

The protection of your personal data is important to us.

We are committed to processing your personal data lawfully, fairly and transparently.

Please take your time to read this Privacy Notice carefully.

PRIVACY NOTICE
PURSUANT TO ART. 13 OF REGULATION (EU) 2016/679

Pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter the “GDPR”), **Daikin Applied Europe S.p.A.** (hereinafter, “**DAE**” or the “**Controller**”), a company of the Daikin Group, wishes to inform the **User** (hereinafter also referred to as “**You**”) regarding the processing of Personal Data collected through the **DAE Digital Platform** which include:

- the **DAE Identity Provider Portal**, acting as a single access point for authentication and login; and
- the **DAE Selection Software Apps** (such as Tools, MTOP, Daikin Translation Software, ASTRA, Meccano Web, etc.) accessible through the **DAE Identity Provider Portal**.

(collectively referred to as the “**DAE Digital Platform**” or “**Platform**”).

1. Definitions

Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Processor: means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.

Data Subject: means an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal Data: means any information relating to an identified or identifiable natural person (“data subject”).

Processing: means any operation or set of operations which is performed on Personal Data or on 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.

Special Categories of Personal Data: means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data processed for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation.

Controller and Data Protection Officer

The Controller is **Daikin Applied Europe S.p.A.**, with registered office in Ariccia (Rome), 00072, Via Piani di S. Maria n. 72, VAT no. 01318801006, telephone +39 06-937311, fax +39 06-9374014, e-mail:

dataprivacy@daikinapplied.eu.

The updated list of Data Processors is available at the Controller's registered office and may be requested by sending an e-mail to dataprivacy@daikinapplied.eu.

The Data Protection Officer (DPO) can be contacted at the following addresses: **Daikin Industries, Ltd. Osaka Umeda Twin Towers South, 1-13-1 Umeda, Kita-ku, 530-0001 Osaka, Japan**; telephone: +81 6-6147-3321; e-mail: euprivacy@daikin.co.jp, or by writing to Daikin's registered office.

2. Categories of Personal Data processed

DAE will process the following categories of Personal Data provided by the User:

- **Browsing data**, such as log files, hardware model, operating system, mobile network information and country of access, access time, duration of access, IP address, cookies, etc. are automatically collected. These browsing data are considered Personal Data whose transmission is implicit in the use of internet communication protocols. Although not collected for the purpose of being associated with identified users, such data could allow identification through processing and association with other information, including that held by third parties (e.g., Internet service providers).
- **Data actively provided by the User**, i.e., information voluntarily submitted by the User by completing the online registration and access form, such as name, surname, e-mail address, company name, and country.

DAE does not process Special Categories of Personal Data.

Regarding cookies, DAE informs that, in accordance with the Decision of the Italian Data Protection Authority dated 8 May 2014, the DAE Digital Platform's Cookie Policy is available at the following [link](#).

3. Purposes and legal basis of processing

Personal Data made available to DAE may be processed for the following purposes:

a) Registration, Authentication, and Access Management

Creation and management of the User's account through the **DAE Identity Provider Portal**, which acts as a single access point (SSO) for authentication and login to various **DAE Selection Software Apps**.

The processing of Personal Data for this purpose does not require your consent as it is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract (Art. 6(1)(b) GDPR).

b) Use of DAE Selection Software Apps

To enable Users to select and configure DAE HVAC products through a specific Daikin Selection Software, share the related projects with other Users, generate reports for orders and anonymous statistical analyses, translate technical documentation into different languages, generate data required to produce the selected units, manage orders and related workflows.

The processing of Personal Data for this purpose does not require your consent as it is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract (Art. 6(1)(b) GDPR).

c) Technical, Security and Maintenance Activities

To carry out technical and security management, maintenance, and troubleshooting of the DAE Digital Platform to ensure their proper functionality, availability, and protection.

