

PRIVACY POLICY

Mitsubishi Electric Klimat Transportation Systems S.p.A., as the processing controller, in accordance and for the effects of Art. 13 of EU Regulation 672/2016 (Privacy regulation) inform you of the following about the treatment of your Personal Data as a Company's Customer (hereinafter "**Customer**").

1. The Controller

The controller is Mitsubishi Electric Klimat Transportation Systems S.p.A., registered office in Corso Stati Uniti, n. 1/1, 35127 Padova, P. Iva 11652040152, pec: amministrazione@pec.mekts.com, tel. +39 0496988402, fax +39 0498704856 (hereinafter referred as "**Controller**" or "**Company**").

2. Processing purpose and legal basis of Personal data and consequences resulting from the non-conferment of data.

The Company would like to inform you that for the establishment and execution of current contract relations it needs to keep Customer' Personal Data, in case of natural person or in case of legal person it will collect the Personal Data of the legal representative, executive or employees of the Customer

With respect of the latter, the data transferred by the Customer and used by the Company for the business management activity with the Customer legal person and on the assumption that a relevant notice has been reported to that subject with reference to the disclosure of the data from the Customer itself.

The personal data collected and processed by the Company, also orally, have been freely and spontaneously provided in the event of the establishment and execution of the contractual relation (among which, merely as an example, as the case may be, name, company name, fiscal code, VAT n., registered office address, or name/surname/e-mail address/contact information etc.)

The Controller process the personal data for the following purpose.

- (i) to **perform our contractual obligations** as well as for the purposes strictly connected, connected, derived and instrumental to the same;
- (ii) to comply with our **fiscal or administrative obligations**;

The provision of the data is mandatory to allow the Controller to perform our contractual and/or legal obligations; any refusal may make it impossible for the Company to perform and/or maintain the contractual relation. In any case, to process the data in order to effectively, efficiently manage the relationship with its suppliers, and manage the related internal and external organizational processes constitutes a legitimate interest of the Controller.

3. Processing method and retention period

The Personal Data will be processed using IT, paper and/or electronic support within the purposes of the processing explained above and in order to protect their security and confidentiality.

The Personal Data will be processed for the entire duration of the contractual relation and for 10 years after its termination for administrative and fiscal purposes.

In any case your personal data will be stored at least up to the prescription period of the rights and obligations with reference to our contractual relation.

4. Recipients of the personal data

Personal data can be transferred, in close relation and compatibly with the purpose described above to the following categories of recipient:

- Banks, Credit Institutes
- Company Auditors
- Firms or Companies as part of advisory and consultancy relations (lawyers, accountants, auditors, members of the 231 Supervisory Body)
- Subjects providing services for the management/IT support of the information system and database.
- Carriers and couriers
- Other Suppliers or Subsuppliers
- Mitsubishi Electric Group Companies

Entities belonging to the above categories act as Processors in behalf of the controller, or operate completely independently as separate controllers. The list of processors could be required at the e-mail address: privacy@mekt.mee.com.

5. Transfer of data to Group Company sited outside EU

The Controller could share with some of the companies within Mitsubishi Group established also outside the European Union. Data transfer will be done taking all the necessary measures according to Article 46 EU Regulation, through the implementation of Standard Contractual Clauses approved by the European Commission for the Extra –EU data transfer.

6. Data Subject's right

The data subject have the right, at any moment, **to invoke the rights**, where applicable by contacting the Controller:

<p>Access to personal data (art. 15 of EU Regulation)</p>	<p>Obtain confirmation as to whether or not personal data are being processed and, in this case, the right to obtain, inter alia, access to such data and information concerning the purposes of the processing, the categories of personal data in question, the recipients or categories of recipients to whom the data were or will be communicated.</p>
<p>Rectification (art.16 of EU Regulation)</p>	<p>(i) obtain the correction of inaccurate personal data concerning him without undue delay and (ii) the integration of personal data, if incomplete.</p>
<p>Right of erasure (<<right to be forgotten>>) (art. 17 EU Regulation)</p>	<p>obtain the deletion of personal data concerning him without unjustified delay (the Data Controller is obliged to cancel the personal data without undue delay in the cases provided for in Article 17 of the Regulation).</p>
<p>Right of restriction of processing (art. 18 del Regulation)</p>	<p>obtain the limitation of treatment in the cases referred to in Article 18 of the Regulation</p>
<p>Right of data portability (art. 20 EU Regulation)</p>	<p>Obtain the data you have provided in a structured, standard, and machine-readable format; right to transfer this data to another controller, without impediments by the Data Controller to whom it has been provided in the cases referred to in Article 20 of the Regulation.</p>
<p>Right of objection to the processing of data performed pursuant to art. 6 , section 1, letter e) or f) (art. 21 EU Regulation)</p>	<p>Right to object at any time, on grounds relating to your particular situation, to our processing of your data, pursuant to Article 6 section 1 letter e) and f) including profiling on the basis of these provisions and (ii) if the data are processed for direct marketing purposes, including profiling in so far as it is related to such direct marketing.</p>

The complete text of the articles of the EU Regulation n. 679/2016 governing the rights of the data subject is available at the following web address web <https://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679&from=IT>

You have the right, at any moment, to withdraw the consent, where it has been given pursuant to this notice. Withdrawal of consent to processing does not affect the lawfulness of the processing carried out based on the consent previously provided.

To present the requests relating to the exercise of the rights as listed above, as data subject you can contact the Data Controller by sending your requests, in writing, by registered mail with return receipt to the headquarters of the Company or sending a an email to the certified address : *privacy@mekt.mee.com*.

Si evidenzia, infine, che l'Interessato ha diritto di **proporre reclamo al Garante per la Protezione dei dati personali** nel caso in cui ritenesse che il trattamento che lo riguarda violi quanto prescritto dal Regolamento UE n. 679/2016.

In any case, you also have the right to file a complaint with the competent data protection authorities, in addition to your rights above in the event that you consider that the treatment concerning you violates the provisions of EU Regulation n. 679/2016

Date 10/12/2022

Signature 

For the Customer as Legal person:

The undersigned legal representative /executives declares that the Data subject who are part of their Staff have been informed that their data could be communicated to customers and suppliers in the context of their work activities.

Date _____

Signature _____