

Mitsubishi Electric Public Utility Equipment Corporation
Privacy Policy for Handling of personal data

1. Handling of Personal data

1.1. Mitsubishi Electric Public Utility Equipment Corporation (hereafter “We”) are committed to safeguarding the privacy of our customers and users(you/your). This privacy policy for handling of personal data (the Notice) is intended to inform you of the ways in which we collect personal data, the uses of that personal data and the ways in which we will share any personal data you choose to provide to us.

1.2. If you are an existing customer of ours, further details about how we use your personal data is set out in your customer contract with us. Further notices highlighting certain uses we wish to make of your personal data together with the ability to opt in or out of selected uses may also be provided when we collect personal data from you.

1.3. The following matters will be explained to you individually when we obtain personal data from you.

(a) Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract

(b) Whether you are obliged to provide the personal data

(c) Possible consequences of failure to provide the personal data

(d) Existence of automated decision-making

1.4. Our websites may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal data. Please check these policies before you submit any personal data to such third party websites.

1.5. This Notice is intended to explain our privacy practices and covers the following areas:

(a) Information we may collect about you

(b) How we may use your personal data

(c) How we protect your personal data

(d) Your rights & contacting us

(e) Changes to our privacy policy for handling of personal data

2. Information We May Collect About You

2.1. We will collect and process all or some of the following personal data about you.

(a) Information you provide to us

During interaction with our company, we may ask you to provide your personal data.

(i) When you purchase, send for repair or return one of our products, we may ask you to provide information such as name, address, contact detail, phone number, email address and payment information, etc.

(ii) When you contact us from contact form on our websites, we may record information such as name, address, business contact detail, telephone number, email address, and other Information, etc. We may keep a record of your inquiry and our correspondence as well.

(iii) We may ask you to complete surveys that we use for research purposes. In such circumstances we may collect information such as name, address, business contact detail, telephone number, email address, date of birth, contact detail, and interests.

(iv) When you create an account to use our online services, we may ask you to provide information such as name, address, business contact detail, telephone number, email address, date of birth, contact detail, interests, and newsletter preferences.

(b) Information Provided by Other Sources

We may collect your personal data from publicly available sources and third parties.

(c) Information collected for website and communication usage

Details of your visits to the websites and information collected through cookies and other tracking

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technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access.

3.How We May Use Your Personal data

3.1. We set out the purposes for which we use personal data that we collect and, in compliance with our obligations under the law, identify the "legal grounds" on which rely to process the information.

3.2. We shall comply with Japan's Act on the Protection of Personal data and its rules and guidelines issued by the Personal Information Protection Committee in Japan. We shall also comply with the international personal data protection laws such as the European General Data Protection Regulation (GDPR). The processing of personal data is based on specific "legal grounds" as outlined in the GDPR and other applicable laws and regulations (the full description of each of these grounds can be found [here](#)). Please note that in addition to the disclosures we have identified below, we may disclose personal data for the purposes we explain in this Notice to service providers, contractors, agents, advisors (e.g. legal, financial, business or other advisors) and affiliates of our company that perform activities on our behalf.

(a) To communicate effectively with you and conduct our business

To conduct our business, including to respond to your queries, to otherwise communicate with you, or to carry out our obligations arising from any agreements between you and us;

Use justification:

contract performance, legitimate interest (to enable us to perform our obligations and provide our services to you)

(b) To provide you with marketing materials

To provide you with updates and offers, where you have chosen to receive these. We may also use your information for marketing our own and our business partners' products and services to you by post, email, SMS, phone and fax and, where required by law, we will ask for your consent at the time we collect your data to conduct any of these types of marketing. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by contacting us through the "[Contacting Us](#)" form below.

Use justification:

consent, legitimate interest (to keep you updated with news in relation to our products and services)

(c) For research and development purposes

To better understand your needs about our service and marketing activities and develop products and services, we may analyze your personal data;

Use justification:

legitimate interest (to allow us to improve our services)

(d) To monitor certain activities

To monitor queries and transactions to ensure service quality, compliance with procedures and to combat fraud;

Use justification:

legal obligations, legal claims, legitimate interest (to ensure that the quality and legality of our services)

(e) To inform you of changes

To notify you about changes to our services and products;

Use justification:

legitimate interest (to notify you about changes to our service)

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(f) To ensure website content is relevant

To ensure that content from our websites is presented in the most effective manner for you and for your device, which may include passing your data to business partners, suppliers and/or service providers;

Use justification:

legitimate interest (to allow us to provide you with the content and services on the websites)

(g) To reorganize or make changes to our business

In the event that we: (i) are subject to negotiations for the sale of our business or part thereof to a third party; (ii) are sold to a third party; or (iii) undergo a re-organization, we may need to transfer some or all of your personal data to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analyzing any proposed sale or re-organization. We may also need to transfer your personal data to that re-organized entity or third party after the sale or reorganization for them to use for the same purposes as set out in this notice.

