

## **Mitsubishi Electric Europe B.V. (Irish Branch) Learning Management System Privacy Policy**

### **1. Learning Management System Privacy Policy**

1.1 Mitsubishi Electric Europe B.V., together with other members of its group (MEU, 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

Personal data that you provide to us, such as when signing up to use our online courses or using the contact form on our websites, including your name, email address, and other contact details;

### (b) Our correspondence

If you contact us, we will typically keep a record of that correspondence;

### (c) Survey information

We may also ask you to complete surveys that we use for research purposes. In such circumstances we shall collect the information provided in the completed survey;

### (d) 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 law, identify the “legal grounds” on which we rely to process the information.

3.2 These “legal grounds” are set out in European Data Protection Law, which allows companies to process personal data only when the processing is permitted by the specific “legal grounds” set out in law (the full description of each of these grounds can be found [here](#))

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 this notice to service providers, contractors, agents, advisors (e.g. legal, financial, business or other advisors) and affiliates of MEU that perform activities on our behalf, as well as other members of the Mitsubishi Electric group.

### (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

A Division of Mitsubishi Electric Europe B.V.

“Registered in the Netherlands as a private company with limited liability, Registration No. 33279602, with registered address at Capronilaan 34, 1119NS, Schipol-Rijk. Registered as a branch at Dublin, Registration No. 903775”.

Directors: Shunji Kurita (Japan), Andreas Wagner (Germany), Eric Pellerin (France), Hartmut Puetz (Germany), Masami Kusano (Japan), Toshimitsu Ito (Japan), Takeharu Kondo (Japan)

entered into between you and us, such as where you sign up to take an online training course;

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 the [“GDPR Contacting Us”](#) form below.

Use justification:

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

(c) For research and development purposes

To analyse 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:

A Division of Mitsubishi Electric Europe B.V.

“Registered in the Netherlands as a private company with limited liability, Registration No. 33279602, with registered address at Capronilaan 34, 1119NS, Schipol-Rijk. Registered as a branch at Dublin, Registration No. 903775”.

Directors: Shunji Kurita (Japan), Andreas Wagner (Germany), Eric Pellerin (France), Hartmut Puetz (Germany), Masami Kusano (Japan), Toshimitsu Ito (Japan), Takeharu Kondo (Japan)

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

(g) To reorganise 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-organisation, 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 analysing any proposed sale or re-organisation. We may also need to transfer your personal information to that re-organised entity or third party after the sale or reorganisation 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 or our subcontractors' secure servers 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.

A Division of Mitsubishi Electric Europe B.V.

"Registered in the Netherlands as a private company with limited liability, Registration No. 33279602, with registered address at Capronilaan 34, 1119NS, Schiphol-Rijk. Registered as a branch at Dublin, Registration No. 903775".

Directors: Shunji Kurita (Japan), Andreas Wagner (Germany), Eric Pellerin (France), Hartmut Puetz (Germany), Masami Kusano (Japan), Toshimitsu Ito (Japan), Takeharu Kondo (Japan)

## 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 When you sign up to one of our online courses, we provide the online courses through a third party, 360Learning. For the purposes of data protection legislation, we are the data controller and 360Learning is our sub-processor. If you would like to get in contact about the information we hold about you, please turn to section 5 (Your rights and contacting us). Please see 360Learning's privacy policy for information about how they use your personal data: <https://360learning.com/privacy-policy>

4.5 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 the full list here [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)), 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.

4.6 Please contact us through the [“GDPR Contacting Us”](#) form below if you would like to see a copy of the specific safeguards applied to the export of your personal information.

## Storage limits

4.7 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 anonymise the data (and we may further retain and use the anonymised information) or securely destroy the data.

## 5. Your rights & contacting us

### Marketing

A Division of Mitsubishi Electric Europe B.V.

“Registered in the Netherlands as a private company with limited liability, Registration No. 33279602, with registered address at Capronilaan 34, 1119NS, Schiphol-Rijk. Registered as a branch at Dublin, Registration No. 903775”.

Directors: Shunji Kurita (Japan), Andreas Wagner (Germany), Eric Pellerin (France), Hartmut Puetz (Germany), Masami Kusano (Japan), Toshimitsu Ito (Japan), Takeharu Kondo (Japan)

5.1 You have the right to ask us not to process your personal information for marketing purposes. 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 as set out in the [“GDPR Contacting Us”](#) form below.

### **Updating information**

5.2 We will use reasonable endeavours 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 as set out in the [“GDPR Contacting Us”](#) form below.

### **Your rights**

5.3 If you have any questions in relation to our use of your personal information, you should first contact us as per the [“GDPR Contacting Us”](#) form below. 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 5.2);
- (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 5.1 for marketing);
- (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.

5.4 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.

