WHISTLEBLOWING CHANNEL PRIVACY POLICY

MITSUBISHI ELECTRIC EUROPE, B.V., Spanish Branch, is a company that maintains a great commitment to protecting the privacy of the Users, Customers and any other individual whose personal data are processed by our Company.

In this regard, **MITSUBISHI ELECTRIC EUROPE, B.V., Spanish Branch**, regularly reviews the processes that involve the processing of your personal data so that it is carried out in the most appropriate way to ensure the confidentiality, availability, integrity, security and protection of your personal information.

Similarly, our Company works to ensure that the processing of the personal data we carry out is done with the necessary respect for the rights and freedoms that belong to the holder of the personal data and in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, regarding the protection of individuals with regard to the processing of personal data (hereinafter the "**GDPR** ") and Organic Law 3/2018, of 5 December, on the Protection of Personal Data and the guarantee of digital rights and in Law 2/2023, of 20 February, Regulating the Protection of Whistleblowers of Regulatory and Anti-Corruption Violations ("**Whistleblower Protection Act** "), as well as the provisions of the rest of the applicable data protection regulations (collectively referred to as "**data protection regulations**" or "**current regulations**"). Below, we explain to you how we process personal data that is provided through the Whistleblowing Channel or internal information system.

The information system has the necessary measures to guarantee and ensure the confidentiality of the identity of the whistleblower and the information transmitted through the Whistleblowing Channel, as well as to ensure the protection of the whistleblower and any third party mentioned in the communication, preventing access to the information to unauthorised persons.

1. DATA CONTROLLER

Your personal data will be processed by:

Information	Information of the Data Controller
Company	Mitsubishi Electric Europe, BV, Spanish Branch, (hereinafter "**Mitsubishi Electric**" or, alternatively, the "**Company**").
NIF	W0031608C
Mailing Address	Av. de Castilla, nº 2, Escalera A Planta 1ª, PC 28830, San Fernando de Henares, Madrid (Spain).
Phone	+34 (93)5653131
Contact Form	https://es.mitsubishielectric.com/en/contact/index.html
Contact Information for the Data Protection Officer (DPO)	You may contact our Data Protection Officer at Ctra. De Rubí, 76-80, 08174, Sant Cugat del Vallès, Barcelona (Spain) or at the Mitsubishi Electric postal address indicated above or at the email address rgpd@sp.mee.com.

2. IDENTIFICATION OF THE WHISTLEBLOWING CHANNELS

Mitsubishi Electric hereby informs you that you can inform the Company or file a Complaint in writing.

In this regard, the Company makes the following channels available to you in writing:

- Web form:
    - https://es.mitsubishielectric.com/en/about/local/legal/index.html

- Written communication to the following mailing address:
    - Ctra. De Rubí, 76-80, 08174, Sant Cugat del Vallès Barcelona;

We hereby inform you that, in accordance with the provisions of the Whistleblower Protection Act, you have the right to request, through any of the aforementioned channels, an in-person meeting to inform the Company or to file your Complaint, and said in-person meeting must be held within seven (7) calendar days following the date of submission of your request for an in-person meeting.

In relation to the foregoing, we hereby inform you that **Mitsubishi Electric will proceed to record the information or Complaint that you file at the aforementioned in-person meeting.** This recording shall be carried out **in order for** the Company to **comply with the legal obligation to document, process, manage and investigate the Complaints filed** in accordance with the provisions of the Whistleblower Protection Act and current legislation.

We also inform you that the complaint may be made both anonymously and in your name (providing the identity of the whistleblower). However, it may be the case that the whistleblower's identifying information is essential in order to continue with the investigation of the complaint, so not providing it may prevent the continuation of the investigation.

External Whistleblowing Channels:

We hereby inform you that you can also file a complaint with the following competent authorities or with the various institutions, bodies or organisations within the European Union (either directly or having previously communicated the complaint to any of the other channels authorised by Mitsubishi Electric):

- Independent Authority for the Whistleblower's Protection (Autoridad Independiente de Protección al Informante [AAI]), these being the competent autonomous authorities, which as of the date of issue of this policy are the following:

