

1 Who we are

1.1 MLE

We are Mitsubishi Logisnext Europe B.V. (“MLE”), Hefbrugweg 77, 1332 AM Almere, the Netherlands, the provider of Logisnext Academy. As such, we are responsible for the processing of your personal data. The data controller is hereinafter referred to as “MLE”, “our” or “we”. We can be reached via legal_mle@logisnext.eu.

1.2 Categories of personal data

To provide Logisnext Academy, we collect and process the following categories of personal data:

- a. When creating your user account, we collect your name, employer, job title and other identifying information. This identifying information may include for instance, the company you work for and your email address we require for providing Logisnext Academy to you.
- b. Information we collect when you use Logisnext Academy:
 - When you use Logisnext Academy, we register your IP address, browser type, operating system, web-browsing behavior, and app use. We also collect information via functional cookies when you use our mobile apps. For more information, please refer to our [cookie policy](#).
 - We may receive an automatic notification when you open our Logisnext Academy related emails or click on a link in such emails.
 - With your permission, we may also receive your location data when using Logisnext Academy.
 - Information you share with us when you use Logisnext Academy. For example, your language and the time zone you live in.
- c. Our communication with you. When you send us an email or communicate with us online or via social media, we register your communication with us.
- d. Information you choose to share with us. For example, when you fill out your email preferences or provide additional information in your Logisnext Academy user account.

2 How we collect your data

2.1 Methods of collecting personal data

We collect the aforementioned categories of personal data in the following ways:

- a. We collect personal data that you or your employer provide(s) to us when creating your user account. We also collect personal data that you provide when you activate and complete the user account.
- b. By completing courses, we collect information on your participation and progress in Logisnext Academy courses.
- c. When you use Logisnext Academy, we collect information via functional cookies. For more information, please read our [cookie policy](#).
- d. Logisnext Academy is provided by us in co-operation with other companies. These companies share your personal data with us if this is necessary for these services. We may share your personal data with these third parties (please see [paragraph 4](#) below).

3 For which purposes we use your personal data

3.1 Main purposes

The main purposes for which we use your personal data are:

- a. To provide Logisnext Academy to you, including the execution of any agreement with you, or the legal entity you represent.
For example, when you use Logisnext Academy, we collect information on your participation and progress in courses to provide you with a better educational experience. In addition, we process your personal data to provide you with the courses that are relevant to you.
- b. To communicate with you.
For example, we process your contact information for the purpose of providing support.
- c. For statistical research.
For example, we may use automated tools to conduct statistical research on general trends in the use of Logisnext Academy and progress of our users. This may include for example, research on the time spent on certain courses

and the completion status of courses.

3.2 Legal basis

We collect, use, and store your personal data to provide Logisnext Academy, to execute an agreement, to comply with the legal obligations we are subject to, if necessary for our legitimate interests or the interests of a third party or on the basis of your consent.

You may withdraw your consent at any time by following the specific instructions in relation to the processing for which you provided your consent, by adjusting your settings (if available) or by contacting us (please see [paragraph 7.1](#) below).

If you refuse to provide personal data that we require for the performance of the contract or compliance with a legal obligation, we may not be able to provide all or parts of the services you have requested from us. For example, when you lose the order details of an order you placed in the past and refuse to provide information related to this order, we may not be able to provide you with a copy of the agreement because we are not able to find the order in our systems.

When we process your personal data for our legitimate interests or the interests of a third party, we have balanced these interests against your legitimate interests.

Where necessary we have taken appropriate measures to limit implications and prevent unwarranted harm to you. Our legitimate interests may for example include security and safety purposes or to provide better services and offers to you. For more information on these interests, please see the purposes for which we process your personal data above. More information on the balancing tests we perform is available upon request. Where we process your personal data for our legitimate interests or the interests of a third party, you have the right to object at any time on grounds relating to your particular situation (please see [paragraph 7.1](#) below).

Where we process your personal data for a purpose other than that for which we collected it initially (and we rely on a legal basis other than consent or complying with legal obligations for this new purpose), we will ascertain whether processing for this new purpose is compatible with the purpose for which the personal data were initially collected. More information on this assessment is available upon request (please see [paragraph 7.1](#) below).

4 Disclosing or sharing data with third parties

4.1 General

As a general rule we do not sell or share your personal data with anyone outside MLE. However, we do disclose or share data with the following categories of recipients.

a. Your employer.

If you are an employee of one of our dealers or of a MLE group company that is engaged in a dealership with MLE, your Logisnext Academy course participation and progress information will be shared with your employer.

b. For the support services we involve.

We use third parties to provide Logisnext Academy. This includes IT suppliers (such as hosting service providers). All such third parties will be required to adequately safeguard your personal data and only process it in accordance with our instructions.

c. Ownership of MLE changes.

If ownership of MLE changes as a result of a merger, acquisition, or a transfer, your personal data may be transferred to the successor entity.

4.2 Public authorities

If we are required to by law, we share your identifying information with public authorities or governmental organizations.

