KOMATSU

GENERAL PRIVACY POLICY

Last updated: 30/09/2026

I. SCOPE

1.1. With this Privacy Policy Komatsu Europe International NV (hereinafter: “KOMATSU”, “we”, “us”, “our”) wishes to inform you about the collection, use and disclosure of your personal data whenever:

(i) you use any of our websites (https://www.komatsu.eu, http://komatsu-deutschland.de, http://komatsu-germany.eu, https://webshop.komatsu.eu, https://smartconstruction.io; hereinafter collectively: “Website”) or visit our social media pages;
(ii) you communicate with us via phone, video calls, chat, text message, email, contact forms or any other form of digital communication;
(iii) we invite you to, or meet you at, a fair, summit or other event, either hosted by us or a third party;
(iv) you visit our company premises;
(v) you are or represent a supplier;
(vi) you are or represent a customer;
(vii) you apply for a vacancy at our company;
(viii) you wish to report a breach using our whistleblowing channel or you are mentioned in a report (such as the person concerned by the report or witnesses) or are a facilitator.

1.2. Information on how we process your personal data through cookies, social media plug-ins, tracking pixels and similar technologies used in our Websites, portals and cloud services can be found in our dedicated cookie policies or in the consent management platforms available or implemented on our Websites, portals and cloud services.

1.3. When you are a Komatsu employee or temporary working in our premises on Komatsu digital infrastructure, the processing of your personal data in your role as employee or temporary worker is explained in our dedicated privacy policies addressed to our employees and temporary workers. This Privacy Policy only applies in a complementary manner for our employees and temporary workers, and this to the extent that any subject matter covered herein is not also specifically mentioned in these dedicated privacy policies.

1.4. When you use one or our online portals, services (e.g. mobile applications, cloud services available through APIs, etc.) or connected products (e.g. construction, mining or quarry machines equipped with telematics capabilities, jobsite monitoring solutions, geolocalization devices, etc.), you can find the information on our processing your personal data through such portals, services and connected products in the Privacy Policy for Komatsu Portals, Products and Services, available at https://www.komatsu.eu/en/data-services-and-telematics.

1.5. This Privacy Policy does not apply to personal data processing activities for which we do not determine the purposes and/or the means because they are managed completely by one of our subsidiaries. Examples are for instance the collection of your personal data when you apply for a position in one of our subsidiaries, the local use of CCTV, or the keeping of a visitor log when you visit the premises of one of our subsidiaries. In such cases, you will be informed about the processing of your personal data by the local entity responsible for the processing of your personal data.

1.6. This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Websites link. The mere fact that we include a link on one of our Websites does not imply our endorsement of that linked site or service. We have no control over, and are not responsible for, this third party's collection, use and disclosure of your personal data.

II. WHO WE ARE

2.1. Your personal data are processed by Komatsu Europe International NV, a corporation organised and existing under the laws of Belgium, with registered office at 1800 Vilvoorde, Belgium, Mechelsesteenweg 586, registered in Brussels under number RPR/CER(0)404.968.268. KOMATSU is responsible and therefore the controller for the purposes for processing your personal data as set forth herein.

2.2. All your inquiries, requests and complaints regarding to the subject matter covered in this Privacy Policy can be addressed to KOMATSU by sending an e-mail to PrivacyOffice@komatsu.eu, through which you can reach the Privacy Office. For security reasons we ask that you never include credit card details, business secrets or other sensitive information in the emails which you send to that email address.

2.3. We are part of a larger group of companies with headquarters in Japan. Your personal data may be shared with our headquarters Komatsu Ltd., a Japanese corporation having its principal place of business at no. 3-6, Akasaka 2-Chome, Minato-Ku, Tokyo, Japan. For more information on how Komatsu Ltd. processes your personal data, please visit the Global Privacy Policy, which is available at https://www.komatsu.jp/en/global-privacy-policy.

2.4. We reserve the right to modify, change or amend this Privacy Policy at our own discretion and from time to time. Such modification, change or amendment shall be communicated via the Website. The "Last Updated" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Where a change materially affects the processing of your personal data, we will inform you in an appropriate manner beforehand.

