

PRIVACY POLICY

Policy pursuant to Article 13 EU Regulation 2016/679 (GDPR)

The present privacy policy is issued by the Data Controller pursuant to EU Regulation 2016/679 (hereinafter “GDPR”) and reports the data processing carried out through the website. The privacy policy is pursuant to Article 13 GDPR.

The privacy policy shall not be considered applicable to third parties websites different from this one and that may be browsed through links present in this website. Therefore, no responsibility is born for third party websites.



1. DATA CONTROLLER: CONTACTS

It is **Mitsubishi Electric Hydronics & IT Cooling Systems S.p.A.** – **Company with a sole shareholder** – Registered office: Via Caduti di Cefalonia 1, 36061 Bassano del Grappa (VI), Italy, in the person of its legal representative pro-tempore, Tel (+39) 0424509500 - Fax (+39) 0424 509509 - e-mail privacy@melcohit.com.



2. TIPOLOGIA DI DATI TRATTABILI

“**Personal data**”: means any information relating to an identified or identifiable data subject, 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 (recitals 26, C27 and C30 GDPR).

Browsing data: information systems and software programs required for the present website acquire, during their standard operation, some personal data, whose transmission is implicit in the use of Internet communication protocols. To this category of data belong IP addresses, domain names of computer and device used by users, URI/URL addresses of requested resources, time of the request, the method used to submit the request to the server, file answer size, numerical code related to the status of the answer given by the server (e.g. successful, error, etc.) and other parameters related to the operating system and the IT environment of the user.

Data provided voluntarily: the optional, explicit and voluntarily sending of messages to the contact addresses reported in the present website and/or filling out data forms entail the subsequent acquisition of the user email address, necessary to reply to a request, and of the other possible personal data provided.

Information on personal data processing performed through Social Media platforms: regarding the personal data processing performed by controllers of Social Media platforms used by the Data Controllers, please refer to information provided by them in their respective privacy policies. The Data Controller processes personal data provided by the user by means of dedicated Social Media platform pages, to manage interactions with the user (e.g. comments, public posts, etc.) and in compliance with current legislation.

Specific privacy policies: specific privacy policies may be present on the pages of the present website in relation to specific services issued or processing of data provided.

“**Processing**”: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Cookie: to obtain further information on what cookies are, what they are used for and on other tracking systems, refer to the cookie policy published in the footer of the website and at the following [link](#).

Data subjects are website’s users.

3. PROCESSING PURPOSES, LEGAL BASIS, DATA RETENTION, TYPE OF DATA PROVISION

Personal data provided will be processed in compliance with the conditions of lawfulness pursuant to Article 6 Reg. UE 2016/679 for the purposes reported in the following table. In compliance with the provisions of Article 5 (1) letter. e) of EU Reg. 2016/679, personal data collected will be stored in a form that allows the identification of the data subjects for a period of time not exceeding the achievement of the purposes for which the personal data are processed. Personal data collected will be deleted as soon as they are no longer necessary for the purposes they were collected for.



PROCESSING PURPOSE



LEGAL BASIS



DATA RETENTION

A) Website browsing. Data required to use the services provided by the website.

B) Obtain statistical information on services usage (e.g. most visited pages, number of visitors by time or day, their geographical area of origin, etc.).

C) Check the proper operation of services provided.

D) Identify responsibility in case of hypothetical cybercrimes against the website.

Article 6 (1), point f) and recital 47 GDPR: the processing is necessary for the pursuit of the **legitimate interest** of the data controller or of a third party, provided that the interests or the fundamental rights and freedoms of the data subjects are not overriding, taking into consideration the reasonable expectations of data subjects and the activities strictly necessary for the website operations and for browsing.

Refer to the website cookies policy. Data are not retained.

Data gathered are anonymous.

No data retained.

Until the purpose they were collected for is achieved.

E) After filling out the form in "RESERVED AREA" to access the reserved area of the website.

Until the end of the contract and for the time technically necessary for disconnecting the user.

F) After filling out the form in the section "SUPPORT AND SERVICES – PRE-SALES" or in products data sheets, to send requests for information about products.

Data are not retained in the website. Data are retained in the inbox of the addressee of a request, according to the data retention policy set for the webmail.

G) After filling out the form in section "CONTACTS" to send contact requests or request for information.

Article 6 (1) point b) and recital 44 GDPR: the processing is necessary for the execution of an **agreement** which the data subject is a part of or for the execution of **pre-contractual measures** upon request of the data subject.

