

# Mitsubishi Heavy Industries Australia Pty Ltd. (“MHI-AUS”) Privacy Policy

## 1. Purpose and Scope

Mitsubishi Heavy Industries Australia Pty Ltd (‘MHI-AUS’, ‘we’, ‘our’, or ‘us’ as the context may require) recognises that all personal information managed and used in its business activities should be handled and protected with the utmost care.

This policy describes how we will manage personal information and fulfill our obligations under the Australian Privacy Principles (‘APPs’) set out in the Privacy Act 1988 (the Act) in relation to the personal data MHI-AUS collects from all its customers from around the world, and other relevant Australian laws and regulations regarding the handling of personal information where applicable. We will furnish our employees and contractors handling such personal information with the necessary and appropriate guidance and supervision. Personal information means information about an identified individual, or an individual who is reasonably identifiable.

This Privacy Policy details the personal information collected by us, including why MHI-AUS holds personal information, how it is protected, and the choices individuals can make about their personal information. MHI-AUS recognises the trust you place in our company through your dealings with us across our various platforms and brands, and we do everything we can to maintain that trust, and we will only use your personal information in a manner consistent with this Privacy Policy.

By accessing, browsing, or using any website owned and/or operated by MHI-AUS (each a ‘Site’) or otherwise providing your information to us, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. Since this Privacy Policy is subject to change without prior notice, you should check back on this Privacy Policy regularly. All changes are effective from the date we post the revised Privacy Policy. In particular, by continuing to use the Site(s) after the Privacy Policy has been varied or by otherwise providing your information to us, you agree to be bound by the variation.

## 2. The Personal Information We Collect

We will collect personal information from you in a variety of ways only as needed for our business purposes, and being when you knowingly provide it to us, such as through our Site(s), via email correspondence, when you enter competitions, when you purchase goods or services, when you subscribe to mailing lists or other services, or otherwise as allowable under law, as further detailed below. We will collect personal information only by fair and lawful means. Whenever reasonably possible, we will collect personal information directly.

The kinds of personal information that we collect about you may include:

- Name
- Address (work, home, or delivery)
- Date of birthday
- Telephone numbers (work, home or mobile)
- FAX numbers
- Email address
- Memberships
- Departments
- Titles
- Social media handles

Individuals who contact us have the option of requesting anonymity. However, it may not be reasonably practicable for us to deal with individuals anonymously if those individuals participate in transactions, wish to obtain information in relation to our exhibitions and seminars, and/or make inquiries or complaints about our services. A request for anonymity may be rejected if it is reasonably necessary for us to deal with individuals who have identified themselves only.

Before collecting information of a sensitive nature or information relating to an individual's health, we will seek consent from the individuals concerned. For instance, we may collect information regarding your racial or ethnic origin, political opinions or associates, religious or philosophical beliefs, trade union membership or associates, sexual orientation or practices, criminal record, health or genetic information or some aspects of your biometric information, with your consent.

We may collect your credit card or banking details in order to procure payment for goods or services you request, however such financial information will be treated in a different manner to the rest of your personal information, as detailed below.

We may also collect information about you to do internal research and to conduct market research for our own purposes.

### 3. How We Collect and Hold Personal Information

#### Online

We only collect personal information about you that is necessary for the purpose of conducting our business and supplying you with the goods and/or services that you have contracted or requested us to provide. We may collect your personal information when you visit our Sites, which may use the technology such as access logs, cookies, or Google enhanced conversions to acquire your browsing history, as detailed below.

When submitting forms on our website, you may be asked to provide explicit consent to receive marketing communications from us. This will typically be done via a checkbox or similar mechanism. You may opt out at any time by following the unsubscribe instructions in the marketing communications or contacting us directly.

#### Offline

We collect personal information over the phone or via email (or other means) when you request information such as where to buy our products, the warranty on products, or other product related information.

#### Third parties

While we endeavour to only collect personal information from you directly, we may also collect information from the following sources that you may be unaware of, including:

- third parties (such as our third-party agents, including Elevate Loyalty, on our behalf or our commercial partners);
- public directories and listings;
- personal interactions with MHI-AUS employees; and
- electronic information from email or the internet.

Other third-party vendors collecting personal information on our behalf will identify themselves as such, to enable you to make informed decisions about when and how you disclose their personal information. We cannot control or be held liable for the business practices of third-party entities to whom personal information is provided.

