

Privacy Policy

Mitsubishi Heavy Industries Thermal Systems, Ltd. (hereinafter "MTH") recognizes that all personal information managed and used in its business activities must be handled and protected with the utmost care. Therefore, MTH will follow the basic policy stated below.

1. MTH will comply with the Act on the Protection of Personal Information and other relevant laws, regulations and guidelines set forth by Japanese governmental authorities or other applicable governmental authorities.
2. MTH will not acquire or use any personal information through false or other improper means.
3. MTH will use personal information only to the extent and for the purposes specified, which will be announced or noticed to the persons to whom the information pertains at or before the time of collection.
4. MTH will endeavor to keep such personal information accurate and up-to-date.
5. MTH will take necessary and appropriate measures to maintain the security of such personal information.
6. MTH will furnish its employees and contractors handling such personal information with the necessary and appropriate guidance and supervision.
7. MTH will not provide personal information to any unaffiliated third party without the consent of the person involved, other than (i) as required by applicable law, or (ii) to our service providers for legitimate business purposes.
8. If MTH receives an inquiry from a person about the use or content of personal information related to that person, it will provide a reasonable response.
9. If MTH receives any complaints regarding the handling of personal information, it will resolve such complaints in a timely and appropriate manner.
10. MTH will establish rules and management systems for proper handling and protection of personal information and will thoroughly adhere to them.
11. MTH will engage in a strong effort to further enhance personal information protection systems by regularly reviewing and updating all rules and procedures regarding the handling of personal information, including this policy.

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Mitsubishi Heavy Industries Thermal Systems, Ltd. Yoshihiro Ito, President

For information regarding the business purposes, the practical handling method of personal information by MTH, refer to the following:

1. Use of Personal Information

MTH will acquire and use personal information only as needed or helpful for its business performance according to its business purposes. (See "7. Activities of MTH".) The business purposes of personal information are:

1. To make applications for transactions between MTH and its customers and other parties concerned with its businesses; obtain confirmation regarding customers and other parties concerned; review and assess such transactions; execute and manage agreements; and conduct termination and other proceedings following termination of agreements with customers and contractors.
2. To issue notices regarding improvement of MTH products and services and of associated products and services, and respond to customer inquiries regarding such products and services.
3. To respond to inquiries about the products and services provided by parties having business relations with MTH.
4. To allow its shareholders to perform their rights and to perform obligations to its shareholders in accordance with the Companies Act; facilitate the implementation of various policies to ensure efficient communications with its shareholders; create data under certain standards in accordance with applicable laws and regulations; and other measures to facilitate the mutual understanding between MTH and its shareholders.
5. To confirm applications for and participation in various exhibitions and seminars, communicate with lecturers, and report on the results of studies and events to the persons involved, and also to provide visitors with access to MTH's facilities.
6. To make contact with the members of any organizations in which MTH is a member, and issue various notices from MTH according to the purposes of activity of such organizations.
7. To send publications issued by MTH to persons who request them, and to distribute e-mails to the applicants for the MTH electronic mailing service.
8. To communicate and enter into joint contracts with various research institutes based on MTH's R&D activities, to which the paragraph a. above shall apply accordingly; participate in academic societies; make recommendations for prizes awarded by academic societies; and make and manage joint patent applications.
9. To communicate with journalists and analysts in publicity activities.
10. To receive applications for employment, communicate with and issue the notification of employment to the applicants, and other issues concerning recruitment activities.
11. To communicate and conduct transactions with public accountants, attorneys and patent attorneys concerned with the business activities of MTH.
12. To communicate with the officers, directors, employees or any related persons in the subsidiaries and affiliates of MTH in the course of performance of business activities other than those as stated above.
13. To issue notices to MTH's retired employees and to communicate with the families of MTH's employees.
14. To exchange necessary information between MTH and its cooperative, non-regular, temporary, part-time and student workers in execution of contracts with them and performance of their works.
15. To receive personal information provided for any order-based works and to complete such works within MTH's scope of business.
16. To personalize or improve MTH's website experience and to deliver content relevant to the interests of our website visitors, including targeted advertising through our website or third-party websites.
17. To fulfill the reason the information was provided to MTH.
18. To conduct business activities incidental or related to the above business purposes.

MTH may provide personal information to a third party with the approval of each respective individual, consign the handling of personal information to a third party, or share personal information with subsidiaries and/or affiliates of MTH to the extent that such personal information is required for a business purpose as stated above.

(Please see the following “4. Provision of Personal Information to Third Parties” and “5. Joint Use of Personal Information”.)

If any personal information is acquired or used for any other business purposes than those described above, a notice or announcement will be issued separately.

2. Possession of Personal Information

MTH possesses and will possess personal information including, without limitation, names, addresses, telephone numbers, FAX numbers, e-mail addresses, gender, ages, memberships, departments and titles of its customers, suppliers and other related companies.

MTH does not acquire and possess any personal information that is not intended for the business purposes listed above. (See “1. Use of Personal Information”.)

3. Personal Information Management

MTH will take necessary and appropriate measures to ensure the security of the personal information possessed by it and endeavor to maintain the contents of such personal information are accurate and up-to-date to the extent necessary for business purposes.

Personal information which is no longer necessary for business purposes will be disposed of in an appropriate manner.