The processing of Personal Data for this purpose does not require your consent as it is necessary for the pursuit of the legitimate interests of the Controller (Art. 6(1)(f) GDPR).

d) Legal obligations

DAE may process Personal Data in order to comply with legal obligations to which it is subject.

The processing of Personal Data for the achievement of such purpose does not require your consent as it is necessary for compliance with a legal obligation to which the Controller is subject, pursuant to art. 6(1)(c) of the GDPR.

e) Claims and Legal Defence

DAE may process Personal Data to protect its rights in the event of claims and legal disputes.

The processing of Personal Data for this purpose does not require your consent as it is necessary for the pursuit of the legitimate interests of the Controller (Art. 6(1)(f) GDPR).

4. Provision of Personal Data. Consequences of failure to provide Personal Data

Purposes a) and b)

The provision of Personal Data is necessary to enable registration and use of the DAE Digital Platform.

Failure to provide such data, or providing inaccurate data, may make it impossible to register, to use the portal's functionalities and to access the services offered.

Purposes c) and e):

The provision of Personal Data is necessary to pursue the legitimate interests of the Controller (defence in claims and disputes, technical and security management of the DAE Digital Platform).

Failure to provide such data, or providing inaccurate data, may make it impossible for DAE to pursue such legitimate interests and to ensure the proper functioning of the Platform.

Purpose d):

The provision of Personal Data is necessary to comply with legal obligations to which the Controller is subject.

Failure to provide such data, or providing inaccurate data, may make it impossible for DAE to comply with those obligations.

5. Processing methods

Personal Data provided by You will be processed mainly by electronic means under the authority of the Controller, by persons specifically designated and authorised to process them pursuant to Articles 28 and 29 GDPR. Adequate security measures will also be observed pursuant to Article 32 GDPR to prevent the loss of Personal Data, unlawful or incorrect use, and unauthorised access.

6. Recipients or categories of recipients of Users' Personal Data

Your Personal Data may be transferred and/or communicated to the following subjects, in their capacity as independent Controllers, Processors, Appointees or Authorised persons for processing, specifically designated by the Controller:

- third parties, natural or legal persons, providing DAE with instrumental services to the purposes mentioned above, including, by way of example, Daikin Group Affiliates, data hosting providers, suppliers, subcontractors, internet service providers;
- law enforcement agencies or judicial authorities in the context of investigations or criminal proceedings for the purposes of prevention, detection or prosecution of offences;
- public authorities, where required by law or upon their request;
- any other subject to whom Personal Data must be communicated pursuant to an express provision of law.

Whenever a third party acts as a Data Processor, DAE will ensure that a contract pursuant to Art. 28 GDPR is signed with that party, binding the Processor to the Controller and setting out the subject matter and duration of the processing, the nature and purpose of the processing, the type of Personal Data and categories of data subjects, as well as the obligations and rights of the Controller.

7. Transfer of Personal Data to Third Countries

For the purposes described above, DAE may transfer Personal Data to other Daikin Group companies, including in countries outside the European Union, in accordance with applicable legislation. In any case of transfer of Personal Data to a non-EU country, DAE undertakes to ensure an adequate level of protection by establishing appropriate safeguards and complying with the provisions of Chapter V GDPR. In particular, the transfer to non-EU countries, in addition to cases where it is guaranteed by adequacy decisions of the European Commission, will be carried out so as to provide appropriate and suitable safeguards pursuant to Articles 46, 47 or 49 GDPR.

8. Duration of processing and storage period of Personal Data

We will process Your Personal Data for as long as necessary to achieve the purposes described above. In particular:

- **User account data:** retained for the entire duration during which the User remains registered on the Website. In the event of account inactivity, the account will be considered inactive after 12 months from the last access and deleted within the following 3 months (for a maximum total retention period of 15 months). If the User requests deletion, data will be erased without undue delay, unless further retention is required to comply with legal obligations or defend the Controller's rights.
- **Data processed for legal obligations:** retained for no longer than 10 years, in compliance with civil and tax requirements.
- **Data processed for technical and security management of the Website:** retained for the time strictly necessary to ensure the security, integrity and proper functionality of the Website and related IT systems.
- **Personal Data processed for purposes related to claims and defence of the Controller's rights:** retained for a maximum period equal to the applicable statutory limitation period (generally 5 or 10 years, depending on the nature of the claim or right to be enforced).