III. GENERAL PURPOSES FOR PROCESSING

3.1. All personal data we collect from you will be used and/or disclosed for the following purposes:

(i) when such use and/or disclosure is required to comply with a legal obligation incumbent upon us, which may include laws outside of your country of residence;

(ii) when competent authorities, officials, members of the judiciary or law enforcement agents order us to use and/or disclose your personal data, even when they are not located in your jurisdiction for which we rely on our legal obligations;

(iii) when the disclosure of your personal data to law enforcement, the judiciary or external counsel is warranted as part of evidence collection or usage, or when use and/or disclosure is warranted in the event of reasonable suspicion of an illegal act or offence on your part when you use the Website, communicate with us, visit our premises or any other interaction you have with, or in relation to, us, for which we rely on our legitimate interest to be able to defend our interests;

(iv) to enforce, and have enforced, any of our agreements, terms and conditions of sale, of procurement or of service rendering, for which we rely on our legitimate interests to have our valid agreements enforced;

(v) to be able to prepare and undertake corporate transactions such as mergers, acquisitions or demergers, for which we rely on our legitimate interest to engage in such transactions;

(vi) to protect our rights and legitimate interests, including safety or property, and those of our affiliates, employees, contractors, you or third parties, for which we rely on our legitimate interests to be a responsible business partner, employer, supplier and member of society.

In principle, we will only retain your personal data in accordance with the retention periods set forth in the sections below, unless one of these general purposes warrants a longer retention period in order for the purpose to be achieved.

3.2. Whenever personal data processing is required for performance of a contract we have with you, the provision of your personal data is to be construed as a contractual requirements. Whenever personal data processing is based on a legal obligation imposed upon us, the provision of your personal data is to be construed as a statutory obligation.

IV. USING THE WEBSITE OR OUR SOCIAL MEDIA

4.1. When you visit the Website or our social media pages, we will collect from you depending on the functionalities and features you use:

(i) technical information related to the device you are using and your internet connection, such as your IP address, browser type, geographical location and operating system;

(ii) information about the manner in which you interact with the Website or social media pages (e.g. the duration of your visit, the links you click on, the pages you visit, etc.);

(iii) information which is already stored on your device, such as your cookie preferences, unique identifiers, etc.;

(iv) the physical location of your device based on your IP address (we will never actively track your satellite-based location information without your consent).

All of the above personal data we receive directly from you as well as from the social media providers (when you visit us on social media). When you visit us on social media, please note that the social media provider is solely responsible for the collection of the information about your interactions with that social media platform which are not shared with us. You can find more information about how they use your personal data in their respective privacy notices:

(i) LinkedIn: https://www.linkedin.com/legal/privacy-policy

(ii) Instagram: https://privacycenter.instagram.com/

(iii) Facebook: https://www.facebook.com/privacy/center

(iv) Pinterest: https://help.pinterest.com/en/article/your-privacy-and-data-settings

(v) YouTube: https://policies.google.com/privacy?hl=en

4.2. When you visit our Website or social media pages, we will collect your personal data to:

(i) allow you to use and interact with the Website and social media pages;

(ii) keep the Website and our social media pages (to the extent managed by us) as well as our company, assets, employees and other stakeholders safe and secure;

(iii) collect non-personalized statistical information about the manner in which people interact with the Website, social media pages and their content.

For all of the above purposes, we base ourselves on our legitimate interest to process your personal data to be able to engage in normal business communications and communicate about our products, services and activities, to understand how our communication channels are used and to evolve as a business.

Your personal data, which are pseudonymized, will be stored until such time you exercise a valid right to erasure. Please bear in mind that we will only erase personal data to the extent that we are still able to establish that these data pertain to you, in accordance with our legal obligations.

