

Privacy Policy

This Privacy Policy is issued jointly by Hitachi Construction Machinery Oceania Holdings Pty Ltd and Hitachi Construction Machinery (Australia) Pty Ltd which operates as an integrated group with certain levels of shared management (together, the “Company”). Hitachi Construction Machinery Oceania Holdings Pty Ltd and Hitachi Construction Machinery (Australia) Pty Ltd as Related Bodies Corporate may collect, hold, use and disclose Personal Information jointly and share such Personal Information between them for the purposes described in this Policy and such sharing forms part of the ordinary business operations and internal management of the entities.

The Company collects, uses, discloses and holds Personal Information provided to the Company in carrying out various functions and activities. The Company has a responsibility to ensure that its management of Personal Information is in accordance with the Australian Privacy Principles as set out in the Privacy Act.

Purpose

The purpose of this Policy is to provide a clear description of how the Company collects and manages Personal Information.

Definitions

‘Company’, ‘our’, ‘us’, ‘we’ means Hitachi Construction Machinery Oceania Holdings Pty Ltd (ABN: 94 632 744 275) and Hitachi Construction Machinery (Australia) Pty Ltd (ABN: 62 000 080 179).

‘Personal Information’ has the same meaning given to it by the Privacy Act.

‘Privacy Act’ means the *Privacy Act 1988* (Cth).

‘Related Body Corporate’ has the same meaning given to it by the *Corporations Act 2001* (Cth).

‘Sensitive Information’ has the same meaning given to it by the Privacy Act.

Commitment to privacy and data protection

The Company commits to complying with applicable laws when collecting and handling Personal Information.

The Company establishes and enforces our rules regarding Personal Information protection that adheres to applicable laws.

The Company will never collect Sensitive Information from an individual unless permitted by law or the individual it concerns has given consent.

What kind of Personal Information is collected by the Company

The Company will collect Personal Information when it is reasonably necessary to provide the products or services it offers or for other purposes in connection with its business.

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The Company may collect names, addresses, tax file numbers, contact details, driver licence, professional accreditation, job titles, financial data and references. The Company may also collect internet data (including user behaviour data, IP addresses and social media profiles). The Company may combine information provided by third parties with information directly provided to the Company. In the course of employment, the Company may gather photographs, images and voice recordings from employees for the Company's various business activities.

Why Personal Information is collected by the Company?

The Company collects and uses Personal Information when it is reasonably necessary to achieve the following purposes:

Scope	Purposes
Individuals involved in the Company's business activities	• Responding to inquiries • Providing information about events, campaigns, new products and services • Fulfilling legal obligations and exercising rights under laws and regulations • Delivering behavioural targeted advertising using advertisement distribution companies • Analysing attribute information and behavioural history obtained by the Company to understand your interests and requests • Other business activities within the scope generally considered to be legitimate in carrying out the business of the Company
Customers (including potential customers)	• Business activities that are generally considered to be legitimate when providing the Company's products and services (including membership services and after-sales services such as warranty), sales, business negotiations, pre-transaction screening, credit checks, contract implementation and conclusion, debt management and collection, etc. • Business activities that are generally considered to be legitimate when developing and improving the quality of the Company's products and services (surveys and analysis, etc.)

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Suppliers (including potential suppliers)	• Business activities that are generally considered to be legitimate when receiving products and services for the Company (sales, business negotiations, contract implementation and conclusion, provision of the Company's designated system, management of customer information, contact required for business, etc.)
Participants in the Company's hosted events	• Implementing, continuing, and improving events hosted by the Company, operations within the scope generally considered to be legitimate (contact and guidance regarding events, questionnaires, analysis, etc.)
Job applicants	• Contacting and providing information to those who wish to join the Company • Recruitment activities and selection procedures • Pre-employment medical assessments at the time of employment and other medical assessments which may be required for various employment tasks or assignments • References for recruitment activities and other business activities related to or incidental to recruitment selection and onboarding etc.
Employment activities	• Payroll processing • Time and record keeping • Workers compensation claims • Workplace health and safety management • Training, career development and workplace accreditation/licences • Obtain feedback about the Company and its activities • Performance appraisal and management • Arranging business travel • Providing IT and telecommunication services • Other activities in connection with providing employment, including compliance with applicable law and

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	regulations in satisfying the Company's obligations as an employer/host employer • Marketing, promotion and communication purposes about Company's products and employment with the Company across various media
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Except as otherwise required by applicable law, you are not obligated to provide Personal Information to the Company. However, this may result in any of the following circumstances:

- you may be unable to obtain or access (fully or partially) various goods, services, systems or support the Company provides;
- you may be unable to obtain or access information the Company may wish to provide to you about its goods, services, systems or support;
- the Company not being able to proceed with your job application; or
- the Company not being able to provide you with information or services as an employer or host employer.

