



DATA PROTECTION POLICY

The protection of your Personal Data matters to us.

We aim to process your Personal Data in a lawful, appropriate and transparent manner.

Take your time to read this Data Protection Policy.

In accordance with the European General Data Protection Regulation (EU) 679/2016 (hereinafter “GDPR”) article 13 and the Italian Privacy Code (D.Lgs. 196/2003 as amended by the D.Lgs.101/2018), **Daikin Applied Europe S.p.A.**, (hereinafter “**Daikin**” or “**DAE**” or “**Data Controller**” or the “**Company**”), a company part of the Daikin Group, wishes to inform Users regarding the processing of their personal data, log files and cookies collected by browsing the Daikin Website called “**DAE Tools**”.

Key Definitions

DAE Website: means the website called **DAE Tools** reachable at the following links: tools.daikinapplied.eu

Data Controller: means a natural person or a legal entity which determines purposes and means of the Processing of Personal Data; The Data Controller is Daikin Applied Europe S.p.A.

Data Processor: means a natural person or a legal entity which processes Personal Data of a given Data Subject under the Data Controller’s instructions;

Data Subject: means an identified or identifiable natural person whose Personal Data are processed;

Personal Data: means any information relating to an identified or identifiable natural person (‘Data Subject’) such as a name, an e-mail address, an identification number, location data, an online identifier etc.;

Processing of Personal Data: means any operation or set of operations which is performed on Personal Data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

User: a person who uses DAE Tools;

1. Data Controller and Data Protection Officer

- The Data Controller is **Daikin Applied Europe S.p.A.** (DAE), with registered office in Ariccia (Rome), 00072, Via Piani di S. Maria no. 72, VAT no. 01318801006, phone 06-937311, fax 06-9374014, email: dataprivacy@daikinapplied.eu.
- The Data Protection Officer (DPO) can be reached by writing an e-mail to: euprivacy@daikin.co.jp; address: Umeda Center Bldg., 2-4-12, Nakazaki-Nishi, Kita-ku, Osaka 530-8323, Japan.

DAIKIN APPLIED EUROPE S.p.A.

Società unipersonale soggetta ad attività di direzione e coordinamento di Daikin Industries Ltd

Sede Legale/Operativa:
Via Piani di S. Maria, 72
00072 Ariccia (Roma), Italia
T +39 06 93 73 11
F +39 06 93 74 0 14

Sede Operativa:
Via Giuseppe di Vittorio, 8
20090 Caleppio di Settala (Milano), Italia
Cap.soc. €1.047.620,60 i.v.
PEC: dae@pec.daikinapplied.eu

Sede Operativa:
Via Giuseppe Ferrari, 31/33
36100 Vicenza, Italia
R. I. RM / C.F. 04878860586
R.E.A. 467651 - P.I. 01318801006

2. Personal data automatically collected by DAE Tools

Like all websites, DAE Tools also makes use of log files where information collected automatically during the Users' visits is stored. The information collected is as follows:

- internet protocol (IP) address
- type of browser and device settings used to connect to the DAE Tools
- date and time of the visit
- user referral and visited web page

Such information is processed automatically and collected in aggregate form in order to verify the proper functioning of DAE Tools.

3. Data entered voluntarily by the Users: purpose and method of use

In order to allow the use of DAE Tools we need to collect certain information concerning Users at the time of their registration such as username, name, surname, e-mail address, country, name of the Daikin contact. In order to register with the DAE Tools, Users must be at least 18 years old. Daikin agrees to use the Users' personal data solely in the manner, under the terms and for the purposes specified below.

The Data Controller processes the Users' personal data for the following purposes:

- (i) allow Users to use DAE Tools services such as the technical selection of Daikin Applied products or for processing order form of products.
- (ii) fulfil the administrative and accounting obligations relating to the use of DAE Tools (for example, for any requests of information or complaints, etc.);
- (iii) fulfil legal obligations;
- (iv) carry out the technical management of the DAE Tools.

4. Cookies

DAE Tools uses cookies. Cookies are text files recorded on electronic media that enable the recording of some parameters and data communicated to the computer system through the browser used by the Users. In particular, DAE Tools uses the so-called "technical" cookies, installed by the DAE Tools operator with the sole purpose of improving the Users' browsing experience; current provisions do not require consent for technical cookies. The technical cookies are deleted after each visit as soon as the session expires and serve to:

- store only during the duration of the session any data entered in the forms to avoid having to rewrite them in case the page is temporarily abandoned;
- improve the use of DAE Tools to indicate which pages have already been visited;
- prevent fraud and improve the DAE Tools 's security;
- properly use the web applications that might be present.