V. COMMUNICATION BETWEEN YOU AND US

5.1. When we communicate with you via phone, video calls, chat, text message, email, contact forms or any other form of digital communication, we collect from you:

(i) basic identity information, such as your name, e-mail address, phone number, postal address;

(ii) the content of the communications;

(iii) the technical information of your communications (the person with whom you communicate on our side, the date and time, other metadata about the communication, etc.)

(iv) your preferences regarding the receipt of our commercial e-mail communications, such as newsletters, commercial offers and promotions;

(v) any other personal data you choose to provide to us.

Note that in principle we do not record phone or video calls. If we record the conversation, we will inform you thereof beforehand and allow you to refuse such recording by ending the conversation.

5.2. When you contact us, we will collect and use your personal data to:

(i) respond to your questions, remarks or other communications (although we cannot guarantee that every single question, remark or communication will be answered);

(ii) keep our Website, social media page as well as our company, employees, assets and information safe;

(iii) make statistical analyses on the use of our communication channels;

(iv) improve our products, services or business processes or develop new products or services.

For all of the above purposes we base ourselves on our legitimate interest to process your personal data to be able to engage in normal business communications, to understand how our communication channels are used and to evolve as a business.

We will retain your personal data for as long as is necessary to respond to your queries and for as long as statistically relevant. When such communications are of a transactional or contentious nature (i.e. they relate to a purchase, warranty, return, etc.), we will store them

for as long as required to finish the conversation with you and at most until any possible claim or legal action in relation to the subject matter of such communication is finally resolved or time-barred.

5.3. When we use your personal data to contact you with our newsletters, commercial offers or promotions, we process your personal data to:

(i) send you these newsletters, commercial offers or promotions;

(ii) personalize such newsletters, commercial offers or promotions; and

(iii) measure the effectiveness of our campaigns.

We will always ask for your consent to send you our newsletters, commercial offers or promotions. We will store your personal data until you withdraw your consent. If you are an existing customer who has not provided consent, however, we base ourselves on our legitimate interests to send you marketing materials relating to similar products and services than those which you already procured from us. We retain your personal data for as long as you remain a customer unless you oppose the processing of your personal data for marketing purposes as set forth in this section.

Where we include tracking pixels in our emails or newsletters, we do so only with your prior consent. A tracking pixel is a small, invisible image that is loaded when you open an email. It allows us to see, for example, whether and when you opened the email, what type of device and email programme you used, and your approximate location based on your IP address. Your consent to tracking pixels is separate from your consent to receive our emails. You can receive our emails without consenting to tracking pixels. If you do not consent, or if you withdraw your consent, we will send you emails without tracking pixels. You can give or withdraw your consent at any time, as easily as you gave it, through the link at the bottom of our emails. Withdrawing consent does not affect the lawfulness of the use of tracking pixels before the withdrawal. We keep the data collected through tracking pixels until you withdraw your consent.

VI. FAIRS AND EVENTS

6.1. When we organize a fair or an event for which we would like to invite you, we will collect from you:

(i) basic identity information, such as your name, e-mail address, phone number and postal address;

(ii) professional information if relevant to the event or fair, such as the company you work for and your role;

(iii) information related to your proof of identity, if required for travelling or participating to the event or fair;

(iv) your image and voice when we make photos or video recordings at the event or fair;

(v) dietary preferences and food (in-)tolerances to the extent that food is served at the event or fair;

(vi) any other information you share with us in relation to your registration for, or participation to, the event or fair.

We collect and use these personal data to:

(i) invite you to the fairs or events we organize;

(ii) organize your travel and participation;

(iii) make statistical analyses;

(iv) improve our fairs and events.

For all of these purposes we base ourselves on our legitimate interests as a company to organize and host events or fairs. We will retain your personal data for as long as required to facilitate your participation and to be able to invite you to subsequent fairs or events.

6.2. When we participate in an event or fair for which we would like to invite you, we will collect from you or from the organizer of the fair or the event:

(i) basic identity information, such as your name, e-mail address, phone number and postal address;

(ii) professional information if relevant to the event or fair, such as the company you work for and your role;

(iii) your image and voice when we make photos or video recordings at the event or fair;

(iv) any other information you share with us in relation to your registration for, or participation to, the event or fair.

