

Privacy policy

1.1 For Mitsubishi Electric Europe B.V. and other members of the Group (**MEU**), protecting the privacy of customers and users is very important. This privacy policy (**Privacy Policy**) sets out the procedures for MEU's processing of your personal data and is intended to inform you of the ways in which we process any personal data that you choose to provide to us.

1.2 The controller, i.e. the entity that decides on the purposes and means of processing your personal data, is Mitsubishi Electric Europe B.V. Besloten Vennootschap with its registered office in Amsterdam, address: 46 Capronilaan Street, 1119 NS, the Netherlands, conducting business in Poland in the form of a branch of a foreign entrepreneur: Mitsubishi Electric Europe B.V. Spółka z ograniczoną odpowiedzialnością - Oddział w Polsce, with its registered office in Balice (32-083), ul. Krakowska 48, KRS: 0000338549.

The controller has appointed a Data Protection Officer whom users can contact under "RODO - Contact".

1.4 Our websites may contain links leading to third party websites. If you access a third-party website via a link, please note that the third-party's privacy policy differs from ours and we are therefore not responsible for such policy and the ways in which we process your personal data. Please read their privacy policy before providing any personal information on third party websites.

1.5 This Privacy Policy is intended to explain our privacy procedures and covers the following:

- a) [What personal data we may collect](#)
- b) [How we may use personal data](#)
- c) [How we protect personal data](#)
- d) [Contact us and your rights to object to the use of your personal data for marketing purposes and to access and update your personal data](#)
- e) [Voluntary data provision](#)
- f) [Processing of personal data by automated means](#)
- g) [Our cookie policy](#)
- h) [Ways of amending the privacy and cookie policy](#)

2 Information we can collect about you

We collect and process all or some of the following user data:

a) Information provided by the user

Personal data provided by the user when using the contact forms, including name, email address and other contact details;

b) Correspondence

If a user contacts us, we usually save the correspondence;

c) Information obtained from the surveys

You may be asked to complete surveys that we use for research purposes. In such circumstances, we collect the information provided in the completed survey;

d) Use of the website and contact options

Details of the user's visits to the pages and information collected through cookies and other data tracking technologies, among other things: the user's IP address and domain name, the user's browser version and operating system, traffic data, location data, web logs and other communication data, and the resources accessed by the user.

3 Use of your personal data

3.1 This section will explain the purposes for which we use the personal information that is collected by Mitsubishi Electric and indicate the legal basis for processing the information.

3.2 Depending on your relationship with us, in carrying out our business functions we process personal data for different purposes and to different extents:

CUSTOMERS AND PERSONS APPOINTED TO PERFORM THE CONTRACT

Purpose of processing	Legal basis	Data retention period	Where data is collected other than from the user, the source of the data and the categories of personal data.
<ul style="list-style-type: none">• performance of the contract with the customer or taking action prior to the conclusion of the contract, at the customer's request• implementation of legal obligations• the purposes specified in your consent to the processing of personal data• establishment, investigation and defence of claims, statistical purposes	<p>Article 6(1)(b) of the DPA - concerning customers</p> <p>Article 6(1)(f) of the DPA - concerning persons acting on behalf of the customer/ counterparty</p> <p>Article 6(1)(c) RODO</p> <p>Article 6(1)(a) of the RODO</p> <p>Article 6(1)(f) RODO</p>	<p>Your personal data will be stored until the expiry of the limitation periods for contractual claims.</p>	<p>The data may be collected from the Customer or from a person working with us on behalf of the Customer.</p> <p>We collect personal data to the extent necessary for the conclusion and execution of the contract, the most common of which are: name, surname, postal address, e-mail address, telephone number, order data and invoice data.</p> <p>In the case of electronic transaction processing - also login, password and purchase and activity histories.</p>