The Personal Data provided by you will be processed mainly by electronic means under the authority of the Data Controller, by persons specifically appointed, authorized and instructed for the processing according to Articles 28 and 29 of the GDPR. Appropriate security measures will be observed also under Article 32 of the GDPR to prevent data loss, illicit or incorrect use and unauthorized access.

5. Mandatory or voluntary nature of providing data, consequences of refusal and legal basis of the processing

For the purpose of the registration to DAE Tools, as well as for the purposes referred to in points (i) and (ii) of paragraph 3, providing personal data is mandatory because failing to do so will make impossible to provide the requested service through DAE Tools.

With reference to the purposes stated in points (i) and (ii) of the above paragraph 3, the legal basis of the Processing is *“the performance of a contract or the performance of pre-contractual steps prior to entering into a contract”* pursuant to article 6, paragraph 1 (b) of the GDPR.

In relation to point (iii) of paragraph 3 the legal basis of the Processing is the *“compliance with a legal obligation to which the controller is subject”* pursuant to article 6, paragraph 1 (c) of the GDPR; and in relation to point (iv) of paragraph 3 the legal basis of the Processing is the *“legitimate interests”* pursuant to article 6, paragraph 1 (e) of the GDPR;

6. To whom and in what context the Data Controller may transmit the Users' personal data

The Users' personal data may be disclosed in full compliance with the provisions of the Italian Privacy Code and the GDPR, to the following subjects:

- (ii) Affiliates, consultants or data hosting that the Data Controller relies on to carry out activities related to, instrumental for or resulting from the provision of DAE Tools;
- (i) public authorities, where this is required by law or upon their request;

Every time that a third-party acts as Data Processor, DAE will make sure to have in place a data processing agreement with this third party under the provisions of Regulation (EU) 679/2016, asking the third party to comply with the principles and the provisions of the same Regulation and to align on appropriate security standards.

7. Transfer personal data to third countries (NON-EU)

Within the scope of the above described purposes the Controller may transmit the Personal Data collected to other Daikin Group's companies and/or Business Partners established in any non-EU countries.

In any case of transfer of Personal Data towards a non-EU country, Daikin shall:

- ensure an adequate level of protection by setting appropriate safeguards and complying with the provisions of Regulation (EU) 679/2016;
- manage the transfer of Personal Data on the basis of:
 - a) European Commission's adequacy decisions; if not
 - b) standard contractual clauses;

8. Your rights as Users

Articles 15 et seq. of the GDPR give Users the right to obtain:

- confirmation of the existence or not of personal data concerning them, even if not yet recorded, and their communication in an intelligible form;
- the indication of the origin of the personal data, the purposes and methods of processing, the procedures applied in case of processing carried out with the aid of electronic tools, the identification details of the Data Controller;
- the updating, correction, addition, deletion, transformation into anonymous form or blocking of data processed in violation of the law - including those that do not need to be kept for the purposes for which the data are collected or subsequently processed - the attestation that these operations have been brought to the attention, including as regards their content, of those to whom the data have been communicated or disseminated, except in the case where this fulfilment proves impossible or involves the use of means clearly disproportionate to the protected right.

Users also have the right:

- to revoke at any time the consent given to the processing of personal data (without prejudice to the lawfulness of the processing based on the consent given prior to the revocation);
- to object, in whole or in part, for legitimate reasons, to the processing of their personal data, even if pertinent to the purposes of the collection;
- to object, in whole or in part, to the processing of personal data concerning them for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication;
- to submit a complaint to the Italian Data Protection Authority in the cases provided for by the General Data Protection Regulation. You can contact the Data Protection Authority involved: Piazza Venezia n. 11 – 00186 Rome, web site www.gdpd.it or www.garanteprivacy.it, fax (+39) 06.69677.3785, telephone (+39) 06.69677.1, email: garante@gdpd.it.

If you want to exercise your rights, you can write an email to: dataprivacy@daikinapplied.eu.

9. Duration of the Processing

The Controller does not keep your Personal Data forever. We process Personal Data to the extent necessary and only with the aim of pursuing the purposes described above. Once the aim no longer exists, we commit to delete the Personal Data, unless archiving them is required by law. The retention period of Personal Data is the statutory retention period (which is often ten years and lasts until the expiry of a contract or the end of a business relationship). The period can be longer where needed for the exercise of our rights.

10. Changes to the Privacy Policy

This Data Protection Policy can be changed or updated in the light of upcoming legislations, both at European and national level. User can always find the most recent version of the Data Protection Policy available in the DAE Tools by clicking on the “Data Protection Policy” section.

Last modified: January 2021