We collect and use these personal data to:

(i) invite you to the fairs or events where we are present;

(ii) make statistical analyses on the fairs and events where we are present.

For all of these purposes we base ourselves on our legitimate interests as a company to participate in fairs or events and invite our business contacts. We will retain your personal data for as long as required to invite you to a fair or event or until you request us to delete it.

6.3. We will also collect and use your personal data to communicate and report about our and your presence at a fair or an event on our Website, social media pages or in printed media. We will always ask for your consent before we publish your image in an identifiable manner on our online or printed media channels. You can withdraw your consent at any time. Your personal data published on our online or printed media channels will be retained until you withdraw your consent.

VII. VISITING OUR PREMISES

7.1. When you visit the KOMATSU premises, we will collect from you the following personal data:

(i) basic identity information, such as gender and name and on occasion we may ask for proof of identity;

(ii) contact details such as email address and phone;

(iii) professional information, such as the company you work for and your role;

(iv) information about the time you enter our premises and, when applicable, the person on our end with whom you have a meeting;

(v) information about your location;

(vi) your license plate;

(vii) your signature;

(viii) your image recorded through our CCTV system;

(ix) your position in the company if you are awarded a temporary access token (e.g. a badge).

7.2. We collect and use these personal data for the following purposes:

(i) to protect our employees, temporary workers, consultants, other visitors, company assets and interests;

(ii) to detect, prevent and act against theft, vandalism and other types of crime or inappropriate conduct;

(iii) for safety reasons in the context of, for example, a fire or an evacuation.

(iv) to inform persons with whom you have a meeting that you arrived.

For these purposes, we base ourselves on our legitimate interests to protect our employees, temporary workers, consultants, visitors, company and interest and to organize ourselves practically. Your personal data are stored for as long as required to achieve the aforementioned purposes.

7.3. We use camera surveillance at our premises. Pictograms at the entrances to the premises and the monitored areas tell you that cameras are in use, and refer to this section of the Privacy Policy. This section applies to visitors, suppliers, customers, drivers, contractors and any other person who enters the areas covered by the cameras. It also applies to our employees and temporary workers, in addition to the information provided to them in their dedicated privacy notice. The cameras are located at the entrances and exits, the reception area, the parking areas, the loading and storage areas and the outer perimeter of the premises. They do not film changing rooms, toilets or other places where you can reasonably expect privacy. The images are viewed live by security guards.

The cameras capture your image, together with the date, time and location of the recording. If an incident occurs, we may extract and store the relevant images separately.

7.4. We use the camera system to:

(i) prevent, detect and document theft, vandalism, unauthorised access and other offences against persons or property;

(ii) prevent, detect and document nuisance and inappropriate conduct at our premises;

(iii) protect the safety of our employees, visitors and contractors, including in the event of an accident, fire or evacuation; and

(iv) establish, exercise or defend legal claims, and provide evidence to insurers, legal advisers and the competent authorities.

For these purposes we rely on our legitimate interest to protect our people, premises, assets and business. We have weighed this interest against your interests, rights and freedoms and have limited the camera surveillance to what we consider necessary for these purposes. We do not use the camera system to monitor the attendance or performance of individual persons.

We keep recorded images for a maximum of one (1) month. We keep images longer only where they may serve as evidence of an offence, nuisance or damage, or to identify a perpetrator, victim or witness. They are then kept until the matter is resolved or any related claim is time-barred.

VIII. YOU ARE OR REPRESENT ONE OF OUR SUPPLIERS

8.1. In addition to any interactions KOMATSU may have with you as a consequence of your use of our Website, social media pages or our communication channels, we collect, from you directly or from the company you work for, whenever we receive a quotation for goods or services or order those goods or services from you:

(i) your basic identity information such as name, e-mail address, postal address, telephone number, company you work for, your role;

(ii) the content of your communications, and the technical information of your communications themselves (the person with whom we communicate on our side, the date and time, etc.);

(iii) payment and invoice related data when you invoice us for your goods or services.