At the end of the relevant retention periods, Personal Data will be deleted or anonymised, unless further retention is required for other legitimate purposes.

For further information on the retention period of Personal Data, please refer to the [Cookie Policy](#).

9. Minors

Through its Website, DAE does not knowingly process Personal Data of minors below the age required for parental consent according to applicable local laws.

10. Your rights as a Data Subject

You are informed that at any time, with regard to Your Personal Data, You may exercise the rights provided for, within the limits and conditions set forth in Articles 7 and 15–22 GDPR. To exercise these rights, as described below, please contact the Controller at any time:

- by writing to Daikin Applied Europe S.p.A. at its registered office: Ariccia (Rome), 00072, Via Piani di S. Maria n. 72, or
- by writing to dataprivacy@daikinapplied.eu.

In order to allow the exercise of Your rights and to prevent anyone else from attempting to exercise them on Your behalf, DAE will need to verify Your identity as thoroughly as possible. Therefore, You will be required to provide a valid identity document at the time of the request.

Right of access to Your Personal Data

As a Data Subject, You have the right to obtain from the Controller confirmation as to whether or not Personal Data concerning You are being processed and, if so, to obtain access to the Personal Data and the following information:

- the purposes of the processing;
- the categories of Personal Data concerned;
- the categories of recipients to whom the Personal Data have been or will be disclosed;
- the envisaged storage period or the criteria used to determine that period;
- the rights You can exercise in relation to our processing;
- the existence of automated decision-making, including profiling, and, at least in such cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for You.

Right to rectification, erasure and restriction of processing of Personal Data

Some Personal Data processed by DAE may be (or may have ceased to be) incorrect, or You may wish to supplement, delete or restrict the Personal Data You have provided.

As a Data Subject, You have the right to obtain from the Controller the rectification of inaccurate Personal Data concerning You without undue delay. Taking into account the purposes of the processing, You also have the right to have incomplete Personal Data completed, including by providing a supplementary statement.

Furthermore, where the conditions of Art. 17 GDPR are met, You have the right to obtain from the Controller the erasure of Personal Data concerning You without undue delay, and the Controller is obliged to erase such Personal Data without undue delay.

Finally, You have the right to obtain restriction of the processing of Personal Data at any time, where the conditions of Art. 18 GDPR are met.

Right to data portability

As a Data Subject, You have the right to receive, in a structured, commonly used and machine-readable format, the Personal Data concerning You that You have provided to a Controller, and You have the right to transmit those data to another Controller without hindrance, where the conditions of Art. 20 GDPR are met.

Right to withdraw consent to the processing of Personal Data

Whenever You have given Your consent to the processing of Your Personal Data, You may subsequently withdraw that consent without affecting the lawfulness of processing based on consent before its withdrawal.

Right to object

As a Data Subject, You have the right to object at any time to the processing of Your Personal Data carried out for the pursuit of a legitimate interest of the Controller. In the event of objection, Your Personal Data will no longer be processed, unless there are compelling legitimate grounds for the processing which override Your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

Right to lodge a complaint with a Supervisory Authority

Finally, pursuant to Art. 77 GDPR, You have the right to lodge a complaint with a competent Supervisory Authority, in particular in the Member State where You have Your habitual residence, place of work or where the alleged violation occurred, if You believe that the processing of Your Personal Data infringes the GDPR.

11. Amendments to the Privacy Notice

This Privacy Notice is subject to updates.

The Controller, therefore invites users who wish to know the methods of processing Personal Data collected to visit this page periodically.

Last update: *November 2025*