

# **HANDLING OF PERSONAL INFORMATION**

## **1. INTRODUCTION**

This document outlines the handling of personal information through the stakeholder reporting system of HORIBA, Ltd. (hereinafter “Company,” “we” or “us”) called the “HORIBA Stakeholder Hotline” (hereinafter “Hotline”). This Hotline was established to ensure the sound management of the Company by obtaining prior information on any misconduct or other issues that may impact the Company. At the same time, we are keen on protecting any personal information received through the Hotline and will safeguard it to the maximum extent under the Hotline.

## **2. DEFINITIONS**

“Hotline” means the hotline of the stakeholder reporting system.

“Report” means a report registered with the Hotline and received by the Company.

“Personal information” means information that can identify an individual that is specified in a report registered with the Hotline.

“Reported event” means an event reported to the Company in a report.

“Reporter” means an individual that files a report with the Hotline.

“Accused” means an individual reported in a report who has engaged in or otherwise been involved in a reported event.

“Parties relevant to the report” means individuals and organizations mentioned in a report.

“Data Controller” means the party that is mainly responsible for handling personal information and determines the methods and policies for handling personal information.

“Data Processor” means the party that actually collects, retains, and processes data on behalf of the Data Controller based on the instructions of the Data Controller.

“Sensitive data” means personal information defined in the law of each relevant country that may greatly impact the personality of an individual if divulged to a third party under such law, including, but not limited to, information on racial or ethnic origin, political opinions, religious or philosophical beliefs, labor union membership, genetic or biometric information, information on health, and information on sex life.

## **3. LAW UNDER WHICH PERSONAL INFORMATION IS HANDLED**

The processing of personal information under the Hotline is in compliance with the personal information protection law of each relevant country and is based on the legitimate interests of the Data Controller in investigating and rectifying internal misconduct and other acts of similar nature.

## **4. CONSENT**

To use this Hotline under your actual name, you need to give your consent to the handling of your personal information in accordance with our personal information protection policy described in this document. However, if you fail to file a report under your actual name because you do not wish to give consent, and the Company or other relevant parties suffer any adverse effects as a result, you will not be punished or receive disadvantageous treatment in any way based on that fact. You can also use this Hotline anonymously without providing personal information, such as your name.

## **5. ORGANIZATIONS IN CHARGE OF THIS HOTLINE**

The following are the operators of this Hotline:

### **5-1. THE PARTY THAT ESTABLISHED THE HOTLINE**

HORIBA, Ltd.

### **5-2. DEPARTMENT IN CHARGE**

Administration Department HORIBA, Ltd. Address: 2 Miyanohigashi-cho, Kisshoin, Minami-ku, Kyoto, Japan Contact: aiji.horii@horiba.com

As the Data Controller, HORIBA, Ltd. is responsible for handling personal information under the Hotline and is in a position to determine and implement policies and protection measures for handling personal information.

### **5-3. OPERATOR**

D-Quest, Inc. Address: Ryumeikan-Honten Bldg., 3-4 Kanda-Surugadai, Chiyoda-ku, Tokyo

As the Data Processor, D-Quest will, on behalf of HORIBA, Ltd., maintain and operate the Hotline system and perform translation and other procedures.

## **6. PROCESSING OF PERSONAL INFORMATION**

### **6-1. LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION**

The Company collects personal information through the Hotline in accordance with the personal information protection law of each relevant country, in pursuit of the legitimate interest of ensuring sound management as an employer by acquiring prior knowledge about, and swiftly responding to, any misconduct and other illicit acts.

### **6-2. PURPOSES OF PROCESSING PERSONAL INFORMATION**

Personal information registered with this Hotline will be processed in order to conduct internal investigations into any misconduct and other acts of similar nature in the Company. It may also be processed in order for the Company to make reports, etc., to the authorities of respective relevant countries at their request.

### **6-3. TYPES OF PERSONAL INFORMATION TO BE PROCESSED**

Through this Hotline, the following types of personal information will be handled. Personal information will only be collected and/or processed on the Hotline's website and will not be collected or processed by other tools or methods.

- Name
- Department
- Position
- Contact information
- Company
- Sensitive data, as long as reasonably required
- Information listed above of the accused
- Information listed above of the parties relevant to the report
- Information of any other individuals that may be mentioned in the report

### **6-4. METHOD OF PROCESSING**

The personal information received through this Hotline will be processed as follows:

- Translation of the contents of the report to Japanese
- Assigning of pseudonyms when conducting internal investigations or sharing information
- Preparation of investigation results reports

#### **6-5. PLACE OF PROCESSING**

Personal information will be processed in Japan.

