Privacy Policy VISR

On behalf of our customers (your employer), we would like to explain which data (including personal data) will be collected through your use of the App and why, how, how long and by whom it will be processed. The protection and security of your personal data are important to us. We comply with applicable data protection law and regulations and we process and protect your data with the utmost care.

Who we are
VISR ("App") has been distributed by Mitsubishi Caterpillar Forklift Europe B.V., having its business address at Hefbrugweg 77 (1332 AM), Almere, the Netherlands and is registered with the Dutch Trade Register of the Chamber of Commerce under number 39052636 ("MCFE", "we", "us" or "our").

The App is developed by Trackunit and part of Trackunit’s Telematics Solutions that our customers (your employer) have purchased to provide them with valuable information about our machines. We act as a processor on behalf of our customers (your employer), who are the controllers of the collected data.

To enable our customers (your employer) to get the necessary information from our machines, we cooperate with the following business partners: MCFE’s affiliates, MCFE’s (sub)dealers (as reflected at www.mitforklift.com and https://www.catlifttruck.com), and Trackunit A/S and its affiliates and IT-service providers such as AWS and Zitcom ("Partners").

Data that is collected by the App
By using the App, the following data will be collected and further processed:

- Information you submit when creating an account in the App;
- Information about your mobile device, including about your location, operating system, troubleshooting and analytical data, IP address and sensor information;
- Telematics information about the machines connected with the App such as:
  - Location
  - Operating hours
  - Alarms
  - Service planning
  - Shock detection
  - Accelerometer
  - Reports

The purposes for which your data are used.
The data mentioned above is being collected and processed for the following purposes:

- To activate and manage your App account;
- To provide our customers (your employer) with insight in statistics, alarms, locations and predictive maintenance of our machines;
To allow us and our Partners to create reports based on aggregated data for statistical purposes, e.g. to create performance benchmarks, predictive maintenance and optimizing the use and efficiency of our machines.

Security measures and data retention
Our customers (your employer) and Partners have taken appropriate technical and organizational measures to protect your data against unauthorized use, unauthorized access and wrongful modifications, loss or destruction. Your personal data will be stored no longer than is necessary for the purpose they were obtained for or compliance with legal and fiscal obligations.

Information sharing
The collected data will be processed by our customers (your employer), Partners and us, but solely for the purposes as stated in this Privacy Policy and as far as necessary to enable us and our Partners to provide the required services to our customers (your employer). This includes sharing the collected data with:

- Amazon (AWS) for cloud data storage of the data in the following countries: Ireland, UK, and Germany; and
- Zitcom A/S for local data storage of the data in the following country: Denmark.

We may share the data with other business partners, distributors or service providers so that they may provide, maintain, host and support the App. All such third parties will be required to adequately safeguard your personal data, subject to agreements that correspond to the requirements of applicable laws. Your personal data may also be shared on legal grounds or investigations (e.g. disclosure to prevent crime or fraud, or to comply with a court order or legislation).

Your personal data will be processed on the basis of the following legal grounds: on the basis of your consent, to comply with legal obligations our customers (your employer), Partners or we are subject to and on the basis of our legitimate interests or the interests of a third party as described in this Privacy Policy. When your personal data is processed for our legitimate interests or the interests of a third party, reasonable measures to prevent unwarranted harm to you will be taken. Our legitimate interests or the interests of a third party may for example include security and safety purposes or improving the Telematics Solutions and the machines. For more information on these interests, please see the purposes for which we process your personal data above.

International data transfers
The collected data may be transferred to trusted third parties in countries outside of the European Economic Area for the purposes mentioned above. Our customers (your employer) will ensure that adequate safeguards are in place to comply with the requirements for the international transfer of personal data under applicable data protection law and regulations. These transfers of data outside
the European Economic Area shall only occur on the basis of a legally recognised transfer mechanism, such as the Standard Contractual Clauses “(EU-)controller to (Non-EU/EEA-)processor” Decision 2010/87/EU. Contact us to obtain a copy.

**Exercising your rights**

Providing the required data is necessary for you to use the App. If you do not wish to provide the required data, you cannot use the App. When you use the App, and provide the required data, you may have the right to request access to your personal data, to have it rectified or erased, to object to its processing or to have access to it restricted. You may also have the right to receive a copy of your personal data in a machine-readable format or to have your personal data sent to another entity. When your personal data is being processed based on your consent, you have the right to withdraw your consent at any time by contacting us. You may be asked for additional information to confirm your identity and for security purposes, before disclosing information requested to you. Furthermore, you have the right to lodge a complaint with the Dutch Data Protection Authority.

To exercise any of your rights in connection with your personal data, please contact us via the contact details stated below.

**Changes to this Privacy Policy**

Any changes to this Privacy Policy in the future will be posted on this page and, at our discretion, provided to you by e-mail or via a push notification on the App.

**Contact**

For any questions about this Privacy Policy or the App please feel free to contact us at: MCFE, Hefbrugweg 77, 1332AM Almere, the Netherlands, phone number: +31 (0)36 54 94 619, e-mail: VISR@MCFE.nl.

This Privacy Policy has last been updated: 2 February 2018