

### 1. Principles and Applicable Legislation

#### 1.1 General Commitment and Applicable Legislation

Hitachi Zosen Inova AG (“HZI”), and its subsidiaries in which it has a controlling interest (each individually “HZI company” or jointly “HZI Group” or “we”) must protect personal data of individuals in compliance with applicable data protection laws, in particular the Swiss Federal Act on Data Protection (the “FADP”), Regulation (EU) 2016/679 the General Data Protection Regulation (the “GDPR”), the UK Data Protection Act 2018 (the “UK GDPR”) and other applicable local personal data protection laws.

The Data Protection Policy (“DPP”) will apply to all personal data we process in connection with our business activities, including personal data of our employees, existing or potential contractual partners, job applicants and visitors of our websites.

#### 1.2 Principles

When processing personal data, the HZI Group follows the principles set out in the FADP and the GDPR.

Under these rules, the most relevant principles of which are set out below, personal data must be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’);
- collected for specified, explicit and legitimate purposes (‘purpose limitation’);
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’);
- accurate and, where necessary, kept up to date (‘accuracy’);
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed – data shall be destroyed or anonymised as soon as they are no longer required for the purpose of processing (‘storage limitation’);
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (‘integrity and confidentiality’);
- processed in good faith and in a proportionate manner.

Each HZI company is responsible for, and must be able to demonstrate compliance with, the above-mentioned principles (‘accountability’).

#### 1.3 Dealing with Country- Specific Topics

Each HZI company must apply the legal regulations of its country for the protection of personal data, and also comply with the DPP unless there are country-specific requirements that would prohibit such compliance. In such case, the security of personal data must nevertheless be ensured as closely as possible at the level of the FADP and the GDPR. Any changes to security measures and internal rules on personal data protection must be documented by the HZI company and reported to the Group Data Protection Officer. HZI companies outside Switzerland or EU/EEA should to the extent possible adhere to key requirements of the FADP and the GDPR and in any event must apply the data protection laws of their country.

## 2. Purpose of Processing

The HZI Group processes personal data for the purpose of doing its business, including to provide its products and services, to process and fulfil contracts and keep data subjects informed (including employees or job applicants), for marketing and analytics purposes, to provide customer support, to verify data subject's identity and protect data against fraud and other unlawful activity.

## 3. Rights of Data Subjects

In order to ensure consistency throughout the HZI Group, and to permit us to apply standard and consistent applications, tools and processes, we apply the requirements of the FADP and the GDPR as a standard baseline, except to the extent prohibited by applicable local law. This baseline may be supplemented by an HZI company, if required by applicable local law. This baseline includes: the right to information, the right of access, the right to rectification, the right to erasure ('right to be forgotten'), the right to restriction of processing, the right to data portability and the right to object to processing of personal data. Data subjects are informed about more details regarding how we process their data and about contacts in respective Privacy Notice published on the HZI website in section Privacy Policy <https://www.hz-inova.com/privacy-policy/>.

## 4. Management of Personal Data Processing

### 4.1 Security of Personal Data

Considering the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the HZI Group must implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, and to ensure proper protection of personal data in line with respective legislation.

### 4.2 Data Protection Organisation

The ultimate responsibility for keeping personal data protection rules and implementation of necessary measures must lie with the management of the HZI companies.

Every employee and every line manager within the HZI Group must comply with legal provisions on data protection within his or her work.

The HZI Group has appointed the Group Data Protection Officer (the "**Group DPO**"). If necessary, as advised by the Group DPO, local DPOs must be appointed in particular countries. The Group DPO and DPO(s) provide advice and trainings to the management and employees of the HZI Group. The Group DPO and local DPO(s) will be the primary point of contact within the HZI Group for data protection matters and must be involved in all issues which relate to the protection of personal data, in supporting implementation of the data protection regulations, in monitoring compliance with the data protection rules, in acting as the contact point for the data protection supervisory authority.

The Group DPO reports on data protection matters and issues at least annually to the Executive Board of Hitachi Zosen Inova AG. The appointed DPOs report on data protection matters and issues to the directors of the HZI company for which they have been appointed and to the Group DPO (to ensure reporting to the HZI Group level).

To ensure smooth coordination of data protection implementation, the Group DPO regularly convenes a Steering Committee for Personal Data Protection composed of the Information Security manager, local DPO(s) and specified HZI managers involved in data protection implementation.

As a contact point for the Group DPO, each HZI company processing personal data without an appointed DPO appoints at least one Data Protection Coordinator (this function may also be appointed in larger units to ensure proper information flows between the unit and the Group DPO).

To keep control over data processing activities, each HZI company creates and keeps updated Records of Processing Activities. The Group DPO creates and keeps this Record for Hitachi Zosen Inova AG and provides advice and keeps control over these Records of Processing Activities in other HZI companies.

### 4.3 Data Breach

Data breach notifications or a suspicion on a data breach must be notified to the Group DPO and local DPO (if appointed) immediately; subsequently, if local legislation so requires, the Group or local DPO ensure notification is delivered to relevant state authorities or data subjects (as required by local legislation).

#### **4.4 Transferring Personal Data Outside the HZI Companies**

Personal data obtained by HZI companies may be transferred to another entity (e.g., a supplier providing services to the HZI Group as a processor or to a customer) if the receiver of the data ensures proper data protection.

Each HZI company concludes data processing agreements whenever this is required by applicable law and ensures adequate technical and organisational measures to protect transferred personal data.


When personal data must be transferred to third countries without adequate data protection safeguards (i.e. outside Switzerland, the EU/EEA and other countries with an EU and Swiss decision on adequate level of personal data protection), or to an international organisation, the HZI company may do so only if the HZI company and the receiver of the data have provided appropriate safeguards, and on condition as defined by respective legislation.

The Group DPO and the local DPO will provide advice and support to HZI companies on these matters whenever they require it.

#### **5. Applicability**

This DPP is binding on the management and employees of the HZI Group whenever they process personal data as defined by respective legislation.

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Chief Executive Officer (CEO)