8.2. We process your personal data in order to:

(i) get a quotation for goods or services from you;

(ii) supplier creation and on-boarding (incl. credit checks and similar verifications);

(iii) compare your offer to similar offers in the market

(iv) process the order, receive the order from you and handle invoicing and quality management;

(v) engage in normal supplier relationship management;

(vi) engage in normal internal management reporting activities.

For the first four purposes we process your personal data because it is necessary to come to an agreement with you and perform said agreement. If you represent a company, we rely on our legitimate interest to process the contact details of the people who represent our suppliers. For the other two purposes the processing is based on our legitimate interest to engage in normal business and supplier follow-up. Your personal data will be retained for as long as you are a supplier and at maximum for the period required to ensure that any possible claim or legal action in relation to our business relationship with you is finally resolved or time-barred.

8.3. When you are a consultant providing services to us as an independent contractor for which you are given (i) an account on one or several of our network and information systems and/or (ii) a badge or similar access token to the whole or part of our premises, your personal data are processed in accordance with Annex A of this Privacy Policy.

IX. YOU ARE OR REPRESENT ONE OF OUR CUSTOMERS OR DISTRIBUTORS

9.1. In addition to any interactions KOMATSU may have with you as a consequence of your use of our Website, social media pages or our communication channels, we collect, from you directly or from the company you work for, whenever you ask for a quotation or order goods or services from us:

(i) your basic identity information such as name, e-mail address, postal address, telephone number, company you work for, your role;

(ii) the content of your communications, and the technical information of your communications themselves (the person with whom we communicate on our side, the date and time, etc.);

(iii) payment and invoice related data when you invoice us for your goods or services;

(iv) order history.

9.2. We process your personal data in order to:

(i) provide you with a quotation for goods or services;

(ii) customer creation and on-boarding (incl. credit checks and similar verifications);

(iii) process your order, send the order to you and handle invoicing and quality management;

(iv) engage in normal customer relationship management;

(v) engage in normal internal management reporting activities.

For the first four purposes we process your personal data because it is necessary to come to an agreement with you and perform said agreement. If you represent a company, we rely on our legitimate interest to process the contact details of the people who represent our customers and distributors. For the other two purposes the processing is based on our legitimate interest to engage in normal business and customer follow-up. Your personal data will be retained for as long as you are a customer and at maximum for the period required to ensure that any possible claim or legal action in relation to our business relationship with you is finally resolved or time-barred.

X. YOU APPLY FOR A VACANCY AT KOMATSU

10.1. When you apply for a position at KOMATSU, we will collect the following personal data from you, the recruitment agency which sent us your profile, the social media channel via which you applied or from an external job site you used:

(i) your basic identity information such as name, e-mail address, postal address, telephone number, company you currently work for (if any), your role;

(ii) academic and professional expertise and experience;

(iii) information you include in your CV and motivational letter, such as your current and previous employers, job description, professional experience, training and qualifications, skills, references, interests, family composition, etc.;

(iv) your image;

(v) publicly available information on your social media profiles (e.g. on LinkedIn);

(vi) any other information you wish to provide us with as part of your application, such as information you include in your cover letter or communicate during your interview.

10.2. We collect and use this personal data to:

(i) if you apply for a vacant position:

(a) evaluate and decide whether to hire you;

(b) during the application process, communicate with you by email, give you a test, invite you to job interviews (online or in person), draw up an employment contract and/or salary proposal, etc.

(ii) if you apply spontaneously, assess whether you might be eligible for a (future) position within our company and thus add you to our talent pool;

(iii) if your application is not successful, ask you if we can add your CV and relevant personal data to our talent pool.

