

**Privacy POLICY pursuant to article 13 of EU Regulation 2016/679- GDPR - Privacy Policy for the processing of personal data obtained from the data subject.**



**WHAT IS THE PURPOSE OF THIS PRIVACY POLICY**

In compliance with the provisions of Regulation (EU) 2016/679 (General Data Protection Regulation), this Privacy Policy provides information about how we process the personal data that you provide. This Privacy Policy is provided pursuant to article 13 of the GDPR. This privacy policy is not valid for other websites that may be consulted through links on the websites in the domain of the owner, who declines all and any liability for the websites of third parties.

This privacy policy is also based on the provisions of Directive 2002/58/EC, as updated by [Directive 2009/136/EC](#), on Cookies, the [Guidelines on cookies and other tracking tools of the Data Protection Authority](#) and the [EDPB Guidelines 05/2020 on consent pursuant to the GDPR, introduced on 4 May 2020](#)

**PERSONAL DATA PROCESSED:**

**Personal Data:** "personal data": means 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; (C26, C27, C30 GDPR)

**Data of the contracting parties.**

**Browsing data**

The computer systems and software procedures used to operate this website acquire, during their normal functioning, personal data whose transmission is implied in the use of Internet communication protocols. This data is not collected for the purpose of being associated with identified data subjects, but could, by its very nature, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users to access the website, the addresses in the URI (Uniform Resource Identifier) notation of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained as reply, the code number indicating the status of the reply from the server (successful, error, etc.) and other parameters relating to the user's operating system and computer system.

**Data provided by the data subject**

The optional, explicit and voluntary sending of messages to the contact addresses indicated on this website and/or the compilation of data forms implies the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data entered

**Specific privacy policies**

Specific privacy policies may be present on the pages of the website for particular services or processing of the data provided.



**COOKIES. WHAT ARE COOKIES? WHY ARE COOKIES USED?**

For more information on the cookies used by this website, see the cookie policy in the footer and on the [following link](#)







1. The **DATA CONTROLLER**, pursuant to articles 4 and 24 of EU Regulation 2016/679, is **Mitsubishi Electric Europe B.V.**, with registered office in 1119NS Schiphol – Rijk Capronilaan 34 The Netherlands, branch office in Vimercate (MB), Via Energy Park n. 14, represented by its legal representative, and may be contacted on the following email address [privacy@it.mee.com](mailto:privacy@it.mee.com)







2. **DATA PROTECTION OFFICER (DPO)**, appointed pursuant to articles 37 – 39 of Regulation (EU) 2016/679, who may be contacted on: [MEU.DMO@mecc.mee.com](mailto:MEU.DMO@mecc.mee.com)





**3. PURPOSE AND LEGAL BASIS OF PROCESSING, RETENTION PERIOD, NATURE OF THE PROVISION OF DATA**

 <b>PURPOSE OF PROCESSING</b>	 <b>LEGAL BASIS</b>	 <b>RETENTION PERIOD</b>	 <b>NATURE OF THE PROVISION OF DATA</b>
<p>Browsing on this website. These data, which are necessary to use the web services, are processed in order to</p> <ul style="list-style-type: none"> <li>•obtain statistical information on the use of services (most visited pages, number of visitors per time slot or day, geographical areas of origin, etc.);</li> <li>•check the correct operation of the services offered.</li> </ul> <p>The data will be used to ascertain liability in the event of hypothetical computer crimes against the website.</p>	<p>Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, taking into account the reasonable expectations of the data subject and the activities strictly necessary for the operation of the site and browsing. (Article 6, paragraph 1 (f) and C47 of the GDPR)</p>	<p>Browsing data will be retained for the duration of the browsing session and in any case the retention will not exceed for more than a few days (unless this is necessary to investigate crimes by the judicial authority).</p>	<p>The provision of data is necessary to browse the website.</p>
<p>Use of cookies and comparable technologies. See the cookie policy in the footer of the website.</p>	<p>For the necessary non-technical comparable cookies and technologies, processing is based on consent to the processing of personal data (article 6 (1) (a) and C42, C43 of the GDPR).</p>	<p>See the cookie policy in the footer of the website.</p>	<p>See the cookie policy in the footer of the website.</p>

In addition to browsing:

 <b>PURPOSE OF PROCESSING</b>	 <b>LEGAL BASIS</b>	 <b>RETENTION PERIOD</b>	 <b>NATURE OF THE PROVISION OF DATA</b>
<p><b>A)</b> personal data will be processed, according to each data collection area, in order to manage the service requested and for the related activities for:</p>			
<p>- <b>CONTACTS</b>, sending contact requests, information, for the management of the service, assistance, returns, technical support</p>	<p>processing is necessary to execute a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to</p>	<p>Maximum 12 months</p>	<p>The provision of data is mandatory. Failure to provide the necessary data will make it</p>

