

For detailed information relating to the FarmCentre Tracker application please refer to 3 below.

## **PRIVACY AND COOKIE INFORMATION**

*Kverneland Group, including the brands Kverneland, Vicon, FEDE and ROC, is a subsidiary of Kubota Holdings Europe B.V (hereinafter also referred to as Kubota).*

## **ABOUT KUBOTA AND OUR APPROACH TO PRIVACY**

Kubota Holdings Europe B.V. and its subsidiaries<sup>1</sup> and affiliates (collectively “Kubota”) take your privacy and your personal data seriously. Kubota understands transparency and respect are foundational aspects of longstanding relationships and, therefore, takes every reasonable effort to protect the information you provide to us.

This Privacy Notice applies to any personal data provided to or collected by Kubota. References in this Privacy Policy to “Kubota”, “we”, “us” or “our” mean Kubota Holdings Europe B.V. and its subsidiaries and affiliates. Each Kubota entity which controls the ways your personal data are collected and the purposes for which your personal data are used will be the relevant “data controller” for the purposes of the applicable local legislation and the European Data Protection Regulation.

This Privacy Notice describes the types of personal information we collect, how we use the information, with whom we share it, and the choices you can make about our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices.

Our privacy practices may vary among the countries in which we operate to reflect local practices and legal requirements.

Our websites may provide links to other websites for your convenience and information. These websites may operate independently from Kubota. Linked websites may have their own privacy notices or policies, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites you visit are not owned or controlled by Kubota, we are not responsible for the websites’ content (including ‘cookies’ used on that website), any use of the websites, or the privacy practices of linked websites.

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## 1. WHAT IS PERSONAL DATA

We refer to personal data according to the following definition given in the General Data Protection Regulation (GDPR):

“any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

## 2. HOW WE COLLECT AND USE PERSONAL DATA

Kubota and its subsidiaries and affiliates may collect personal data as described below, depending on processing purposes applicable to you.

<b>Activity</b>	<b>Processing purpose and legal basis</b>	<b>Data categories</b>	<b>Data source</b>
<b>Order fulfilment, lead generation, product integration, Product owner registration,</b>	We process personal data for the purpose of products/services order processing and fulfilment, which also	Name, contact details, order and payment details, other information you	You / Dealers and distributor network

	<p>includes services provided via our online portals (such as Partner-portals, End-Customer/User-portals and Product and Media-portals). We may exchange data with dealers and/or distributors where necessary. The latter also includes where we follow up on your request to be contacted by a relevant dealer or sales partner distributor within our network or via online lead generating platforms.</p> <p>Where you request us to integrate our products/services with a product or service of a third party, such integration may require us to share relevant information with such third party. This may for example include fleet management system providers or third party add-on services to our</p>	provide us with.	
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	<p>telematics services/products. Data processed in this context may include machine/product diagnostics data and machine/product GPS-location data.</p> <p>The legal basis for this data processing is partly necessary for the purpose of entering into or performing an agreement with you, and partly based on our legitimate interest as described above.</p>		
<b>Customer service and support</b>	<p>We process personal data for the purpose of providing customer service and support. This may for example relate to updating and securing warranty services, financing or purchasing, product delivery and maintenance support. We may share your personal data with parties involved in the provision of services or</p>	<p>Name, contact details, order history details, business communications, location data, other information you provide us with.</p>	<p>You / Dealers and distributor network</p>

	<p>carrying out the transactions you request, including distributors and dealers.</p> <p>At your request, customer support may also include the use of product diagnostics data and product location data of your relevant product for diagnostics and maintenance services, including sharing such data with the dealer/distributor involved in the context of providing such support.</p> <p>The legal basis for this data processing is partly the necessity to process data for the purpose of entering into or performing an agreement with you, and partly based on our legitimate interest as described above.</p>		
<p><b>Marketing and communications</b></p>	<p>We engage in marketing activities for the purpose promoting our products</p>	<p>Name, contact details. order history details, business</p>	<p>You / Our marketing and communications</p>

	<p>and services, including via telephone, e-mail and post. You can opt-out to receiving marketing communications at any time.</p> <p>The legal basis for sending you marketing communications is consent, except where we are permitted under applicable law to send you use communications for products and similar to past purchases you have made with us.</p>	communications	department
<p><b>Customer surveys and feedback</b></p>	<p>With your consent, we may invite you to participate in customer surveys to help us improve our products and services.</p> <p>When possible we will send out customer surveys, and request for feedback, to you based on our legitimate interest to understand how our business, products and</p>	Name, contact details, survey feedback, product ownership info	You

	performance is reviewed.		
<b>Events/site visits</b>	<p>If you participate in a live or digital event/site or visits hosted and recorded by us via photo and/or video, public comments and questions shared by you during such event may be included in such recordings. We may publish such recordings after an event for our marketing purposes. We may also require registration details in the context of your attendance of an event or site visit.</p> <p>The legal basis for this data processing is our legitimate interest as described above.</p>	Photo/video footage, Name, contact details, information provided by you in the context of an event/site visit.	You / Our responsible department
<b>Job applications</b>	We may use information submitted by you either via mailing or online via any Kubota website or portal designated for this purpose to determine	Name, contact details, information you provide by your application, communications with you.	You, social media (such as LinkedIn)