How does the Company collect Personal Information?

The Company will only collect Personal Information through lawful and fair means. The Company will collect Personal Information directly from the subject individual unless the individual has consented to collection of their Personal Information from a third party, where it is unreasonable or impractical to directly collect such information from the individual, and/or where the Company is required or authorised by law to collect Personal Information from a third party.

The Company may collect Personal Information when an individual:

- communicates with the Company, including by physical post, email, social media, telephone, text message, fax, or via the Company's website;
- visits a website that displays or links to this Policy;
- visits the Company's locations or meets with the Company's representatives;
- uses the Company's products or engages the Company's services;
- attends events hosted by the Company or visits the Company's booths at exhibitions, conferences or expos;
- applies for or accepts a job at the Company; and/or
- offers to supply or supplies goods and services to the Company.

Regardless of who provides Personal Information to the Company, it will always be handled by the Company in accordance with this Policy.

Disclosure of Personal Information

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In providing our customers with their chosen product or service or in the course of the Company's business operations including to fulfil its obligations as an employer, the Company may sometimes need to disclose Personal Information to our advisers, agents, contractors, government bodies or a Related Body Corporate.

Sometimes, the law requires the Company to disclose Personal Information. For example, Personal Information may be disclosed to a court in response to a subpoena or to a government agency such as the Australian Taxation Office on receipt of a direction issued under taxation laws or to the Australian Skills Quality Authority for skills accreditation purposes.

The Company may disclose Personal Information to prevent illegal use of the Company's products and services or violation of our Website Terms of Use, or to defend the Company from third-party claims. We may also disclose Personal Information to organisations that assist with fraud protection or investigation.

The Company may disclose an individual's Personal Information where the individual consents to the Company doing so. That consent may be written, verbal or implied from the individual's conduct.

How long does the Company keep your Personal Information

The Company will retain Personal Information for as long as it is necessary to fulfill the purpose of use (including for legal or accounting requirements). When deciding how long to retain Personal Information about an individual, the Company will consider several factors such as the amount, nature and sensitivity of the Personal Information; the risk of unauthorised use or disclosure of the Personal Information; purpose of use of the Personal Information; whether the Company can achieve the purpose of use through other means; any consents you have provided and any applicable legal requirements.

In some cases, the Company may anonymise Personal Information for research and statistical analysis by rendering the Personal Information no longer identifiable to an individual. The Company may use the anonymised information for an unlimited period without notifying you.

International access to Personal Information

The Company may transfer Personal Information to countries or regions including those that do not have Personal Information protection laws or regulations equivalent to those in the country or region in which you reside or are located as the Company conducts our functions and activities globally. This may include access by other members of the Hitachi Construction Machinery group located outside Australia. The Company will take appropriate measures in accordance with the provisions of the Privacy Act when transferring Personal Information to these countries or regions.

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Direct Marketing

From time to time, the Company may use Personal Information to provide information about our products and services including special offers, events or promotions and to inform individuals about developments within the Company and employment opportunities with the Company. The Company may send an individual with material relating to joint promotions with other business associates of the Company of our respective products and services.

If an individual does not wish to receive this information, please let us know by contacting the Company's Privacy Officer on privacy@hcma.com.au.

Once an individual lets us know that they no longer wish to receive this information, we will stop sending it. The individual can change their mind about receiving information about our products and services at any time. They just need to let us know by emailing privacy@hcma.com.au.

If the law requires the Company to provide an individual with information about the Company's products or services, the Company will provide that information even if the individual has elected not to receive information about our products and services generally.

How the Company ensures that Personal Information is up to date

The Company relies on the Personal Information we hold in conducting our business. Therefore, it is very important that the information we hold is accurate, complete and up to date.

