

Mitsui Rail Capital Europe

Privacy policy

Responsible party pursuant to data protection laws, in particular the EU General Data Protection Regulation (GDPR), is

According to § 5 TMG:

Mitsui Rail Capital Europe B.V.

Postal address:

Barbara Strozilaan 366
1083 HN Amsterdam

Contact:

Tel.: + 31 (0) 20 70 85 910
E-Mail: info@mrce.eu

Represented by:

Board of Directors:
Beller, Rainer Heinz
Hayato, Yanagisawa
Hirai, Masaaki
Toyonaga, Kenji

Registered on:

Kamer van Koophandel (KvK)
34214164

VAT identification number:

NL856084049B01

Your rights as the data subject

You can exercise the following rights at any time using the contact details of our data protection officer:

- Information on your data stored by us and the processing thereof (Art. 15 GDPR),
- Rectification of inaccurate personal data (Art. 16 GDPR),
- Deletion of your data stored by us (Art. 17 GDPR),
- Restriction of the data processing, provided that we may not delete your data due to legal obligations (Art. 18 GDPR),
- Objection to the processing of your data with us (Art. 21 GDPR)

- Data portability, provide that you have consented to the data processing or have entered into a contract with us (Art. 20 GDPR).

If you have given us consent, you may withdraw it at any time, which will remain in effect in the future. You can contact a supervisory authority with a complaint at any time, e.g. the supervisory authority of the state of your residence or the authority that oversees us as the responsible party.

You will find a list of supervisory authorities (for the non-public area) with their respective addresses at: https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html.

1. Collecting general information during a visit to our website

Type and purpose of the processing

When you access our website – i.e. if you do not register or submit information – information of a general nature will be collected automatically. This information (server log files) contains the type of web browser, the operating system used, the domain name of your Internet service provider, your IP address and the like.

It is processed in particular for the following purposes:

- Ensuring an unproblematic website connection
- Ensuring seamless use of our website
- Analysis of system security and stability as well as
- For additional administrative purposes.

We will not use your data to draw conclusions about your person. This type of information will be statistically analysed by us if necessary to optimise our website and its underlying technology.

Legal basis

The processing occurs according to Art. 6 Para. 1 (f) GDPR, based on our legitimate interest in improving the stability and functionality of our website.

Recipients

Recipients of the data may be technical service providers, who work on the operation and maintenance of our website as the processor.

Retention period

The data will be deleted as soon as they are no longer required for the reason they were collected. This is generally the case, after the respective session has ended, for data that are used to make the website available.

Mandatory or required provision

The provision of the aforementioned personal data is neither legally nor contractually mandatory. Without the IP address however, the service and functionality of our website are not guaranteed. Furthermore, individual services can be unavailable or limited. For this reason, an objection is excluded.

2. Contact form**Type and purpose of the processing**

The data you enter are used for individual communication with you. A valid e-mail address and your name are required for this communication, which serves to organize your inquiry and the respective subsequent reply. Providing additional information is optional.

Legal basis

The processing of the data entered in the contact form occurs on the basis of a legitimate interest (Art. 6 Para. 1 (f) GDPR).

By providing the contact form, our aim is to facilitate an uncomplicated means for you to contact us. The information you enter will be used to process the inquiry and saved for possible follow-up questions. If you contact us to request an offer, the processing of the information provided in the contact form will occur in order to implement pre-contractual measures (Art. 6 Para. 1 (b) GDPR).

Recipients

Primary recipient of your data will be MRCE. The contact form and your data will be used to be able to contact you and follow-up on sent requests. Recipients of the data may be additionally our technical service provider Brendly, who works on the operation and maintenance of our website as a processor.

Retention period

The data will be deleted no later than 6 months after processing the inquiry.

Provided that we enter into a contract together, we will use the statutory retention periods in the German Commercial Code (Handelsgesetzbuch) and delete your data according to the respective stipulated deadlines.

Mandatory or required provision

The provision of your personal data is voluntary. However, we can only process your inquiry if you provide us with your name, e-mail address and the reason for your inquiry.

3. Customer Portal

Type and purpose of the processing

The purpose of the Customer Portal is to provide you with information about the fleet you are currently leasing. You agree your access to MRCE's Customer Portal and its content, shall be solely used for obtaining information and/or services and that you shall not use your account and its content to directly compete with or gain competitive advantage over MRCE.