	<p>your eligibility for any vacancy for which you have applied in accordance with the advertised eligibility criteria and any relevant privacy notice given to you when using such website or portal.</p> <p>The legal basis for this data processing is our legitimate interest as described above.</p>		
<p><b>Follow-up and Improvement of products and services</b></p>	<p>For product and service research and development purposes, we collect and analyze data generated by products which are equipped with telematics hardware. Such data may also include GPS-locations of such product and detailed diagnostics data about how a product is operated.</p> <p>The presence of telematics hardware in product is indicated by a sticker and or other</p>	<p>Telematics (machine/product diagnostics, machine/product GPS location data).</p>	<p>Telematics-equipped products</p>

	<p>identifying imagery.</p> <p>The legal basis for this data processing is our legitimate interest as described above.</p> <p>Telematics functionality can be disabled. Please contact your local dealer/distributor for more information and assistance in regards to telematics functionality.</p>		
<b>Dealer/distributor staff data</b>	<p>If you are a dealer/distributor staff member, we process your personal data in the context of our legitimate interest to perform our rights and obligations under the agreements and cooperation with such dealers/distributors.</p>	<p>Name, contact details, business communications.</p>	<p>You, Dealers and distributor network</p>
<b>Administration</b>	<p>We process personal data insofar necessary for the purpose of compliance with legal company administration and record keeping obligations (such as tax-</p>	<p>Name, contact details, order and payment details, business communications.</p>	<p>You / Dealers and distributor network</p>

	based retention obligations) and our legitimate purpose to maintain a proper administration in the context of our day-to-day business operations.		
<b>Cookies and similar techniques</b>	Information about our use of cookies and similar techniques is included in our <a href="#">Group Privacy Notice</a> .		
<b>Video surveillance</b>	<p>Our offices and facilities may indicate the presence of video surveillance, implemented in accordance with local law as applicable. We use video surveillance for the purpose of protection our properties and staff, including to prevent and investigate safety incidents.</p> <p>The legal basis for this data processing is our legitimate interest as described above.</p>	Video footage (may also include audio)	Our responsible department

<b>Compliance</b>	<p>We may disclose your data to comply with court orders and legal or regulatory requirements; to prevent injury, death, losses, fraud or abuse; to protect Kubota's rights or to defend Kubota in legal proceedings; and where needed in connection with the sale or transfer of business assets.</p> <p>The legal basis for this data processing is partly based on the necessity to comply with legal obligations, and partly based on our legitimate interest as described above.</p>	Context-dependent	Context-dependent
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### 3. FARMCENTRE TRACKER APPLICATION

#### **Kverneland Farmcentre Tracker application**

FarmCentre Tracker application is an Apple and Android mobile application that, when combined (Paired) with an Tag can be used to locate and track the movement of farm implements in real time, review how fields/locations have been worked, and gather data on work rates. The application is required to be connected (Paired) with the Tag to allow for the location monitoring. The data is hosted on a secure server in the cloud.

Activity	Processing purpose and legal basis	Data categories	Data source
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<p><b>Create an account</b></p>	<p>To make use of our services, you must create an account on the mobile application. With this account, we are able to provide you with the application. After registration, we store the personal data you entered in your account.</p> <p>We store this data in the context of our services (performance of the contract).</p> <p>The creation of secondary accounts are possible for additional users on the farm. The creation of the secondary account and levels of access are viewable on the primary owners account.</p>	<p>Company name; Name contact person; Company address; Company Email; IP address; Company Phone number;</p>	<p>You</p>
<p><b>Use of the application</b></p>	<p>Only one person is able to register as a primary user, but there will be secondary accounts connected to the primary user account. In the most cases, the machine owner/farmer who owns the implements, will register as the primary user of the product. The application will be on the mobile devices of the primary owner, their additional devices or staff devices. The application will pair with the Tag to provide location data on the implement in use.</p> <p>We collect and process this data to be able to provide the service as is required (performance of contract).</p> <p>We further collect and process this personal data because we have a legitimate interest to do so.</p> <p>We process data that is collected from our product in order to improve and deliver the services that we offer with the FarmCentre Tracker application as a product. This includes the processing of most device data and GPS-data. Without this information, the application will not work and will not provide the necessary data.</p>	<p>Name; Address; Email; IP address; FarmCentre Tracker license identifier; Tracking: latitude and longitude (home coordinates set by user); Task data and results; Positions tracking GPS; Analytics use data</p>	<p>You and Telematics-equipped products,</p>

	<p>We may use third-party Service Providers to monitor and analyse the use of our application. The use of the services are based on our Legitimate Interest to ensure the platform works as intended and for product improvement purposes.</p> <p>We shall ask for your Consent if it is required for the processing.</p>		
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The Farmcentre Tracker application and service is Powered by FarmBackup for further information on the Terms and Conditions and privacy Notice of Farmbackup: [https://farmbackup.com/task/privacy\\_policy](https://farmbackup.com/task/privacy_policy)

The location data of the FarmCentre Tracker application and associated smart device will only be tracked when the application is in service and is connected to the paired Tag. Please contact us via [khe\\_g.privacy@kubota.com](mailto:khe_g.privacy@kubota.com) if you want to object to the use of your personal data or if you have any questions.

