

PRIVACY GOVERNANCE

DATA PROTECTION AND PRIVACY



HOW THE CANON PRIVACY ACCOUNTABILITY FRAMEWORK HELPS US PROTECT YOUR PERSONAL DATA

The Canon Europa N.V. Group ('Canon EMEA' or the 'Group') spans Europe, the Middle East and Africa, and across this large region there are many different privacy laws that apply.

Canon has a comprehensive **Privacy Accountability Framework** that incorporates leading data protection principles and practices to help the Group, and those that we provide products and services to, deal with privacy considerations in a uniform and standardised way across all our markets and for the smooth operation of our business.

The Privacy Accountability Framework sets out Canon's approach to compliance with data protection and privacy legislation and our commitment towards securely handling personal data to help meet this commitment and our obligations under applicable data protection laws, including the EU General Data Protection Regulation ('GDPR').

The Canon Privacy Office and our network of Privacy Champions support customers, partners and more than 14,000 employees, located in more than 120 countries. Canon always strives to comply with relevant privacy legislation whilst continuously improving privacy compliance processes.

The Canon Privacy Accountability Framework is continuously monitored and updates are communicated to employees using appropriate channels and training provided where appropriate.

The Privacy Accountability Framework includes:

- Privacy Accountability Framework Policy
- Customer Data and Marketing Policy
- Breach Management Policy
- Data Processor Policy
- Individual Rights Policy
- Privacy Risk Management Guidelines
- Vendor Management Guidelines
- Privacy by Design Guidelines
- HR Data Guidelines
- Data Retention Standard
- Merger & Acquisition Guidelines



DATA PROTECTION AND PRIVACY AT CANON

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CANON GROUP CODE OF CONDUCT - PRIVACY AS PART OF CORPORATE ETHICS

Canon established the 'Canon Code of Conduct' in 1992 and later updated it as the **Canon Group Code of Conduct** in 2001. It clarifies the Group's management stance and standards that Group executives and employees must comply with in their roles.

A Compliance Card has been created in Japanese and more than 20 other languages, including English, French and German, and given out to Group executives and employees worldwide. Written on one side of the card is the San-ji (Three Selves) Spirit, which has been the guiding principle of the company since its founding, and on the other side is a compliance test that enables employees to conduct a daily self-evaluation.

We are also guided by the **Canon "San-Ji" spirit in handling the personal data of our customers, employees and partners.**

CANON "San-Ji" Spirit

Ji-hatsu (Self-Motivation)

Take the initiative and be proactive in everything you do

Ji-chi (Self-Management)

Conduct yourself responsibly and be accountable for all of your actions

Ji-kaku (Self-Awareness)

Understand the situation you find yourself in and your role in that situation

Our commitment under the "San-Ji" Spirit:

- We must observe and act in accordance with all applicable laws and rules.
- We must always conduct ourselves in a fair, honest and ethical manner.



Compliance Test

Would your actions

- violate any laws or rules?
- leave you feeling guilty?
- disappoint your family, friends or co-workers?
- embarrass you if reported publicly in the news?
- cause trouble for the community?
- harm the Canon Brand?

When in doubt, always consult your superior or the designated department.

SAN-JI

JI-CHI (SELF MANAGEMENT)

We conduct ourselves responsibly when processing the personal data of our customers, employees or partners and we demonstrate accountability for our actions.

JI-KAKU (SELF AWARENESS)

We strive to have a better understanding of stakeholder needs by always putting people at the heart of our decision making. This principle guides us when our actions could impact the privacy of the individuals we deal with.

JI-HATSU (SELF MOTIVATION)

We take the initiative to always consider privacy in everything we do. Privacy by Design helps us embed privacy in a proactive way.

For details please visit <https://global.canon/en/csr/management/risk.html>

