

mitsubishi elevator india private limited

PERSONAL DATA PROTECTION POLICY

Revision 1

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1. Introduction:

Mitsubishi Elevator India Private Limited ("IMEC"), a company incorporated under the laws of India, collects certain personal and sensitive personal information from its Employees during the course of employment; from Business Partners/Channel Partners and Service Providers at the time of onboarding and contract execution; and from Customers via our website for responding to product inquiries, providing services, or fulfilling contractual obligations.

For the purpose of this Policy, Employees, Business Partners, Service Providers, and Customers are collectively referred to as "You" or "Data Principals."

This Policy governs the collection, storage, use, disclosure, retention, transfer, and deletion of your personal information. IMEC is committed to safeguarding personal information of all stakeholders and ensures compliance with applicable Indian laws, including emerging obligations under the Digital Personal Data Protection (DPDP) framework.

2. Objective

The objective of this Policy is to ensure responsible and transparent processing of personal data and to establish IMEC's internal governance framework aligned with Indian data protection requirements..

3. Scope

This Policy applies to all employees, job applicants, customers, vendors, contractors, service providers, business partners, and any individual whose personal data is processed by IMEC within India.

4. Your Consent

You are requested to carefully review this Policy before sharing your personal information with IMEC. By accessing our website, submitting information, or engaging with IMEC:

- I. You consent to the collection, use, storage, disclosure, and processing of your personal information as described herein.
- II. Consent must be free, informed, specific, unambiguous, and capable of withdrawal as required under Indian data protection principles.

5. Application of Privacy Policy

This privacy policy of Mitsubishi Elevator India Private Limited applies to everyone who is a resident of India and uses our website and share their data to us out of free consent directly or while using the website. This policy does not apply to other companies' or organizations' websites to which the Site links. This policy applies to all systems, operations, business processes, and personnel that deal with personal data within IMEC.

6. Non-Personal Information

In general, you can visit this site without telling us who you are or revealing any information about yourself. However, we may automatically (i.e., not by registration) collect information that is not personally identifiable to help us provide better customer service. Our service

automatically gathers certain information such as the numbers and frequency of visitors to the Site, but we do so in ways that keep that information anonymous. This information is aggregated to measure the number of visits, average time spent on the Site and how much of the Site you use, so that we can improve our Site. We do not review information on individuals themselves. Mitsubishi Elevator India Private Limited may use a technology nicknamed "cookies" that indicates how and when pages in the Site are visited, and by how many people. A cookie is an element of data that a website can send to your browser, which may then be stored on your system but does not collect personally identifiable information. You can set your browser to notify you before you receive a cookie, giving you the chance to decide whether to accept it or not. You can also set your browser to turn off cookies. If you do so, however, some areas of some sites may not function properly. When you visit the website, we may collect your IP address and web pages visited by you. IMEC may collect non-personal or anonymised information for system improvement, analytics, and service quality enhancement.

7. Collecting Personal Information

- I. IMEC collects personal & personal sensitive information by legal and fair means
- II. When we directly collect personal & personal sensitive information from you in writing, we will specify how we intend to use the information provide contact information and ask for your consent.
- III. Whether or not you provide personal information to IMEC is up to you. Please note, however, that there are some services we may be unable to provide without your personal information. When you provide personal information to IMEC, you agree to the terms and conditions described in this section concerning this privacy policy. If you do not agree to the terms and conditions herein, please note that some services we offer (including responses to your inquiries) may not be available to you.
- IV. Collection practices must ensure fairness, transparency, and lawful purpose as required under Indian regulations.

8. The Personal Information We Collect

- I. IMEC uses the personal & personal sensitive information we receive from employees, Business Partners & Service provider to execute contracts and transactions concluded between each of employee/ Business Partner/ service provider and IMEC or to arrange a call from our authorized person/ service center for product related information to our customers as enquired or requested on our website.
- II. IMEC may be entrusted by a client company to process personal information. In such cases, we may make use of some of your personal key information as instructed by the client company and retain the information until returning it to the client company or deleting it from our system.
- III. We may at times acquire commercially available lists or directories.
- IV. IMEC will not collect, use or provide to any third party any personal information such as the following without your consent.

Information concerning:

- a. Personal philosophies, beliefs, or religion

- b. Race, ethnicity, physical/ mental disabilities, criminal records, or other information that may lead to social discrimination
- c. Workers' right to organize, collective bargaining, or other collective activities
- d. Participation in demonstrations, petitions, or the exercising of other political rights
- e. Medical treatment or sexual practices.
- f. password
- g. financial information such as Bank account or credit card or debit card or other payment instrument details
- h. Biometric information

9. Personal data management during recruitment & selection:

Personnel responsible for the recruitment and selection process should ensure that personal data received through recruitment agencies or from aspiring candidates in electronic or paper form may be stored in safe place so that it is not available in public domain. The personal data so obtained for recruitment may only be accessed by personnel who are responsible and are involved in the recruitment and selection process as per organization guidelines.

