

Privacy Policy for Using the Website & Notes on Data Processing for Business Partners, Interested Parties and Other Persons Concerned ("Data Protection Information")

A. Privacy Policy (Revision status: 09 March 2023)

We are very delighted that you have shown interest in our Group. Data protection is of a particularly high priority for the managements of Mitsubishi Power Group in Europe (Mitsubishi Power Europe, Ltd., Mitsubishi Power Europe GmbH and their respective branches and subsidiaries) (hereinafter "Mitsubishi Power Europe"). The use of the Internet pages of Mitsubishi Power Europe is possible without any explicit indication of personal data; however, if a data subject wants to use special enterprise services via our website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the EU General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to Mitsubishi Power Europe. By means of this data protection declaration, our Group would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, Mitsubishi Power Europe has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

1. Definitions

The data protection declaration of Mitsubishi Power Europe is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

a) 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.

b) Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

c) Processing

Processing is 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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

d) Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

e) Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

f) Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

g) Controller or controller responsible for the processing

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or Member State / United Kingdom law, the controller or the specific criteria for its nomination may be provided for by Union, Member State or United Kingdom law.

h) Processor

Processor is a natural or legal person, public authority, agency or other body, which processes personal data on behalf of the controller.

i) Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union, Member State or United Kingdom law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

j) Third party

Third party is a natural or legal person, public authority, agency or body, other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

k) Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

2. Name and Address of the controller

Controller for the purposes of the GDPR, other data protection laws applicable in Member states of the European Union / the United Kingdom and other provisions related to data protection is:

For Mitsubishi Power Europe, Ltd.:

Mitsubishi Power Europe, Ltd.
The Point, 37 North Wharf Road
London W2 1AF
United Kingdom
Phone: +44 208 431 0500
Email: MPWEMEA_INFO@mhi.com
Website: <https://power.mhi.com/regions/emea/>

For Mitsubishi Power Europe GmbH:

Mitsubishi Power Europe GmbH
Schifferstr. 80
47059 Duisburg
Germany
Phone: +49 (0)203 8038 0
Email: infobox@eumhi.com
Website: <https://power.mhi.com/regions/emea/>

3. Name and Address of the Data Protection Officer

You can contact the Data Protection Officer of Mitsubishi Power Europe GmbH as follows:

Mitsubishi Power Europe GmbH
Data Protection Officer
Schifferstr. 80
47059 Duisburg
Germany
Phone: +49 (0)203 8038 1691
Email: dataprotection@eumhi.com

Any data subject may, at any time, contact our Data Protection Officer directly with all questions and suggestions concerning data protection at Mitsubishi Power Europe GmbH.

4. Cookies

The Internet pages of Mitsubishi Power Europe use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.

Through the use of cookies, Mitsubishi Power Europe can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

5. Collection of general data and information

The website of Mitsubishi Power Europe collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, Mitsubishi Power Europe does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, Mitsubishi Power Europe analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

6. Routine erasure and blocking of personal data

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

7. Rights of the data subject

a) Right of confirmation

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any employee of the controller.

b) Right of access

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organization. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact any employee of the controller.

c) Right to rectification

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the

processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact any employee of the controller.

d) Right to erasure (“Right to be forgotten”)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by Mitsubishi Power Europe, he or she may, at any time, contact any employee of the controller. An employee of Mitsubishi Power Europe shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. An employee of Mitsubishi Power Europe will arrange the necessary measures in individual cases.

e) Right of restriction of processing

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by Mitsubishi Power Europe, he or she may at any time contact any employee of the controller. The employee of Mitsubishi Power Europe will arrange the restriction of the processing.

f) Right to data portability

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact any employee of Mitsubishi Power Europe.

g) Right to object

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Mitsubishi Power Europe shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defense of legal claims.

If Mitsubishi Power Europe processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to Mitsubishi Power

Europe to the processing for direct marketing purposes, Mitsubishi Power Europe will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by Mitsubishi Power Europe for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may contact the Data Protection Officer or any other employee of Mitsubishi Power Europe. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

h) Automated individual decision-making, including profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorized by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, Mitsubishi Power Europe shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision. If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact any employee of Mitsubishi Power Europe.

i) Right to withdraw data protection consent

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent with effect for the future, he or she may, at any time, contact any employee of Mitsubishi Power Europe.

