

# Privacy Notice for employees

## 1 Who we are

Daikin Europe N.V. and Daikin Europe Coordination Center N.V. ("**Daikin**"), with registered office in Zandvoordestraat 300, 8400 Ostend, Belgium, registered under company number **BE 0412.120.336**, as the Data Controller of your personal data, informs the employees of the entities belonging to the group about how your personal data are processed within the scope of human resources management, in accordance with Articles 13 and 14 of the European Regulation 2016/679 on the protection of personal data ("**Regulation**" or "**GDPR**"), the Act of July 30, 2018 on the Protection of Natural Persons with Regard to the Processing of Personal Data, and its subsequent amendments and integrations.

## 2 Categories of personal data processed

In the context of existing employment relationships, Daikin may process the following categories of data:

- Identification data such as name, surname, date of birth, telephone number, home address, email address, etc.;
- Identification documents such as passport, identity card, driving license.
- Personal data of your family members, such as, for example, marital status, family composition, their personal information, etc.;
- Data related to education, career, role in the company, such as, for example, educational qualifications, previous work experiences, promotions, work performance, etc.;
- Data related to the type of contract (fixed-term or permanent, full-time or part-time, etc.), remuneration, benefits etc.;
- Working time, including overtime; leave requests (used or remaining); absence from service in cases provided by law or collective employment contracts; transfers to other workplaces; disciplinary proceedings and measures;
- Electronic identification data, such as, for example, badges, IP addresses, access rights, etc.;
- Images collected for, among other things, the following purposes: personnel list published on the company intranet, organizational chart, employee badges, workplace safety (video surveillance).

## 3 Sensitive Data

Daikin and authorized third parties process a limited amount of "sensitive" data for the purposes outlined below:

- Health and medical data such as, for example, illnesses, disabilities, pregnancy, postpartum or breastfeeding, injuries, insurance information, etc.;
- Health status and fitness for work: Daikin will only process personal data related to the medical assessment to determine the employee's fitness for the specific position, without indications regarding the specific health condition determined by the doctor, as required by law.

Like other personal data, the processing of sensitive data is carried out in compliance with the principles of necessity and lawfulness, informing the data subjects in advance and seeking their consent if it is not appropriate to rely on other equivalent legal bases.

## 4 Collection of personal data

Daikin primarily relies on the information you provided during the selection process, the onboarding process, or throughout your employment or assignment period. This is especially true for identification and contact data as well as work-related data, such as personal details, contact information, identification documents, information related to bank accounts, etc.

Some of this information is obtained from publicly accessible/public domain data or from databases belonging to third parties that have been duly authorized to share such data with Daikin.

While Daikin makes every effort to ensure that your data is accurate, complete, and up-to-date, employees are encouraged to review their data at least once a year. Additionally, employees must immediately report any relevant changes in personal data to the employer. The company disclaims any liability for inaccuracies or deficiencies in the personal or sensitive data you have provided.

## 5 Legal basis and purposes for processing your personal data

The personal data you provide is processed by Daikin for the following purposes:

- 1.1 **Establishment and management of the employment relationship**, for the performance of related contractual, pre-contractual, and legal obligations (e.g., to verify the accurate fulfilment of the service or to determine the amount of compensation, including overtime pay or bonuses to be paid, to quantify holidays and permits, to ascertain a legitimate reason for absence; ensure equal opportunities at work; verify access and presence in the company premises through appropriate registration tools such as badges); ensure Worker training; prepare documents and reports for business reasons (e.g., annual reports or documents related to a tender).
- 1.2 **Management of social security obligations**, to fulfil the obligations imposed by the civil code and social security legislation.
- 1.3 **Management of tax and accounting obligations**, to fulfil obligations imposed by the civil code and tax regulations and the maintenance of accounting records.
- 1.4 **Management of obligations related to safety and hygiene at work**, to fulfil obligations imposed by the law of August 4, 1996 concerning the well-being of employees during the performance of their work.
- 1.5 **Management of disputes**, to assert or defend a right, including by a third party, in court, administrative proceedings, or arbitration or conciliation procedures in cases provided by laws, EU regulations, regulations, or collective agreements.
- 1.6 **Monitoring of employees**, based on legitimate interests, where permitted by national law and in compliance with the provisions of personal data protection and the legal requirements in the field of labor law and the modalities agreed at company level – for example, images contained in closed-circuit videos, access data to systems and company buildings, data collected by IT security programs and filters, within the limits necessary for security, organizational needs, and other legitimate purposes;
- 1.7 **Control over the use of company tools for the prevention and repression of any illegal or fraudulent conduct** to the detriment of Daikin or other interested third parties; in some cases, data may be collected directly from company devices, where provided and within the limits allowed by applicable laws and internal company procedures. Such data

