, or under the terms of a contract we have with you, and you do not provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

**Information We Collect When You Use Our Services.** Automated technologies or interactions. As is true of most websites, we receive and store certain types of Personal Information whenever you interact with us online. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. When you access and use our

website and platforms from your mobile devices, we receive data from that mobile device. This may include your device ID, location data, IP address and device type. You may manage how your mobile device and mobile browser share location information with us, as well as how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings. If you turn off your cookies, some of the features of the website may not function properly.

**Information We Collect From Third Parties.** The collection, use, and disclosure of Personal Information received from third parties is governed by the privacy policies listed on the website where the information was submitted by the user. Third parties may send their own cookies and pixel tags to you, and may collect information and use it in a way inconsistent with this Policy. Please carefully review these third-party privacy policies to understand how your information may be collected, used and disclosed by these third parties.

Third Party Service Providers. We collect Personal Information from service providers including payment processors and website hosting providers.

**Third Party Advertising Partners.** We collect Personal Information received from third party advertising partners, including partners who host and manage various online advertisements and ad platforms. This may be combined with the website analytics data described below.

**Your 'Do Not Track' Browser Setting.** Some web browsers incorporate a Do Not Track ("DNT") feature that signals to the websites that you visit that you do not want to have your online activity tracked. At this time, our website does not respond to DNT signals. Other third-party websites may keep track of your browsing activities when they provide you with content, which enables them to customize what they present to you on their websites.

# 2 Purpose of processing

Our Group collects, retains and processes personal information for the following purposes:

- For comprehensive provision of goods and services throughout our Group
- For execution and performance of agreements, including provision of goods and services and management after execution of agreements
- For execution and performance of agreements with business partners, management after execution of agreements and any other necessary communication to business partners
- For implementation of various measures to construct and maintain smooth relationships with business partners and provision of various accommodations
- For reimbursement of business partners' expenses
- For audits (including internal control audits)
- For our Group as a whole to implement activities related to CSR (corporate social responsibility)
- For provision of information related to goods and services and information related to any other business activities of our Group
- For provision of information and advertisement delivery on goods and services by e-mail through analysis of browsing history and trading history, etc.
- For processing information on applicants who have been hired as a result of the recruitment screening as personnel information for us after joining our Group
- For provision of corporate information and necessary contact with applicants and candidates for employment with our Group
- For responses to enquiries and opinions to our Group
- For improvement of goods and services through analysis of browsing history of our Group website
- For cases where it is necessary to perform the business operations of our Group
- 3 Processing and retention period of Personal Information

Our Group retains Personal Information only for the period necessary to achieve the purpose of processing mentioned in Section 2. The specific retention period is determined by taking into account the purpose for which personal information is collected and processed, the nature of Personal Information, and the need to maintain legal or business personal information.

# 4 Disclosure to third parties

We disclose your Personal Information with third parties only in the ways that are described in Chapter 2.

In addition to Chapter 1, Section 5 "Sharing of Personal Information", the categories of third parties in which our Group disclosed Personal Information over the past 12 months are as follows:

- (1) **Internal Third Parties.** We may share Personal Information with our parent company, subsidiaries, successors, assigns, licensees, affiliates, or business partners and others, including where disclosure of your Personal Information is needed to protect the employees, independent contractors, officers, directors, members, users, or shareholders of our Group who may use the Personal Information for the purposes described above.
- (2) **Business Transactions.** We may do business with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Information in the same way as set out in this Policy.
- (3) **Legal Process.** Subject to applicable law, we may disclose information about you (i) if we are required to do so by law, regulation or legal process, such as a subpoena; (ii) in response to requests by government entities, such as law enforcement authorities; (iii) when we believe disclosure is necessary or appropriate to prevent physical, financial or other harm, injury or loss; or (iv) in connection with an investigation of suspected or actual unlawful activity.

# 5 Sales to third parties

Like most companies, we allow certain third party advertising partners to place tracking technology such as cookies and pixels on our websites. This technology allows these advertising partners to receive information about your activities on our website, which is then associated with your browser or device. These companies may use this data to serve you more relevant interest based ads as you browse the internet. Under some state laws, sharing data for online advertising may be considered a "sale" of information. Except for this sharing, the Group does not sell any of your information. The Group has no actual knowledge of any sales of Personal Information of minors under 16 years of age.

# 6 Ability to access, update, and correct Personal Information

Our Group wants your Personal Information to be complete and accurate. You represent and warrant that all information you provide in connection with your use of the website will be complete and accurate, and that you will update that information as necessary to maintain its completeness and accuracy. To confirm the completeness and accuracy of, or make changes to, your Personal Information, please contact us at this <u>link</u>.

# 7 How we protect your Personal Information

While we endeavor to incorporate reasonable safeguards to help protect and secure your Personal Information, no data transmission over the Internet, mobile networks, wireless transmission or electronic storage of information can be guaranteed to be 100% secure. Therefore, we cannot guarantee its absolute security. It may be possible for third parties to intercept or access transmissions or private communications unlawfully. Any such transmission is done at your own risk.

# 8 California Privacy Rights

**California Consumer Privacy Act.** The California Consumer Privacy Act of 2018 ("CCPA") provides California residents with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

Upon verification of your identity you may:

- (1) No more than twice in any 12-month period, request disclosure of the following information:
  - Categories of Personal Information we collect.
  - Categories of sources from which Personal Information is collected.
  - Categories of Personal Information sold or disclosed to third parties.
  - Categories of third parties with whom such Personal Information is sold or disclosed.
  - Business or commercial purpose for collecting or selling Personal Information.
  - Specific pieces of Personal Information we collect.
- (2) Request deletion of your Personal Information, subject to the exceptions provided by law.
- (3) Opt-out from having your Personal Information sold to third parties, if applicable.

Please note that these rights apply only to select California consumers and exclude job applicants, employees, and

business contacts. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. Except where you have provided an agent with a Power of Attorney pursuant to Sections 4000 - 4465 of the California Probate Code, when using an authorized agent you must: (1) provide the agent with signed permission clearly describing their authority to make a request on your behalf; (ii) verify your own identity; and (iii) directly confirm that you have provided the authorized agent permission to submit the request. That agent must also be able to verify their identity with us and provide us with their authority to act on your behalf.