4.3 Third party websites

Logisnext Academy may contain links to third-party websites; if you follow these links, you will exit Logisnext Academy. While these third-party websites are selected

with care, we cannot accept liability for the use of your personal data by these organizations. For more information, please consult the privacy policy of the website you are visiting (if such a policy is provided).

5 Security and retention

5.1 Security

MLE will ensure that your personal data are properly secured using appropriate technical and organizational measures, so that they are protected against unauthorized or unlawful use, alteration, unauthorized access, or disclosure, accidental or wrongful destruction, and loss.

5.2 Retention

Your personal data will be retained for as long as required for the purposes described in this privacy policy or in so far as such is necessary for compliance with statutory obligations and for solving any disputes.

If your user account is deleted, for example, because your employment as meant in [paragraph 4.1\(a\)](#) has ended, all information linked to your user account will be automatically erased within 30 days after deletion of your user account.

6 International transfer of your personal data

6.1 International transfers

MLE may transfer your personal data to countries other than your country of residence (including countries outside the European Economic Area). This occurs in the course of providing Logisnext Academy or because our group companies, partners or service providers have operations in countries across the world. The laws of these countries may not afford the same level of protection to your personal data. The European Commission has determined that certain countries outside the European Union offer an adequate level of data protection (see article 45 General Data Protection Regulation, GDPR). You can find an overview of these countries [here](#).

6.2 Standard Contractual Clauses

MLE will ensure that adequate safeguards are in place to comply with the requirements for the international transfer of personal data under applicable privacy laws. For transfers of personal data outside the European Economic Area, MLE may use Commission approved Standard Contractual Clauses as safeguards (see article 46 GDPR).

7 Your rights

7.1 Rights of data subjects

You may contact our Contact Person (please see [paragraph 7.4](#) below) to exercise any of the rights you are granted under applicable data protection laws, which includes (1) the right to access your data, (2) to rectify them, (3) to erase them, (4) to restrict the processing of your data, (5) the right to data portability and (6) the right to object to processing.

1. Right to access.

You may ask us whether or not we process any of your personal data and, if so, receive access to that data in the form of a copy. When complying with an access request, we will also provide you with additional information, such as the purposes of the processing, the categories of personal data concerned as well as any other information necessary for you to exercise the essence of this right.

2. Right to rectification.

You have the right to have your data rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal data about you and, taking into account the purposes of the processing, complete incomplete personal data, which may include the provision of a supplementary statement.

3. Right to erasure.

You also have the right to have your personal data erased, which means the deletion of your data by us and, where possible, any other controller to whom your data has previously been made public by us. Erasure of your personal data only finds place in certain cases, prescribed by law, and listed under

article 17 of the General Data Protection Regulation (GDPR). This includes situations where your personal data are no longer necessary in relation to the initial purposes for which they were processed as well as situations where they were processed unlawfully. Due to the way we maintain certain services, it may take some time before backup copies are erased.

4. Right to restriction of processing.

You have the right to obtain the restriction of the processing of your personal data, which means that we suspend the processing of your data for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal data was contested but some time is needed for us to verify their (in)accuracy. This right does not prevent us from continuing to store your personal data. We will inform you before the restriction is lifted.

5. Right to data portability.

Your right to data portability entails that you may request us to provide you with your personal data in a structured, commonly used, and machine-readable format and to have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible, we will transmit your personal data directly to the other controller.

6. Right to object.

You also have the right to object to the processing of your personal data, which means you may request us to no longer process your personal data. This only applies in case the 'legitimate interests' ground (including profiling) constitutes the legal basis for processing (see [paragraph 4.2](#) above).

7.2 Withdrawal of consent

You may withdraw your consent at any time by following the specific instructions in relation to the processing for which you provided your consent, by adjusting your settings (if available) or by contacting our Contact person.

7.3 Denial of, or restrictions to rights

Under conditions we are entitled to deny or restrict your rights as described above. In any case, we will carefully assess whether such an exemption applies and inform you accordingly.

We may, for example, deny your request for access when necessary to protect the rights and freedoms of other individuals or refuse to delete your personal data in case the processing of such data is necessary for compliance with legal obligations. The right to data portability, for example, does not apply in case the personal data was not provided by you or if we process the data not on the basis of your consent or for the performance of a contract.

7.4 MLE Contact Person

When you would like to exercise your rights, all you have to do is send your request to the Contact person of MLE: Mitsubishi Logisnext Europe B.V., Hefbrugweg 77, 1332AM, Almere, legal_mle@logisnext.eu.

7.5 Further questions

You can also contact us at any time if you have any questions, remarks, or complaints in relation to this privacy policy. However, if you have unresolved concerns, you also have the right to complain to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens, <http://www.dutchdpa.nl>) located in The Hague, The Netherlands.

8 How we look after this policy

8.1 Recent amendments

This privacy policy was most recently amended on month date year and replaces earlier versions. We may amend this privacy policy from time to time and will notify you of any substantive changes by posting the revised policy on this website or via our apps, prior to these changes taking effect.