

# Online Privacy Statement

Last modified: 21 February 2019

This online Privacy Statement ("Statement") applies to our company: KYOCERA Document Solutions Europe B.V., located at Bloemlaan 4, 2132 NP, Hoofddorp, the Netherlands.

This Statement applies to the collection of personal information by KYOCERA Document Solutions Europe B.V. through those KYOCERA websites and portals where this Statement is published.

## INTRODUCTION

When you visit our website, we collect certain information relating to your use of the website through the use of cookies and related technologies. For more detail on the use of cookies and related technologies, please visit our [Cookie Statement](#). For more information on how we process your personal information for our **KYOCERA Fleet Services (KFS)**, please visit our [Privacy Statement for KFS](#).

You may also choose to provide us with your personal information in a variety of situations, or in the event we receive your personal information via someone else (e.g. your employer). For example, you may sign up to receive one of our whitepapers/newsletters, sign up for one of our events or promotions, register on our partner portal, register for an online survey, or contact us via email or phone.

In this Statement, we will explain in detail the following:

- [Why we are processing your personal information](#)
- [On what legal basis we are processing your personal information](#)
- [With whom we share your personal information](#)
- [To which countries your personal information is sent to](#)
- [For how long we keep your personal information](#)
- [What your legal rights are concerning us processing your personal information](#)
- [How you can contact us and other important information](#)

## WHY ARE WE PROCESSING YOUR PERSONAL INFORMATION (PURPOSE)?

A. **Event registration.** If you sign up for one of our events via our website, we will use your information to sign you up for the event and to record the preferences that you may have, such as meal preferences. We share your personal information with our event management partners to make the necessary arrangement(s) for the applicable event.

B. **Marketing.** We may use your information for the following marketing purposes:

1. If you are a KYOCERA partner or client, we may contact you for the promotion of our own similar products and services. You can easily opt-out of this service by clicking the unsubscribe button provided in the email.
2. When you leave your information for us to send you whitepapers/newsletters per email, we will use your information to send you these whitepapers/newsletters. You can easily opt-out of this service by clicking the unsubscribe button provided in the email.
3. We don't deliver third party online advertisements on our website, but we may advertise our products and services on third party websites under the privacy policies/cookie statements of these third party websites.

Your personal information is securely stored on our cloud partner's servers in the US.

**C. Website/Portal registration.** On our website where this Statement is published, you may have the possibility to register in order to access content, and/or conduct business with us. In order to process your registration and deliver the requested content, KYOCERA processes your name, company name, business email address and job function from you or your employer.

**D. Online surveys.** At times we will ask event participants to participate in a survey that allows us to improve our products and services. In such a case, we will share your contact details with our survey partner.

**E. Contact with you.** When you contact us, e.g. through one of the contact forms on our website, or in case we have ongoing business with each other, we use your personal data to answer your requests, e.g. provide you with support regarding our products and services.

**F. Preventing fraud and security of our products and services.** To prevent fraud and to maintain the security of our products and services, we may use your information.

**G. Phone call monitoring.** If you call us, we may record the conversation for training quality and fraud prevention purposes. We will notify you beforehand if the conversation is indeed recorded.

**H. Improve your experience on our websites.** We use personal information to evaluate the use of our websites, products and services, for the purpose of improving your experience on our websites.

**I. Legal purposes.** Sometimes we need to use your information to handle legal claims, or to comply with applicable legal obligations or law enforcement agency requests.

## ON WHAT LEGAL BASIS ARE WE PROCESSING YOUR PERSONAL INFORMATION?

### Consent

For the marketing activities under purpose (B)(ii) and (iii) we shall ask you for your consent. You can withdraw your consent at any time here and manage your Cookie preferences here.

For purpose (G) it is necessary for us to be able to evaluate our performance, so that we can improve our products, services and communication.

### Performance of a contract or taking steps prior entering into a contract

For purpose (A) we need to be able to process your personal information to register you for the applicable event and to further manage the event using your preferences.