The verifiable consumer request initiated by you or your authorized agent must:

- Include your full legal name, email, and phone number, which we will need to contact you in order to verify that you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. One of our representatives will contact you in order to verify your identity. You may need to provide additional information in order to verify your request. Depending on the nature of the request, we may require additional verification actions be taken, including but not limited to providing a signed declaration under penalty of perjury that you are the consumer whose Personal Information is the subject of the request. We will only use this information to verify the requestor's identity or authority to make the request.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a product or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded.

The CCPA provides the right to be free from discrimination if you choose to exercise your rights under the statute, and we will not discriminate by:

- Denying you products or services.
- Charging you different prices or rates for products or services, including through granting discounts or other benefits, or imposing penalties.
- Providing you a different level or quality of products or services.
- Suggesting that you may receive a different price or rate for products or services or a different level or quality of products or services.

**Other California Privacy Rights.** California residents have the right to receive information that identifies any third party companies or individuals that our Group has shared your Personal Information with in the previous calendar year, as well as a description of the categories of Personal Information disclosed to that third party. You may obtain

this information once a year and free of charge by contacting us at the address below.

Please note that disclosure or deletion may make it impossible to provide services that were previously available or that are in line with your needs.

If you, as a California resident, want to exercise your right to know or delete under the CCPA, our Group has the following methods and contact information:

• Toll-free: +1-800-535-5376 Contact Us Form: https://www.ebaratech.com/about-ebara/contact/

You can exercise the right to opt out of the sale of your personal data to third parties through the "Do Not Sell My Personal Information" link.

9 Changes to this Policy

Our Group may modify or update this Policy from time to time. We encourage you to revisit this page often to remain fully informed of this Policy or you can contact us at any time to obtain the latest copy of this Policy.

10 Questions about this Policy

For questions or comments regarding our Policy, you should contact us by using the <u>Contact Us form</u>. You can also email us at info@ebaratech.com or write to us at: 51 Main Avenue, Sacramento, CA 95838.

# Chapter 3. Handling of Personal Information of People Resident in China

Our group will comply with the Personal Information Protection Act in China and related laws and regulations, appropriately handle personal information of those residing in China, and strive to protect their privacy. In addition to Chapter 1, the provisions of Chapter 3 shall apply to the handling of personal information of persons residing in China. In the event the contents stipulated in Chapter 1 conflict with those stipulated in Chapter 3, the provisions of Chapter 3 shall prevail.

#### 1 Personal Information to be Collected

In addition to the personal information listed in Chapter 1, the Group may collect the following personal information (including sensitive personal information) as recruitment information:

Ethnicity, contact information, school from which the data subject graduated, date of graduation, academic background, specialty, graduation table (applicants within one year of graduation), political party/organization to which (an individual) belongs, family register-related information (including location of family register), title, work status, job history, qualification, reason for retirement, salary wishes, department to which he or she belongs, position

(Sensitive Personal Information: ID card number, salary status, health information, marriage status, and family information (personal information of minors under the age of 14), information on how the business partners use the Group's websites, including cookies, website activity logs, etc.).

When collecting sensitive personal information as listed above, our Group will obtain the individual consent of the person concerned separately.

Sensitive personal information collected by our Group from persons residing in China is necessary for our Group's recruitment activities or for the improvement of our Group's goods and services, and does not affect your individual rights and interests.

Please note that our Group may process personal information without the consent of the individual in cases where there are legal reasons as defined the Personal Information Protection Law or other applicable laws in China.

# 2 Purpose of handling personal information

Our Group collects, retains, and uses personal information of persons residing in China for the purposes listed in Chapter 1, Section 1.

#### 3 Retention Period of Personal Information

Our Group retains employment information for a maximum of seven years after the employee leaves the company for hired candidates and for a maximum of one year after the end of the recruitment process for rejected candidates. Other personal information will be retained only for the legally permissible and necessary period of duration to achieve the purposes of collection and use listed above.

The specific retention period will be determined by taking into consideration the purpose of collecting and using the personal information, the nature of the personal information, and the legal or business necessity to retain the personal information.

- 4 Protection of Personal Information
- (1) Our Group has taken security measures in accordance with relevant laws, regulations, and industry standards to protect personal information and to prevent unauthorized access, disclosure, use, change, damage or loss of data. Our Group has established an organization for information management as a company, has implemented personnel measures such as education for officers and employees, and has taken technical measures concerning information security.
- (2) Our data security capabilities meet the standards required by labour inspectorates and cyber security competent departments in China.
- (3) Our Group will take all reasonable and practical measures to prevent unnecessary personal information from being obtained. Our Group stores personal information only for the period necessary to fulfill the purposes set forth in this privacy policy. Except as may be required or permitted by law to extend the storage period.
- (4) The network environment is not 100% secure. Our Group will use its best efforts to secure or ensure the security of the information that you send to our Group. Our Group is legally responsible for any unauthorized access, disclosure, tamper, or damage to your personal information resulting from damage to our Group's physical,

technical, or administrative shelters that adversely affects your legal rights and interests.

(5) In the event of a personal information security incident, our Group will inform you of the impact that is considered to be the basic status of the personal information security incident (type and cause of personal information leaked, falsified, or lost), the countermeasures that our Group has already implemented or is scheduled to implement, the proposals to you regarding self-prevention and risk reduction, and our Group's improvement measures to you without delay in accordance with laws and regulations. This information will be announced by e-mail, fax, telephone, push notification, etc., but in the event it is difficult to notify the personal information subject individually, the information will be disclosed appropriately and effectively.

At the same time, our Group will take the initiative in reporting the handling of personal information security incidents in accordance with regulatory requirements.

# 5 Your Rights

You have the following rights to your personal information held by our Group:

- Right to require access, correction or deletion of personal information based on withdrawal of consent, etc.
- Right to view and copy personal information
- The right to restrict or refuse the processing of personal information by persons other than our Group.