CONTRACTORS, SUPPLIERS AND PERSONS APPOINTED TO PERFORM THE CONTRACT

Purpose of processing and legal basis	Legal basis	Data retention period	Where data is collected other than from the user, the source of the data and the categories of personal data.
<ul style="list-style-type: none"> • performance of the contract with you or pre-contractual action • accounting, bookkeeping and financial reporting • implementation of legal obligations • establishment, investigation and defence of claims, statistical purposes 	<p>Article 6(1)(b) of the DPA - concerning clients</p> <p>Article 6(1)(f) RODO - concerning persons acting on behalf of the client/ counterparty</p> <p>Article 6(1)(c) and (f) RODO</p> <p>Article 6(1)(c) RODO</p> <p>Article 6(1)(f) RODO</p>	<p>Your personal data will be stored for the period required by law or until the expiry of the limitation periods for claims.</p>	<p>The data may be collected from the Customer or from a person working with us on behalf of the Customer.</p> <p>We collect personal data to the extent necessary for the conclusion and execution of the contract, the most common of which are: name, surname, postal address, e-mail address, telephone number, order data and invoice data.</p> <p>In the case of collaboration in an IT system, also the login, password and collaboration history.</p>

CORRESPONDING

Purpose of processing and legal basis	Legal basis	Data retention period	Where data is collected other than from the user, the source of the data and the categories of personal data.
maintaining correspondence and ensuring the circulation and archiving of documents	Article 6(1)(f) RODO	The data are processed for the periods indicated by law. If these are not indicated - for the duration of possible redress.	As a general rule, we process the data you provide.

NEWSLETTER SUBSCRIBERS AND RECIPIENTS OF MARKETING ACTIVITIES

Purpose of processing and legal basis	Legal basis	Data retention period	If data is collected other than from the user, the source and categories of personal data
<ul style="list-style-type: none"> marketing of its own products and services, in the case of consent also the products and services of companies cooperating with the Administrator the purposes specified in the consents for processing personal data fulfilment of legal obligations, in particular the Electronic Communications Law establishment, investigation and defence of claims, statistical purposes 	<p>Article 6(1)(a) of the RODO</p> <p>Article 6(1)(a) of the RODO</p> <p>Article 6(1)(c) RODO</p> <p>Article 6(1)(f) RODO</p>	<p>Your personal data will be stored until you withdraw your consent or object. Once your consent has been withdrawn or you have objected, your personal data may be stored for the purpose of pursuing possible claims.</p>	<p>As a general rule, we process the data you provide.</p> <p>The personal data collected includes the data necessary for the type of marketing activities in question: name, surname, e-mail address, telephone number and/or postal address.</p>

PARTICIPANTS IN COMPETITIONS

Purpose of processing and legal basis	Legal basis	Data retention period	Where data is collected other than from the user, the source of the data and the categories of personal data.
<ul style="list-style-type: none"> fulfilling the competition organiser's obligations accounting, bookkeeping and financial reporting implementation of legal obligations 	<p>Article 6(1)(f) RODO</p> <p>Article 6(1)(c) and (f) RODO,</p> <p>Article 6(1)(c) RODO</p>	<p>Your personal data will be kept for the period necessary to fulfil the purpose for which it was collected, after which it will be kept for the period of the statute of limitations for claims.</p>	<p>As a general rule, we process the data you provide.</p>

<ul style="list-style-type: none"> the purposes specified in the consents for processing personal data 	Article 6(1)(a) of the RODO		
<ul style="list-style-type: none"> establishment, investigation and defence of claims, statistical purposes 	Article 6(1)(f) RODO		