For purpose (C) it is absolutely necessary for the business partner relationship that a business partner contact person is managing the account. You have either directly supplied us with your personal information, or your company may have done so.

For purpose (E), we need to be able to respond to your requests of course, and need to be able to provide the necessary support on our products and services.

### **Legitimate business interest**

The legal basis for processing your personal information for the purposes under A – H is that we have a legitimate business interest to do so. Here is why:

For the marketing activity under purpose (B)(i) we have a legitimate interest to contact you. If you have ordered a product or service with us, it is in our legitimate interest to be able to notify you of our similar products and services.

For purpose (D) it is critical for us to have the opportunity to receive feedback on our products and services. If you do not wish to participate, we shall not use your personal information for this purpose. You can object to the processing of your personal data here.

For purpose (F) we need to be able to prevent and combat fraud where necessary.

For purpose and (H) it is necessary for us to be able to evaluate our performance, so that we can improve our products, services and communication.

We have made a careful assessment of your fundamental rights and freedoms and our legitimate business interests and are continuously monitoring the balance. Should you however wish to object to the processing of your personal information based on our legitimate business interest, please see the section 'Your rights' below.

### **Compliance legal obligation**

For purpose (I) we may be obligated to share your personal information to handle legal claims, to comply with applicable legal obligations or law enforcement agency requests.

## **WHO ARE WE SHARING YOUR PERSONAL INFORMATION WITH?**

KYOCERA Document Solutions Europe B.V. is a globally operating company and different functions are located in different countries. We might therefore share your personal information with those group companies who are providing a service for KYOCERA Document Solutions Europe B.V. A list of our European subsidiaries can be found [here](#). Our [global headquarter](#), KYOCERA Document Solutions Inc., is located in Japan.

For the marketing purpose under item (B), we will share your personal information with our group company located in your country.

We also use trusted external agents, suppliers and contractors to provide certain services for us in relation to the processing of your personal information, such as hosting and communication service providers.

To the extent we are required by law, regulation or court order to disclose your personal information, we may have to share your personal information in compliance with that law, regulation, or court order.

## INTERNATIONAL TRANSFERS

We may transfer your personal information to a group company or third party that is located outside the European Union or the European Economic Area. If this country does not provide for an adequate level of protection by domestic law according to the European Commission, we have ensured this adequate level of protection by agreeing on additional appropriate safeguards with that group company or third party through the Standard Data Protection Clauses adopted by the European Commission. A list of countries that have ensured an adequate level of protection according to the European Commission can be found [here](#).

Where we use service providers from the US, such US based service provider has registered itself to be on the [EU/US Privacy Shield](#) list and has been self-certified with the US Department of Commerce. More information on the European Commission decision on the adequacy of the EU/US Privacy Shield can be found [here](#).

Alternatively, we may ask you for your explicit consent to the proposed transfer. You may request a copy of the Standard Data Protection Clauses by sending us an email, motivating your request.

## FOR HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

Where possible, we have set specific retention periods for keeping your personal information. These specific retention periods are stated below, or we shall communicate these to you at or before we start processing your personal information.

Where it is not possible for us to use set retention periods, we have stated below the criteria that we use to determine the retention periods.

### Specific retention periods

**Purpose (B) Marketing.** We keep your personal information for as long as you are subscribed, or until we cancel our newsletter/whitepaper service, whichever occurs first. You can easily opt-out of the newsletter/whitepaper by clicking the unsubscribe button provided in the email.

**Purpose (C) Website/Portal registration.** When you have an account with us, we shall keep your personal information for as long as your account is active and in case you cancel your account, we shall delete your personal information as soon as possible thereafter, in any case within 1 month.

**Purpose (E) Contact.** When we communicate via email, we keep your personal information for as long as the enquiry/matter is ongoing and in case Dutch laws on maintaining a proper business administration apply for a term of 7 years.