#### 6 Provision of Personal Information

Our Group will not share personal information with our Group companies or third parties without the express and individual consent of the person concerned. At present, our Group will obtain your consent to share your personal information with the following recipients:

Name of Recipient	Country of Recipient	Contact Information	Purpose of Processing	Method of Processing	Type of Personal Information
EBARA CORPORATION	Japan	contact_priv acy@ebara.c om	<ul> <li>To communicate with our Group regarding business transactions, etc.</li> <li>Purposes described in (1) and (2) of Chapter 1 "5 Sharing of Personal Information"</li> </ul>	Storage, use, processing, transmission, provision, disclosure, deletion	Types described in (1) and (2) of Chapter 1 "5 Sharing of Personal Information"
EBARA (CHINA) CO., LTD.	China	+86-10- 65000100	Purposes described in (1) and (2) of Chapter 1 "5 Sharing of Personal Information"	Same as above	Same as above
Ebara Machinery (China) Co., Ltd.	China	+86-10- 65309996	Same as above	Same as above	Same as above
EBARA GREAT PUMPS CO., LTD.	China	+86-577- 6532-2226	Same as above	Same as above	Same as above
EBARA MACHINERY ZIBO CO., LTD.	China	+86-533- 3919586	Same as above	Same as above	Same as above
EBARA DENSAN (QINGDAO) TECHNOLOGY CO., LTD.	China	office@edq- ebara.com	Same as above	Same as above	Same as above
EBARA REFRIGERATION EQUIPMENT&SYSTEM S (CHINA) CO., LTD.	China	+86-0535- 6322301	Same as above	Same as above	Same as above
EBARA QINGDAO CO.,	China	+86-532-	Same as above	Same as	Same as

LTD.		8486-2975		above	above	
EBARA Environmental		+86-0532-		40070	above	
Engineering ( China )	China	8163-2907	Same as above	Same as	Same a	as
6 6	Ciiiia	0105-2707	Same as above	above	above	
Co., Ltd						
SHANGHAI EBARA	<u></u>	+86-21-		Same as	Same a	as
PRECISION	China	6058-1899	Same as above	above	above	
MACHINERY CO., LTD.				~	~	
Xian Ebara Precision	China	+86-29-	Same as above	Same as		as
Machinery Co., Ltd.		8652-3712		above	above	
HEFEI EBARA		+86-551-		Same as	Same a	as
PRECISION	China	6264-0588	Same as above	above	above	<b>A</b> D
MACHINERY CO., LTD.				40010	uoove	
EBARA DENSAN	China	+86-512-	Same as above	Same as	Same a	as
(KUNSHAN) CO., LTD.	Ciiiia	5762-6121	Same as above	above	above	
EBARA PRECISION		+82-70-		Same as	Same a	
MACHINERY KOREA	Korea		Same as above			as
INCORPORATED		4716-3962		above	above	
EBARA VIETNAM		. 0.4		G	a	
PUMP COMPANY	Vietnam	+84-	Same as above	Same as		as
LIMITED		978493880		above	above	
EBARA Precision	~	+49 89	~ .	Same as	Same a	as
Machinery Europe GmbH	Germany	8006578-0	Same as above	above	above	
EBARA MACHINERY						
INDIA PRIVATE	India	+91	Same as above	Same as		as
LIMITED	mana	7995576570	Same as above	above	above	
EBARA PUMPS						
AMERICAS	U.S.A.	+1-803-327-	Same as above	Same as	Same a	as
CORPORATION	0.5.71.	5005	Same as above	above	above	
Ebara Pumps South		+55 19		Same as	Same a	as
America	Brazil	3641-9096	Same as above	above as	above	15
EBARA PUMPS		+971		~	a	0.0
MIDDLE EAST FZE.	UAE	554500445	Same as above			as
	Candi			above	above	
EBARA PUMPS SAUDI	Saudi	+973 66	Same as above	Same as		as
ARABIA LLC	Arabia	738727		above	above	
EBARA BOMBAS	Colombia	+57	Same as above	Same as		as
COLOMBIA S.A.S.		3208303555		above	above	
EBARA		+1-916-923-		Same as	Same a	as
TECHNOLOGIES	U.S.A.	7502	Same as above	above	above	~0
INCORPORATED						
EBARA PUMPS	Italy	+39 335	Same as above	Same as		as
EUROPE S.p.A.	itary	8302743		above	above	
EBARA PUMPS	Spain	+34 91 692	Same as above	Same as	Same a	as
IBERIA, S.A.	Span	36 30	Same as above	above	above	

7 Provision of Personal Information Overseas

In principle, personal information obtained in China is stored in China.

Our group may, with your consent, share your personal information with our Group companies outside China (See table below for specific information). Our Group will also take other security measures before providing personal information outside of China.

Name of Recipient	Country of Recipient	Contact Information	Purpose of Processing	Method of Processing	Type of Personal Information	Method of exercising rights
		Same as "6	Same as "6	Same as "6	Same as "6	Contact
EBARA		Provision of	Provision of	Provision of	Provision of	"Contact
CORPORATION	Japan	Personal	Personal	Personal	Personal	Information"
CORFORATION		Information"	Information"	Information"	Information"	of "6
		above	above	above	above	Provision of

						Personal Information"
EBARA PRECISION MACHINERY KOREA INCORPORATED	Korea	Same as above				
EBARA VIETNAM PUMP COMPANY LIMITED	Vietnam	Same as above				
EBARA Precision Machinery Europe GmbH	Germany	Same as above				
EBARA MACHINERY INDIA PRIVATE LIMITED	India	Same as above				
EBARA PUMPS AMERICAS CORPORATION	U.S.A.	Same as above				
Ebara Pumps South America	Brazil	Same as above				
EBARA PUMPS MIDDLE EAST FZE.	UAE	Same as above				
EBARA PUMPS SAUDI ARABIA LLC	Saudi Arabia	Same as above				
EBARA BOMBAS COLOMBIA S.A.S.	Colombia	Same as above				
EBARA TECHNOLOGIES INCORPORATED	U.S.A.	Same as above				
EBARA PUMPS EUROPE S.p.A.	Italy	Same as above				
EBARA PUMPS IBERIA, S.A.	Spain	Same as above				

# 8 Transfer of Personal Information

Our Group does not transfer personal information to any company, organization, or individual, except as follows: If the transfer of personal information involves mergers, acquisitions, or declaration of bankruptcy, our Group will notify you of the name and contact information of the new company or organization to which your personal information is transferred and require them to continue to be bound by this policy, or, if not, require the new company or organization to again require your consent.