These data should be restricted for internal usage and should not be referred to any outside person, company or agency without the knowledge of the applicant or by the source from where the data is received. Any incident of willful non-compliance for any personal gains that can harm the interest of the Organization or infringement of personal privacy will be viewed seriously and the company's Business Conduct Guidelines policy will be applicable for such instances.

The sharing or disclosure of personal data during recruitment and selection process should be limited to following purposes:

- a) Reference checks
- b) Pre-employment medical check-up
- c) Any other purpose relating to employment medical check-up
- d) Any other purpose relating to employment

Recruitment data is collected only for evaluating suitability for employment and processed with confidentiality. Only authorised HR personnel may access this information.

10. Personal data management of Company staff:

Post recruitment and selection process, personal data will be maintained in:

- a. **Employees confidential file (ECF):** The Employee Confidential File (ECF) shall be maintained by HR department and should be stored in safe secured place with limited authorized access. The personal data contained in ECF should be validated by HR during documentation for its authenticity and correctness.
- b. **Electronic form:** Personal data management in electronic form may be maintained for fast retrieval of data and for purposes of various HR process and data analysis. All such

data has to be secured and stored in a safe manner by respective process owner as per the guidelines mentioned in the IMEC I.T protocols

The personal data may be utilized / shared for the following purpose but are not limited to:

- i. Manpower planning and deployment (including transfer, promotion etc...)
- ii. Performance appraisal
- iii. Compensation and benefits
- iv. Training and Development
- v. Auditing and Due Diligence
- vi. Legal or statutory requirements
- vii. Any other purposes relating to employment

11. Personal Data Access Rights:

Each employee has the right to know and ascertain from the company:

- I. About availability/documentation of personal data submitted by the concerned staff
- II. If the company holds such data, to be supplied with a copy of such data in the event of loss of original data by the concerned staff.
- III. This right of information is limited and cannot be used for comparing any compensation or other benefits.
- IV. All data access request should be made in writing through the Head of the Department/Regional Head as the case may be. The company will share the information within in 15 days from the date of receipt of the request. In case the company is unable to provide the data in the stipulated time of 15 days, the company will communicate accordingly. Under Indian law, Data Principals have rights to access, correction, erasure, and withdrawal of consent.

12. Data Updation and Data Correction:

An employee, who wishes to update personal data pertinent to employment, may do so through the concerned Department Head, with a request application mentioning requisite update to be made in the record along with documentary proof as the case may be. On receipt of such requests, Human- Resources department will take necessary steps to update the records immediately and duly provide an Email acknowledgement to the concerned staff. IMEC shall respond to such requests within timelines prescribed under Indian regulations.

In case of any correction to be made, same procedure as mentioned above will be followed.

13. Retention of Employment related Data:

The data retention period will be as follows:

- I. In respect of recruitment related data held about a job applicant, the data retention period is no longer the 3 months from the date of rejecting the applicant;
- II. In respect of employment related data held about an individual staff, the data retention period is no longer than 5 years from the date the individual staff leaves the employment.

- III. Upon completion of retention timelines, IMEC shall delete or anonymise personal data in accordance with Indian data protection requirements
- IV. The data which is in physical form (hard copies) would be destroyed after the retention period.

14. Employment Related Data Security:

Necessary precautionary measures will be adopted by the Company for proper storage to avoid accidental unauthorized access, any damage to data/records, loss and erasure of data. All reasonably practicable measures will be adopted to ensure that staff handling the data are competent and educated in the Company's personal data privacy policies, exercise due diligence in the application of those policies and are subject to procedures designed to ensure compliance with those policies. Security controls shall include measures such as encryption, access control, and periodic security reviews as required under Indian law

15. How We Use your Personal Information

- I. IMEC uses the personal & sensitive personal information we receive from employee's, Business Partner's/ service provider's to execute contracts and transactions concluded between each of employee/ Business Partner/ service provider and IMEC. The information we receive from Customer on our website are generally name, company name (if any), residential/ office address, state, city, contact no, email address (if any). The same is used for locating the related Business Partner who can satisfy your requirement in your city and your contact details are used to contact Customer who enquired about the product.
- II. IMEC uses personal information of Customer to provide with relevant information that may be of interest such as information on our products, solutions, and associated services.
- III. IMEC uses personal & sensitive personal formation of Employees obtained during employment strictly for processing employment, employee related services through third Party and meeting other statutory requirements.
- IV. IMEC uses personal & sensitive personal formation of business Partners (Channel partners)/ service provider obtained during their appointment/ registration strictly for meeting its business obligation, extending other business-related services through third Party and meeting other statutory obligation.
- V. IMEC may at times be entrusted by a client company to process information or perform other such activities on its behalf. The personal information we obtain as a result will be used only for the activities with which we are entrusted. In such cases, IMEC and the client company will be bound by a confidentiality agreement not to disclose the name of the client company or details of the activity.
- VI. IMEC will not use personal information we receive from you for purposes other than those specified at the time of collection. However, we may use the information to-without personally identifying individuals-gather statistical data on the number of visitors our website receives, sales volume, and information on how visitors navigate through our website.
- VII. Processing must be limited to lawful and specific purposes notified to the Data Principal.