Legal basis

Only MRCE customers with an active lease contract are eligible to request for a customer portal account. Upon your request for an account creation, we will only use information already registered in our system (e.g. your MRCE customer number, account holder, e-mail address) to process your access to the portal. Your account will remain active for the duration of your lease period.

Recipients

The primary recipient of your data will be MRCE. Your MRCE customer number and contact information as stipulated in your lease contract will be used to process the creation of your customer portal account. Recipients of your data maybe be additionally our technical service provider SRA (Europe) B.V., who provides second line technical support.

Retention period

As the portal is linked to MRCE's ERP system, the data will be retained for the duration of your lease contract. We will use the statutory retention periods stated in your contract and delete your data according to the respective stipulated termination date.

Mandatory or required provision

The provision of your personal data is voluntary as we can only grant you access to the fleet portal upon your request. Any personal information you supply to MRCE will be stored in a secure database and maintained in accordance with the GDPR.

4. Cookies

We use technical and profiling cookies. Technical Cookies are essential for the correct functioning of the website and to provide the service offered and requested by a user. Profiling Cookies are used to create user profiles based on personal choices and preferences, in order to send adverts in line with the profile. On our website we use technical cookies who identify website traffic to see which pages are being used. This helps us analyse data about web page traffic and improve our website to tailor it to customer needs. The gathering of this usage data and the creation of a usage profile is carried out on an anonymized basis using a cookie ID. We create and store these usage profiles solely in anonymized form

and do not combine them with your name or with any other information such as your email address which may reveal your identity. We only use this information for statistical analysis purposes and then the data is removed from the system.

Type and purpose of the processing

This website uses http cookies. An http cookie is a partial text that is stored on our computer from your web browser. Cookies are forwarded as a field in the header of the http response by our online web servers. This information is always recommunicated whenever it accesses the respective web server. We use technically required cookies in accordance with the legitimate interest in a user-friendly design of our website.

Legal basis

The processing of the data occurs on the basis of the user’s consent (Art. 6 Para. 1 (a) GDPR).

Recipients

The recipient of the data is mrce.eu.

Retention period

The deletion of the data occurs as soon as they are no longer necessary for our recording-keeping purposes.

Revocation of consent

Should you wish to discontinue the use of cookies, you have the opportunity to use your browser settings to prevent the acceptance and storage of cookies and also once entering our website, you have the opportunity to neglect or accept these setting via the cookie banner.

Profiling

With the assistance of cookies, the browsing behaviour of the website visitors can be evaluated and their respective interests can be analysed. For this analysis, we create a pseudonymous user profile and link it with Google Analytics.

Name	Purpose	Expiry
GA (Google Analytics)	Used to track and report website traffic	Session

5. Web Analytics

Type and purpose of the processing

This website uses Google Analytics, a web analytics service of Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043 USA (hereinafter: ‘Google’). Google Analytics is used to collect anonymous statistics of visits and use, including duration, origin and destination and duration of the browsing

sessions. The information generated by the cookie about your use of this website is typically transmitted to a Google server in the U.S. and stored there. However, due to the activation of IP anonymisation on these websites, your IP address will be truncated beforehand by Google within the member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the U.S. and truncated there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, summarise reports on website activities and provide other services related to website and Internet usage to the website operator. The IP address transferred from your browser as part of Google Analytics will not be combined with other data from Google.

The data processing purposes are the website-use analysis and the summary of reports on activities on the website. Based on the use of the website and the Internet, other related services will be provided.

Legal basis

The processing of the data occurs on the basis of the user's consent (Art. 6 Para. 1 (a) GDPR).

Recipients

The recipient of the data is Google as the processor. For this, we have entered into the corresponding data-processing contract with Google.

Retention period

The deletion of the data occurs as soon as they are no longer necessary for our recording-keeping purposes.

Third country transfers

Google processes your data in the United States of America and relies on the European Commission's Standard Contractual Clauses (SCCs). This means that where there is a relevant transfer of personal data, the SCCs incorporated into Customer's contract with Google will apply:

<https://www.privacyshield.gov/EU-US-Framework>.