9 Handling of Personal Information of Minors under the Age of 14

When handling the personal information of minors under the age of 14, our Group shall obtain the prior individual consent of the parent or other guardian of the minor.

When handling the personal information of minors under the age of 14 with the consent of the parent or other guardian of the minor, such personal information will be handled only when legally permissible, the parent or other guardian of the minor consents, or when necessary for the protection of minors under the age of 14.

When our Group discover that our Group has collected personal information of minors under the age of 14 without the prior confirmed consent of the minor's parents or other guardian, our Group will delete such personal information immediately.

10 Update of this privacy policy

When this privacy policy is updated, the previous version of this privacy policy will be archived for your reference and obtain your consent if required by law.

# 11 Inquiries

If you have any questions or comments regarding this privacy policy, please contact the following contact address:

- EBARA (CHINA) CO., LTD.
   Address : Unit 2804-2806, North Tower, Beijing Kerry Centre, 1 Guanghua Road, Chaoyang District, Beijing, P.R.China TEL : +86-10-65000100
- Ebara Machinery (China) Co., Ltd. Address: No.303, Beijing Fortune Plaza, No.7, Dongsanhuan Zhonglu Road, Chaoyang District, Beijing, 100020 P.R.China Tel: +86-10-65309996 Fax: +86-10-65308516
- EBARA GREAT PUMPS CO., LTD.
   Address: NO.111, Fengdu 1st Road, Tangxia Town, Ruian City, Zhejiang, P.R.China TEL: +86-577-6532-2226
- EBARA MACHINERY ZIBO CO., LTD. Address: No.517, Zunxian Road, New&Hi-tech Industrial Development Zone, Zibo, Shandong Province, China. TEL: +86-533-3919586
- EBARA DENSAN (QINGDAO) TECHNOLOGY CO., LTD. Address: No. 216 Shuang Yuan Road, Cheng Yang District, Qingdao office@edq-ebara.com.
- EBARA REFRIGERATION EQUIPMENT&SYSTEMS(CHINA)CO., LTD.Address: No.720, Yongda Road, New & High-Tech Zone, Fushan District, Yantai, Shandong, China 265500 Office Office: +86-535-6322301 6322300
- EBARA QINGDAO CO., LTD. Address: 1 Banghai Rd. Sifang Qingdao, Shandong Province 266042, P.R.China TEL: +86-532-8486-2975 Fax:86-532-84862983
- EBARA Environmental Engineering (China) Co., Ltd Address : Room 8203-2-2, 2F, Yufang Hailian Office Building, Indian Ocean Road No.1, Qingdao West Coast Comprehensive Bounded Area, Qingdao Area of the Shandong FTZ, Qingdao, Shandong, China TEL : +86-0532-8163-2907
- SHANGHAI EBARA PRECISION MACHINERY CO., LTD. Address: 268 Xiangke Road, 3/F, 303, 305, Zhangjiang Hi-Tech Park, Pudong, Shanghai 201210, P.R.China TEL: +86-21-6058-1899
- Xian Ebara Precision Machinery Co., Ltd. Address: 1709 Zongsi Road, High-tech Comprehensive Bonded Zone, Xi'an, Shaanxi Province, P.R.China
- HEFEI EBARA PRECISION MACHINERY CO., LTD.
- Address: No.4273 Tiandu Road, Hefei Economic and Technological Development Area, Hefei P.R.China
  EBARA DENSAN (KUNSHAN) CO., LTD
  - Address: No.521 Qingyang North Road, Zhoushi Town, Kunshan City, Jiangsu Province, P.R. China

If you are not satisfied with our Group's response, particularly if the processing of your personal information by our Group violates your legal rights and interests, you may refer to the courts of your jurisdiction for resolution.

Date of last update: 18 October 2023

# Chapter 4. Handling of Personal Information of People Resident in the European Economic Area and the UK

Our Group will comply with the EU General Data Protection Regulation (hereinafter referred to as the "GDPR") and related laws and regulations, and appropriately process and protect the privacy of your Personal Information located in the European Economic Area (hereinafter collectively referred to as the "EEA") consisting of EU Member States, Norway, Iceland and Liechtenstein, as well as in the processing of Personal Information located in the UK in accordance with the UK GDPR.

In addition to Chapter 1, the provisions of Chapter 4 shall apply to the handling of personal information of persons residing in the EEA and the UK. In the event the contents stipulated in Chapter 1 conflict with those stipulated in Chapter 4, the provisions of Chapter 4 shall prevail.

1 Personal Information collected and processed

The purpose of processing, legal basis and retention period of personal information obtained by our Group are as follows:

Item of Personal Information	Purpose of Processing	Legal basis	Storage period
[Required Information] Name, place of employment, department, position, address, phone number, e- mail address [Contact information (free description field)] Religion, wedding anniversary, graduated university, contact information (when and	<ul> <li>To communicate with customers regarding business transactions</li> <li>To use for various sales measures</li> </ul>	Performance of contract (including pre- contract) and Legitimate interest	Ongoing business relationships, including trading
where business cards were exchanged), types of social networking sites used, level of interest in the company, business objectives and challenges, hobbies, hometown, family structure, career and previous employment information, medical history, smoking status, qualifications			
Name, name of supplier's company, position, address, phone number, e-mail address, bank details of company	To contact of business & delivery and payment of goods	Performance of contract (including pre- contract) and Legitimate interest	Ongoing business relationships, including trading
<ul> <li>Name, address, phone/fax number, e-mail address</li> <li>Work address information (company name, department name, position, address,</li> </ul>	<ul> <li>For comprehensive provision of goods and services throughout our Group</li> <li>For execution and performance of agreements, including provision of goods and services and management after execution of agreements</li> </ul>	Performance of contract and Legitimate interest	Ongoing business relationships, including trading