MTH takes the following main security control measures:

1. Formulation of a basic policy
To ensure proper handling of personal data, MTH formulates a basic policy regarding compliance with related laws, regulations, guidelines, etc., a contact point for handling questions and complaints, and other matters.
2. Establishment of rules regarding the handling of personal data
MTH formulates personal information protection rules that stipulate the responsible persons of the company and each department including their duties, as well as the way to handle personal data for each stage, including acquisition, use, management, provision and responding to requests from the concerned individual.
3. Organizational security control measures
 - MTH appoints the person and department responsible for protecting personal information for the company and assign a responsible person in each department to monitor employees, and maintains an organization for reporting to and notifying the

responsible person in case of a violation or suspected violation of laws or the personal information protection rules

- In cases where all or part of the handling of personal data is entrusted to a subcontractor, MTH selects the subcontractor in accordance with the personal information protection rules and concludes an agreement with the subcontractor that stipulates the matters concerning the protection of personal data.

4. Personnel-based security control measures

- MTH incorporates personal information protection into company-wide periodic training, and appropriately conducts training in accordance with the needs of each department.
- MTH obtains confidentiality pledge covering personal information and stipulates in the employment rules that improper handling of personal information results in disciplinary action.

5. Physical security control measures

- MTH establishes security measures and controls the entry and exit of persons for each factory, building, department and area, and implements measures for preventing unauthorized or unrelated persons from viewing or handling personal data.
- MTH implements measures for preventing the theft, loss of devices, electronic media, paper-based documents, etc. that contain personal data

6. Technology-based security control measures

- MTH controls the file server access for each department to limit the scope of the access so that only related departments can access to particular personal data.
- MTH introduces mechanisms for protecting information systems that handle personal data from external unauthorized access or malware.

7. Understanding of the external environment

In cases of handling personal data in a country outside Japan, MTH confirms the legal systems regarding the protection of personal information in that country and implements security control measures.

4. Provision of Personal Information to Third Parties

MTH will not provide the personal information of any person to any unaffiliated third party without such person's approval, except in the following cases:

1. With respect to the provision of personal information (excluding special care-required personal information, improperly acquired personal information and personal information provided by a personal information handling business operator) to third parties, the matters stipulated for the provision of personal information in the Personal Information Protection Act are noticed or easily known to such person and also reported to The Personal Information Protection Commission, provided that the provision of the personal information will be suspended upon the individual's request;
2. The work of handling personal information is entrusted, in whole or in part, to any third party to the extent necessary for MTH's business purposes.

- Provided, that an agreement protecting the confidentiality of personal information shall be entered into by and between MTH and such entrusted company and that MTH will provide necessary and appropriate supervision of such entrusted company;
- 3. MTH will share the personal information of any specific person with one or more of its subsidiaries and/or affiliates to the extent necessary for business purposes (see “5. Joint Use of Personal Information”); and
- 4. Such disclosure of personal information to any third party is otherwise authorized or required under any applicable law or regulation.

5. Joint Use of Personal Information

MTH may share the personal information acquired by MTH with one or more of its subsidiaries and/or affiliates for the above business purposes (see "1. Use of Personal Information"), provided MTH shall remain responsible for the security of the same. Such personal information may include, without limitation, the names of customers and other parties concerned with MTH's businesses and their work or home addresses, telephone numbers, fax numbers, e-mail addresses, genders, ages, associated organizations and departments and professional titles.

6. Contact for Personal Information

For information regarding the specific business purposes, the disclosure, correction and suspension of use of the contents of personal information (hereinafter "inquiries about personal information"), contact the respective departments of MTH to which such personal information was provided. (To make inquiries about personal information, it is necessary to submit a completed request form including a valid form of identification. Request forms will be sent from MTH on request.)

In the event the department to which the personal information was provided is unknown, or for any inquiry for general information on the process of handling personal information, contact:

General Affairs Group,
General Affairs Department,
Mitsubishi Heavy Industries Thermal Systems, Ltd.
3-1, Asahi, Nishibiwajima-cho, Kiyosu, Aichi, 452-8561, Japan
Tel: +81-52-504-9820

For contacts about personal information to MTH's other locations, refer to "Access".

7. Activities of MTH

The corporate activities of MTH are as follows.

1. Development, design, manufacture, installation, sale and repair of refrigerating machinery, air-conditioning machinery and various other machinery, equipment and apparatus for industrial and general use and parts thereof;
2. Development, design, manufacture, sale and repair of air conditioners for cars and parts thereof;
3. After-sales services and engineering in those items mentioned in the foregoing sub-paragraphs.

How we Handle Personal Information on Our Website

(1) Security in obtaining personal information

In obtaining the personal information of a visitor to the MTH Website, MTH uses a Secure Socket Layer (SSL) and other encrypting means to protect the personal information inputted through a communications link or otherwise observed through visitor Website activity. The SSL is a general technology used for security of communications on Webnet, which can encrypt the input data before it is transmitted over the Internet and prevent the input data from being intercepted or tapped. If you use any browser that is not compatible with the SSL, you would not be able access to this page, such as from the intranet of your company due to firewall or other software settings.

(2) Collection of Browsing History

The Website collects information from your device in order to improve our services and provide a better user experience. The information collected includes, for example, server access logs including system information and IP address, cookies and web beacons.

The collected information is anonymous and it is not possible for MTH to readily identify any specific individual or user.

You can reject cookies or get a warning when receiving a cookie by setting your browser accordingly. If you reject all cookies, you can still use the Website, but some parts might not function properly. Contact the manufacturer or provider of your browser for details on how to change the settings.

(3) Others

MTH disclaims any responsibility for maintaining the security of your personal information on any other Website linked with the MTH Website. If you have any query or inquiry regarding the

handling of personal information by such other Websites, make direct inquiries to each such Website.

The Smart M-Air Service may obtain or use each user's location information for some functions for the purpose of informing a user that the air conditioner is running when the user's smartphone is a certain distance away from the air conditioner.