The Company takes reasonable steps to ensure that the Personal Information it holds is accurate, complete and up to date whenever we collect or use it. This means that from time to time, the Company will ask individuals to tell us if there are any changes to their Personal Information. If an individual finds that information the Company holds about them is incorrect, they should contact us immediately and it will be corrected.

How the Company stores Personal Information

The Company holds the Personal Information it collects in its electronic databases, computer systems and in physical documents which it either manages and controls or is managed by a third party on the Company's behalf with the authorisation of the Company.

How does the Company protect your Personal Information

The Company takes necessary and appropriate measures to prevent the loss, destruction, alteration and leakage of Personal Information and to ensure its security. The key measures are as follows:

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1. Institutional Measure

- We will regularly review the operational status of information security and personal information protection.

2. Human Security Control Measures

- The Company regularly conducts employee training on Personal Information protection and information security according to their roles and responsibilities.
- The Company requires employees to sign and submit a confidentiality agreement as part of their employment contract when joining the Company and enforce strict compliance with regulations regarding the protection of confidential information during and after their employment.

3. Physical Control Measures

- Entrances and exits to information security areas are limited and, as a general rule, are kept locked at all times. In addition, records of entry and exit are kept. Furthermore, the Company has established entry permission standards for the area and restrict access to unauthorised personnel.
- We implement thorough theft prevention measures for devices that handle personal data and manage such data by encrypting it or applying equivalent confidentiality safeguards.
- When disposing of or reusing documents, information storage media, or information devices that contain confidential data, the Company ensures that all stored information assets are completely erased to make them indecipherable or unreadable.

4. Technological Security Control Measures

- The Company properly manages information devices and information system accounts, and restricts access to information systems that handle personal data (e.g., minimising privileged accounts, requiring managerial approval for issuing privileged accounts, conducting periodic reviews of general and privileged accounts, etc).
- In order to prevent unauthorised access from external parties and information leakage, we implement appropriate security measures for IT devices, such as PCs, servers, and networks, used by the Company. In addition, we continuously monitor for signs of cyberattacks, unauthorised use of information systems, and potential security flaws or vulnerabilities.

5. Understanding External Environment

- In order to prevent unauthorised access from outside and prevent information leakage, the Company collects system vulnerability information in real time.

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Access to and correction of Personal Information

The Company will respond to inquiries from an individual regarding whether it holds any Personal Information relating to that individual and depending on the circumstances and requirements under applicable law, may allow access to and/or correction of any such Personal Information. Individuals can make enquiries by contacting us by email at privacy@hcma.com.au.

Depending on the amount of information requested to be accessed, the Company may charge an access fee to cover the cost of retrieving the information and supplying it to the individual who has requested access if the Company decides to provide access.

Access to Personal Information may be refused in a number of circumstances, such as where the information relates to anticipated legal proceedings or the request for access is frivolous or vexatious. If the Company denies or restricts an individual's access to their Personal Information, we will explain why.

If an individual requests the Company to correct Personal Information we hold in relation to the individual, we will take reasonable steps to correct the Personal Information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

Resolving complaints

If an individual believes that the privacy of their Personal Information has been compromised or believe the Company has not complied with the Privacy Act, they are entitled to lodge a complaint. Complaints can be made by the individual contacting the person or department they were dealing with or by emailing privacy@hcma.com.au. The Company will respond to complaints as soon as possible.

If you disagree with our decision in relation to your complaint, you may refer your complaint to the Office of the Australian Information Commissioner by visiting www.oaic.gov.au, calling 1300 363 992 or by emailing enquiries@oaic.gov.au.

Additional information

Individuals who would like more information about the Company's approach to privacy are encouraged to email: privacy@hcma.com.au.

Use of Cookies and Web Beacons

The Company uses cookies and web beacons to improve and modify the content of our website and other features aimed to better meet your needs. For more information, please see the Company's 'Cookies Notice' which can be accessed on our website [here](#).

Links to Third Party Websites

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The Company website may contain links to third party websites. The Company does not take any responsibility for the handling of Personal Information on such third party websites. The Company recommends that you review the privacy policy of any third party websites before using them

Changes to this Policy

The Company will update this Policy from time to time to reflect the changes in practices, technologies, legal requirements and other factors. Updates will be effective from the 'Last Updated' date stated on the bottom of this Policy.

Last Updated: 24 August2026