is not collected constantly, but its collection is possible if, for example, Daikin needs to conduct investigations into potential violations of legal provisions, its internal procedures, or the rights of Daikin, its employees, or collaborators, or group companies. The Worker can obtain more information about the above-mentioned controls by consulting the company's policy on the use of the Internet and company devices.

1.8 **Disciplinary proceedings.**

- 1.9 To facilitate company activities and the achievement of its objectives and internal corporate communication (e.g., photographs and contact details of the employee and their supervisor).

Personal data of dependents, or other family members, cohabitants, or emergency contact persons can be processed by Daikin for the purpose of HR process management.

## 6 Data Sharing

The data collected by Daikin will only be shared or transferred to third parties for the purposes mentioned in this Privacy Notice.

As part of our company operations and exclusively for the objectives outlined in this Privacy Notice, your personal information might be shared with the subsequent recipient categories:

- Company personnel (including direct and indirect supervisors, HR personnel, and colleagues as part of their job responsibilities).
- Other companies within the Daikin group, acting as data controllers, when necessary for activities like global processes, group communications, or personnel planning.
- External parties collaborating with the company.
- Any public and/or private entities requiring the communication of your personal data in relation to your employment, strictly for the relevant purpose (e.g., healthcare institutions, company doctors, welfare and social assistance institutes, insurance companies, employment agencies, professionals, entities providing supportive services to those carried out by Daikin, such as experts, consultants, legal advisors, auditing firms, leasing companies, marketing and communication agencies), public administrations, Daikin's subsidiary/parent/affiliated companies, entities resulting from potential mergers, spin-off, or other transformations of Daikin, external entities involved in activities related to or resulting from the execution of the contract, credit institutions for payment instructions or other financial activities strictly instrumental to service execution).
- Service providers, e.g., payroll providers, IT system providers, cloud service providers, database providers, and consultants.
- Insurance companies, banks, public entities acting as data controllers, for which reference to their privacy notices and policies on how they use your personal data is appropriate.

## 7 Transfers to Non-EU Countries

Daikin may need to transfer your personal data to countries located outside the European Union/European Economic Area (EEA), referred to as "third countries." Such transfers to third countries may include all processing activities mentioned in the above chapter 3. This Privacy Notice

also applies in cases of data transfer to third countries where the level of data protection differs from that of the European Union. In particular, international data transfers may occur in the following situations:

- a) **Group Companies:** Group companies located outside the European Union have entered into data protection agreements using contractual clauses in line with the standards set by the European Commission to protect privacy and legitimize international data transfers;
- b) **Other Third Parties Outside the European Union/EEA:** Any transfer of personal data to third parties will only occur after informing you and, if required, obtaining your consent. Any transfer of data to countries other than those for which the European Commission has issued an adequacy decision is based on agreements using standard contractual clauses adopted by the European Commission or other suitable safeguards in compliance with applicable laws.

## 8 Security of Personal Data

Daikin has implemented appropriate technical and organizational measures to provide an adequate level of security and confidentiality to personal data. These measures take into consideration:

- (i) the state of the art of technology;
- (ii) the costs of implementation;
- (iii) the nature of the data; and
- (iv) the risks of processing.

The purpose is to protect your data against accidental or unlawful destruction, alteration, accidental loss, unauthorized disclosure or access, and other unlawful forms of processing. Additionally, when handling your personal data, Daikin:

- collects and processes only personal data that are adequate, relevant, and not excessive, as required to fulfil the above purposes; and
- ensures that such personal data remain up-to-date and accurate.

