

## 1. Privacy Policy

- 1.1. Mitsubishi Elevator Hong Kong Company Limited (our company, **we/us/our**) are committed to safeguarding the privacy of our customers and users (**you/your**) who visit our websites (the **Websites**). This privacy policy (the **Privacy Policy**) sets out our personal information collection and sharing practices for our websites and is intended to inform you of the ways in which the Websites collect personal information, the uses of that personal information and the ways in which we will share any personal information you choose to provide to us.
- 1.2. If you are an existing customer of ours, further details about how we use your personal information is set out in your customer contract with us. Further notices highlighting certain uses we wish to make of your personal information together with the ability to opt in or out of selected uses may also be provided when we collect personal information from you.
- 1.3. 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 information. Please check these policies before you submit any personal information to such third party websites.
- 1.4. This Privacy Policy is intended to explain our privacy practices and covers the following areas :
  - (a) What personal information about you we may collect
  - (b) How we may use your personal information
  - (c) How we protect your personal information
  - (d) Contacting us & your rights to prevent marketing and to access and update your personal information
  - (e) Our Cookies Policy
  - (f) How changes to this Privacy Policy and the Cookies Policy will be made

## **2. Information we may collect about you**

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

(a) **Information you provide to us**

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

- (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 telephone number, e-mail address.
- (ii) When you contact us from contact form on our websites, we may keep information such as name, address, contact telephone number, e-mail address. 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, contact telephone number, e-mail address.
- (iv) When you create an account to use our online services, we may ask you to provide information such as name, address, contact telephone number, e-mail address.

(b) **Information provided by other sources**

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

- (i) If you purchase our products from a retailer, we may receive certain information about your purchase from that retailer.

(c) **Information collected for website and communication usage**

Details of your visits to the websites and information collected through cookies and other tracking 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. Uses made of your personal information

3.1. In this section, we set out the purposes for which we use personal information that we collect via our websites and, in compliance with our obligations under European Data Protection Law (the "Law"), identify the "legal grounds" on which we rely to process the information.

3.2. These "legal grounds" are set out in the Law, which allows companies to process personal data only when the processing is permitted by the specific "legal grounds" set out in the Law.

3.3. Please note that in addition to the disclosures we have identified below, we may disclose personal information for the purposes we explain in 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, as well as other members of the Company.

(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 entered into 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 selected 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 sending email to [ccs@hmecg.com](mailto:ccs@hmecg.com).

**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 analyze your personal information in order to better understand your and our other clients' services and marketing requirements, to better understand our business and develop our products and services;

**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)

(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 information 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 information 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 policy.

**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 information to comply with our regulatory requirements or dialogue with regulators as applicable which may include disclosing your personal information 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. Transmission, storage and security of your personal information**

### **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 information in accordance with data protection legislative requirements.
- 4.2. All information you provide to us is stored on our secure server located in Hong Kong 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 the EEA**

- 4.3. Your personal information 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 information as set out in this Privacy Policy.
- 4.4. Where we transfer personal information from inside the European Economic Area (the EEA) to outside the EEA, we may be required to take specific additional measures to safeguard the relevant personal information. Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections to EEA data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions. In countries which have not had these approvals (see [https://commission.europa.eu/index\\_en](https://commission.europa.eu/index_en) for more information), we will establish legal grounds justifying such transfer, such as EU Commission-approved model contractual clauses, or other legal grounds permitted by applicable legal requirements.
- 4.5. Please contact us through sending email to [ccs@hmecg.com](mailto:ccs@hmecg.com) if you would like to see a copy of the specific safeguards applied to the export of your personal information.

## **Storage limits**

- 4.6. 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 automated decision-making technologies that 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 information 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 information. You can also exercise the right at any time by contacting us through sending email to [ccs@hmecg.com](mailto:ccs@hmecg.com).

### Updating information

- 5.3. We will use reasonable endeavors to ensure that your personal information is accurate. In order to assist us with this, you should notify us of any changes to the personal information that you have provided to us by contacting us through sending email to [ccs@hmecg.com](mailto:ccs@hmecg.com).

### Your rights

- 5.4. If you have any questions in relation to our use of your personal information, you should first contact us through sending email to [ccs@hmecg.com](mailto:ccs@hmecg.com). Under certain conditions, you may have the right to require us to:
- (a) provide you with further details on the use 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 information we hold (please see paragraph 5.3);
- (d) delete any personal information that we no longer have a lawful 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);
- (f) object to any processing based on the legitimate interest ground 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 information 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 information processed by us under this Privacy Policy will be different.

5.8. If you have any questions in relation to this policy, please contact us through sending email to [ccs@hmecg.com](mailto:ccs@hmecg.com) .

5.9. If you would like to contact our Data Protection Officer, please contact through sending email to [ccs@hmecg.com](mailto:ccs@hmecg.com) .

## **6. Cookies policy**

6.1. We use cookies on the websites. To find out more about how we use cookies, please see our [Cookies Policy](#).



## **7. Changes to our Privacy Policy and/or Cookies Policy**

- 7.1. We may change the content of our websites and how we use cookies and consequently our Privacy Policy and our Cookie Policy may change from time to time in the future. If we change this Privacy Policy or our Cookies Policy, we will update the date it was last changed below. If these changes are material, we will indicate this clearly on our Websites.
- 7.2. This Privacy Policy was last updated on 29 Apr 2024.

## **Annex**

Use of personal information under European Data Protection Law 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 policy. We note the grounds we use to justify each use of your information next to the use in the “Uses of your personal information” 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 through sending email to [ccs@hmecg.com](mailto:ccs@hmecg.com) .

### **Contract performance:**

where your information is necessary to enter into or perform our contract with you.

### **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 us to defend, prosecute or make a claim against you, us or a third party.