(1) Business Partner Information

<ul> <li>phone/fax number, e-mail address)</li> <li>School information (school name, address, phone and fax number, e-mail address)</li> <li>Contents of inquiries, requests, goods and services and other purchasing histories, information on contract details, information on goods uses</li> <li>Private business partner's expense payment account (bank, account, name holder)</li> </ul>	<ul> <li>For execution and performance of agreements with business partners, management after execution of agreements and any other necessary communication to business partners</li> <li>For implementation of various measures to construct and maintain smooth relationships with business partners and provision of various accommodations</li> <li>For reimbursement of business partners' expenses</li> <li>For audits (including internal control audits)</li> <li>For our Group as a whole to implement activities related to CSR (corporate social responsibility)</li> <li>For provision of information related to goods and services and information related to any other business activities of our Group</li> <li>For provision of information and advertisement delivery on goods and services by e-mail through analysis of browsing history and trading history</li> <li>For provision of corporate information and applicants who have been hired as a result of the recruitment screening as personnel information for us after joining our Group</li> <li>For provision of corporate information and necessary contact with applicants and candidates for employment with our Group</li> <li>For responses to enquiries and opinions to our Group</li> <li>For responses to enquiries and services through analysis of browsing history of ur Group</li> </ul>		
<ul> <li>Name, phone number, address, email address, workplace information (company name, department, position, address, phone number, fax number),</li> <li>Details of transactions (information contained in correspondence with business partners, inquiries, requests, and opinions)</li> <li>Information on how</li> </ul>	<ul> <li>For execution and performance of agreements, including provision of goods and services and management after execution of agreements</li> <li>For execution and performance of agreements with business partners, management after execution of agreements and any other necessary communication to business partners</li> <li>For implementation of various measures to construct and maintain smooth relationships with business partners and provision of various accommodations</li> <li>For provision of information related</li> </ul>	Performance of contract (including pre- contract) and Legitimate interest	Ongoing business relationships, including trading

business partners use our group's website, including cookies and activity logs on the website	<ul> <li>to goods and services and information related to any other business activities of our Group</li> <li>For responses to enquiries and opinions to our Group</li> <li>For cases where it is necessary to</li> </ul>	
	perform the business operations of our Group	

#### (2) Recruitment information

Item of Personal Information	Purpose of Processing	Legal basis	Storage period
Name, address, gender, birth date, phone number, email address, graduated university, hobbies, hometown, family structure, career, work experience, qualifications, education information, previous employment information, disability, etc.	<ul> <li>To contact applicants regarding recruitment activities or use as basic data</li> <li>To decide whether to hire or reject applicants</li> </ul>	Performance of contract and Legitimate Interest	Approved applicant: the data are stored as employee data Rejected applicant: the data are deleted after 6 months

Please note that where the provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into a contract, you are obliged to provide such Personal Information. In the absence of such Personal Information, we may not be able to provide with the products or services that you have requested.

We will not collect and use your information of a sensitive nature ("sensitive information"), such as concerning race or ethnic background, religion, philosophical beliefs, political opinions, social status and trade union affiliation, health data and medical history, sexual life and preferences, genetic data, biometric data, criminal record, and the fact of having fallen victim to a crime, unless required by applicable laws or with your consent.

#### 2 Disclosure of Personal Information with third parties

Our Group may disclose your personal information to group companies and audit corporation within the scope of the purposes of processing.

#### 3 Your rights

You have the following rights to your personal information held by our Group:

- Right to request access
- Right to request rectification
- Right to request deletion
- Right to request restriction processing
- Right to request for data portability
- Right to object to processing (including for marketing purposes)
- Right to withdraw consent at any time if the personal information is collected on consent
- Right to lodge a complaint with the data protection authority that has jurisdiction in the country where the processing of Personal Information relating to you is taking place (please refer to the list provided by the EDPB here).

#### 4 Transfer of personal information outside the EEA or the UK

Our Group may, transfer personal information from the EEA or the UK to third parties located in countries outside the EEA or the UK within the extent of the Purpose of Processing. The European Commission has issued an

adequacy decision for Japan in 2019<sup>1</sup>. Some foreign group companies that receive personal information are located in third countries that are not recognized by the European Commission as having data protection laws which provide the same level of protection for personal information as the EEA or the UK, but the company has entered into data transfer agreements with our group companies to ensure a sufficient level of personal information protection. In this case, our Group will take the appropriate safeguards necessary for international data transfer such as the EU standard contractual clauses.

# 5 Update of this privacy policy

When this privacy policy is updated, the previous version of this privacy policy will be archived for your reference.

# 6 Inquiries

The data controller for Personal Information that is collected from individuals in the EEA/UK is the EEA/UK legal entity listed in the link below:

https://www.ebara.co.jp/en/corporate/locations/global-network/eme.html

If you have any questions or comments regarding this privacy policy, please contact the following contact address:

DPO: EBARA CORPORATION 11-1 Haneda-Asahi-cho, Ota-ku, Tokyo Toru Nakayama (Toru NAKAYAMA) <u>Contact\_privacy@ebara.com</u>

<sup>&</sup>lt;sup>1</sup> Commission Implementing Decision (EU) 2019/419 of 23 January 2019 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequate protection of personal data by Japan under the Act on the Protection of Personal Information (Text with EEA relevance), C/2019/304/, OJ L 76, 19.3.2019, p. 1–58

Chapter 5. Handling of Personal Information of People Resident in Korea

Our group will comply with the Personal Information Protection Act in Korea and related laws and regulations, appropriately handle personal information of those residing in Korea, and strive to protect their privacy.

In addition to Chapter 1, the provisions of Chapter 5 shall apply to the handling of personal information of persons residing in Korea. In the event the contents stipulated in Chapter 1 conflict with those stipulated in Chapter 5, the provisions of Chapter 5 shall prevail.

1 Legal Bases for Processing Personal Information

Notwithstanding the other legal bases for processing personal information set forth in Chapter 1, we will process your personal information pursuant to legal bases under applicable laws, such as the Personal Information Protection Act. For example, if consent is required for processing your personal information, we will obtain your consent.

- Personal information to be obtained
   In addition to the personal information listed in Chapter 1, Our Group may acquire the following personal information:
   Company address, birth date, job information.
- 3 Transfer of personal information Specifically, our group transfer personal information to third parties as below.