Whistleblower Protection Authorities	
European Union Authority	
Name	**European Anti-Fraud Office (Oficina Europea de Lucha Contra el Fraude [OLAF])**
Contact details	**https://anti-fraud.ec.europa.eu/index_en**
Catalan Authority	
Name	**Oficina Antifrau de Catalunya [Anti-Fraud Office of Catalonia]**
Contact details	**https://www.antifrau.cat/**
Andalusian Authority	
Name	**Oficina Andaluza contra el Fraude y la Corrupción [Anti-Fraud and Corruption Office of Andalusia]**
Contact details	**https://antifraudeandalucia.es/**
Valencian Community Authority	
Name	**Agencia Valenciana Antifrau [Anti-Fraud Agency of Valencia]**
Contact details	**https://www.antifraucv.es/buzon-de-denuncias-2/**

Balearic Islands Authority	
Name	**Oficina de prevenció i lluita contra la corrupción a les Illes Balears [Corrpution and Fraud Prevention Office of the Balearic Islands]**
Contact details	**https://www.oaib.es/**

3. PURPOSES AND LEGITIMATION

Mitsubishi Electric carries out the processing of personal data of which it is the owner for certain purposes. The processing of your personal data for such purposes is carried out because it is justified by one or more of the legally justified reasons (legal bases for processing) that are recognised as being covered by data protection regulations.

Taking into account the data processing that may occur for the management and processing of your queries and/or complaints, Mitsubishi Electric hereby informs you that your personal data may be processed for the following purposes and in accordance with the following legal bases:

PURPOSES AND LEGAL BASES	
Resolve queries	**Purpose of resolving queries:** We will process your data to respond to enquiries you make regarding the operation and management of the Whistleblowing Channel. **Legal basis:** legitimate interest. Mitsubishi Electric has a legitimate interest in offering its customers, employees, collaborators and any third party that interacts with us the ability to enquire about our products and services or about anything you wish to enquire about that arises from your relationship with our Company. Mitsubishi Electric has deliberated over this legitimate interest, concluding that there is no prevalence of the fundamental rights or freedoms of data subjects over the aforementioned legitimate interest.
Receipt and processing of complaints	**Purpose of receipt and processing of complaints:** We will process the data to receive complaints, determine the appropriateness or otherwise of opening investigations into complaints about irregular conduct affecting the entity, in order to carry out the corresponding investigations of the reported facts, protect the whistleblower from potential retaliation and to take, if necessary, the appropriate corrective measures and, if applicable, initiate the relevant legal actions. **Legal basis**: legal obligation and processing for the essential public interest In the event of complaints, the processing is legitimate, since there is a legal obligation to have whistleblowing channels and investigate the communications sent through them, in accordance with Article 30.2 of the Whistleblower Protection Act. If the data are considered to be of a special category, their processing is exempted, in accordance with the provisions of Article 30.5 of the Whistleblower Protection Act, in relation to Article 9.2.g) of the GDPR, as it is necessary for reasons of essential public interest. If we process special categories of personal data for reasons of essential public interest (Article 30.5 of the Whistleblower Protection Act and Art. 9.2.g of the GDPR), Mitsubishi Electric will proceed to erase or anonymise all those personal data in special categories that may be provided by the

	whistleblower when they are not relevant to the processing and investigation of the complaint, provided that this is possible in accordance with the law and does not pose an excessive burden on the Company. In the event of an in-person meeting, we may inform you that we are required to document the complaint, to which end we will record your voice or transcribe your report completely and accurately. If we transcribe the conversation, you will have the opportunity to check, rectify and accept the transcript of the conversation and provide your signature. **Legal basis:** In order to record or transcribe the in-person meeting, we will ask for your consent in advance.
Include information about complaints in the complaints register	**Purpose of including information about complaints in the complaints register:** Mitsubishi Electric shall keep a register of complaints received and the investigations initiated, in accordance with the Whistleblower Protection Act. **Legal basis**: Obligation to comply with Article 26 of the Whistleblower Protection Act.
Demonstrate the proper functioning of the information system and retain evidence for Mitsubishi Electric's defence	**Purpose of demonstrating the proper functioning of the information system**: We may process your data to demonstrate the proper functioning of our Compliance Model and/or retain evidence for Mitsubishi Electric's defence. This processing will imply that your data may be kept for the time periods specified in section 8, *Duration of Processing*, of this Privacy Policy. **Legal basis:** legitimate interest and legal obligation. Mitsubishi Electric has a legitimate interest in being able to demonstrate before any judicial, administrative or other supervisory authority or body, that it is a Company with an effective compliance system. Mitsubishi Electric has deliberated over this legitimate interest, concluding that there is no prevalence of the fundamental rights or freedoms of data subjects over the aforementioned legitimate interest.