For the first purpose, we rely on the necessity of processing for the performance of contractual and pre-contractual measures taken at your request. For the second and third purposes, we rely on your consent to assess whether you may be eligible for a (future) position within our company and to provide you with relevant and personalised information about future interesting vacancies within our company. You may withdraw your consent at any time by sending an email to PrivacyOffice@komatsu.eu. In this case, we will immediately delete your CV and personal data. However, we will no longer be able to contact you about future interesting vacancies. Your personal data will be retained for the full duration of the application process and for the longer of (a) the period until all possible claims or legal actions in relation to your application with us are finally resolved or time-barred and (b) until you withdraw your consent if we have retained your personal data in our talent pool.

10.3. When we hire you, your personal data will be processed in accordance with our personnel policy. We will inform you about the processing of your personal data in a separate privacy statement for employees and temporary workers. This privacy statement for employees and temporary workers will be provided to you on your first day of work.

10.4. We ask that you do not send nor disclose any special categories of personal data (for example, personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometrics or genetic characteristics, criminal background, data concerning health or data concerning a person's sex life or sexual orientation, or social security numbers) as part of your application with us. If you send or disclose such information nonetheless, you will be presumed to have given explicit consent for the processing of such personal data.

XI. YOU REPORT A CONCERN

11.1. When you report a breach through our whistleblowing channel, which is the e-mail address Compliance@komatsu.eu, we collect:

(i) the information you include in your report, which may contain personal data about you, the person concerned and third parties;

(ii) if you identify yourself, your name, function, contact details and, where relevant, the company you work for;

(iii) the technical information of your e-mail (sender address, date and time);

(iv) information collected in the follow-up of your report, such as documents, statements and interview notes, and the outcome of the assessment and any measures taken.

11.2. We collect and use your personal data to:

(i) receive your report, confirm receipt, assess it, communicate with you, ask for further information and give you feedback, for which we rely on our legal obligations under the Act of 28 November 2022 on the protection of persons who report breaches of Union or national law within a legal entity in the private sector (the “Whistleblower Act”);

(ii) investigate the reported concern and take appropriate follow-up measures. Where the report falls within the scope of the Whistleblower Act, we rely on our legal obligations. Where it concerns other misconduct, we rely on our legitimate interest to detect, address and prevent misconduct within our organisation;

(iii) keep a register of the reports received, for which we rely on our legal obligation under the Whistleblower Act. Your identity is not recorded in the register;

(iv) establish, exercise or defend legal claims, for which we rely on our legitimate interest to protect our rights of defence; and

(v) comply with legal obligations or with requests from competent police, judicial or supervisory authorities, for which we rely on our legal obligations.

11.3. We receive this information from you, and, where needed for the follow-up, from the persons we contact in the context of the assessment. A report may contain data relating to suspected offences or, exceptionally, special categories of personal data. We only process such data to the extent necessary to handle the report and permitted by law. Personal data that are manifestly not relevant to the handling of a report are deleted without undue delay. You may report anonymously. We then cannot acknowledge your report or ask follow-up questions, and it may be harder to assess.

11.4. Reports are received and handled by the Hotline Committee, consisting of at least three employees appointed by the Board of Directors to handle reports impartially and in confidence. If you have questions about the processing of your personal data in this context, you can contact the Privacy Office at PrivacyOffice@komatsu.eu. Do not send a report to that address. Use the whistleblowing channel above.

XII. RECIPIENTS OF YOUR PERSONAL DATA

12.1. We may disclose your personal data:

(i) to our affiliates for the purposes described in this Privacy Policy.

(a) You can consult the list and location of our affiliates at www.komatsu.eu. Affiliates as used in this document mean the entities controlled by, under common control with or controlling us.

(ii) to our third party service providers, to facilitate services they provide to us.

(a) These can include providers of services such as website hosting, data analysis, payment processing and other financial services, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, auditing, legal and consultancy services, debt collection services, product review services, referral services and other services.

(iii) to third parties, to permit them to send you marketing communications, consistent with your choices.

(iv) to public, law enforcement or judicial authorities, in case of legal disputes or when we are required by law or are ordered to do so by such an authority.

12.2. By using our social media pages, you may elect to disclose personal data. Please note that any information you post or disclose through these services will become public and may be available to other users, the general public and to your social media account provider. By doing so, you authorize us to facilitate this sharing of information, and you understand that the use of shared information will also be governed by the social media provider's privacy policy.