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<p>- <b>CUSTOMER AREA</b>, to access the reserved area, download information, documentation, videos, etc.</p>	<p>entering into a contract; (C44) article 6, paragraph 1(b) of the GDPR</p> <p>processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract (C44) Article 6(1) (b) of the GDPR</p>	<p>Through to termination of the contract and the time actually required to disable the credentials</p>	<p>impossible to receive the service</p>
<p><b>RECRUITMENT OF PERSONNEL IN THE WORK WITH US AREA</b> to submit an application for the recruitment of personnel in order to establish an employment relationship, even for positions other than those for which the data subject spontaneously has submitted an application; storage of personal data above all for future recruitment; management of applications in response to job offers published on our website; interviews and any video-interviews (processing of data including images/audio).</p> <p>For other purposes related to recruitment, please refer to the specific information in the dedicated area if this is present on the website</p>	<p>processing is necessary to execute a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract; (C44) article 6, paragraph 1(b) of the GDPR</p> <p>For other purposes related to recruitment, please refer to the specific information in the dedicated area if this is present on the website</p>	<p>Maximum 24 months</p> <p>As a general rule, the data collected during the recruitment process will be deleted as soon as it is known that the applicant will not be offered a job or that the offer will not be accepted by the applicant</p> <p>For other purposes related to recruitment, please refer to the specific information in the dedicated area if this is present on the website</p>	<p>The provision of data is mandatory.</p> <p>Failure to provide the necessary data will make it impossible to submit a job application</p> <p>For other purposes related to recruitment, please refer to the specific information in the dedicated area if this is present on the website</p>
<p><b>B) DIRECT MARKETING</b>, to send advertising or direct sales material or carry out market research and analysis, customer satisfaction surveys or send commercial and promotional communications, newsletters, communications about events, invitations or similar sent by email, by automated (email) and traditional methods (telephone and letter mailings).</p> <p>Communications may contain promotional activities and/or logos of third parties and companies belonging to the group. Personal data will not be transferred.</p> <p>For a complete list of group companies and partners, please write to <a href="mailto:privacy@mee.com">privacy@mee.com</a></p> <p>In order to compare and possibly improve the results of automated communications, the Data Controller uses systems with reports. Thanks to the reports, the Data Controller is</p>	<p>Processing is based on consent to the processing of personal data (C42, C43) article 6, paragraph 1(A) of the GDPR</p>	<p>Until consent is revoked (or the data subject opts-out)</p>	<p>The provision of data is optional.</p> <p>Failure to provide the necessary data will make it impossible to send direct marketing communications</p>

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<p>able to know, for example: the number of readers, openings, unique "clickers" and "clicks"; the devices and operating systems used to read the communication; the details of the activities of individual users; details of the emails sent, delivered or not delivered, emails forwarded. The above data are used to compare, and possibly improve, the results of communications.</p>			
<p><b>C) NON-AUTOMATED PROFILING:</b> in order to carry out analyses, evaluations and subdivide the data subjects into similar groups by specific characteristics of activities in order to better manage the services, allow us to analyse the profile, area and sector to which they belong, create clusters, analyse habits, consumptions and behavioural preferences, in order to retain loyalty and improve the commercial offer, the services proposed and allow us to send communications that might be of interest to you and for a more customised service. The processing of personal data may involve customer care activities, by offering customised and courtesy services. These purposes are also pursued by entering the data in the Data Base/company CRMs/platforms and the data will also be processed by the other branch offices.</p>	<p>Processing is based on consent to the processing of personal data (C42, C43) article 6, paragraph 1(A) of the GDPR</p>	<p>Until consent is revoked and in any case no more than 12 months</p>	<p>The provision of data is optional.</p> <p>Failure to provide the necessary data will make it impossible to carry out analyses and/or send targeted communications.</p>
<p><b>D) MANAGEMENT OF REQUESTS TO EXERCISE THE RIGHTS OF DATA SUBJECTS,</b> pursuant to art. 15 et sequitur of the GDPR (rights of the data subject)</p>	<p>Data processing is necessary to fulfil a legal obligation of the Data Controller (C45) Article 6, paragraph 1(c) of the GDPR</p>	<p>5 years of when the request is settled, other than in the case of pending litigation</p>	<p>The provision of personal data is mandatory, given that this is necessary to fulfil legal obligations.</p>



