



KONICA MINOLTA

# GLOBAL PERSONAL DATA PROTECTION POLICY

26 September 2017

**YOU**

WANT A PARTNER  
WHO ADAPTS TO YOUR  
BUSINESS NEEDS



**WE**

ARE INVENTING  
TODAY WHAT YOU  
NEED TOMORROW



## 1. INTRODUCTION

As a growing global company engaged in various business areas, We, Konica Minolta Group recognise that the confidence of our customers, business partners, officers and employees is our most valuable asset. Konica Minolta Group also recognises that we are, not only to provide the best products and services, but also to meet the highest standards regarding compliance and social responsibility.

Konica Minolta Group is committed to respect the privacy of our customers, business partners, officers and employees and to protect the personal data of our customers, business partners, officers and employees.

## 2. SCOPE AND APPLICABILITY OF THIS POLICY

This policy applies to Konica Minolta, Inc. (“Konica Minolta”) and all of its affiliated companies (“Group Companies”) and our officers and employees. “Affiliated” in this instance means, that Konica Minolta may enforce the adoption of this Policy directly or indirectly, on the basis of voting majority, majority management representation or by agreement. Konica Minolta and Group Companies (“Konica Minolta Group”) establish and enforce internal rules such as regulations and procedures in accordance with this Policy.

This Policy sets forth the basic principles of Konica Minolta Group’s data protection and data security standards and ensures compliance with national and international data protection laws in force all over the world. It therefore comprises the internationally accepted data protection principles, intending not to replace, but to supplement the respective national data protection and privacy laws (“National Legislation”). This means, that the content of this Policy has to be observed in the absence of a corresponding National Legislation or if a National Legislation provides lower requirements than this Policy. On the other hand, a National Legislation always takes precedence in case of a conflict with this Policy or if the National Legislation provides stricter requirements than this Policy.

This Policy extends to all processing of personal data. In countries where the data of legal entities are protected to the same extent as personal data, this Policy applies equally to data of legal entities. Anonymised data, e.g. for statistical evaluations or studies, is not subject to this Policy.

## 3. KONICA MINOLTA GROUP’S PRINCIPLES FOR PROCESSING OF PERSONAL DATA

### 3.1 Lawfulness, fairness and transparency

Personal data will be collected and processed in a lawful, fair and transparent manner to protect the individual rights of the data subjects.

### 3.2 Restriction to a specific purpose

Personal data will only be collected for specified explicit and legitimate purposes and will not be processed in a manner incompatible with those purposes.

### 3.3 Data accuracy/Data actuality

Personal data will be accurate and where necessary kept up to date. Konica Minolta Group will take every reasonable step to erase or rectify inaccuracies without delay.



### **3.4 Data economy/Data minimisation**

Personal data will be adequate, relevant and limited to what is necessary. Personal data will not be stored longer than necessary.

### **3.5 Rights of data subjects**

Konica Minolta Group respects the rights of all data subjects including rights of access to their data, the right of restriction of processing or erasure, and the right of accuracy. Konica Minolta Group will provide clear and unambiguous information about how and why subjects' data are collected and processed.

### **3.6 Erasure**

Time limits for storage of personal data will be defined. Konica Minolta Group erases personal data that is no longer necessary in relation to the purposes for which it has been collected or in a case a given consent is withdrawn and no other legitimate purpose for processing applies.

### **3.7 Security of processing/Data security**

Personal data will be processed securely. Measures appropriate to the technical and organisational risk will be taken against unauthorised processing or alteration, and against loss or destruction or unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed. Konica Minolta Group will ensure ongoing integrity, availability, confidentiality and authenticity. Konica Minolta Group will ensure resilience of our systems and services processing personal data. In the event of an incident Konica Minolta Group will have the ability to restore the availability and access to data in a timely manner.

### **3.8 Data protection by design and by default**

Konica Minolta Group will implement appropriate technical and organisational measures for ensuring that, by default, only personal data that is necessary for each specific purpose of the processing is processed. The principle of Data Protection by design and by default will be followed during the development of new products.

### **3.9 Accountability**

There shall be accountability in all processing activities. Konica Minolta Group is responsible for and able to demonstrate compliance.

## **4. KONICA MINOLTA GROUP'S DATA PROTECTION ORGANISATION**

Each Konica Minolta Group company shall appoint a qualified person, who is responsible for the implementation and observance of the aforementioned principles.

The latest version of this Policy can be accessed at Konica Minolta's website [www.konicaminolta.co.uk](http://www.konicaminolta.co.uk)