

# Privacy Statement

## 1. Controller

This Privacy Policy sets out how Canon Production Printing Netherlands B.V. collects and processes information about you when you use this website (“Login Page”).

Canon Production Printing Netherlands B.V. (hereinafter “we”, “us”, “our”) is the controller of the processing of your personal information for the purposes of this Login Page.

## 2. Personal information we collect and how we use it

On this Login Page, users who are entitled to use PRISMA Applications or Tools (“PRISMA Services”) based on contractual arrangements with our affiliated companies, their customers or us (“Subscription Agreement”), can initiate their login process to PRISMA and generate a user account.

For this purpose, we process certain personal information, which you provide to us and which we collect when you use this Login Page, particularly your email address and your password.

In order to administer the Login Page for internal business operations including detecting security incidents and debugging to identify and repair errors that impair existing functionality (troubleshooting purposes) and as part of our effort to keep the Login Page safe and secure, we may collect and process certain other personal information such as your IP address, location information, browser plug-in types and versions, operating system.

Further, you may choose to provide additional information to us when you contact us.

### **3. Login via platform providers**

As an alternative to the login process described in section 2 above, you may choose to login via external authentication services of the platform providers Google and Microsoft, provided you have a corresponding Google or Microsoft user account. If you use such login function, your e-mail address stored by the respective platform provider will be disclosed to us. In addition, the platform provider will transmit to us the following personal data in the course of the login process: email address, name and profile picture.

We will only use and store the following personal data, which we require for the login process: email address, name, profile picture and login time.

We do not transmit any personal data to the platform provider in connection with the login process. Google and Microsoft record that user logged in in our platform.

Since you enter the platform provider's websites when logging in, the provider may collect additional information from you (e.g. via your browser).

The platform providers exclusively determine the processing of your personal data including the scope, purpose and duration of the processing. The platform provider's privacy policy and terms of use apply to any such data processing.

For further information on how Google processes your data when using its services, please refer to the privacy policy and the terms of use of <https://policies.google.com>

For further information on how Microsoft processes your data when using its services, please refer to the privacy policy and the terms of use of <https://privacy.microsoft.com>

#### **4. How we share and disclose your information**

We may share your personal information with our affiliates and third parties, which provide IT services to us and which process the information only for the purpose of such services (e.g. Microsoft Corporation).

We may further share your personal information with our affiliates if required to enable your use of the PRISMA Services under the applicable Subscription Agreement. If we do so, we transfer your personal information as a data processor on behalf of the company, which is granting you the use of the PRISMA Services under the applicable Subscription Agreement.

#### **5. Legal basis**

The legal basis for the processing of your personal data as described in Section 1 and 2 above is our and our affiliates' legitimate interest to run and maintain a secure and efficient centralized website for the login to PRISMA systems by our employees and employees of our affiliates and customers.

#### **6. Data Retention**

We will only hold your personal information for the duration necessary to carry out the login process or for any additional period as required by law.

For the avoidance of doubt, we may further hold your personal information to the extent necessary to enable you to use PRISMA Services in accordance with the Subscription Agreement applicable to your use of such services. In this respect, however, we do not hold your personal data as a data controller, but as a data processor on behalf of the company, which is granting you the use of the PRISMA Services under the applicable Subscription Agreement.

## **7. Information Security**

We apply reasonable and appropriate security measures to protect your personal information under our control from unauthorized access, collection, use, disclosure, copying, modification or disposal. All information you provide to us is stored on secure servers.

## **8. Your Rights**

You have the following legal data protection rights under the relevant legal conditions: Right to make complaints and consultations regarding personal information, Right of request disclosure, notification of purpose of use, correction, addition, deletion, suspension of use, erasure, and suspension of provision regarding personal information. The aforementioned data subject rights can be exercised by sending an email to [privacy@cpp.canon](mailto:privacy@cpp.canon) or by contacting us under the contact details provided hereinafter.

## **9. Contact, Data Protection Officer**

If you have a question, concern or complaint about this Privacy Policy or our handling of your personal information, or wish to exercise your right, please contact our data protection officer at [privacy@cpp.canon](mailto:privacy@cpp.canon) or under the contact details provided hereinafter.

## **10. Managing the Security of Personal Data**

We have established an appropriate security management to protect personal information and take necessary based on laws and regulations to prevent leakage, loss, or damage of personal information, depending on the respective personal information being processed.

<b>DEVELOPMENT OF RULES FOR HANDLING OF PERSONAL INFORMATION</b>	Internal policies are in place with respect to information security, data protection and privacy. These policies are reviewed on yearly basis.
<b>ORGANIZATIONAL MEASURES</b>	A formal risk management method is in place. Further data processing (be it as controller or as processor) are documented in a data base managed by the Data Protection Officer. Information security risks are included in the CPP risk management tool.
	Data Protection Officer and Information Security Director are appointed. R&D functional managers are appointed with appropriate information security, data protection and privacy roles.
<b>PHYSICAL MEASURES</b>	All services are hosted on third party servers (Azure, SendGrid) with appropriate entry controls). Only authorized personnel are allowed access to information processing facilities or areas that contain sensitive or personal information
<b>PEOPLE MEASURES</b>	Regular trainings are offered (e-learning and classroom
	The employees are required to sign a dedicated confidentiality undertaking
<b>TECHNICAL MEASURES</b>	Data pertaining to a tenant are only accessible by the NSO having created the tenant and not accessible (unless explicit consent is provided) by any other NSO (on creation level). and within a tenant only by the assigned employees of that customer and not by other customers or third parties.  In general, after 30 days of ending a subscription for a tenant all Data is deleted.
	HTTPS is the only mechanism allowed for Data transit.

	Logical access controls, including unique user account and password management, has been implemented.
<b>SUPERVISION OF SUB PROCESSORS</b>	CPP shall impose obligations on its Sub-Processors that are the same as or equivalent to those set out in this DPA by way of written contract, and shall remain liable to Subscriber for any failure by a Sub-Processor to fulfil its obligations in relation to the Subscriber Personal Data.
<b>UNDERSTANDING THE FOREIGNER ENVIRONMENT</b>	When storing personal information in foreign countries, we will implement safety management measures after understanding the system for protecting personal information in the foreign countries

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