#### **4. Use and Disclosure of Personal information**

MHI-AUS will generally only use and disclose your personal information if the disclosure is necessary to answer your enquiry or request, to supply you with goods and/or services requested, or to complete the services we provide.

When MHI-AUS collects personal information from you, we will use it for the reasons we collected it and for other reasonable business purposes, which may include:

1. To make applications for transactions between us and our customers and other parties concerned with our 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 our products and services and of associated products and services and respond to customer inquiries regarding such products and services.
3. To respond to enquiries about the products and services provided by parties having business relations with us.
4. To confirm applications for the participation in various exhibitions and seminars, communicate with lecturers, and report on the results of studies and events to the persons involved, and to provide visitors with access to our facilities.
5. To contact the members of any organisations in which we are a member, and issue various notices from us according to the purposes of activity of such organisations.
6. To send publications issued by use to persons who request them, and to distribute emails to subscribers to our electronic mailing service.
7. To receive applications for employment, communicate with and issue the notification of employment to the applicants, and other issues concerning recruitment activities.
8. To communicate and conduct transactions with public accountants, attorneys and patent attorneys concerned with our business activities.
9. To receive personal information provided for any order-based works and to complete such works within our scope of business.
10. To issue useful notices incidental to the above purposes of use from us and our group companies.
11. To disclose personal information to our third-party agent, Elevate Loyalty, through online, and offline (phone and email) means.
12. For marketing and promotion purposes including to contact you for the purposes of our consumer cashback promotion.
13. To personalise content and promotions you may receive from us including tailoring product recommendations, marketing messages and website experiences based on your interactions and preferences.
14. To request customer feedback such as product ratings or quotation and service reviews to improve the overall customer experience.

We may provide personal information to third parties, as further detailed below.

We will only use sensitive information we hold about you for the primary purpose for which it was collected or for a purpose directly related to the primary purpose, and where you would reasonably expect us to use or disclose it for that purpose.

We will not sell your personal information to third parties for the purpose of enabling them to market their products and services to you. We will never sell or disclose your credit card or financial information to third parties.

If you wish to adjust your marketing preferences, our Sites and marketing communications may provide you with opt-in/opt-out preferences and, if so, you should use those to tailor your experience to your liking.

## **5. Disclosure of Personal Information to Third Parties**

We may disclose your personal information to third parties:

- where we have sought your consent or as is otherwise allowed or required by law;
- to our related companies, contractors, suppliers or service providers for the purposes of providing products and services on our behalf and performing our administration and other operations, including accounting and finance checks, IT, marketing, recording keeping and statistical purposes, market research, safety purposes, fulfilment services and/or Site traffic analysis;
- to selected third party advertisers and promotional partners to deliver targeted marketing campaigns or to perform advertising measure on our behalf;
- to our installer partners or authorised contractors to provide a product and/or installation quotation or undertake a warranty service request;
- to any entity to which we propose to assign any part of our business; or
- to other organisations with whom we have contractual agreements.

In addition to the above, your personal information may be disclosed to our third-party vendor, Elevate Loyalty, for marketing promotion purposes. Elevate Loyalty is located within Australia.

We will not disclose the personal information of any person to any other third party without such person's approval except where disclosure is expressly authorised by you, required, or permitted by law or where you would reasonably expect us to do so.

If any such third parties collect your information they will have their own obligations regarding the treatment of your information, and if you have any concerns about those parties you should liaise with them directly.

## **6. Cookies**

The use of cookies and other information is used on our Sites to optimise the viewing experience, troubleshoot any problems and better serve content. A cookie is a piece of information that our web server may send to your machine when you visit our Sites. The cookie is stored on your machine but does not identify you or give us any information about your machine, so is not personally identifiable information under Australian law. A cookie helps us to recognise you when you re-visit our Sites and to coordinate your access to different pages on the Sites. With most internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. If you want to do this, refer to your browser instructions or help screen to learn more.

## **7. Transfer of Your Information Outside of Australia**

Personal information which we collect and hold is stored within our locally housed data servers in Australia. We utilise some cloud-based service providers for specific functions, such as email and accounts, who may store certain information on our behalf on servers based in the USA, Japan and Singapore.

Some of the companies we may disclose your personal information to are located overseas. In all instances of overseas disclosure, we shall ensure the transfer of your personal information is carried out in accordance with all applicable privacy and data protection laws. We will not send your personal information outside of Australia unless:

- it is necessary (including to provide the personal information to a third party) to provide our goods and/or services to you;
- you have provided your consent;
- we believed on reasonable grounds that the organisation involved would only deal with your personal information in a similar manner to the requirements under the APPs; or
- where otherwise allowed by the Privacy Act.