8. Right to lodge a complaint

In case of an infringement of data protection laws, the data subject has a right to lodge a complaint with the competent supervisory authority.

The competent supervisory authority for Mitsubishi Power Europe, Ltd. is

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
United Kingdom
<https://ico.org.uk/make-a-complaint/>

The competent supervisory authority for Mitsubishi Power Europe GmbH is

Landesbeauftragte für Datenschutz und Informationsfreiheit
Nordrhein-Westfalen
Postfach 20 04 44
40102 Düsseldorf
Germany
Telephone: +49 (0)211 / 38424-0, Fax: +49 (0)211 / 38424-10, E-Mail: poststelle@ldi.nrw.de

9. Data protection provisions about the application and use of Google Analytics (Marketing)

This website uses the service "Google Analytics", which is offered by Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA) to analyze website usage by users. The service uses "cookies" - text files that are stored on your terminal device. The information collected by the cookies is usually sent to a Google server in the USA and stored there. IP anonymization is used on this website. The IP address of the user is shortened within the member states of the EU and the European Economic Area (EEA). This shortening eliminates the personal reference of your IP address. As part of the agreement on commissioned data processing, which the website operators have concluded with Google Inc., the latter uses the collected information to create an evaluation of website use and website activity and provides services associated with internet use.

You have the option of preventing the cookie from being stored on your device by making the appropriate settings in your browser. It is not guaranteed that you can access all functions of this website without restrictions if your browser does not allow cookies.

Furthermore, you can use a browser plug-in to prevent the information collected by cookies (including your IP address) from being sent to and used by Google Inc. The following link will take you to the corresponding plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>

Alternatively, you can prevent Google Analytics from collecting data about you within this website by clicking `this link`. By clicking on above link, you will download an "opt-out cookie". Your browser must therefore generally allow the storage of cookies for this purpose. If you delete your cookies regularly, you will need to click on the link again each time you visit this website.

Here you can find more information about the use of data by Google Inc.:
https://support.google.com/analytics/topic/2919631?hl=en&ref_topic=1008008

10. Data protection provisions about the application and use of LinkedIn (Social Media)

The controller has integrated components of the LinkedIn Corporation on this website. LinkedIn is an internet-based social network that allows users to connect with existing business contacts and to make new business contacts.

The operating company of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, USA. For data protection issues outside the USA, LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible.

With each individual visit of our website that is equipped with a LinkedIn component (LinkedIn plug-in), this component causes the browser used by the data subject to download a corresponding representation of the component from LinkedIn. Further information on LinkedIn plug-ins can be found at <https://developer.linkedin.com/plugins>. As part of this technical procedure, LinkedIn receives knowledge of which specific subpage of our website is visited by the data subject.

If the data subject is logged in to LinkedIn at the same time, LinkedIn identifies which specific subpage of our website the data subject is visiting each time the data subject visits our website and for the entire duration of the respective stay on our website. This information is collected by the LinkedIn component and assigned by LinkedIn to the respective LinkedIn account of the data subject. If the data subject activates a LinkedIn button integrated on our website, LinkedIn assigns this information to the personal LinkedIn user account of the data subject and stores this personal data.

LinkedIn always receives information via the LinkedIn component that the data subject has visited our website if the data subject is logged into LinkedIn at the same time when visiting our website; this takes place regardless of whether the data subject clicks on the LinkedIn component or not. If the data subject does not want this information to be transmitted to LinkedIn, it can prevent the transmission by logging out of its LinkedIn account before accessing our website.

LinkedIn offers the ability to unsubscribe from email messages, SMS messages, and targeted ads, as well as to manage ad settings at <https://www.linkedin.com/psettings/guest-controls>. LinkedIn also uses partners such as Quantcast, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua and Lotame, which may set cookies. Such cookies can be rejected at <https://www.linkedin.com/legal/cookie-policy>. LinkedIn's applicable privacy policy is available at <https://www.linkedin.com/legal/privacy-policy>. LinkedIn's cookie policy is available at <https://www.linkedin.com/legal/cookie-policy>.