#### 4. TO WHOM WILL YOUR DATA BE COMMUNICATED? DATA RECIPIENTS

Your personal data will be disclosed, above all for the envisaged purposes in specific areas, to persons who will process your data as independent Data Controllers, or Data Processors (article 28 of the GDPR) and will be processed by individuals (article 29 GDPR) acting under the authority of the Data Controller and Data Processors based on specific instructions relating to the purposes and methods of processing, for specific purposes according to the area in question. Your data may be disclosed to recipients belonging to the following categories:

- Companies and organisations based in Italy and EEA countries, who provide services for the website and communications networks, including e-mail, hosts, website management services, platforms and CLOUD, databases;
- Mitsubishi Electric Group Company, to the sales/distribution network and servicing in the territory;

- Firms or companies for purposes of servicing and consulting services, including teachers for training;
- Credit reference agencies that provide solvency assessments and payment habits surveys and/or debt collection agencies in the case of administrative accounting purposes;
- Agencies based in Italy, with which the Data Controller has signed agreements and given prior consent, where applicable;
- For direct marketing, after giving prior consent, to agencies for the management of direct marketing activities;
- For the Work with Us Area, with agencies for the management of recruitment activities;
- The competent authorities in order to fulfil obligations under applicable laws and/or orders of public authorities, on request.

In order to receive the list of Data Processors please write to [privacy@it.mee.com](mailto:privacy@it.mee.com) or the other addresses indicated above.



## 5. ARE DATA TRANSFERRED TO NON-EEA COUNTRIES?

Personal data will be transferred to non-EEA countries, if necessary, in order to fulfil the above purposes. Data will be transferred in accordance with articles 44 ff. of EU Regulation 2016/679, to Third countries with an adequacy decision or to agencies with which the Standard Contractual Clauses (SCC) provided by the European Commission have been stipulated. The data subject may request information about the guarantees relating to the transfer of data by writing to [privacy@it.mee.com](mailto:privacy@it.mee.com)



## 6. WILL AUTOMATED DECISION-MAKING PROCESSES BE USED?

Your personal data will be processed using traditional, electronic and automated processing methods. No fully automated decision-making process is in use.

Profiling consists of the use of personal data to evaluate, with the express consent of the data subject as indicated in the purposes, through an operator who prepares the profile of the data subject and analyses the habits and consumption preferences, in order to improve the commercial offer and services of the data controller (non-automated profiling).



## 7. WHAT ARE YOUR RIGHTS? HOW CAN YOU EXERCISE YOUR RIGHTS?

You may exercise your rights as set out by article 15 et sequitur of Regulation (EU) 2016/679, by contacting the Data Controller, sending an e-mail to [privacy@it.mee.com](mailto:privacy@it.mee.com) or writing to the above contact addresses. You have the right, at any time, to request any of the following rights: right of access (article 15), right to rectification (article 16), right to erasure (article 17), right to restriction of processing (article 18). The controller shall communicate (article 19) any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed. The controller shall inform the data subject about those recipients if the data subject requests this. In addition, in the cases envisaged you have the right to data portability (article 20) and in this case you will receive your personal data in a structured, commonly used, machine-readable and interoperable format. You have the right to object (article 21), at any time, to the processing of your data based on legitimate interest, and withdraw any consent given without prejudice to the lawfulness of the processing based on your consent prior to the withdrawal of such consent. To stop receiving direct automated marketing messages (emails), simply write at any time to [privacy@it.mee.com](mailto:privacy@it.mee.com) indicating in the subject line "cancellation from automated marketing message" or use our automatic cancellation systems used only for emails. To stop receiving traditional direct marketing messages (operator calls and direct mail), simply send an email to [privacy@it.mee.com](mailto:privacy@it.mee.com) at any time indicating in the subject line "cancellation from traditional marketing".

If you wish to stop marketing messages, simply send an email at any time to [privacy@it.mee.com](mailto:privacy@it.mee.com) indicating in the subject line "cancel marketing messages". You may revoke your consent to profiling (non-automated) at any time by writing to [privacy@it.mee.com](mailto:privacy@it.mee.com) indicating in the subject line "no profiling".

If the data subject believes that the processing of his or her personal data by the Data Controller is in breach of the provisions of Regulation (EU) 2016/679, the data subject has the right to lodge a complaint with the Supervisory Authority, in particular in the Member State where it habitually works or resides or the place where the alleged breach of the regulation took place, or take appropriate legal action.

There is no automated decision-making process.



#### **8. CHANGES TO THE PRIVACY POLICY**

The Data Controller reserves the right to modify, update, add or remove parts of this privacy policy. In order to facilitate verification and modification of the text, the date of update will be shown in the privacy policy.

Date of update: 2 August 2023