USERS OF THE ORGANISATIONS' WEBSITES

Purpose of processing and legal basis	Legal basis	Data retention period	If data is collected other than from the user, the source and categories of personal data
<ul style="list-style-type: none"> ensuring the functionality of the website and facilitating the use of the site provision of electronic services fulfilment of legal obligations, in particular the Electronic Communications Law marketing of its own products and services and, in the case of consent, also of the products and services of companies cooperating with the Administrator for the purposes indicated in the consents for processing personal data establishment, investigation, defence of claims, statistical purposes 	<p>Article 6(1)(b) and (f) RODO</p> <p>Article 6(1)(b) RODO</p> <p>Article 6(1)(c) RODO</p> <p>Article 6(1)(f) RODO or Article 6(1)(a) RODO</p> <p>Article 6(1)(a) of the RODO</p>	<p>Your personal data will be stored until you withdraw your consent or object. Once your consent has been withdrawn or you have objected, your personal data may be retained for the purposes of demonstrating that the Administrator has properly complied with its legal obligations or until the expiry of the limitation periods for claims.</p> <p>If you enter into a contract with the Administrator, your personal data will be processed for the duration of the contract and, after the end of the contract, until the expiry of the limitation periods.</p>	As a general rule, we process the data you provide.

	Article 6(1)(f) RODO		
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THE APPLICANT, THE COMPLAINANTS AND THEIR REPRESENTATIVES

Purpose of processing and legal basis	Legal basis	Data retention period	Where data is collected other than from the user, the source of the data and the categories of personal data.
<ul style="list-style-type: none"> handling a complaint, request or claim implementation of the contract associated with the notification accounting, bookkeeping and financial reporting implementation of legal obligations the purposes specified in the consent establishment, investigation and defence of claims, statistical purposes 	<p>Article 6(1)(f) RODO</p> <p>Article 6(1)(b) of the DPA - concerning clients</p> <p>Article 6(1)(f) RODO - concerning persons acting on behalf of the client/ counterparty</p> <p>Article 6(1)(c) and (f) RODO</p> <p>Article 6(1)(c) RODO</p> <p>Article 6(1)(a) of the RODO</p> <p>Article 6(1)(f) RODO</p>	<p>Your personal data will be stored until your request is processed and the limitation periods for claims have expired.</p>	<p>As a general rule, we process the data you provide.</p>

JOB APPLICANTS

Purpose of processing and legal basis	Legal basis	Data retention period	If data is collected other than from the user, the
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			source and categories of personal data
<ul style="list-style-type: none"> • taking the steps necessary for the conclusion of the contract • fulfilment of legal obligations for the purpose of recruitment • to carry out the recruitment process, if you provide data other than that required by law • establishment, investigation or defence of claims • consent to be taken into account for future recruitment or consent to be contacted by references 	<p>Article 6(1)(b) RODO</p> <p>Article 6(1)(c) RODO</p> <p>Article 6(1)(a) of the RODO or Article 9(2)(a) of the RODO</p> <p>Article 6(1)(f) RODO or Article 9(2)(f) RODO</p> <p>Article 6(1)(a) of the RODO</p>	<p>Your personal data will be processed for 6 months and, if you have consented to participate in further recruitments, until you withdraw it.</p> <p>If there is reasonable information about the possibility of claims, personal data will also be kept until the expiry of the limitation periods.</p>	<p>If you have given your prior consent, your personal data may be passed on by entities specialising in recruitment or by references.</p> <p>The categories of personal data obtained are: first name, last name, contact details, educational information, employment history and other data provided by the user in the application documents and, in the case of references, data on the candidate's achievements with a previous employer.</p>

CANDIDATES FOR COOPERATION

Purpose of processing and legal basis	Legal basis	Data retention period	If data is collected other than from the user, the source and categories of personal data
<ul style="list-style-type: none"> • taking the steps necessary for the conclusion of the contract • to carry out the recruitment process, if you provide data other than that required by law • establishment, investigation or defence of claims 	<p>Article 6(1)(b) RODO</p> <p>Article 6(1)(a) of the RODO or Article 9(2)(a) of the RODO</p> <p>Article 6(1)(f) RODO or Article 9(2)(f) RODO</p>	<p>Your personal data will be processed for 6 months and, if you have consented to participate in further recruitments, until you withdraw it.</p> <p>If there is reasonable information about the possibility of claims, personal data will also be kept until the expiry of the limitation periods.</p>	<p>If you have given your prior consent, your personal data may be passed on by entities specialising in recruitment or by references.</p> <p>The categories of personal data obtained are: first name, last name, contact details, educational information, employment history and other data provided by the user in the application documents and, in the case of references, data on the</p>

