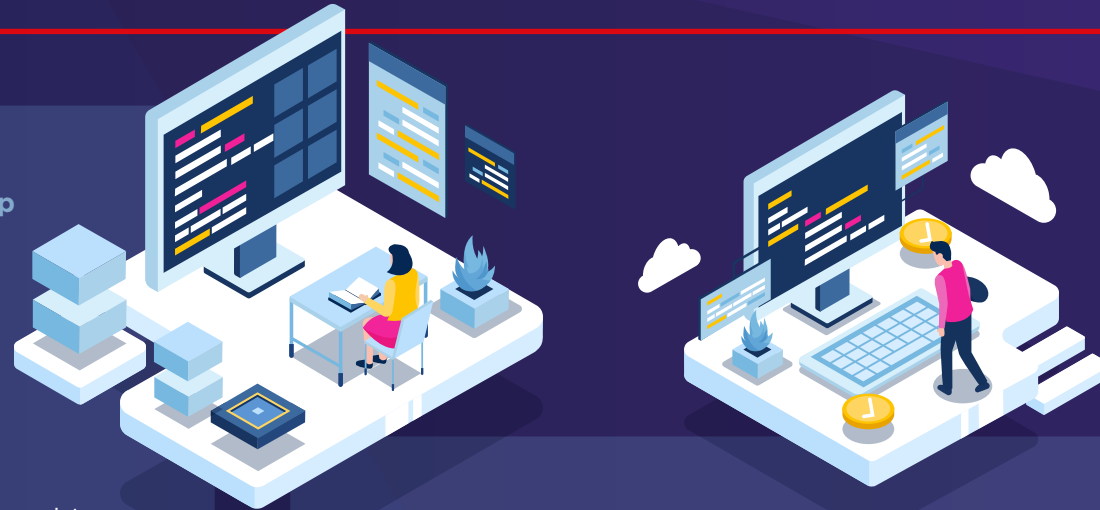


CANON'S COMMITMENT TO PRIVACY: TECHNICAL AND ORGANISATIONAL MEASURES (TOMS)

DATA PROTECTION AND PRIVACY

Canon

These technical and organisational measures help ensure Canon's compliance with data protection obligations.



ORGANISATIONAL MEASURES

POLICIES



Canon's Privacy Accountability Framework consists of a series of policy statements reflecting different aspects of data protection and privacy compliance.

GOVERNANCE



A comprehensive governance structure consisting of a network of DPOs and Privacy Champions, with clearly defined roles and responsibilities, is utilised to implement the Accountability Framework throughout EMEA.

RISK MANAGEMENT



A number of risk management approaches are utilised to mitigate risks to Personal Data including Privacy Impact Assessments, Data Protection Impact Assessments, Technical and Organisational Measures questionnaires, and comprehensive Vendor Due Diligence procedures.

CONFIDENTIALITY



Access to customer data is authorised only to the extent necessary to serve the applicable data processing purposes, and all staff with access to customer data are subject to confidentiality obligations.

EDUCATION AND AWARENESS



Education and awareness reinforce the Accountability Framework and all staff with access to, or responsibilities for, processing personal data are required to complete appropriate training through Canon's Development Hub.

VENDOR DUE DILIGENCE



Third Party companies undergo due diligence assessments and only process customer data in accordance with contractual arrangements.

CANON'S COMMITMENT TO PRIVACY: TECHNICAL AND ORGANISATIONAL MEASURES (TOMS)

DATA PROTECTION AND PRIVACY

Canon

ORGANISATIONAL MEASURES (CONT.)



CUSTODIANSHIP

Canon is committed to the safe handling of personal data that we process on behalf of our customers and we work closely with our partners to help ensure that privacy regulations are complied with.



TRANSFER OF DATA

Canon does not transfer data outside a particular jurisdiction without appropriate safeguards, for example Standard Contractual Clauses in the case of the EEA.



NOTICE AND TRANSPARENCY

Canon's Privacy notices reflect how the Group manages personal data. Transparency and trust are central principles when processing personal data.



