

Data Subject Request Policy

Owner: Data Privacy Manager	Version: 1	Effective Date: October 26, 2023
Approvers: General Counsel/Chief Legal and Compliance Officer; Global Data Protection Officer; Chief Information Officer; Chief Information Security Officer		Collaborators: Human Resources, Chief Information Security Officer, Legal Counsel

Introduction & Purpose

Certain data protection laws give data subjects the ability to access, rectify, erase, restrict processing, object to processing, and/or have portable formats of their personal information. Data subjects may exercise these rights by way of a data subject rights request (i.e., a written request by an individual to a data controller or data processor to exercise her/his rights under such laws). This document establishes Hitachi America, Ltd.'s policy for responding to a data subject rights request under applicable data protection laws, including the California Consumer Privacy Act.

Hitachi America, Ltd. welcomes all reasonable requests for information. Hitachi America, Ltd. will review and, when appropriate, respond to these requests within the time period specified by applicable law.

To learn more about what constitutes personal information, please refer to Hitachi America, Ltd.'s [Global Data Protection and Privacy Policy](#) (or the "Privacy Policy").

Making a Request to Access Your Information

Depending on where you live, you may have the right to see, correct, delete, object to or limit how we process, and/or obtain a portable copy of the personal information we hold about you. However, this is not an absolute right. This means that your requests may be subject to certain exemptions or grounds on which we may refuse. Should you wish to make a request, you are encouraged (but not obligated) to do so by using our online request form found [here](#) or by calling [Hitachi America's Reporting Hotline](#).

Receiving a Data Subject Request

Upon receiving a request, we will first take steps to verify your identity to ensure the request has been made by you or by another person who is authorized to act on your behalf (such as a legal guardian or authorized agent). You may be asked to provide evidence that confirms your identity (such as proof of your address). If you are requesting on behalf of another individual, you must supply the individual's consent for the release of that individual's personal information to you.

We will then evaluate your request pursuant to applicable law, the rights of third parties, and any contractual agreements we have with you. This may involve communications with external parties who hold the relevant personal information. Unless such other parties have provided their consent or it is reasonable to do so without their consent, we will not share any information that relates to a third party. Information may be redacted with an explanation of its scope and reason.

We aim to respond to your request within the period mandated by the relevant law, or if none is specified, within a reasonable time period after you make the request. If we are unable to respond timely,

you can expect an explanation from us on why we are unable to do so. You may also receive a preliminary reply from us requesting further information or updating you on progress undertaken and/or the timing of response (including the fact that the time limit will not start to run until the further information is received).

Except where permitted by law, we will not charge you any administrative or other fee. If we do, we will inform you promptly.

Access Request: If you make a request to access your personal information, we may do any of the following as part of issuing our response when permitted by law: (a) summarize information within one or more records rather than provide a copy of the whole document; (b) provide access to your personal information on an informal basis, such as by phone or in person; (c) send physical copies of the information to you (except where otherwise agreed, it is impossible to do so, or it would involve undue effort); (d) allow you to view the information on screen. Our use of these options, and your access to the results, will depend on the means by which we received the request, the volume of information sought or the nature of the information. In any event, we will consult with you to try to satisfy your request and explain any complex terms or abbreviations contained in the information.

Refusing a Request

Data protection laws contain a number of exemptions to any right to access, correct, delete, object to and/or limit how we process, and/or obtain a portable copy of, your personal information. An example of an exemption is information covered by legal professional privilege. Should we refuse your request based on an applicable exemption, we will write to you to explain our grounds for the refusal and identify any other matters prescribed by the data protection law that are applicable to your request.

Complaints Procedure

If you are not satisfied with our actions, you may submit a complaint to the Data Privacy Office (privacy@hal.hitachi.com). If you remain dissatisfied, you may have the right to refer the matter to an appropriate data protection agency in your state or other jurisdiction.

General Application

This document forms part of and supplements the Hitachi America, Ltd. Global Data Protection and Privacy Policy and prevails over such Policy in the event of any inconsistency. This document may be used as part of general privacy compliance training for those involved in handling subject access requests.

Effective Date and Revision History:

Date: October 26, 2023

Description: Approved updates by Legal team for compliance with applicable law.