<ul style="list-style-type: none"> • consent to be taken into account for future recruitment or consent to be contacted by references 	Article 6(1)(a) of the RODO		candidate's achievements with a previous employer.
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EMPLOYEES AND COLLEAGUES

Purpose of processing and legal basis	Legal basis	Data retention period	If data is collected other than from you, the source and categories of personal data
<ul style="list-style-type: none"> • implementation of the employment contract • maintenance of accounts, bookkeeping • the exercise of rights in the field of labour law, social security and social protection • fulfilment of legal obligations, including those towards ZUS, US, NFZ, archiving of personal files • the purposes specified in the consent • performance of health and safety duties • implementation of contracts with clients, contractors and suppliers • establishment, assertion and defence of claims 	<p>Article 6(1)(b) RODO</p> <p>Article 6(1)(c) and (f) RODO</p> <p>Article 6(1)(c) and Article 9(2)(b) of the DPA</p> <p>6(1)(c) and 9(2)(b) RODO</p> <p>6(1)(a) RODO, 9(2)(a) RODO</p> <p>6(1)(f) RODO</p>	<p>Personnel files are archived for 50 years after the employee's termination date or up to 10 years, e.g. for contracts concluded after 1 January 2019.</p> <p>in the case of a cooperation/commissioning/work contract, until the expiry of the limitation period for claims arising from the contract or the expiry of data retention obligations under the law</p> <p>until the date on which a legitimate objection is lodged or consent is withdrawn, where the processing of personal data is based on a legitimate interest of the controller or voluntary consent of the data subject,</p> <p>video surveillance recordings, will be stored for up to 3 months and, if necessary for the establishment, investigation or defence of claims, until the final settlement of the claims asserted or the expiry of the period of limitation.</p>	As a general rule, we process the data you provide.

<ul style="list-style-type: none"> • marketing of products and services • statistical purposes 			
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3.3 When there is no longer a need for personal data, it is either irreversibly anonymised (it can continue to be stored and used anonymously) or destroyed in a secure manner.

Recipients of data

3.4 In connection with its activities, MEU will disclose your personal data to the following entities:

- a) to companies providing services to the MEU (providers of external ICT systems, subcontractors, auditing or appraisal entities, entities providing accounting, HR or legal services, entities disposing of or archiving documents and other media, training providers, transport companies, marketing companies, security companies, access control and monitoring the use of work tools),
- b) business partners (distributors, system integrators),
- c) to state authorities or other entities authorised by law,
- d) to medical establishments when referred for occupational health examinations or when other circumstances requiring their participation arise,
- e) the organisation's customers - if this is necessary to serve them,
- f) banks, insurance companies and other financial and payment institutions,
- g) Krajowy Rejestr Długów Biuro Informacji Gospodarczej Spółka Akcyjna,
- h) MEU affiliates who perform activities on our behalf and other members of the Mitsubishi Electric Group.

4 Transmission, storage and security of your personal data

Data security on the Internet

4.1 It is not possible to guarantee the complete security of data when transmitted over the Internet or to websites. However, commercially reasonable physical, electronic and procedural safeguards are in place to ensure that your personal data is protected in accordance with legal data protection requirements.

4.2 Any information you provide to us is stored on our servers or those of our subcontractors, and access to and use of that information is in accordance with our security standards and policies. If you have been given (or have self-selected) a password to access certain parts of our websites, it is your responsibility to keep this password confidential and to follow any security procedures notified to you. Please do not share your password with others.