Provision of personal inf	formation to third parties		
Third party recipients	Purposes of using personal information	Items of personal information provided	Periods of retention by such recipients of personal information
Please see the following link. • Group companies in Korea <u>https://www.ebara.</u> <u>co.jp/corporate/loc</u> <u>ations/global-</u> group/index.html	Contacting, etc., regarding transactions with our Group Same as above	Name, workplace, department, position, telephone number, e-mail address. Name, workplace, department, address, telephone number, e-mail address.	During trading period 2 years after the end of trading
<ul> <li>Please see the following link.</li> <li>Group companies in Japan https://www.ebara. co.jp/corporate/loc ations/group/index</li> <li>.html</li> <li>Group companies outside Japan https://www.ebara. co.jp/corporate/loc ations/global- group/index.html</li> </ul>	Purposes described in (1) and (2) of Chapter 1 "5 Sharing of Personal Information"	Items described in (1) and (2) of Chapter 1 "5 Sharing of Personal Information"	Ongoing business relationships, including trading

• <u>Provision of personal information to third parties</u>

- 4 Procedures/methods for Destruction of Personal Data
  - Procedures of destruction
    - We select the personal information to be destroyed (i.e., personal information whose purpose of processing is achieved or whose retention period has expired) and destroy it with the approval of our Data Protection Officer.
  - Method of destruction If printed on paper, the personal information will be destroyed by shredding, incinerating, or some other similar method and, if saved in electronic form, the data will be destroyed by technical methods (e.g., Low Level Format) which ensure that the data cannot be restored or recovered.
- 5 Cookies and Other Tracking Mechanisms

When accessing the service via a web browser, we may automatically collect information using web technologies like cookies. When you access the Services, cookies may be used to personalize your experience. A cookie is a small text file that is placed on your device and used to collect information about your activity. Many web browsers allow you to limit the use of cookies. You can find more information about cookies and how to manage them at www.allaboutcookies.org. We have also included a few helpful links should you choose to do so here: Google Chrome, Internet Explorer, Firefox, Safari, and Opera. However, please be advised that when you limit or turn off certain cookies, certain functions or features of the Services may no longer be available to you.

6 Handling of Personal Information for Persons under the Age of 14 Notwithstanding Section 9 of Chapter 1, personal information for those under the age of 14 must be provided with the consent of their guardians.

# 7 Chief Privacy Officer

Ebara Precision Machinery Company Korea Inc. and Ebara Fluid Machinery Korea Co., Ltd. have designated a Chief Privacy Officer to handle questions and complaints related to the processing of the personal information of users in South Korea. The Chief Privacy Officer may be contacted by using the following information.

- Ebara Precision Machinery Company Korea Inc. Chief Privacy Officer: Ok Hyun Sook Position: Chief Privacy Officer Department: Internal Control Email: jeong.hyuntaek@ebara.com
- Ebara Fluid Machinery Korea Co., Ltd. Chief Privacy Officer: Kuhwan Kim Position: Chief Privacy Officer Division: Administration Division Email: privacy.efmk@ebara.com

# Chapter 6. Handling of Personal Information of People in Brazil

Our group will comply with the Brazilian Personal Data Protection Law, Law No. 13.709/2018 ("LGPD"), and related laws and regulations, appropriately handle personal information of those located in Brazil, and strive to protect their privacy.

In addition to Chapter 1, the provisions of Chapter 6 shall apply to the handling of personal information of persons located in Brazil or data collected in Brazil. In the event the contents stipulated in Chapter 1 conflict with those stipulated in Chapter 6, the provisions of Chapter 6 shall prevail.

# **1** Personal Information to be Obtained

In addition to the personal information listed in Chapter 1, Our Group may acquire the following personal information:

CPF, RG, PIS, CTPS, CNH, gender, birth date.

# 2 Handling of Personal Information for Persons under the Age of 12

Personal information for those under the age of 12 must be provided with the consent of their guardians.

# 3 Transfer outside Brazil

Our Group may provide personal information to Group companies overseas. In this case, our Group company will take the necessary measures for the transfer outside the country in accordance with the laws and regulations of each country.

Some of the overseas Group companies that receive personal information are located in third countries that are not sufficiently certified by the Brazilian National Data Protection Authority ("**ANPD**"), but our Group has concluded data transfer agreements with group companies that share such information in order to protect Personal information at an adequate level.

For information on protecting personal information to provide personal information to companies outside Brazil (including a copy of a Data Transfer Agreement concluded by our Group), please contact our DPO.

#### 4 Your rights

According to LGPD, an individual has certain rights in relation to their personal information. Some of these rights will only apply in certain circumstances. If an individual would like to exercise, or discuss, any of these rights they should submit their request in writing or email to our DPO and provide sufficient information to allow us to understand the scope of the request, if applicable. These rights include:

- Confirmation: confirmation of the existence of the processing.
- Access: an individual has the right to obtain information regarding the processing of their personal data and access to particular personal data we hold about the individual.

• Correction: an individual is entitled to request that any incomplete or inaccurate personal data we hold about the individual is corrected.

• Erasure, block or anonymization: an individual has the right to request that we erase, block or anonymize their personal data in certain circumstances, such as when unnecessary or excessive data is processed in noncompliance with the provisions of the law or when processing is based on consent. Please note that there may be circumstances where you may ask us to erase, block or anonymize your personal data but we are legally entitled to retain it. We hold personal data where we are bound by regulations or other laws to retain this personal data. Data is retained in line with the Retention Policy.

• **Portability**: portability of the data to another service provider or product provider, subject to commercial and industrial secrets.

• **Objection**: where we are processing personal data based on legitimate interests (or those of a third party) an individual may challenge this. However, we may be entitled to continue processing personal data based on our compelling legitimate interests or where this is relevant to legal claims.

• Information on data sharing: request information about entities with which we shared data and information

• **Information on consent**: – information about the possibility of denying consent and the consequences of such denial

• **Revocation**: revocation of consent.

• Automated Decision Making: we currently do not carry out any automated decisions based on your

personal data. In case we do, you will have the right to request for the review of decisions made solely based on automated processing of personal data affecting your interests.