Use justification:

legitimate interest (in order to allow us to change our business)

(h) In connection with legal or regulatory obligations

We may process your personal data to comply with our regulatory requirements or dialogue with regulators as applicable which may include disclosing your personal data to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.

Use justification:

legal obligations, legal claims, legitimate interest (to cooperate with law enforcement and regulatory authorities)

4.How We Protect Your Personal data

Security over the internet

4.1. No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal data in accordance with data protection legislative requirements.

4.2. All information you provide to us is stored on our servers or other secure servers set up by trusted third-party service providers who have been verified to meet our company's management standards and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

Export outside Japan

4.3. Your personal data may be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside the country in which you are located, whose data protection laws may be of a lower standard than those in your country. We will, in all circumstances, safeguard personal data as set out in this Notice.

4.4. Please contact us through the "[Contacting Us](#)" form below if you would like to see a copy of the specific safeguards applied to the export of your personal data.

Storage limits

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4.5. Our retention periods for personal data are based on business needs and legal requirements. We retain personal data for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, we may retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When personal data is no longer needed, we either irreversibly anonymize the data (and we may further retain and use the anonymized information) or securely destroy the data.

5. Your Rights & Contacting Us

Marketing

5.1. For the purpose of making the online marketing on our websites tailored to your needs or interests, we use technologies that automatically tracks information such as browsing history on our websites, links you click on our emails, or mobile applications you use.

5.2. You have the right to ask us not to process your personal data for marketing purposes including above. From time to time, we will inform you if we intend to use your information for certain types of marketing activities, or if we intend to disclose your information to certain categories of third parties for such purposes. You can exercise your right to prevent such processing by not checking certain boxes on the forms we use to collect your personal data. You can also exercise the right at any time by contacting us as set out in the ["Contacting Us"](#) form below.

Updating information

5.3. We will make reasonable endeavors to ensure that your personal data is accurate. While this requires your assistance, you should notify us of any changes to the personal data that you have provided to us by contacting us as set out in the ["Contacting Us"](#) form below.

Your rights

5.4. If you have any questions in relation to our use of your personal data, you should first contact us as per the ["Contacting Us"](#) form below. Under certain conditions, you may have the right to require us to:

- (a) provide you with further details on the uses we make of your information;
- (b) provide you with a copy of information that you have provided to us;
- (c) update any inaccuracies in the personal data we hold (please see paragraph 5.3);
- (d) delete any personal data that we no longer have a legal ground to use;
- (e) where processing is based on consent, to withdraw your consent so that we stop that particular processing (see paragraph 5.2 for marketing);
- (f) object to any processing based on the legal ground of legitimate interest unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- (g) restrict how we use your information whilst a complaint is being investigated.

5.5. Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights we will check your entitlement and respond in most cases within a month.

5.6. If you are not satisfied with our use of your personal data or our response to any exercise of these rights you have the right to complain to the Regulator.

Contacting us

5.7. Depending on where you are located, the "data controller" of your personal data processed by

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us under this Handling of Personal data will be different. Please see here for a list of which branches will be data controllers in which countries.

5.8. In some countries or regions, data protection laws may require the appointment of a Data Protection Officer (DPO). If necessary, we appoint a DPO in accordance with applicable regulations. If you have any inquiries regarding our Data Protection Officer (DPO), please contact us per the ["Contacting Us"](#) form below.

5.9. If you have any questions in relation to this Notice, please contact us as per the ["Contacting Us"](#) form below.

6.Changes to Our Privacy Policy for Handling of Personal data

6.1. We may change the details of handling of personal data and this Notice may change from time to time in the future. In this case, we will update the date it was last changed below. If these changes are material, we will indicate this clearly on our websites.

6.2. This Notice was last updated on [2025/04/01].

Annex

Use of personal data under the data protection laws of each country must be justified under one of a number of legal "grounds" and we are required to set out the grounds in respect of each use in this Notice. We note the grounds we use to justify each use of your information next to the use in the "Uses of your personal data" section of this policy.

These are the principal legal grounds that justify our use of your information:

Consent:

where you have consented to our use of your information (you will have been presented with a consent form in relation to any such use and may withdraw your consent by contacting us as per the ["Contacting Us"](#) form).

Contract performance:

where your information is necessary to enter into or perform a contract between you and us.

Legal obligation:

where we need to use your information to comply with our legal obligations.

Legitimate interest:

where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.

Legal claims:

where your information is necessary for defense, lawsuit or claim against you, us or a third party.