# CANON'S COMMITMENT TO ACCOUNTABILITY

**DATA PROTECTION AND PRIVACY** 

We demonstrate compliance through systematic documentation, while supporting our customers with their own accountability obligations.

### **CONTRACTUAL ARRANGEMENTS**



Canon requires that third parties, including vendors and partners who process personal data on behalf of Canon, are contractually bound to safeguard any personal data they receive from Canon. They are prohibited from using the personal data for any purpose other than to perform the services as instructed by Canon. Canon has implemented a risk based compliance assessment for suppliers handling Canon or Canon's customers' data.

#### INTER COMPANY ARRANGEMENTS



When acting as a data processor, a Canon company will not transfer to or permit another Canon company to act as a sub-processor or to have access to or process personal data unless that Canon company is a signatory to the appropriate Intercompany Data Processing Agreement.

## BREACH MANAGEMENT



Canon has processes to identify, report, manage, recover from, and resolve personal data breaches. Such processes are formally documented by Canon.



### **INTERNAL RECORDS**



Canon demonstrates accountability by maintaining comprehensive internal records of all personal data processing activities through systematic Privacy Impact Assessment (PIA)/ Data Protection Impact Assessment (DPIA) forms. Individual Rights Requests (IRR) are recorded and complied with, within the statutory timeframe.



### REGISTER OF PROCESSING ACTIVITIES

Canon maintains records of its processing activities, covering areas in accordance with the relevant privacy legislation in the countries in which we operate.