### Criteria for determining retention periods

In any other circumstances, we use the following criteria to determine the applicable retention period:

- The assessment of your fundamental rights and freedoms;
- The purpose(s) of processing your personal information. We shall not keep your personal information longer than is necessary for the purpose(s) we collected it for.
- Any relevant industry practices or codes of conduct on keeping personal information;

- The level of risk and cost associated with keeping your personal information (accurate and up-to-date);
- Whether we have a valid lawful basis to keep your personal information;
- The nature, scope and context of processing of your personal information and our relationship with you.
- Any other relevant circumstances that may apply.

In any case, we shall keep your personal information in compliance with applicable legal requirements and we make periodical reviews of the personal information we hold.

## YOUR RIGHTS

You have certain legal rights that we wish to inform you of.

**Access.** You have the right to be informed on whether we process your personal information or not and to related information on that processing.

**Rectification.** You have the right to have your personal information rectified or completed by us without undue delay. If you have set up an account with us, you have the possibility to rectify or complete your personal information yourself.

**Right to be forgotten.** You have the right to have your personal information erased by us without undue delay. This right is limited to specific grounds, for example if you have withdrawn your consent, or if you object and there are no overriding legitimate grounds for us to maintain the processing. If you have an account with us, in many instances you have the option to erase your account yourself, in which case all your personal information is permanently deleted.

**Restriction of processing.** You have the right to request that we restrict the processing of your personal information based on specific grounds. These are (1) the time for us to verify the accuracy of your personal information on your request; (2) instead of erasure of unlawful processing, you request restriction of use instead; (3) you need personal information in legal proceedings; or (4) we are verifying whether our legitimate grounds override your objection to the processing.

**Right to object.** You have the right to object at any time to our processing of your personal information if such processing is (1) based on our legitimate interest (including us making a profile of you based on your consent); (2) for direct marketing purposes; or (3) necessary for the performance of a task carried out in the public interest or exercise of official authority vested in us. We shall cease to process your personal information based on your objection, unless we demonstrate compelling legitimate grounds overriding your interests, rights and freedoms or if we need your personal information in legal proceedings.

**Data portability.** We are required to inform you of your right to receive your personal information from us so that you can transmit that personal information to another service provider. For KFS that means that at your request we shall supply you with your personal information related to your user account. It does not include any device data, including data that was transmitted to us in a log file.

**Consent withdrawal.** If you have supplied us with your personal information based on your consent, you have the right to withdraw such consent at any time. You may do so by unsubscribing from the service that you have subscribed to if applicable. You may also do so by sending us an email to [privacy@deu.kyocera.com](mailto:privacy@deu.kyocera.com). We shall then permanently remove your personal information from our database.

Lodging a complaint. You have the right to lodge a complaint with a supervisory authority, in particular in the country of your residence, about our processing of your personal information. You can find a complete list of supervisory authorities [here](#).

## EXERCISING YOUR RIGHTS AND CONTACTING US

At KYOCERA we have a network of privacy professionals available, including a Data Protection Officer, to assist you with your queries. If you wish to exercise any of your rights, or you have a question about this document, please contact us via email, or send us a letter to the address below:

KYOCERA Document Solutions Europe B.V.  
Attn.: Data Protection Office  
Bloemlaan 4  
2132 NP HOOFFDORP  
The Netherlands  
e-mail: [privacy@deu.kyocera.com](mailto:privacy@deu.kyocera.com)

Alternatively, you may contact your local privacy professional here.

Please note that in exercising your rights, we may ask you to complete a request form. We shall then inform you of the process of handling your request. Exercising your right is free of charge and we are determined to answer your request without undue delay.

## CHANGES TO THIS DOCUMENT

In the event that we modify this document, we will publish it on our website with a revised publication date and, if applicable, notify you of the changed document via your user account.

## OTHER KYOCERA PRIVACY STATEMENTS

In addition to this Privacy Statement, we have specific promotions, campaigns, services and privacy processes that are substituted, or supplemented by different privacy statements. We will notify you in these instances and make the applicable privacy statement available to you.