11. Legal basis for the processing

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which Mitsubishi Power Europe obtains consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Is our company subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

12. The legitimate interests pursued by the controller or by a third party

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our business in favor of the wellbeing of all our employees and the shareholders.

13. Period for which the personal data will be stored

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfilment of the contract or the initiation of a contract.

14. Provision of personal data as statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; Possible consequences of failure to provide such data

Mitsubishi Power Europe clarifies that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject may contact any employee. The employee clarifies to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

15. Existence of automated decision-making

As a responsible company, Mitsubishi Power Europe does not use automatic decision-making or profiling.

B: Notes on Data Processing for Business Partners, Interested Parties and Other Persons Concerned ("Data Protection Information") (Revision status: 09 March 2023)

The Mitsubishi Power Group in Europe (Mitsubishi Power Europe, Ltd., Mitsubishi Power Europe GmbH and their respective branches and subsidiaries) (hereinafter "Mitsubishi Power Europe") hereby informs you about the processing of personal data by Mitsubishi Power Europe and the rights to which you as a data subject are entitled.

1. Scope and terminology

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the EU General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to Mitsubishi Power Europe.

This privacy policy applies to the processing of personal data by Mitsubishi Power Europe. With regard to the terminology used (e.g. "personal data", "processing" or "controller"), reference is made to the definitions in Art. 4 of the EU General Data Protection Regulation (hereinafter referred to as "GDPR").

If interested parties, business partners and contacts are not at the same time persons concerned, they will pass on the data protection information to the natural persons acting on their behalf (e.g. their contact persons, other commissioned or authorized persons).

2. Controller and Data Protection Officer

The Controllers for the processing of personal data within the meaning of Art. 4 para. 7 GDPR are

Mitsubishi Power Europe, Ltd.

The Point, 37 North Wharf Road
London W2 1AF
United Kingdom
Phone: +44 208 431 0500
Email: MPWEMEA_INFO@mhi.com
Website: <https://power.mhi.com/regions/emea/>

Mitsubishi Power Europe GmbH

Schifferstraße. 80
47059 Duisburg
Deutschland
Tel.: +49 (0)203 80380
E-Mail: infobox@eumhi.com
Website: <https://power.mhi.com/regions/emea/>

You can contact the **Data Protection Officer designated by Mitsubishi Power Europe GmbH** at dataprotection@eumhi.com or at the aforementioned postal address by inserting "An den Datenschutzbeauftragten" ("To the Data Protection Officer").

3. Purpose and legal basis of the processing

3.1 Processing for purposes of carrying out the contractual relationship

Within the framework of the initiation (e.g. processing of an inquiry, preparation of an offer), justification, processing and handling of the contractual relationship, Mitsubishi Power Europe processes the data provided and required for this purpose (master and contact data of the business partner or his contact persons and other parties involved, contract and accounting data, communication with business partners or his contact persons and other parties involved, further information necessary for processing the enquiry or the order). The processing of these data takes place primarily for appropriate order processing.

This also includes processing for the following purposes:

- communication with the customer/supplier and other parties involved within the scope of order justification and processing,
- identification in accordance with the Money Laundering Act (German Geldwäschegesetz, hereinafter “GwG” - see section 3.2),
- the administrative execution (e.g. file management, contact administration) as well as the billing of the order,
- the assertion, exercise or defense of reciprocal legal claims.

Within the framework of the contractual relationship, it may be necessary for Mitsubishi Power Europe to collect personal data from publicly accessible sources (e.g. public registers, press, Internet).

Data processing is required pursuant to Art. 6 para. 1 s. 1 lit. b GDPR for the aforementioned purposes. If it is not you, but your employer or client, who is a contractual partner of Mitsubishi Power Europe, the processing of the data provided by the contractual partner within the framework of the contractual relationship is carried out on your person on the basis of Art. 6 para. 1 s. 1 lit. f GDPR. The justified interest of Mitsubishi Power Europe results from the necessity of the processing of these data for purposes of the order fulfilment and/or contribution of pre-contractual measures.

3.2 Fulfilment of legal obligations

Mitsubishi Power Europe processes personal data to fulfil legal obligations such as compliance with commercial law, money laundering law and tax law documentation and storage obligations.