XIII. JURISDICTION AND CROSS-BORDER TRANSFER

13.1. Your personal data can be stored and processed in any country where we have offices, factories or other premises or in which we engage service providers You understand that, when you interact with an international company such as KOMATSU, your information will be transferred to countries outside of your country of residence, including Japan and the United States, which may have data protection rules that are different from those of your country. In certain circumstances courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal data.

13.2. Some countries outside the EEA (comprised of the EU Member States, Iceland, Liechtenstein, and Norway, together "EEA") are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available at: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en), which includes Japan. For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your personal data.

XIV. YOUR RIGHTS

14.1. You have the right to request access to all personal data processed by KOMATSU concerning you. KOMATSU reserves the right to charge administrative fees for several subsequent access requests that are clearly submitted in order to harm or prejudice KOMATSU.

14.2. You have the right to request the rectification, free of charge, of any personal data concerning you that are inaccurate. In the event of a request for rectification, this request must be accompanied by proof of the erroneous nature of the data which is the object of the request for rectification.

14.3. You have the right to withdraw your earlier given consent for the processing of your personal data.

14.4. You have the right to request the deletion of personal data concerning you if they are no longer necessary for the purposes set out above or if you withdraw your consent to their processing. However, you should keep in mind that KOMATSU will assess your deletion request against:

(i) the overriding interests of KOMATSU or any other third party;

(ii) any legal or regulatory obligations or judicial or administrative orders that may conflict with such deletion.

Instead of requesting the deletion of your personal data, you may also request that KOMATSU limits its processing if and when (a) you dispute the accuracy of the data, (b) the processing is unlawful or (c) the data are no longer necessary for the purposes listed in this Privacy Policy but you need them to defend yourself in legal proceedings.

14.5. You have the right to receive from us in a structured, commonly used and machine-readable format all personal data you have provided to us either on the basis of your consent or where such personal data was necessary for the performance of our agreement with you.

14.6. You have the right to object to the processing of personal data if you can prove that there are serious and well-founded reasons linked to particular circumstances guaranteeing such opposition. However, if the processing operation envisaged is a direct marketing operation, you have the right to object to such processing free of charge and without justification.

14.7. If you wish to submit a request to exercise one or more of the rights listed above, you may send an e-mail to PrivacyOffice@komatsu.eu. An e-mail requesting the exercise of a right shall not be construed as consent to the processing of your personal data beyond what is required for the processing of your request. This request must clearly indicate which right you wish to exercise and the reasons for the request, if legally required. It must also be dated, signed and completed by a scanned copy of a valid proof of identity.

KOMATSU will inform you promptly of the receipt of this request. If the request is valid, KOMATSU will honour it as soon as reasonably possible and no later than thirty (30) days after receiving the request, unless your request is complicated.

If you have any complaints about KOMATSU's processing of your personal data, you can always contact KOMATSU at the e-mail address indicated in the first paragraph of this clause. If you are still not satisfied with KOMATSU's response, you are free to lodge a complaint with the competent data protection authority, namely your local data protection authority or the Belgian Data Protection Authority (https://www.gegevensbeschermingsautoriteit.be).

KOMATSU

Annex A – Consultants Personal Data Processing

This Annex applies if you work for us as an independent consultant or contractor, or as an employee or subcontractor of a consultancy or contracting firm (in each case a "Consultant"), and:

- we give you an account on our network and information systems, such as Microsoft 365; or
- you have access to our premises, including a workplace.

This Annex A supplements the rest of this Privacy Policy. Employees, temporary workers and students are covered by their own privacy notice. Section XI (whistleblowing) and the camera surveillance section in Section VII also apply to you. If you invoice us, the rest of Section VIII also applies.

I. DIVISION OF RESPONSIBILITIES

KOMATSU is the controller for the processing described in this Annex. If you work through a firm, that firm remains responsible for its own processing of your personal data as your employer or business partner, such as payroll and evaluation. We do not process that personal data. In no event should anything in this Privacy Policy or Annex be construed as creating an employer-employee relationship or diminish the independency by which you render your services.