## 9 Retention Period of Personal Data

Subject to your right to object to the processing of personal data and/or to request their deletion, Daikin will only retain your personal data for the time necessary to achieve the purpose for which they were collected or to fulfil legal or regulatory requirements, after which it is deleted from Daikin's active systems. However, in certain cases, legal or regulatory obligations (e.g., tax-related matters) require us to retain some data for a specific period, including the period following the termination of the employment or collaboration relationship between Daikin and the worker. In tax-related cases, for example, we are obliged to retain data related to worker compensation for up to 10 years. For more information about the retention period of personal data of individuals, including worker data, please refer to the Record Retention Schedule – Belgium.

## 10 Your Rights

The rights related to the personal data processed by Daikin are as follows:

- **Right of Access:** You can ask Daikin for information about the personal data stored concerning you, including information on the categories of personal data Daikin possesses or controls, the purpose for which they are used, where they have been collected (if not directly from you), and to whom they may have been communicated.

- **Right to Rectification:** You can obtain from Daikin the rectification of the personal data concerning you or communicated by you. Daikin makes reasonable efforts to ensure that the personal data it holds are accurate, complete, up-to-date, and relevant, based on the most recent information available.
- **Right to Erasure:** You can obtain from Daikin the erasure of your personal data if:
  - The personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
  - You have the right to object to further processing of your personal data and you exercise this right to object;
  - The personal data have been processed unlawfully; unless processing is necessary in terms of legal obligations, law, or to establish, exercise, or defend a legal claim.
- **Right to Restriction:** You can obtain restriction of processing of your personal data if:
  - You contest the accuracy of your personal data during the period when Daikin must verify their accuracy;
  - The processing is unlawful or the data is no longer needed for the purposes of processing, but you require it for the establishment, exercise, or defense of legal claims.
- **Right to Data Portability:** Upon your request, Daikin will transfer your personal data to another data controller, if technically feasible, provided that the processing is based on your consent or is necessary for the execution of a contract.
- **Right of Objection:** You have the right to object to the processing of your personal data at any time, provided that the processing is not based on your consent but on the legitimate interests of Daikin or third parties. In such cases, Daikin will no longer process your personal data unless compelling and legitimate reasons can be demonstrated that override your interests, rights, or freedoms, or for the establishment, exercise, or defense of legal claims. If you object to the processing, please specify whether you wish to delete your personal data or restrict its processing.
- **Right to Lodge a Complaint:** If you believe that there has been a violation of applicable privacy laws, you have the right to lodge a complaint with the Belgian Data Protection Authority (<https://www.gegevensbeschermingsautoriteit.be/www.autoriteprotectiondonnees.be>) or the location where the alleged violation occurred.

To exercise the aforementioned rights, you can contact the Data Controller at the following email address [dpc@daikineurope.com](mailto:dpc@daikineurope.com). Please note that pursuant to Article 14(3) of the GDPR, the Data Controller provides the information referred to in paragraphs 1 and 2 of Article 14 GDPR: a) within a reasonable period from the collection of personal data, but no later than one month, considering the specific circumstances in which personal data is processed; b) in case personal data is intended for communication with the data subject, no later than at the time of the first communication with the data subject; or c) in case communication to another recipient is foreseen, no later than the first communication of personal data.

To exercise the rights pursuant to Articles 15 and following of the Regulation, you may address the Data Controller Daikin Europe N.V. / Daikin Europe Coordination Center N.V., with registered office in Zandvoordestraat 300, 8400 Ostend, Belgium, registered under company number **BE0412.120.336**, or to [dpc@daikineurope.com](mailto:dpc@daikineurope.com).

## 11 Data Protection Officer

The Global Data Protection Officer responsible for compliance by Daikin in the European area with data protection regulations is Ren Caoqin.

The Data Subject can securely and confidentially contact the Data Protection Officer or their offices at any time if they have general questions regarding the processing of their personal data or for any matter related to data protection, using the following:

- Email address: [euprivacy@daikin.co.jp](mailto:euprivacy@daikin.co.jp)
- Data Protection Officer, Umeda Center Bldg., 2-4-12, Nakazaki-Nishi, Kita-ku, Osaka 530-8323, Japan.

## 12 Changes to this Privacy Notice

Any future changes or additions to the processing of personal data as described in this Privacy Notice will be notified in advance through individual notifications via the usual communication channels used by Daikin (e.g., via email).

Daikin, Ostend, 1 September 2024

Hilde Goossens