PRIVACY BY DESIGN

Privacy is embedded in all products, solutions and services throughout the data lifecycle.



CODE OF CONDUCT

Canon adheres to Group Code of Conduct which states that the executive and employees of the Group shall strictly manage all forms of personal information and comply with all applicable laws and regulations and prescribed company procedures.



ACCOUNTABILITY

Canon demonstrates accountability by maintaining comprehensive internal records of all personal data processing activities, information rights requests, data breaches and risk assessment processes. We also support our customers with their own accountability obligations.



INCIDENT MANAGEMENT AND BUSINESS CONTINUITY

Canon has processes to identify, report, manage, recover from, and resolve personal data breaches.

CANON'S COMMITMENT TO PRIVACY: TECHNICAL AND ORGANISATIONAL MEASURES (TOMS)

DATA PROTECTION AND PRIVACY

Canon

TECHNICAL MEASURES



CERTIFICATION

Where appropriate for the particular product/solution/service Canon maintains relevant certifications such as ISO/IEC 27001.



DE-IDENTIFICATION AND DELETION

De-identification techniques are embedded within our products and solutions and may include anonymisation and pseudonymisation and deletion without damage to referential integrity.



DOCUMENT SECURITY

Canon protects personal data in transit and in production and non-production environments through appropriate cryptographic controls. Where appropriate, configurations are 'hardened' to ensure device security.

ACCESS POLICY



Access control policies and processes, based on business and information security requirements, have been formally documented and implemented, and periodically reviewed. These policies and processes address privileged user access and home/mobile working arrangements.



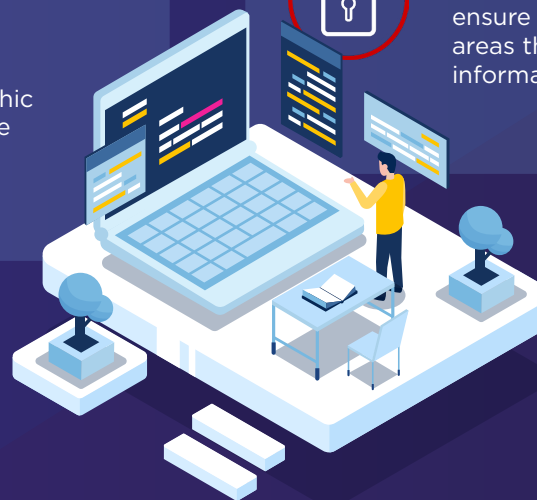
USER ACCESS CONTROL

Logical access controls have been implemented. Unique user accounts are only assigned to authorised individuals and managed to provide the minimum access to information. Password controls are enforced.



PHYSICAL SECURITY

Secure areas are protected by appropriate entry controls to ensure that only authorised personnel are allowed access to areas that contain sensitive or critical business information and information processing facilities.



CANON'S COMMITMENT TO PRIVACY: TECHNICAL AND ORGANISATIONAL MEASURES (TOMS)

DATA PROTECTION AND PRIVACY

Canon

TECHNICAL MEASURES (CONT.)



SEGREGATED ENVIRONMENT

Where a solution is hosted, logical client separation is enforced.



REMOVABLE MEDIA

Controls have been established to manage the use of removable media in order to prevent unauthorised disclosure, modification, removal or destruction of personal data stored on it.



SECURE DISPOSAL OR RE-USE OF EQUIPMENT



There are secure disposal processes in place for all media, and all items of equipment containing storage media are verified to ensure that any personal data has been removed or securely overwritten to an appropriate standard prior to disposal or re-use.



ACTIVITY LOG

The solution or service can store activity logs (for example logging of user and administrator access; and entering, changing and deleting data).



MONITORING

User and system activity are monitored to identify and help prevent data breaches.



AVAILABILITY

Controls are in place to ensure reliability of service and low incidence of outage.



HARDWARE AND SOFTWARE INTEGRATION

Canon-owned document solutions like uniFLOW and IRIS allow us to more readily adapt to emerging security needs and reduce the potential for system violations.