



Canon EMEA Speak-Up Privacy Notice

This Privacy Notice has been created to provide visibility on how personal data will be processed through Canon EMEA Speak-Up Framework (including EMEA group-wide central Speak-Up process and all local Speak-Up processes of Canon EMEA group companies). More specifically, this Notice provides information on the collection, processing, and use of personal data as part of the Canon EMEA Speak-Up Framework. It applies to Speak-Up processes across all Canon EMEA Group companies, unless a local Privacy Notice is provided to supplement the local Speak-Up Policy of the relevant Canon EMEA Group company. This Privacy Notice is based on the requirements of data protection legislation within the EMEA region to ensure a high level of privacy protection and is applicable in all jurisdictions in which Canon EMEA organisations operate in.

1. Who are we?

In this Privacy Notice, "Canon", referred to as "we", "us", "our" or "Canon", shall mean Canon Europa N.V. (CENV) and companies owned by CENV, directly or indirectly, with more than 50% ownership.

Canon is the Data Controller of your personal data shared with us. This means Canon is the entity that determines the purposes, and means, of the processing of your personal data through the Speak-Up process.

Personal Data is collected through the Speak-Up process when a report is submitted via online Canon EMEA Speak-Up system (EthicsPoint), by e-mail, letter or other channels specified in the Canon EMEA Speak-Up Policy or local Speak-Up policies of the relevant companies.

Navex Global Inc is a Data Processor on behalf of Canon Europa N.V. (CENV). Navex Global's storage of personal data on behalf of Canon is subject to contractual obligations that require Navex Global to implement appropriate security measures to safeguard the personal data of data subjects, and to process personal data received through EthicsPoint only as instructed by Canon. EthicsPoint is a third-party incident reporting platform operated by Navex Global Inc. As one of the secure reporting channels available under the Speak-Up Framework, concerns may be reported through the EthicsPoint online platform.

Canon is the sole decision-maker on how and when personal data is processed through EthicsPoint and as such remains the Data Controller.

Please contact Canon with any questions or comments about this Privacy Notice at either your regional Canon Office, which can be found on our website's Contact Us page, or directly to our EMEA DPO on DataProtectionOfficer@Canon-Europe.com.

2. What data do we collect?

The information you supply about yourself, your colleagues, or any aspect of the company's operations may result in data processing through a Speak-Up investigation. Therefore, we ask that you only provide information that is necessary to demonstrate your belief or suspicion that a wrongdoing has occurred.

We collect the following personal data and information as and when a report is voluntarily submitted using a Speak-Up reporting channel:

- The name and contact details of the reporter, if disclosed.
- Relationship or affiliation with Canon, (employment or otherwise), if disclosed.
- The names and other personal data (e.g., role title and/or contact details) of any persons that are mentioned as part of the report.
- A description of the alleged misconduct as well as circumstances of the incident.

3. What is the purpose of collecting your personal data?

Canon will only process personal data through the Speak-Up process where there is a legal basis for doing so and in such instances as outlined in this Privacy Notice.

We collect and use personal data received through the Speak-Up process for several reasons linked to our regulatory obligations and our legitimate interests.

The legal basis for processing the Personal Data:

- Legal Obligation - In fulfilment of our legal obligations to receive and manage reports of misconduct as part of our Speak-Up Framework.
- Legitimate Interest - In the legitimate interests of Canon or third parties (such as existing or potential business partners, suppliers, customers, or end-customers) to prevent misconduct (for example, fraud, bribery and corruption, and breaches in labour standards) and unethical behaviours by and towards colleagues that do not align with our values (such as discrimination, bullying and harassment).

4. Who has access to your personal data?

All personal data provided through the Speak-Up process will be treated confidentially subject to any disclosure that is necessary to carry out the investigation or subject to any legal requirement for compulsory disclosure, (excluding legally privileged documents where there is an existing legal right to refuse disclosure), in which case the information provided will continue to be handled sensitively.

For the purpose of processing and investigating reports and subject to the provisions of local law, the personal data provided through the Speak-Up process may be accessed, processed and used by the relevant Speak-Up personnel of your local Canon organisation, including Human Resources, Finance, Internal Audit, Legal, Corporate Compliance, management, external legal advisors and/or external investigators.

Personal data and information provided may also be disclosed to the police and/or other enforcement or regulatory authorities. The relevant bodies that receive and process personal data

may be located in other countries that may not provide an adequate level of protection. Please see section 6 for further details.

5. How long is your personal data stored?

Personal data will be kept as long as necessary to process the report, or, if applicable, as long as necessary to initiate sanctions or to meet legal or financial requirements. Thereafter, the data will be stored for the legal retention period applicable.

6. The Transfer of Personal Data

Canon operates internationally and has locations in various countries. When processing a Speak-Up report, personal data may need to be transferred across borders in instances where, for example:

- a) Due to their relevance and proximity to the investigation, persons located abroad must be informed of the progress and/or outcome of the investigation; or
- b) Individuals operating abroad have been assigned to process or investigate the report; or
- c) There is a legal obligation to inform local authorities abroad.

Data transfers to countries that offer a lower standard of legal protection for your personal information will be made using appropriate safeguards and mechanisms such as, for example, Standard Contractual Clauses.

The personal data and information provided via EthicsPoint will be stored in a database which is located on servers hosted and operated by NAVEX Global in the European Union. NAVEX Global is committed to maintaining stringent privacy and security practices.

7. What are your data protection rights?

Canon is committed to being transparent about how it collects and uses your personal data and to meeting our data protection obligations. Under the various Data Protection Legislations within the EMEA region, you have the right to access, correct/ update, restrict, object, have a machine-readable copy of your personal information transmitted to another controller, delete your personal information, as well as any other right applicable in your jurisdiction.

Any request to exercise these rights will be assessed by us on a case-by-case basis to ensure legal compliance for such requests.

Individuals named in the Speak-Up report will be promptly notified except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information. With some exceptions, the subject of the report may request access to information concerning the report (with the exception of the identity of the reporter) and request correction of personal data that is inaccurate or incomplete in accordance with applicable law.

If you wish to exercise any of the above rights, please do so via the form that can be found on our website here: https://www.canon.co.uk/privacy/#id_2188184 or directly to our EMEA DPO on DataProtectionOfficer@Canon-Europe.com.

8. Updates to this Privacy Notice

We reserve the right to update this privacy notice at any time without prior notice or announcement. Please refer often to this page for the latest information and effective date of updates.

Last updated: 1st October 2024