4. TYPE OF PERSONAL DATA THAT MAY BE PROCESSED

Whether you provide us with your personal data directly or they are provided by a third party, we will process the following personal data:

Type of Data Subject	Categories of Data and Data Subject to Processing
Inquirer	a) Identifiable data: name and surname(s); b) Contact details: email and phone; c) Data associated with the query: employment data, tax data, economic data, etc.; d) Evidence: photographs or documents related to the submitted query.
Named whistleblower	The named complaint shall, to the extent possible, provide the following information: a) Identification data: first and last names of the person making the complaint; b) Contact details: email, telephone or address of the whistleblower, or secure place to send notifications related to the complaint;

	c) First and last names and position of the person(s) investigated; d) Details of the facts that are considered relevant, such as the description, dates, duration and frequency of the facts; e) Name and surname(s) of potential witnesses; f) Evidence: photographs or documents that can demonstrate the facts reported; g) Biometric data: in case we record your voice.
Anonymous whistleblower *(The whistleblower may provide the following details or none of them)*	a) Pseudonym; b) Contact details: email, telephone or address; c) Evidence: photographs or documents that can demonstrate the facts reported.
Confidential whistleblower	a) Identifiable data: name and surname(s).

When necessary to carry out the processing and investigation of the complaint, we may request clarification on the information communicated or ask you to provide additional information with regard to the initial complaint or with respect to any other information that may be provided later.

5. DATA COMMUNICATION

Mitsubishi Electric informs you that your data will not be transferred, sold, rented or otherwise made available to any third party, except its parent company located in Europe (MEU B.V.). Nonetheless, the Company will communicate your personal data to those technology providers who provide services to us for the management of IT and communication systems over networks, as well as to those suppliers who provide us with consulting and advisory services, who may need to access your data for the proper provision of these services, according to a processing agreement, without being able to use it for other purposes.

The contracting of the aforementioned suppliers is necessary for Mitsubishi Electric to have the necessary systems, infrastructure, technology, advice and resources to carry out its activities.

Mitsubishi Electric informs you that both the contracting of technology providers and consulting and advisory service providers meet all the requirements established in data protection regulations. In this regard, the transfer and/or access of your data is subject to the necessary guarantees and safeguards to preserve your privacy, with your data being processing by the aforementioned suppliers as Data Processors who will not, in any case, process the data for their own purposes.

When there is evidence that the facts reported may represent a violation of a law or constitute a crime, Mitsubishi Electric will send, following its internal procedure, the information available to the Public Prosecutor's Office in accordance with its legal obligations. If the Company finds that the facts reported may affect the financial interests of the European Union, it will be transferred to the European Public Prosecutor's Office.

The personal data of the complaints will be reserved and will not be communicated to the persons linked to the events set out or to third parties. Notwithstanding the foregoing, the personal data of the complaints may be communicated to law enforcement, Judges or Courts, as well as any other competent body, if required in compliance with current legislation.

6. AUTOMATED DECISION-MAKING AND PROFILING

Mitsubishi Electric informs you that in no case does it process your personal data to carry out automated profiling or automated decision-making.

7. INTERNATIONAL DATA TRANSFERS

Mitsubishi Electric has international suppliers, so your data may be processed outside the European Union or European Economic Area.

Specifically, the Company informs you that it has hired technology suppliers located in Japan and that it needs to make international transfers to its parent company located in that country as well (country for which the European Commission has adopted an adequacy decision that allows personal data to flow freely between the two economies based on guarantees and protection of their privacy) and whose purpose is to unify the management, maintenance and technical support of Mitsubishi Electric's customer and supplier databases.

If Mitsubishi Electric has contracted the services of technological suppliers, suppliers of advisory and consulting services and/or other types of suppliers located in countries with regulations not equivalent to European ones ("Third-Party Countries"), the Company will ensure that the contracting of such services will be performed in compliance with all the requirements established by the data protection regulations, applying to the transfer of your data the guarantees and safeguards necessary to preserve your privacy.

In this regard, if the Company needs to contract suppliers in Third-Party Countries that require international personal data transfers, Mitsubishi Electric would ensure that such data processing is always protected with the appropriate guarantees, which could include:

- EU-approved Standard Clauses: These are contracts approved by the European regulator, and which provide sufficient guarantees to ensure that the processing complies with the requirements established by the European Data Protection Regulation.