Legal basis for this is Art. 6 para. 1 s. 1 lit. c GDPR in conjunction with the respective legal obligations.

3.3 Processing of Business Contacts, Marketing and Advertising

If Mitsubishi Power Europe has received your business contact data within the scope of a business event, business appointments, seminars or similar or within the scope of a business initiation or order (e.g. within the scope of handing over business cards), Mitsubishi Power Europe stores your contact data in the CRM system (Customer Relationship Management System) for the purpose of maintaining and managing business contacts. The legal basis is Art. 6 para. 1 s. 1 lit. f GDPR. The legitimate interest arises from the aforementioned purposes.

Mitsubishi Power Europe also uses the contact data for the purpose of sending event invitations, information brochures or other information on products and topics (e.g. on current topics in the field of energy generation), events, etc. to business partners and potential interested parties. If your business contact details are publicly accessible (e.g. via the company website or professional networks such as Xing, LinkedIn) and Mitsubishi Power Europe events and/or services may be of interest to you due to your business activities, Mitsubishi Power Europe may also use and store your business contact details for the aforementioned purposes.

If you have given Mitsubishi Power Europe your consent to this, your contact data will be used for these purposes on the basis of Art. 6 para. 1 s. 1 lit. a, Art. 7 GDPR. Your consent is freely revocable with effect for the future at any time (cf. Article 7 thereon). For the rest, the use of your contact data for the aforementioned purposes is subject to the requirements of Art. 6 para. 1 s. 1 lit. f GDPR. The legitimate interest of Mitsubishi Power Europe lies in customer care and the acquisition of new business contacts. If you do not wish information material and/or event invitations to be sent and your contact data to be used for these purposes, you may object to this at any time (cf. Article 8 thereon).

3.4 IT Security

In order to ensure the security, stability, integrity and functionality of the IT systems and IT operations, as well as the security of the data stored and the data processing operations at Mitsubishi Power Europe, it may be necessary to process the personal data stored in the Mitsubishi Power Europe IT systems (e.g. when creating backups or performing tests). The legal basis for this processing of personal data is Art. 6, para. 1, s. 1 (f) GDPR. The legitimate interest arises from the aforementioned purposes.

4. Place of data processing

The processing of personal data generally takes place in states of the European Union (EU) or the European Economic Area (EEA) or within the United Kingdom. If Mitsubishi Power Europe transfers personal data to affiliated group companies or service providers in countries outside the EU/EEA (so-called third countries), the transfer will only take place if the third country has been confirmed an appropriate level of data protection by the EU Commission or other appropriate data protection guarantees (e.g. EU standard contractual clauses) are in place.

5. Storage Time

As a matter of principle, Mitsubishi Power Europe stores your personal data only for as long as this is necessary to perform the processing purposes described in these Privacy Policy provisions or statutory requirements or filing duties. Other major filing duties arise under commercial law (in particular the storage of commercial and business letters for 6 years and of accounting documents for 10 years, section 257 German Commercial Code (Handelsgesetzbuch hereinafter "HGB"), under tax law (in particular filing of accounting documents for 10 years and of other tax-relevant documents for 6 years, section 147 Fiscal Code (Abgabenordnung, hereinafter "AO") and under anti-money laundering law (filing of records and other documents as defined in section 8 para. 1 to 3 GwG for 5 years from the end of the calendar year in which the business relations ended, section 8 para. 4 GwG).

After expiry of the statutory filing periods, the data and documents are erased or destroyed unless Mitsubishi Power Europe requires the same to protect its own professional interests taking account of the limitation period stipulated in section 199 para. 3 German Civil Code (Bürgerliches Gesetzbuch, hereinafter "BGB") for a period of 10 years, beginning with the end of the year in which the relevant engagement was ended or unless the data subject has consented to a longer period of storage.

6. Recipients and categories of recipients

Where this is necessary to administer contractual relationships, your personal data are transferred to third parties or other organizations. This includes in particular the transfer to service providers (e.g. forwarding agents) for the purpose of proper order processing.

Mitsubishi Power Europe also uses external service providers who may have access to personal data within the scope of their activities for Mitsubishi Power Europe (e.g. postal/transport services, IT service providers, waste disposal companies). Such service providers are only commissioned in accordance with the relevant data protection regulations.