Data are not retained in the website. Data are retained in the inbox of the addressee of a request, according to the data retention policy set for the webmail.

H) After filling out the form in the section "SIGN UP" to provide data required to set up the user access to the website reserved area.

Until the end of the contract and for the time technically necessary for disconnecting the user.

I) Receive sales information, to be informed about updates of the website contents (processing addressed only to sales partner).

Until the end of the contract and for the time technically necessary for disconnecting the user.



TYPE OF DATA PROVISION

The data provision for the purposes A), B), C) and D) is necessary for browsing the website. The data provision for the purposes E), F), G), H) and I) is necessary: without the provision of required data it will not be possible to receive the required service according to the reported purposes.



4. WHO WILL THE PERSONAL DATA BE COMMUNICATED TO: DATA RECIPIENTS

Personal data will be not disseminated. Data will be communicated, even according to the specific processing purposes, to data subjects that will process data as data controllers or data processors (Article 28 GDPR) and processed by persons (Article 29 GDRP) under the authority of data controller or data processors according to specific instructions provided regarding processing purposes and means. Data will be communicated to recipients belonging to the categories reported below.

Data recipient category	Name	Location	Activity performed
	Servizi e Sistemi S.n.c.	Italy	Website user database and documentation management, publication of services (API)
Entities who provide services for the website and for communication networks	Interlogica Srl	Italy	Website front end management
	OVH	France - hosting Honk Kong – server replication to allow browsing	Website hosting
Entities who provide services for webmail and web platforms	-	Italy and UE	Provider of webmail and data management platforms
Group companies	-	UE and out of EEA	Management of the contact/information request in the selected sales territory, approval of the user who requests access the reserved area.
Entities of the sales/distribution network	-	UE and out of EEA	Management of specific contact/information request in the selected sales territory,

Data will be also communicated to competent authorities to fulfil legal obligations and/or dispositions of public bodies, upon request. The parties belonging to the aforesaid categories act as Processors or operate in complete autonomy as separate Controllers. The list of Processors is constantly updated and available by writing to privacy@melcohit.com or to the other addresses reported above.



5. DATA TRANSFER TO AN EXTRA EEA COUNTRY

Personal data will be transferred out of EEA to pursue the aforementioned processing purposes. The processing takes place in France (location of the hosting service), in Honk Kong (location of hosting data server replication) and may take place in the locations of Group companies and of sales/distribution network. Data will be transferred on the basis of Articles 44 and ss. GDPR: (Article 45) to Countries for which the Commission has expressed a decision of adequacy; to subjects who provided adequate guarantees, through the European Commission standard contractual clauses (SCC, Article 46 (2) point c and d). To obtain information of guarantees underlying the data transfer out of EEA address to privacy@melcohit.com.



6. IS THERE AN AUTOMATED PROCESSING?

Data will be subject to a processing traditionally manual, electronic and automatic. It should be noted that fully automated decision-making processes are not carried out by the Data Controller: a manual authorisation of the user's sign up is always present.



7. DATA SUBJECTS RIGHTS

You can assert your rights as expressed in Articles 15 and subseq. of the EU Regulation 2016/679 by writing to privacy@melcohit.com or writing to the abovementioned addressed. You have the right, at any time, to ask the Controller for accessing your personal data (Article 15), to rectify them (Article 16), delete them (Article 17) or limit their processing (Article 18). The Data Controller communicates (Article 19) to each of the recipients whom the personal data have been transmitted to any corrections or cancellations or limitations of the processing carried out. The Data Controller informs the data subjects of these recipients if the data subjects request it. In the cases provided for, you have the right to the portability of your data (Article 20) and in this case they will be provided to you in a structured format, commonly used and readable, by an automatic device. In the cases provided for, you have the right to object (Article 21) at any time to the processing of data based on the legitimate interest. In the event that you believe that the processing of personal data carried out by the Data Controller is in violation 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 the data subject habitually resides or works or in the place where the alleged violation of the regulation has occurred (Italian Privacy Authority "Garante Privacy" <https://www.garanteprivacy.it/>), or to take appropriate judicial offices.

8. CHANGES TO THE PRIVACY POLICY

The Controller may change, modify, add or remove any part of this Privacy Policy at any time, unless it is necessary to request your consent, where required. In order to facilitate the verification of any changes, the policy will contain an indication of its update date.

Update date: 11 May 2022

Data Controller

Mitsubishi Electric Hydronics & IT Cooling Systems S.p.A. – Company with a sole shareholder