5.5 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

5.6 Depending on where you are located, the “data controller” of your personal information processed by us under this Privacy Policy will be different. Please see [here](#) for a list of which branches will be data controllers in which countries.

5.7 If you have any questions in relation to this policy, please contact us as per the “[GDPR Contacting Us](#)” form below.

## 6. Cookie Policy

We use cookies on the <https://mitsubishielectricire.360learning.com/> website that are necessary for correct function of the website. These cookies are necessary in order to enable you to move around the website and use its features. Without these cookies, the service that you have requested cannot be provided.

The website uses the following cookies;

Cookie Name	Type	If you browse....
360Learning (personaliation_id)	Required	The cover website
360Learning (Token)	Required	A private training space
360Learning (rememberMe)	Required	A private training space
360Learning (TrafficSource)	Functional/Personalization	The cover website or the Blog or a private training space
360Learning (mail; telephone)	Functional/Personalization	The cover website
Zendesk (__cfduid)	Functional	
Amplitude (amplitude_id)	Analysis and performance	The cover website or a private training space

360Learning uses services provided by third parties in order to know how you use the website, improve your user experience and display ads on other websites.

These third parties (i.e., for example, advertiser networks and external service providers, such as services which analyse web traffic) may use cookies.

<b>Third Party Cookies</b>	<b>Type</b>	<b>If you browse....</b>
Zendesk (_cfduid)	Functional	A private training space
Amplitude (amplitude_id)	Analysis and performance	The cover website or a private training space
Errorception/CloudFare (_cfduid)	Analysis and performance	The Blog or a private training space
Marketo (_mkto_trk)	Targeting	The cover website or the Blog
Google Analytics (_ga_gat_gid)	Analysis and performance	The cover website or the Blog
Adroll (__adroll; __adroll_fpc; ar_v4)	Targeting	The Blog
Facebook (fr, pl, presence, sb, spin, act, wd, xs)	Social networks	The cover website or the Blog
Linkedin (BizID; UserMatchHistory; Bcookie; Lang; Lidc)	Social networks	The cover website or The Blog
Bing (MUID ; MUIDB)	Advertisement	The cover website or the Blog
Drift (Dftt_end_user_prev_Bootstrapped; driftt_aid; driftt_sid)	Targeting	The cover website
Crazy Egg (_ceg.s; _ceg.u; _ceir)	Advertisement	The cover website or the Blog
Google/DoubleClick (1P_JAR; DSID; DV; HSID; IDE; NID; SAPISID; SID; SIDCC; SSID)	Advertisement	The cover website or the Blog

WordPress (pum_alm_first_activity)	Functional	The Blog
------------------------------------	------------	----------

The purpose of the various types of cookies is:

- **Required cookies:** technically required for the browsing on the website (in order to go through it, to use its basic functionalities and secure your connection) and the provision of the service.
- **Functional cookies (or personalization cookies):** improve the browsing on the website and offer you personalized functionalities: nominative welcome and registration of your preferences (the language or the region where you are).
- **Analysis (or performance) cookies:** allow for the monitoring and the statistical analysis of the users of the Website to which they are linked (most-read pages, error messages, overview of the traffic on the website, origin of this traffic and most consulted pages, etc). The aim is to improve your user experience and to enhance the way our website works so that you find what you are looking for in an intuitive way
- **Advertising cookies:** allow for the management of advertising spaces on the website that is visited, the app or the platform from which the service requested is offered.
- **Behavioral advertising and targeting cookies:** store the information on the behavior of the users which are obtained via their browsing habits, which enable relevant ads to be offered to them based on their interests. They are also used to limit the number of times an ad is displayed and help measuring the efficiency of advertising campaigns. The deletion of these cookies shall not prevent the display of the ad.
- **Social networks' cookies:** allow for contents of our Website to be shared with other persons or to make your visit or your opinion on a content of the Website know to these persons.

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

7.1 We may change how we process your personal data, 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 27.11.2024.

A Division of Mitsubishi Electric Europe B.V.

"Registered in the Netherlands as a private company with limited liability, Registration No. 33279602, with registered address at Capronilaan 34, 1119NS, Schipol-Rijk. Registered as a branch at Dublin, Registration No. 903775".

Directors: Shunji Kurita (Japan), Andreas Wagner (Germany), Eric Pellerin (France), Hartmut Puetz (Germany), Masami Kusano (Japan), Toshimitsu Ito (Japan), Takeharu Kondo (Japan)

## Changes to the Cookies Policy

We may update this cookies policy and we would encourage you to review the policy from time to time to stay informed of how we are using cookies. This cookies policy was last updated on 1 July, 2020.

### **Annex**

Use of personal information under EU data protection laws 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 as per the [“GDPR Contacting Us”](#) form below.

#### **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.