• Appeal to supervisory authority: You have the right to petition in relation to your data against our Group before the ANPD: www.anpd.com.br

# 5 Storage Period of Personal Information

Our Group stores recruitment information for a maximum of 2 years after retirement and rejection employees for a maximum of 1 month after completion of recruitment activities. Other personal information shall be stored only for the period necessary to achieve the above-listed purposes of acquisition and use. The specific retention period will be determined in consideration of the purpose for which personal information is acquired and used, the nature of personal information, and the need to maintain legal or business personal information.

# 6 **Protection of Personal Information**

(1) Our Group has taken security measures in accordance with industry standards to protect personal information and to prevent unauthorized access, disclosure, use, change, damage or loss of data. Our Group has established an organization for information management as a company, has implemented personnel measures such as education for officers and employees, and has taken technical measures concerning information security.

(3) Our Group will take all reasonable and practical measures to prevent unnecessary personal information from being obtained. Our Group stores personal information only for the period necessary to fulfill the purposes set forth in this privacy policy. Except as may be required or permitted by law to extend the storage period.

(4) The network environment is not 100% secure. Our Group will use its best efforts to ensure or ensure the security of the information that you send to our Group. Our Group is legally responsible for any unauthorized access, disclosure, tamper, or damage to your personal information resulting from damage to our Group's physical, technical, or administrative shelters that adversely affects your legal rights and interests.

(5) In the event of a personal information security incident, our Group will inform the person of the impact that is considered to be the basic status of the personal information security incident, the countermeasures that our Group has already implemented or is scheduled to implement, the proposals to the person regarding self-prevention and risk reduction, and our Group's improvement measures to the person without delay in accordance with laws and regulations. This information will be announced by e-mail, fax, telephone, push notification, etc., but in the event it is difficult to notify the personal information subject individually, the information will be disclosed appropriately and effectively.

At the same time, our Group will take the initiative in reporting the handling of personal information security incidents in accordance with regulatory requirements.

# 7 Update of this privacy policy

When this privacy policy is updated, the previous version of this privacy policy will be archived for your reference.

# 8 Inquiries

If you have any questions or comments regarding this privacy policy, please contact the following contact address:

# EBARA BOMBAS AMERICA DO SUL LTDA. (BRAZIL)

Address: Rua Joaquim Marques de Figueiredo 2-31, CEP 17034-290 Bauru S.P., Brazil

DPO: Rodrigo Bovo rodrigo.bovo@ebara.com.br

# Chapter 7. Handling of Personal Information of Persons Residing in India

You hereby consent to the collection, use, processing, disclosure or transfer of (i) your personal information as set out under Chapter 1; and (ii) your sensitive personal data or information as defined under the (Indian) Information Technology Act, 2000 and its underlying rules (**Privacy Rules**), by our Group for the purposes stated in Chapter 1 of this privacy policy (**Policy**) and in accordance with the Privacy Rules. Sensitive personal data or information as defined under the Privacy Rules, means password, financial information such as bank account or credit card or debit card or other payment instrument details, physical, physiological and mental health condition; sexual orientation; medical records and history and biometric information.

In addition to Chapter 1, the provisions of Chapter 7 apply to the handling of personal information or sensitive personal data or information of persons residing in India, in accordance with the Privacy Rules. In the event the contents stipulated in Chapter 1 conflict with those stipulated in Chapter 7, the provisions of Chapter 7 shall prevail, in relation to any personal information or sensitive personal data or information of persons residing in India.

Our Group will comply with applicable Indian laws, including the Privacy Rules to appropriately handle personal information of those residing in India, and strive to protect their privacy.

# 1. Purpose

- (a) Our Group collects, uses, processes, discloses, or transfers personal information or sensitive personal data or information, for the purposes set out under Chapter 1, and you consent to the processing of personal information or sensitive personal data or information, for each such purpose.
- (b) When our Group collects, uses, or processes sensitive personal data or information from you, it does so if the collection, use or processing of such sensitive personal data or information is considered necessary for the purpose stated in this Policy and on the basis of your consent. If there is any change in the purpose for which sensitive personal information is processed or the recipients with which sensitive personal information is shared, the relevant Group entity will obtain your written consent, either by way of letter, fax or any other physical or electronic means.

#### 2. Retention Period

(a) Our Group stores personal information or sensitive personal data or information for such period as may be required to achieve the purposes set out under this Policy, or as may be required to comply with applicable laws.

# 3. Security Measures

(a) In addition to the security measures set out under Chapter 1, our Group has taken reasonable security measures in accordance with industry standards to protect personal information and to prevent unauthorized access, disclosure, use, change, damage or loss of data that are commensurate with international standards such as IS/ISO/IEC 27001.

# 4. Sharing

(a) We will share or entrust sensitive personal data or information set out under Chapter 1, to outsourcees as identified under Chapter 1, only with your consent.

# 5. Transfer Of Personal Information Outside India

(a) In addition to the security measures set out under Chapter 1, our Group may, with your consent, share your sensitive personal data or information within our Group or outsourcees set out under Chapter 1, which may be located outside India (**Overseas Recipient**), subject to such Overseas Recipient maintaining the same or better level of data protection that is required under the Privacy Rules.

# Chapter 8. Handling of Personal Information in the Republic of Colombia

In addition to Chapter 1, the provisions of Chapter 8 apply when the handling of personal information is carried out in the territory of the Republic of Colombia or when the controller or processor of the Personal Information, that is not established in Colombia, shall apply Colombian law by virtue of rules and international treaties, in accordance with the laws of the Republic of Colombia including Law 1581 of 2012 and Decree 1377 of 2013 as amended from time to time. In the event the contents stipulated in Chapter 1 conflict with those stipulated in Chapter 8, the provisions of Chapter 8 shall prevail.

1 Controller

EBARA BOMBAS COLOMBIA S.A.S. Address: Calle 98 No. 70-91 Piso 10 Of. 1016 Centro Empresarial Pontevedra, Bogotá, Colombia E-mail: rodrigo.bovo@ebara.com.br Telephone: +57-601-8269865

# 2 Handling

The information contained in our Group's databases shall be subject to different forms of handling such as collection, exchange, updating, processing, reproduction or compilation, analysis, reporting, circulation, conservation, storage, use, systematization and organization, rectification and deletion of personal data, all of them partially or totally in compliance with the purposes set forth in this policy. The information may be delivered, transmitted or transferred to public entities, commercial partners, contractors, affiliates, subsidiaries, only in order to comply with the purposes of the corresponding database.