7. Rights of data subjects

In connection with the processing of personal data, you as a data subject are entitled to the following rights under the GDPR:

Right to information: Pursuant to Art. 15 GDPR, you have the right to ask for information at all times about your personal data processed by Mitsubishi Power Europe and receive the information listed in Art. 15 paras. 1 and 2 GDPR in connection with processing. In accordance with your right to information, you have the right to receive a copy of your personal data subject to the requirements of Art. 15 para. 3 GDPR. The restrictions of the right to information under Art. 15 para. 4 GDPR and section 34 Federal Data Protection Act (Bundesdatenschutzgesetz, hereinafter "BDSG") must be observed.

Right to rectification: In accordance with Art. 16 GDPR, you may require rectification of your personal data stored by Mitsubishi Power Europe if they are inaccurate or their completion if they are incomplete.

Right to erasure: In accordance with Art. 17 GDPR, you may require the erasure of your personal data stored at Mitsubishi Power Europe, unless processing is necessary to fulfil a legal obligation or to assert, exercise or defend legal claims. The further restrictions under Art. 17 para. 3 GDPR and section 35 BDSG must be observed.

Right to restriction of processing: Subject to the requirements of Art. 18 GDPR, you have the right to restrict processing of your personal data. In this event, your personal data - apart from their storage - may only be processed with your consent or subject to the requirements of Art. 18 para. 2 GDPR.

Right to data portability: Subject to the requirements of Art. 20 GDPR, you have the right to receive your personal data which you have provided to Mitsubishi Power Europe in a structured, common and machine-readable format or, as far as technically feasible, to request transfer directly to another controller.

Revocation of consent granted: In accordance with Art. 7 para. 3 GDPR, you are entitled to withdraw at any time your consent after once having given it to Mitsubishi Power Europe. The consequence of this is that Mitsubishi Power Europe may not continue the data processing, which was based on this consent, in the future.

If you would like to exercise the rights listed above, please contact the Controller (for Mitsubishi Power Europe, Ltd.) / the Data Protection Officer (for Mitsubishi Power Europe GmbH), please refer to contact details in Article 2.

8. Right to object

If your personal data are processed on the basis of legitimate interests in accordance with Art. 6 para. 1 s. 1 lit. f GDPR or on grounds of public interest in accordance with Art. 6 para. 1 s. 1 lit. e GDPR, you have the right, in accordance with Art. 21 GDPR, to lodge an objection to the processing of your personal data at any time, if there are grounds for the objection arising from your particular situation.

In the event of a justified objection to the processing of your personal data under Art. 6 para. 1 s. 1 lit. e or f GDPR, we must refrain from any further processing of your data unless it is necessary on grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims. The right to objection is subject to the restrictions of section 36 BDSG. If your personal data are processed for direct marketing purposes, you have the right to object at any time without restriction to the processing of your data for such direct marketing purposes. The statement of

reasons is not required. This also applies to profiling that it is related to such direct marketing. In the event of your objection to the processing of your personal data for direct marketing purposes, we must refrain from any further processing of your data for such purposes.

The objection can be addressed form-free to the Controller (for Mitsubishi Power Europe, Ltd.) / the Data Protection Officer (for Mitsubishi Power Europe GmbH), please refer to contact details in Article 2.

9. Right to lodge a complaint with the supervisory authority

If you are of the opinion that the processing of your personal data by us infringes data-protection regulations, you also have the right to lodge a complaint with a supervisory authority under Art. 77 GDPR.

To this purpose, you can normally contact the supervisory authority at your usual place of residence or place of work or at the place of the suspected infringement.

The competent supervisory authority for Mitsubishi Power Europe, Ltd. is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
United Kingdom
<https://ico.org.uk/make-a-complaint/>

The competent supervisory authority for Mitsubishi Power Europe GmbH is:

In North Rhine-Westphalia, the LDI NRW (Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen) is [the](#) competent supervisory authority which can be contacted as follows:

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen
Postfach 200444
40102 Düsseldorf
Germany
Telephone: +49 (0)211 / 38424-0, Fax: +49 (0)211 / 38424-10, E-mail: poststelle@ldi.nrw.de