16. When We Disclose or Provide your Personal Information to Third Parties

As a rule, IMEC does not disclose or provide the personal information we receive from you to any third party, IMEC may share personal data with service providers, statutory bodies, insurance partners, travel agencies, background verification vendors, and other required third parties. except in the following cases:

- I. When we have your consent.
- II. When we employ a third party to handle all or part of the personal and sensitive personal information we have collected from employees & business Partners, to perform services that are necessary to achieve our objectives and perform the services beneficial to employees & business partners.
- III. When personal information is provided in conjunction with the succession of business resulting from a merger or other transfers of business.
- IV. When we are required by law to do so.
- V. When it is necessary to do so to protect the life, body or property of people, and obtaining your consent is difficult.
- VI. When it is necessary to do so to improve public health or promote the welfare or well-being of children, and obtaining your consent is difficult.
- VII. When it is necessary to cooperate with national agencies, local governments, or their consigned parties in the execution of legally prescribed business, but where obtaining your consent may hinder execution of the said business.
- VIII. To stop the provision of personal information to third parties without customer consent:

It may at times be necessary for IMEC to provide personal & personal sensitive information received from employees, business partners & customers to IMEC affiliates located both in India and abroad for business purposes.

17. Stopping provision of personal information to third parties

If an individual withdraws consent for data sharing, IMEC will stop providing personal data to third parties except where legally mandated.

18. How We Protect your Personal Information

IMEC employs administrative, technical, personal, and physical safeguards to protect your personal information.

- I. IMEC employs necessary safety measures and takes necessary corrective actions to protect your personal information from unauthorised access, loss, destruction, alteration, or leakage. However, please be reminded that there is no fail-proof technology that can prevent illegal access to personal information.
- II. IMEC employees receive regular education on safeguarding personal information.
- III. In cases when client company is hired by IMEC to provide services on our behalf are commissioned to handle personal information, we select appropriate contractors and require them to sign all necessary agreements (Non-Disclosure Agreement) concerning the handling of personal information. The agreements are signed prior to

any services We initiate with them and will only use it in order to initiate and/ or continue the services they are providing for us and also employ all safety measures required by law.

- IV. IMEC follows organisational and technical measures to protect personal data against loss, unauthorised access, misuse, alteration, or disclosure.

19. Questions Concerning Personal Information

- I. You may request the disclosure of any of your personal information in our possession. You may also enquire about the results of such requests and request revisions when necessary.
- II. You may contact us with questions or comments regarding our handling of personal information.
- III. Mitsubishi Elevator India Private Limited will respond to any such request in an appropriate manner, within reason. We have appointed the Grievance officer expressly for this purpose.
- IV. Queries regarding personal data may be directed to IMEC's designated appointed DPO.

20. Children

Children without the consent of their parent or guardian should not submit personal Information to the Site. While few, if any, of the materials of the Sites are directed towards children, IMEC encourages all parents or guardians to instruct their children in the safe and responsible use of their personal information while using the Internet. IMEC does not knowingly collect personal data from minors unless explicitly permitted by law with guardian consent.

21. Cookies for Marketing Purposes

Cookies for marketing purposes are used to offer more relevant content to users, based on their specific interests. They are also used to limit the display frequency of an ad and to measure and control the effectiveness of advertising campaigns. They register whether users have visited a website or not, and which contents were used. This information may possibly also be shared with third parties, such as advertisers, for example. These cookies are often linked to the functions of third-party websites. You can block the use of such cookies by creating an opt-out cookie. Cookies may be used on IMEC's digital platforms to improve user experience.

22. Questions or Comments

It is important to us to hear what visitors have to say about our services, and our policies. If you have any questions, concerns, about our off-line and on-line products and services, please contact us. General queries or comments may be submitted to the IMEC administration office.

23. Disputes

Any dispute arising from this policy shall be governed under Indian laws and resolved under the jurisdiction applicable to IMEC.

24. Breach Notification and Incident Reporting

IMEC shall notify the Data Protection Authority of India of any personal data breach likely to cause harm, and shall inform affected Data Principals if required by law.

“Reporting Structure for EU Personal Data: In the event of an EU personal data incident in IMEC, President of IMEC , will be reporting the same to Mitsubishi Electric Group Personal Data Protection Manager (MELCO_DPO).“

25. Cross-Border Transfer of Personal Data

Sensitive personal data shall be stored in India and may be transferred outside India only with explicit consent and in accordance with lawful conditions approved by the Government or the Data Protection Board.

26. Subcontractor & Third-Party Data Processing Controls

IMEC shall execute data processing agreements with all third-party processors and ensure they comply with Indian data protection requirements.

27. Rights of Data Principals (India-specific)

Data Principals have rights to access, correction, erasure, grievance redressal, consent withdrawal, and data portability where applicable. IMEC shall respond to these requests within legally required timelines.

28. Amendment

IMEC reserves the right to amend this Privacy Policy at any time. If IMEC changes its privacy practices, a new Privacy Policy will reflect those changes and the effective date of the revised Privacy Policy will be set forth in this paragraph.

Authorized Signatory & Date _____ _____

Grievance Officer

Mr. Harish Shetty

GM-HR/Admin

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