Mandatory or required provision

The provision of your personal data is voluntary, based solely on your consent. If you prevent access, this can lead to functional limitations on the website.

Revocation of consent

You can prevent the storage of cookies by a corresponding setting in your browser software; however, please note that in this case you may not be able to use all the functions of this website in their entirety. Furthermore, you can prevent the collected data generated by the cookie and the data related to your use of the website (including your IP address) being transmitted to Google, as well as the processing of this data by Google, by downloading and installing the browser plug-in available at the following link: [browser add-on to deactivate Google Analytics](#).

In addition, or as an alternative to the browser add-on, you can prevent tracking by Google Analytics on our web pages [by clicking this link](#), which will install an opt-out cookie on your device. This will prevent data collection by Google Analytics for this website and for this browser in the future, as long as the cookie remains installed in your browser.

Profiling

With the assistance of the tracking tool Google Analytics, the browsing behaviour of the website visitors can be evaluated and their respective interests can be analysed. For this analysis, we create a pseudonymous user profile.

6. Social Media Plugins

Type and purpose of the processing

We are not making use of any social media plugins to store data of our users or analyse it. You can find a link to Facebook, Instagram or LinkedIn but these are not directly linked to us, which means that your data will not be collected, stored or used in any other way or for any other purpose.

7. Using Google Maps

Type and purpose of the processing

We use Google Maps on this website. Google Maps is operated by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA (hereinafter 'Google'). This allows us to show you interactive maps directly on the website, allowing you to conveniently use the map feature.

You'll find additional information about Google's data processing [on the Google privacy policy page](#), where you can also change your personal privacy settings in the data protection center.

[Click here](#) for detailed instructions on how to manage your own data related to Google products.

Legal basis

Your consent is the legal basis for the integration of Google Maps and the associated data transfer to Google (Art. 6 Para. 1 (a) GDPR).

Recipients

By visiting the website, Google receives information that you have accessed the corresponding subpage of our website. This occurs regardless of whether Google provides a user account that you are logged into or if there is no user account. When you're logged into Google, your data will be directly assigned to your account.

If you do not want this assignment in your Google profile, you must log out of Google before activating the button. Google stores your data as usage profiles and uses them for advertising, market research and/or tailor-made design of its website. Such an analysis occurs in particular (even for users who are not logged in) to provide needs-based advertising and to inform other users of the social network about

your activities on our website. You have the right to object to the formation of these user profiles, but you must submit this objection to Google.

Retention period:

We do not collect any personal data via the integration of Google Maps.

Third country transfers

Google processes your data in the United States of America and is subject to the EU-U.S. Privacy Shield: <https://www.privacyshield.gov/EU-US-Framework>.

Revocation of consent

If you do not want Google to collect, process or use information about you via our website, you can disable JavaScript in your browser settings. In this case, you cannot or only partially use our website.

Mandatory or required provision

The provision of your personal data is voluntary, based solely on your consent. If you prevent access, this can lead to functional limitations on the website.

SSL encryption

To protect the security of your data during transmission, we use state-of-the-art encryption methods (such as SSL) via HTTPS.

Revision of our privacy policy

We reserve the right to amend this privacy policy so that it always complies with current legal requirements or to implement changes to our services in the privacy policy, e.g. when introducing new services. Your next visit will be subject to the new privacy policy.

8. Questions for the data protection officer

If you have any questions pertaining to data protection, please send us an e-mail or contact the person responsible for data protection in our organization:

info@mrce.eu

Information on your right to object according to Art. 21 GDPR

Case-specific right to object You have the right, for reasons arising from your particular situation, to object at any time to the processing of personal data concerning you on the basis of Art. 6(1)(f) GDPR (data processing on the basis of a weighing of interests); this also applies to profiling based on this provision within the meaning of Art. 4(4) GDPR.

If you file an objection, we will no longer process your personal data unless we can prove compelling reasons for the processing worthy of protection which outweigh your interests, rights and freedoms, or the processing serves the assertion, exercise or defence of legal claims.

Recipient of an objection The objection can be made in any form. Simply send us a letter or e-mail with "Objection" in the subject line, your name, address or other identifiers, and address it to:

Mitsui Rail Capital Europe B.V.
Barbara Strozilaan 366
1083 HN Amsterdam
The Netherlands

E-Mail: info@mrce.eu