

SMART CONSTRUCTION

GDPR in Smart Construction Solutions

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Smart Construction and personal data

Personal data collected depends on the Smart Construction service

- For most services (incl. SC Dashboard, SC Fleet and SC Remote), the customer decides why and how personal data are processed, acting as data **controller**
- For most services (incl. SC Dashboard, SC Fleet and SC Remote), Komatsu uses most personal data upon instruction of the customer (e.g., to provide the service), acting as data **processor**



Smart Construction Partners do not have access to customer personal data unless the customer explicitly grants the SC partner access to the Smart Construction service



device information

operator id

location

name

communication

machine usage
pictures

working time

How we ensure GDPR compliance in Smart Construction

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The data processing agreement is between Komatsu and the customer.

GDPR is part of the App Terms and Conditions (<https://smartconstruction.io/legal-overview/>)

The Privacy notice for the customer portal and certain apps where Komatsu acts as controller
Are available on the Smart Construction website (<https://smartconstruction.io/legal-overview/>)

- ✓ An internal data protection impact assessments has been performed for more GDPR-sensitive applications (including Fleet and Field)
- ✓ Komatsu has put a “Data processing agreement” with third-party subcontractors in place (if any)
- ✓ Data transfer arrangements are in place

A “Data protection officer” has been appointed for the offered cloud solutions

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