

TR-COM Data Handling Policy

Torishima Pump Mfg. Co., Ltd. (the “Company”) hereby establishes the following basic policy (the “Policy”) regarding the handling of various data in the services offered by the TR-COM rotary machine monitoring system provided by the Company (the “Services”).

1. Definitions

“Relevant Data” means an electronic or magnetic record (meaning a record used in computerized information processing that is created by you or under your authority, in relation to the Services, and stored in the Services in an electronic form, magnetic form, or any other form that cannot be perceived by the human senses).

“Customer Data” means the Relevant Data that can identify you, such as a company name, department name, personal name, or e-mail address.

“Machine Data” means the Relevant Data that fall under the categories of specification information such as the names, model numbers, and rotating speeds relating to the machines and devices registered by you, the data on communication and electronic equipment collected and accumulated upon starting the use of the Services, or the data relating to the operation status of devices.

“Sensor Data” means the Relevant Data that fall under the categories of the numerical data outputted by a TR-COM sensor’s samplings or operations such as temperatures and vibrations.

“Content Data” means the Relevant Data that fall under the categories of text, voices, music, images, videos, software, programs, code, or other information.

“Authorization to Use” means any and all authorization relating to data including the authorization to use, disclose, assign (including licensing), and dispose of the Relevant Data.

2. Purposes of Use

The Company uses the Relevant Data for the purposes of providing, maintaining, and enhancing the Services as well as improving our products, services, and contents related thereto. In addition, the Company may use the Relevant Data in combination with other information to the extent necessary to achieve these purposes.

3. Range of Use

The Company has Authorization to Use the Relevant Data within the range of the above Purposes of Use and may share with its subsidiaries and affiliates, and shall not use the Relevant Data for any purpose other than the said purposes of use. The Company shall not, without your prior written consent, disclose, provide, sell, loan, or share the Relevant Data to/with

any third party, except the Company and its subsidiaries and affiliates; provided, however, that this shall not apply in cases falling under the following items or where the Company reasonably so determines.

4. Handling of Relevant Data in the Services

4.1 Exceptions to Range of Use

- 1) Cases where you give directions or authorization that the Relevant Data be disclosed;
- 2) Cases where the Relevant Data is anonymized information or otherwise processed in a manner that prevents identification of an individual or a corporation;
- 3) Cases where the Relevant Data is required to be disclosed in accordance with a court order or subpoena to protect the rights or property of the Company or other users, including cases where the Company's contracts or policies are required to be changed for the prevention of fraud or your use of the Services.
- 4) In cases where the Company sells or reorganizes all or part of its business, the Company shall provide information to the third party or parties who have acquired the Company's assets to the extent permitted by law. In all circumstances mentioned above, the Company shall notify you of the contents of the disclosure related to you in preference to other disclosures.

4.2 Granting Access Rights in Collaboration with Other Companies

The Company occasionally contracts with vendors, consultants, and other service providers, aiming for the provision of the Services. The Company may provide these companies with rights to access information as necessary.

5. Data Management

5.1 Data Management

The Company shall store the Relevant Data in clear distinction from other information to keep the Relevant Data in confidence, and handle the Relevant Data with the due care of a prudent manager, complying with the guidelines of competent authorities as well as taking reasonable measures (appropriate measures necessary to prevent unauthorized access, improper use, and other misconduct) to maintain confidentiality. The Company exercises extreme caution regarding security, to protect your information. In order to ensure that the Relevant Data are strictly managed, the Company makes all employees thoroughly understand the Policy and security guidelines of the Company and strictly enforces the protection of information on you

within the Company. Relevant data will be stored, managed and operated in Japan.

5.2 Security System

The Company uses computer systems with limited access within its facilities where physical security measures are taken and manages the Relevant Data on a server for which security measures of a level generally required in the industry are implemented.

6. Intellectual Property Rights

If any intellectual property right arises based on the analysis, process, and the like resulting from the original ideas of the Company with the use of the Relevant Data, such intellectual property right shall be vested in the Company. Even if an intellectual property right is not recognized, the proprietary value thereof shall be vested in the Company.

7. Ownership

7.1 Ownership vested in you

The ownership of the Machine Data and the Content Data uploaded onto the Services shall be vested in you.

7.2 Ownership not vested in either the Company or you

Since the Sensor Data are generated or created from a TR-COM sensor, the ownership thereof and intellectual property rights thereto shall not be vested in either the Company or you, but the Authorization to Use the same shall be held by both the Company and you.

8. Data Deletion Request

The following Relevant Data stored in the Services shall be deleted upon a data deletion request from you:

- 1) Customer Data;
- 2) Machine Data; and
- 3) Content Data.

9. Changes to the Policy

The Company may, at its discretion, change the Policy without your prior consent. In such case, the Company shall immediately announce the provisions after such change to you by disclosure from this system, mail delivery, or other means. The Policy after the change shall become effective at the time the Company notifies you.

10. Supplemental Provisions

The Policy shall be applicable as from October 1, 2021.

This policy revision is effective February 1, 2024.