II. THE PERSONAL DATA WE COLLECT AND THE PURPOSES FOR WHICH WE USE IT

2.1. We process the following personal data for the purposes set forth below:

(i) For engagement and onboarding, which covers your identity and business contact details, your firm, your role, your KEISA contact person, the start and end dates and description of your assignment, proof of identity, and your acknowledgement of our policies. We receive these personal data from you, your firm and your KEISA contact person. We use the personal data to engage you, administer the assignment, and provide access to our systems and premises. We rely on the performance of our agreement with you where you contract with us personally. Otherwise we rely on our legitimate interest to manage our relationship with the firms we work with and their staff.

(ii) For account and access management, which covers your account identifier, group memberships, roles and licences, access rights, device identifiers, your profile in our directory, and your mobile phone number, which we use for multi-factor authentication. We use them to create, manage and remove your account, apply least-privilege access, authenticate you (including by sending or confirming authentication codes) and support you. We rely on our legitimate interest to run a secure and efficient IT environment, and on the performance of our agreement where you contract with us personally.

(iii) For providing you with access to our collaboration tools, which covers the content and metadata of your emails, Teams messages, files and calendar in our environment. It also covers recordings and transcripts of Teams meetings you attend or organise, and your prompts and the responses when you use Microsoft 365 Copilot. We use them to enable you to do your work, ensure business continuity, keep business records, and produce meeting notes and summaries. We rely on our legitimate interest, and on the performance of our agreement where you contract with us personally.

(iv) For security logging, which covers authentication and access logs (timestamps, IP addresses, user identifiers, devices, location derived from IP address, and remote access via RSA, VPN and Citrix), Microsoft 365 audit logs, firewall, proxy and web logs, endpoint and email security alerts, and printer logs (name, email address, time and location). We use them to protect our networks, systems and information, detect and respond to security incidents, prevent unauthorised access and data leakage, and meet our information security standards. We rely on our legitimate interest in information security, and on our legal obligations under cybersecurity law to the extent they apply to us.

(v) For incident handling, which covers incident reports and tickets, forensic data, statements and findings. We use them to handle and document security incidents, including reporting to Komatsu Ltd. and, where required, to authorities, and to establish, exercise or defend legal claims. We rely on our legitimate interest, on our legal obligations where they apply, and on our interest in defending legal claims.

(vi) For security awareness, which pertains to your security awareness training records, phishing simulation results, and your acknowledgements of the Acceptable Use Policy and related policies. We use them to ensure compliance with our security requirements. We rely on our legitimate interest.

(vii) For managing our devices, which happens when we provide you with a device. We process managed device data, such as the device identifier, operating system, compliance status and installed managed applications. We do not access private applications or personal data on the device. Windows Hello data remains on your device and is not accessible to us. We use these data to secure and manage devices, and we rely on our legitimate interest.

(viii) For granting you access to our premises. This covers your access token or badge data, access logs, licence plate, visitor or contractor register entries, evacuation lists, and camera images as described in Section VII. We use them to organise access, protect people and property, and ensure safety. We rely on our legitimate interest and on our safety obligations.

2.2. Private use of our systems is not permitted. Please do not send, store or record private communications or files on them. If private content is nevertheless present, we treat it confidentially and do not consult it unless this is unavoidable for a justified investigation.

2.3. Where a breach is established, we may suspend or withdraw your access, inform your firm and take the measures provided for in your agreement. The sanctions in our employment regulations do not apply to you.

2.4. When a Teams meeting is recorded or transcribed, all participants are informed by Teams at the start. When you use Microsoft 365 Copilot, your prompts and its responses are processed within our European Microsoft 365 environment and are subject to the same monitoring and retention as other content in that environment. Third-party AI note-taking tools may not be used in meetings on our systems.

This annex covers only the systems and premises we provide. It does not cover your own firm’s systems.