

## MELCloud Hub Website Privacy Policy

### 1. Privacy Policy

1.1 This privacy policy ("**Privacy Policy**") applies to information we collect about you through your use of the MELCloud Hub Website ("**MELCloud Hub**") accessible via <https://www.melcloud.com>. This Privacy Policy is intended to inform you (as a user of MELCloud Hub) of the ways in which we collect, use and share Personal Data you provide to us. It also explains the ways that you can manage your Personal Data, including the right to object to certain types of processing we carry out. See paragraph 7 below for more information on your rights as a data subject.

1.2 [Mitsubishi Electric Europe B.V.] ("**we**"/"**our**"/ "**us**") is the data controller for the MELCloud Hub, which means we are responsible for processing your Personal Data.

1.3 If you have any questions about this Privacy Policy, please contact our Data Protection Officer using the details set out below:

Full name of legal entity:	Mitsubishi Electric Europe B.V., operating through its branch in England (registered number FC019156, BR003391)
Title:	Data Management Team
DPO email address:	dmt@meuk.mee.com
Postal address:	Mitsubishi Electric Europe B.V., Travellers Lane, Hatfield, Herts, AL10 8XB United Kingdom
Telephone number:	+44 1707 278877

1.4 MELCloud Hub 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 Data. Please check these policies before you submit any Personal Data to such third party websites.

1.5 In this Privacy Policy when we refer to:

(a) "**Applicable Data Protection Law**" we mean:

- (i) to the extent UK GDPR applies to our processing of your Personal Data, the law of the United Kingdom or a part of the United Kingdom; and
- (ii) to the extent EU GDPR applies to our processing of your Personal Data, the law of the European Union or any member state of the European Union to which we are subject,

which in either case relates to the protection of Personal Data. ("**EU GDPR**" means the General Data Protection Regulation ((EU) 2016/679) and "**UK GDPR**" has the meaning given in the UK Data Protection Act 2018.)

(b) "**Personal Data**" we mean as it is defined in Applicable Data Protection Law.

(c) "**you**"/ "**your**" means you a user of the MELCloud Hub.

1.6 This Privacy Policy is intended to explain our privacy practices and covers the following areas:

- (a) What Personal Data we collect about you
- (b) How we share your Personal Data
- (c) How we use your Personal Data
- (d) How we store your Personal Data
- (e) Contacting us & your rights in relation to your Personal Data
- (f) Our Cookies Policy: <https://www.melcloud.com/cookie-policy>
- (g) How changes to this Privacy Policy and the Cookies Policy will be made

## **2. Personal Data we collect about you**

2.1 We will collect and process the following Personal Data about you:

(a) **Identity and Contact Data**

Full name and email address.

(b) **Technical Data**

Information about your access to the MELCloud Hub such as your internet protocol (IP) address and domain name, your browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform.

(c) **Usage Data**

Information about your interaction with MELCloud Hub, including the content you view or engage with, features you use, actions you take, time zone, country, access dates and times.

2.2 We do not collect any special categories of Personal Data about you (details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any data about criminal convictions and offences.

## **3. How we collect your Personal Data**

3.1 The information we collect about you depends on how you use the MELCloud Hub and the information you provide to us. We use different methods to collect Personal Data from you including through the following ways:

(a) **Data provided by you.** You may give us your Identity and Contact Data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you make an enquiry about our products, services or solutions, or submit a complaint.

(b) **Automated and third-party technology.** As you interact with the MELCloud Hub, we may automatically collect certain information, through the use of cookies, server logs and other similar technologies or analytics providers such as Google. This includes Technical Data about your equipment, browsing actions and patterns.

## **4. Sharing your Personal Data**

4.1 We do not disclose your Personal Data to any third parties other than as follows:

(a) RJC Digital Ltd (MELCloud Hub Website Application & Infrastructure Support); and

(b) Microsoft Azure (MELCloud Hub Website Hosting).

## **5. How we use your Personal Data**

5.1 In this paragraph, we set out the purposes for which we use your Personal Data that we collect from your use of the MELCloud Hub and, in compliance with our obligations under Applicable Data Protection Law, identify the lawful bases on which we rely to process the Personal Data.

5.2 These lawful bases are set out in Applicable 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.

5.3 The following table sets out the lawful basis we rely on for processing each type of Personal Data, as well as the purpose for the processing.

<i>Use/Purpose</i>	<i>Personal Data</i>	<i>Lawful basis</i>
To analyse and assess the functionality and content of MELCloud Hub, including bug detection and error reporting, to understand how users interact with the MELCloud Hub, to improve its usability and effectiveness and to test and create new features and services.	Technical Data and Usage Data	Legitimate Interests
To communicate with you, including to review and respond to enquiries or complaints submitted by you.	Contact Data	Legitimate Interests

Where we rely on “legitimate interests”:

<i>Use/Purpose</i>	<i>Personal Data</i>	<i>Legitimate interests</i>
To analyse and assess the functionality and content of MELCloud Hub, including bug detection and error reporting, to understand how users interact with the MELCloud Hub, to improve its usability and effectiveness and to test and create new features and services.	Technical Data and Usage Data	To operate, maintain, and improve the MELCloud Hub offering, enhance user experience, and respond to user enquiries and technical issues.
To communicate with you, including to review and respond to enquiries or complaints submitted by you.	Contact Data	To maintain and enhance business relationships with our customers by responding to their enquiries or complaints

## 6. Storing your Personal Data

- 6.1 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 originally collected, as outlined in this Privacy Policy, unless otherwise required by law. When Personal Data is no longer needed, we securely destroy the data.

## 7. Your rights & contacting us

### Your rights

- 7.1 Applicable Data Protection Law gives you the following rights in respect of Personal Data we hold about you. These rights may vary depending on our lawful basis of processing:
- (a) request access to and to be provided with a copy of Personal Data, including the categories of your Personal Data we collect and disclose (right of **access** to your Personal Data);
  - (b) ask us to rectify any inaccuracies in the Personal Data we hold (right to **rectify** your Personal Data);
  - (c) ask us to delete any Personal Data that we no longer have a lawful ground to use (right of **deletion** of your Personal Data/right to be **forgotten**);
  - (d) where processing is based on consent, to withdraw your consent at any time so that we stop that particular processing (right to **withdraw consent** to processing);
  - (e) 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 (right to **object** to processing);
  - (f) ask us to restrict how we use your information (right to **restrict** processing); and
  - (g) ask us to transfer your Personal Data you gave us to another organisation, or to you (right of **data portability**).
- 7.2 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 within a month. If the request is complex, this timeline may be extended to three months.

- 7.3 If you are not satisfied with our use of your Personal Data or our response to any exercise of these rights you have the right to complain to the Information Commissioner's Office, the UK regulator, or any other competent data protection supervisory authority. You can contact them by calling 0303 123 1113. Or go online to [ico.org.uk/make-a-complaint/](https://ico.org.uk/make-a-complaint/) (opens in a new window; please note we are not responsible for the content of external websites).

#### **Contacting us**

- 7.4 If you have any questions in relation to this policy, please contact our Data Protection Officer whose details are at paragraph 1.3 above.

#### **8. Cookies policy**

- 8.1 We use cookies on the MELCloud Hub. To find out more about how we use cookies, please see our Cookies Policy at: <https://www.melcloud.com/cookie-policy>.

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

- 9.1 We may change the content of the MELCloud Hub 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.
- 9.2 This Privacy Policy was last updated on **11 September 2025**.