



A Yokogawa Company

KBC Privacy Statement

KBC Advanced Technologies Ltd and its subsidiary companies ('KBC') are wholly owned subsidiaries of Yokogawa Electric Corporation, a company incorporated in Japan and listed on the Tokyo Stock Exchange.

KBC recognize that the protection of information relating to individuals processed in the course of business (hereinafter referred to as 'Personal Information') is an important social responsibility. KBC is committed to the proper handling and protection of Personal Information in accordance with the following statement.

1. Purpose

In order for KBC to conduct its business, KBC needs to process certain Personal Information about individuals. These individuals include, but are not limited to, KBC's employees, representatives of customers, suppliers, business contacts and other people that KBC has a relationship with or may need to contact. KBC declares that it will process Personal Information in an appropriate manner and endeavor to protect the rights and interests of individuals by undertaking appropriate compliance and security measures in line with common practice and industry standards.

2. Establishment of a compliance system for the protection of Personal Information

KBC has established a global Privacy and Data Protection management system for the purpose of ensuring compliance with Privacy and Data Protection laws and regulations. As part of this management system KBC's Privacy and Data Protection Governance Team has been established, which is the organization within KBC responsible for global Privacy and Data Protection compliance. KBC Top Management oversees the Privacy and Data Protection Governance Team.

3. Appropriate processing of Personal Information

The Privacy and Data Protection management system referred to above, includes several internal Privacy and Data Protection policies, which specify how Personal Information shall be processed by KBC, to meet KBC's Privacy and Data Protection standards and to comply with applicable Privacy and Data Protection laws and regulations. All KBC employees must be familiar with and comply with KBC's Privacy and Data Protection policies and receive Privacy and Data Protection training, which includes training on KBC's Privacy and Data Protection policies.



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Failure to comply with the KBC's Privacy and Data Protection policies will render an employee liable to disciplinary action.

A number of principles included in KBC's Privacy and Data Protection policies:

Collection and Use: When KBC collects Personal Information, a Privacy Notice to inform the individual(s) from whom KBC collects Personal Information must be provided with the content set forth by and in line with applicable Privacy and Data Protection laws and regulations. Personal Information shall only be used for the specific purposes notified to the individual(s) through the relevant Privacy Notice, unless otherwise set forth in the applicable law.

Accuracy: Personal Information shall be accurate and kept up to date. Inaccurate or out-of-date Personal Information must be corrected/destroyed.

Retention Period: Personal Information shall not be retained any longer than is necessary for the purpose for which the Personal Information was acquired and/or as necessary to comply with legal retention requirements.

Transfer to third parties: Personal Information may only be transferred to a third party if the transfer is allowed under the applicable Privacy Notice; appropriate security measures have been taken to protect Personal Information, and other requirements under applicable Privacy and Data Protection laws and regulations have been met.

Data Processor: When outsourcing operations processing Personal Information to subcontractors, before engaging with a subcontractor, KBC conducts due diligence by using KBC's supplier privacy compliance questionnaire form to validate if they ensure the same or higher level of Privacy and Data Protection standards ensured by KBC and KBC concludes data processing agreements if necessary.

Privacy by Design: In order to ensure that KBC considers Privacy and Data Protection in the development, design and implementation of any new process, application or product/service which involves the processing of Personal Information, KBC's Privacy and Data Protection policies contain strong Privacy by Design requirements, such as conducting privacy impact assessments, and where required data protection impacts assessments.

4. Security of Personal Information

In order to ensure proper security of Personal Information, KBC maintains robust Information Security Management standards. Under these standards KBC strives to prevent unauthorized access to, loss, destruction, falsification or leakage of



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Personal Information. When outsourcing operations which include processing of Personal Information to subcontractors, KBC takes appropriate security measures, such as requiring the subcontractors to maintain a high level of information security. Information security incidents related to Personal Information, however trivial, are managed in line with KBC's Privacy and Data Protection policies.

5. Response to Individual Rights on Personal Information

If KBC receives a request from an individual concerning the individual's Personal Information, such as informing about the collection and use of their Personal Information, having inaccuracies regarding their Personal Information corrected, withdrawing their consent for the collection and use of their Personal Information, and/or having their Personal Information deleted, KBC will respond to and handle the request in line with the applicable statutory requirements and in line with KBC's Privacy and Data Protection policies.

6. Audit

To monitor KBC's Privacy and Data Protection compliance, the Privacy and Data Protection Governance Team conducts Privacy and Data Protection audits at company level in line with KBC's Privacy and Data Protection policies.

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