#### 4. RETENTION OF YOUR PERSONAL DATA

Kubota will retain personal data no longer than is permitted under applicable data protection laws. The applicable data retention period may vary per data category. The criteria on which our retention policy is based are:

- The necessity to retain data in light of the purpose for which they have been collected;
- Compliance with applicable data retention obligations under mandatory law (such as tax regulations);
- The relevance of data in light of pending or potential legal proceedings; and
- Applicable limitation periods under civil law.

Please let us know in case you have specific enquiries regarding the applicable retention period to specific categories of personal data. We are more than happy to provide you with additional information in this regard.

#### 5. YOUR RIGHTS AND CHOICES

You have certain rights regarding the personal information we maintain about you. We also offer you certain choices about what personal information we collect from you, how we use that information, and how we communicate with you. In accordance with the applicable laws, it is your right to

- **access to your personal data** processed by Kubota. Namely, you can obtain confirmation that we hold personal information about you, request access to and receive information about the personal information we maintain about you, receive copies of the personal information we maintain about you.
- request **correction, update** and **deletion** of personal data
- **object**, for legitimate reasons, to your personal data being processed;
- **object** to your personal data being used for prospecting purposes, including commercial purposes (marketing);
- **withdraw any consent** declaration given through the website or in any other manner (if any) with effect for the future at any time, and to access the wording of such consent declaration at any time.

You can at any time tell us not to send you marketing communications by contacting us as indicated in the section 'How to contact us' or by clicking on the unsubscribe link within the marketing e-mails you receive from us. For opt-out options please.

If you provide us with any information or material relating to another individual, you should make sure that the sharing with us and our further use as described to you from time to time is in line with applicable laws, so for example you should duly inform that individual on the processing of her/his personal data and obtain her/his consent, as may be necessary under applicable laws.

Kubota does not knowingly collect personally identifiable information from or market to **children under the age of 13 years old**. If a child under the age of 13 has provided personal data to Kubota through our website, a parent or guardian may contact Kubota to request the information be deleted from our records. Following receipt of such a request, we will make reasonable efforts to delete the child's information from our records.

If you are concerned that we have breached your rights you can lodge a complaint by contacting Kubota as indicated in the section How to Contact us. Our Data Protection Officer will manage your complaint and will give you additional information about how it will be handled.

You have the right to complain to the national Data Protection Supervisory Office in your country if you believe we do have not handled your request in an appropriate manner. You can find the relevant authorities for your country at this link: [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en)

## 6. INTERNATIONAL DATA TRANSFERS

We may transfer the personal information we collect about you to recipients in countries other than the country in which the information was originally collected. Please note that Kubota goes through detailed due diligence process before selecting the data processors with whom we share your personal data.

In the context of intra-group day-to-day business, we may transfer personal data to our parent company in Japan. Japan is recognized by the European Commission as offering an equivalent level of data protection as the European Economic Area.

Insofar personal is transferred to receivers located in the United States of America, we have entered into so-called Standard Contractual Clauses (approved by the European Commission) with such receivers for the purpose of compliance with European data protection laws.

## 7. SECURITY

The security of your personal data is important to Kubota. We are committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide, or we collect against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. These safeguards are intended to protect the confidentiality, integrity and availability of the information you provide to us. We periodically assess risks to your information and update our policies, procedures and technology accordingly.

Kubota stores personal information only for as long as it is necessary for the fulfilment of the purpose for which the personal information was collected, unless otherwise required or authorized by applicable law. We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

## 8. UPDATES TO OUR PRIVACY NOTICE

This Privacy Notice was last updated on July 2024 and may be updated periodically to reflect changes in our personal information practices. We will inform you about material changes in the privacy statement insofar required under applicable law.

## HOW TO CONTACT US

If you have any questions or comments about this Privacy Notice, Kubota privacy practices or if you would like to exercise your rights or to update information or preferences you provided to us, please contact us using the details below:

### **Chief Privacy Officer**

Kubota Holdings Europe B.V.  
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2153LR Nieuw-Vennep The Netherlands  
khe\_g.privacy@kubota.com

*1. Kubota Europe SAS, Kubota (Deutschland) GmbH, Kubota (U.K.) Ltd., Kubota Baumaschinen GmbH, Kubota Farm Machinery Europe SAS, Kubota Research and Development Europe SAS, Kubota Espana S.A., Pulverizadores Fede S.L., Kverneland AS <https://ien.kvernelandgroup.com/About-us/Manufacturing-Competence-Global-Presence/Global-Presence-and-Supplier-information>*