#### **6-6. DURATION OF PROCESSING**

Personal information will be processed within a reasonable period of time to the extent necessary, until the investigation and/or the handling of the reported event is completed.

#### **6-7. COUNTRY TO WHICH PERSONAL INFORMATION IS TRANSFERRED ACROSS BORDERS**

Personal information will be transferred across borders to Japan where our Japan head office is located.

### **7. MANAGEMENT OF PERSONAL INFORMATION**

#### **7-1. DURATION OF DATA RETENTION**

Personal information will be retained for the reasonable period of time necessary for handling a reported event that is within the period of time prescribed under the law of each relevant country.

#### **7-2. PLACE OF RETENTION**

The server in which personal information will be retained is located in Japan. Reports made in European countries, including the EU and the U.K., will be temporarily retained in a server in the French Republic and transferred to and retained in the server in Japan later. Reports made in countries on the North and South American continents will be temporarily retained in a server in the U.S. and transferred to and retained in the server in Japan later.

#### **7-3. SHARING OF PERSONAL INFORMATION**

For the purpose of investigating a report, personal information may be shared with the counterparts (president or senior management) of each company and the Company's Board of Directors, etc. Personal information may also be disclosed to external law firms for investigation purposes.

#### **7-4. PURPOSES OF THE CROSS-BORDER TRANSFER OF PERSONAL INFORMATION**

Personal information will be transferred across borders to Japan so that our Japan head office can investigate a reported event. No information will be transferred across borders to countries other than Japan, nor will it be transferred from Japan to other countries.

#### **7-5. PROVISION TO THIRD PARTIES**

As a general rule, no personal information received through the Hotline will be transferred or sold to external companies or other similar parties. However, personal information may be provided to external parties in the following cases:

- It may be provided to public agencies of a relevant country, such as courts, at the request of the authorities in that country.
- It may be provided to our corporate attorneys or partner law firms for the purpose of investigating a

reported event.

## **8. YOUR RIGHTS TO THE PROTECTION OF PERSONAL INFORMATION**

### **8-1. LIST OF RIGHTS**

All individuals involved with the Hotline hold the following rights under the law:

- The right to access their own personal information that is being processed
- The right to correct or delete their own information if it contains errors
- If the processing of their own information has serious adverse effects, the right to delete such information or to restrict or suspend the processing of such information
- The right to reproduce their own information
- The right to request that their own information be protected
- The right to object to the processing of personal information
- The right to withdraw consent
- The right to receive their own information in a structured, commonly used, and machine-readable format, and to transfer such information to another Data Controller
- The right to not be discriminated for exercising any of the aforementioned rights

### **8-2. RESTRICTIONS ON THE RIGHTS OF THE ACCUSED**

In order to protect the personal information of the reporter and to prevent any danger to his/her physical or mental health, even if a reporter has revealed his/her identity, the accused may not access the contents of the report or the reporter's personal information. Furthermore, the accused may not inquire whether he/she is the one accused in the relevant report.

### **8-3. EXERCISE OF RIGHTS**

If you wish to exercise any of the aforementioned rights, please reach us through the contact information specified in Section 5-2. Department in Charge. You may need to provide us with the personal information that is necessary to exercise such rights. The handling of such personal information is also subject to this document.

## **9. POTENTIAL SIGNIFICANT ADVERSE CONSEQUENCE OR DAMAGE WHICH IS UNDESIRABLE**

Although adequate security and operational rules are in place for the use of this window, the following potential undesirable outcomes may occur.

- Temporary closure of the window without prior notice due to disasters or infectious diseases
- Inaccessibility due to system failure
- Unintended large-scale investigations or disclosure of facts to authorities, media, etc. (except for personal information) concerning matters that have a serious negative impact on the company, its stakeholders, or society.

## **10. COOKIES**

We use cookies on the Hotline's website. Cookies are small text data exchanged between a user's device and a server. This Hotline uses necessary cookies that only handle session IDs that are necessary for

communication. No information collected through these cookies will be retained beyond the relevant session. At the end of a session, any collected cookies will be automatically erased.

## **11. ANONYMOUS REPORTING**

You can make an anonymous report under this Hotline. Please bear in mind, however, that your anonymity may prevent us from conducting a proper investigation, and the issue you raised may not be resolved as a result. We ask for your kind understanding and cooperation in making reports under your actual name.

## **12. COMPLIANCE WITH LAWS OF RESPECTIVE COUNTRIES**

This Hotline complies with the personal information protection law of each relevant country, as well as laws that protect whistleblowers if there are any such laws in that country.

## **13. AMENDMENTS TO THIS DOCUMENT**

This document may be amended without advance notice. If you continue to use the Hotline after such amendments, we will assume that you have consented to such amendments.