Exports outside the EEA

4.3 Your personal data may be transferred to third countries outside the EEA and/or the United Kingdom. This will be the case in particular if the transfer is necessary for the performance of a contract/order, or for the implementation of pre-contractual measures taken at the request of the data subject, as well as if the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal

person, or as required by law. The transfer of data outside the EEA and/or UK may also occur in connection with MEU's cooperation with IT solution providers (e.g. Google, Microsoft).

Certain countries outside the EEA, such as Japan and the UK, have been recognised by the European Commission as providing data protection broadly equivalent to that set out in the EEA legislation and therefore no additional security measures are required for the export of personal data to these jurisdictions.

Please note that data protection and other regulations in the countries to which your data may be transferred may be less stringent than those in your country.

For recipients in the territory of countries not covered by the European Commission's decision, such as the United States or Serbia, in order to ensure an adequate level of this protection, the data exporter (controller or processor acting on behalf of the controller) shall enter into contracts with recipients of personal data, which are based on the standard contractual clauses issued by the European Commission in accordance with e.g. 46(2)(c) RODO.

4.4 Information about the safeguards in place, the possibility of obtaining a copy of the standard contractual clauses and a copy of your data, as well as where these can be made available to you, can be obtained using the "[RODO - Contact us](#)" form.

5 Your rights and contacting us

User rights

5.1 Any person whose data is processed by the Controller has the right to:

- a) to provide detailed information on the use of personal data (right of access);
- b) receive a copy of the personal data it has provided;
- c) update (rectify) personal data;
- d) delete your personal data,
- e) withdraw consent at any time, without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal; withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal;
- f) to suspend data processing on the basis of legitimate interest, unless the reasons for processing the data outweigh the possible violation of your data protection rights;
- g) portability of your data - where the legal basis for processing is consent (e.g. 6(1)(a) or e.g. 9(2)(a) RODO) or contract (e.g. 6(1)(b) RODO),
- h) object to the processing of its personal data - where the legal basis for the processing is a legitimate interest (e.g. 6(1)(f) RODO),
- i) to restrict the processing of your personal data.

For more information on data subjects' rights, please refer to provisions e.g. 12-23 of the RODO.

5.2 The exercise of these rights is subject to certain exceptions to protect the public interest (e.g. the prevention or detection of crime) and to protect our interest (professional confidentiality). If you exercise any of your rights, your entitlement will be checked and most cases will be responded to within one month.

5.3 If you are dissatisfied with the way we use your personal data or with our response to you exercising any of your rights, you have the option to lodge a complaint with the data protection supervisory authority.

5.4 The User may consent to the processing of their data for marketing purposes. The user can give consent by ticking the appropriate box on the form used to collect personal data. The user may withdraw consent by contacting us using the "[RODO - Contact us](#)" form below.

Contact

5.5 If you have any questions about this policy, please use the "[RODO - Contact Us](#)" contact form below.

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 data protection authority in the country that you reside in or, the country of your place of work or the country where the alleged infringement took place. For data subjects in the PL, this is the President of the Office for Personal Data Protection (Stawki street 2, 00-193 Warsaw)

6 Voluntary data provision

The provision of data is necessary for the conclusion of contracts and the settlement of the business conducted and for the Administrator to comply with legal requirements. In the remaining scope (in particular, for the Administrator's processing of data for marketing purposes), the provision of data is voluntary.

7 Processing of personal data by automated means

Your personal data will not be subject to automated decision-making resulting in legal effects or similarly significant impacts.

8 Cookie policy

Our websites use cookies. To find out more about the use of cookies, please read our cookie [policy](#).

9 Changes to our privacy and cookie policy

9.1 The content of our sites and our use of cookies are subject to change and consequently our privacy and cookie policy may change from time to time in the future. In the event of changes to this privacy and cookie policy, the date of the most recent change will be stated below. If the changes are material, a relevant notice will be posted on our websites.

9.2 This privacy policy was last updated on 2024-12-09