The collection of personal data of the data subject may be done through direct and/or personal delivery by any means of physical or electronic contact between the data subject and the responsible or its processor(s). It may also collect personal data indirectly through publicly available sources and other available sources.

3 Rights of the data subject

In accordance with this policy and the applicable regulations, the data subject may exercise the following rights with respect to the personal data that are subject to handling by our Group:

- (1) To know, update and rectify his personal data. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or data whose handling is expressly prohibited or has not been authorized.
- (2) Request proof of the authorization granted for the handling, except when expressly exempted as a requirement for the handling.
- (3) To be informed by the responsible or the eventual processor, upon request, regarding the use given to his personal data.
- (4) File complaints before the Superintendency of Industry and Commerce of Colombia for breaches of the provisions of this policy and the applicable regulations. The data subject or the authorized persons by him may only file complaints before the Superintendency of Industry and Commerce of Colombia once the consultation or complaint process established in this policy has been completed.
- (5) To revoke the authorization and/or request the deletion of the personal data when the handling does not fulfill the constitutional and legal principles, rights and guarantees, applying the procedure of the complaint process. The request for deletion and/or revocation of the authorization shall not proceed when the data subject has a legal or contractual duty to remain in the database.
- (6) Access, free of charge, to his personal data that have been subject to handling, for which the subject shall send a written request to the responsible.
- (7) The data subject has the right to choose not to provide any sensitive information as defined by Colombian law, related, among others, to data on racial or ethnic origin, membership in trade unions, social or human rights organizations, political, religious, sex life, biometric or health data.
- (8) The handling of information of children and adolescents is prohibited except for those data that are of a public nature and when such handling complies with the following parameters and requirements: (i) that it responds to and respects the best interests of children and adolescents; (ii) that it ensures respect for their fundamental rights; and (iii) the data of minors shall be collected in order to affiliate them to compensation and social security funds as beneficiaries.

The provision of personal data of minors is optional and must be done with the authorization of the parents or legal representatives of the minor.

The rights of the data subject may be exercised by the following persons: (i) by the data subject, who must sufficiently prove his or her identity; (ii) by the successors of the subject, who must prove such capacity; (iii) by the data subject's representative and/or proxy, upon proof of representation or power of attorney; (iv) by stipulation in favor of another or for another; and (v) in the case of children and adolescents, by the persons who are empowered to represent them.

The truthfulness, authenticity, validity and accuracy of the information provided by the subject or the authorized persons is the responsibility of the subject and the subject undertakes to notify our Group of any changes to such information.

#### 4 Consultation and complaint procedure

The data subject or the persons authorized by him, who considers that the data should be corrected, updated or deleted, or that alleges breach of any of the duties contained in the applicable regulations, may file a complaint, or may consult his personal data by means of a written communication containing at least the following information:

- (1) name of the data subject and copy of the documents proving him as such;
- (2) contact details (telephone, email, address);
- (3) clear and precise description of the personal data with respect to which he seeks to exercise any of the rights or description of the personal data regarding which the consultation is required;
- (4) clear and precise description of the complaint, the facts that give rise to the claim and the documents to be asserted or clear and precise description of the consultation request;
- (5) in the event of request for correction and/or update of the personal data, also indicate the modifications to be made and provide the documentation supporting the request;
- (6) in the event that the complaint or consultation procedure is requested from a person authorized by the data subject, the communication shall also contain the name of the authorized person and a copy of the documents accrediting him as such.

Said documents shall be sent to the e-mail address rodrigo.bovo@ebara.com.br with the subject "Request for consultation of personal data" or "Personal data complaint request" respectively.

For consultation requests the following rules apply:

The request will be responded within a maximum period of ten (10) business days from the date of receipt thereof. When it is not possible to answer the request within such term, the data subject shall be informed, stating the reasons for the delay and the date on which the request will be answered, which in no case may exceed five (5) business days following the expiration of the first term.

The data subject shall have the right to consult his personal data free of charge: (i) at least once every calendar month; and (ii) whenever there are substantial modifications to the policy that motivate new consultations. For consultations whose frequency is greater than one per calendar month, our Group may charge the data subject for the costs of sending, reproduction and, if applicable, certification of documents. In any case, the reproduction costs shall not be higher than the recovery costs of the corresponding material.

# For complaints the following rules will apply:

If the information in the claim is erroneous and/or insufficient and/or incomplete, our Group will request, within five (5) business days of receipt of the claim, that you provide the information and/or elements and/or documents necessary to process the complaint. After two (2) months from the date of the request, without the applicant submitting the required information and/or elements and/or documents, the claim shall be deemed to have been withdrawn.

Once the complete claim has been received and within a term no longer than two (2) business days, a legend will be included in the database stating "claim in process" and the reason for the claim. Said legend shall be maintained until the claim is decided.

In any case, our Group shall attend to the data subject's complaint within a maximum term of fifteen (15) business days from the day following the date of its receipt. When it is not possible to address the claim within such term, the interested party shall be informed of the reasons for the delay and the date on which the claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.

In the event that the person who receives the claim is not competent to resolve it, he/she shall transfer it to the appropriate person within a maximum term of two (2) business days and shall inform the interested party of the situation.

# 5 Transfer and transmission of personal data

Our Group may transfer the personal data in order to comply with its legal and/or commercial obligations.

The recipients of the personal data are obliged to maintain the confidentiality of the personal data and to comply with the Policy.

The international transmission and transfer of personal data shall be made in accordance with the applicable information protection laws.

# 6 Effective Date

This privacy policy shall be in effect and its provisions shall be effective as of 1 December 2022. The handling and databases shall last as long as it is reasonable and necessary, in accordance with the purposes that justified it, taking into account the provisions applicable to the matter in question and the administrative, accounting, fiscal, legal and historical aspects of the information. In any case, the personal data shall be kept when so required for compliance with a legal or contractual obligation.