## **8. Links to Other Websites**

Our Sites may contain links to other websites of interest. However, once you have used these links to leave our Site, you should note that we do not have any control over that other website. Remember, this Privacy Policy is strictly limited to our collection, storage and use of personally identifiable information collected via the Sites or otherwise in the course of our business, and does not apply to any third parties. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites and such websites are not governed by this Privacy Policy. You should exercise caution and look at the privacy statement or policy applicable to the website in question.

## 9. Security of Your Personal Information

We will take necessary and appropriate measures to ensure the security of the personal information possessed by it and endeavour to maintain the contents of such personal information is accurate and up to date to the extent necessary for business purposes.

All reasonable steps are taken to ensure that your personal information is kept secure and protected against misuse, interference and loss, unauthorised access, modification, or disclosure. When we have collected information about you, it cannot be seen or modified by anyone other than those authorised to access the information for the for the purposes stated above. We ensure only those necessary have access to your personal information.

Personal information which is no longer necessary for business purposes will be disposed of promptly in an appropriate way. The exception to this may be information required for possible data analysis at a future date, or information we are legally required or advised to hold for specific time periods. Wherever practicable subject to the above, the information will be retained in a form that does not allow you to be identified.

In obtaining the personal information of a customer from the website, we use Secure Socket Layer (SSL) and other encrypting means to protect the personal information inputted through a communications link. SSL is general technology used for security of communications online, which can encrypt the input data before it is transmitted to 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 may not be able to access the page from the browser of your choice due to the settings of your firewall or other software. Google enhanced conversions uses a secure one-way hashing algorithm called SHA256 and is ISO 27001 compliant.

No communication via the internet is 100% secure.

Physical, electronic and managerial procedures have been put in place to reasonably secure any information collected from misuse, interference or loss, and in order to prevent unauthorised access, modification to or disclosure of that information. We utilise systems, services and third-party platforms to manage and store your personal information that may be located outside of Australia. However, we will never lose effective control of your personal information other than as detailed in this Privacy Policy.

## **10. Access to and Correction of Your Personal Information**

Individuals have the right to request access to and correct personal information we hold about them, except where law allows us to refuse such request, in which case we will provide reasons why we have refused. Upon request, and within the parameters of the legislation, we will provide individuals with access to this information.

To protect the integrity and security of the information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity. In certain cases, we may charge you an administration fee for providing you with access to the information you have asked for, but we will inform you of this before proceeding.

There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases, we will let you know why we cannot comply with your request.

We will take reasonable steps to update the personal information we hold if the information is not accurate, up-to-date, and complete.

You may contact us to update or correct your personal information (see contact details below). Please include your name, address and/or email address when you contact us. You will not be charged for a correction request.

## **11. Enquiries and Complaints**

We are committed to working with individuals to obtain a fair resolution of any privacy concerns. If you are concerned about the way in which we are managing your personal information and think we may have breached the APPs or the Privacy Act, or any other relevant obligation, please contact us using the contact details set out below.

Our Privacy Officer will deal with the matter within a reasonable time and will keep you informed of the progress of our investigation. If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved satisfactorily, you can contact us to discuss your concerns,

You are also entitled to make a complaint to the Office of the Australian Information Commissioner (OAIC). You can obtain further general information about your privacy rights and privacy law from the OAIC by:

- calling their Privacy Hotline on 1300 363 992
- visiting their web site at <http://www.oaic.gov.au>
- writing to:

The Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 1042

## **12. Policy Review Statement**

We will regularly review and update all rules and procedures regarding the handling of personal information, including this policy.

Our policy may be updated following changes to legislation or to our policy scope and purpose. If we make changes, we will publish an updated statement on our website and social media channels. You can acquire a copy of our privacy policy at any time by using the contact details below.

## **13. Contact for Personal Information**

For any inquiries about our handling of personal information, contact:

Privacy Officer  
Eiji Matsubara  
Mitsubishi Heavy Industries Australia Pty Ltd  
Telephone: 02 8075 4729  
Email: [eiji.matsubara.f7@mhi.com](mailto:eiji.matsubara.f7@mhi.com)  
Mail: Level 36, Gateway, 1 Macquarie Place, Sydney, NSW 2000