- Third Party Certifications: Framework agreement between the EU and a third-party country that establishes a standardised framework for data processing in accordance with the requirements of the European Data Protection Regulation, as is the case in relation to international transfers made to our parent company located in Japan (Mitsubishi Electric Corporation).

We hereby inform you that if you have any questions regarding international data transfers, you may contact the Data Controller through the contact methods indicated in section 1 of this Privacy Policy.

8. DURATION OF THE PROCESSING

- **Queries**

In the event of queries, the personal data will be kept for the time needed to resolve the matter or question raised and facilitate the response to the data subject. Once the corresponding storage period has ended, the data may be duly blocked and kept in order to prove compliance with the Compliance Model of the Controller and, where appropriate, for compliance with legal obligations. Once this period has passed, the data will be definitively erased.

- **Complaints**

Personal data will be kept in the information system only for the time necessary to decide on the admissibility of an investigation into the reported facts and, in any case, a maximum period of three (3) months from the date of submission of the acknowledgement of receipt or, if we have

not acknowledged receipt, a maximum period of three (3) months from the seven days following the date on which the complaint was submitted. If, once the investigation has been initiated within said period and the complexity of the investigation of the complaint so requires, the Data Controller may extend the investigation period by another three (3) additional months.

If, within said period of three (3) months, a decision has been made to initiate an investigation, the data will be kept outside the information system for the duration of the investigation of the facts. In the event that the investigation results in the adoption of certain measures against the persons investigated, the data will be kept as long as the appropriate legal actions persist.

If, after three (3) months, no investigation actions have been initiated (because no decision has been made as to whether to investigate or not, or if a decision has been made to investigate but investigations have not been initiated), the data must be erased from the information system, unless it is kept as evidence of the proper functioning of the system.

In the event that a decision has been made not to investigate, we will keep the data from the complaint in an anonymised form, without the blocking obligation being applicable.

Please be advised that we will immediately erase data from the information systems in any of the following cases:

- If it is proven that all or part of the information provided is not truthful (unless such lack of truthfulness constitutes a criminal offence, in which case the information will be kept for the necessary time during which the judicial procedure is carried out);
- If the personal data reported refers to conduct that is not included within the scope of this law;
- If the complaint received contains special categories of personal data (i.e. data on health, religion, race, sexual orientation, trade union membership, genetic data or biometric data). In this case, they would be immediately erased without being registered or processed;
- If personal data is provided that is not necessary for knowledge and investigation of the actions and omissions reported.

Retention of data on complaints admitted for processing:

The personal data of the complaints admitted for processing will be kept blocked within the Internal Information System for the duration of the investigation and, even later, during the corresponding prescription periods, according to the facts reported, if the data storage is required by law and/or for the appropriate time to prove effective compliance with our Compliance Model.

9. EXERCISE OF RIGHTS

Mitsubishi Electric informs you that, as the owner of your personal data, you can exercise your rights of access, rectification, erasure, restriction and/or objection to the processing.

The owner of the personal data may at any time exercise their data protection rights free of charge by communicating it through the postal and electronic addresses indicated below:

- **Email:** rgpd@sp.mee.com
- **Mailing Address:** Ctra. De Rubí, 76-80, 08174 Sant Cugat del Vallès, Barcelona (Spain)
- **Web: https://es.mitsubishielectric.com/en/contact/index.html**

In the event that we deem it necessary to verify your identity, we may request a copy of your ID or an equivalent document that proves your identity in order to execute your request to exercise your rights.

Nonetheless, in the event that the person investigated exercises the right to object to the processing of their personal data, it will be presumed that, unless proven otherwise, there are compelling legitimate reasons that legitimise continuing with the processing of their personal data.

10. ENQUIRIES, CLAIMS AND ADDITIONAL INFORMATION

We hereby inform you that, in the event that you have any questions, you wish to make any query related to Mitsubishi Electric's processing of your personal data or you consider that such processing violates the regulations, you may:

1. Make your enquiry and/or submit your claim to our DPO through the addresses listed in sections 1 and 9 above, or;
2. Make a query and/or file a claim before the Spanish Data Protection Agency through its postal address at C/ Jorge Juan, 6, PC 28001, Madrid (Spain) or through its telephone service line at the electronic headquarters of said authority. The above can be found at the following link: https://www.aepd.es/es/la-agencia/en-que-podemos-ayudarte.

Latest update: 13 June 2023.