



KONICA MINOLTA

Privacy Policy (15.06.2023)

With the following information we would like to inform you about the processing of your personal data by us and your rights resulting from the data protection laws and especially from the general data protection regulation (regulation (EU) 2016/679 – "GDPR").

1 Controller and data protection officer

Controller in accordance with Art. 4 VII GDPR is:

Data processing will take place through Konica Minolta's Customers, which generally is your employer. The information on the Controller will be given by the company responsible for giving access to bizVIEW.

You can get further information on the contacts stated below. For clarification: Konica Minolta is considered a Processor (acc. Article 28 GDPR), the processing between the Controller and Konica Minolta on the use of the portal is covered by internal contracts on data protection between the Controller and Konica Minolta.

You may also contact Konica Minolta's data protection officer if you have any questions relating to the topic of data privacy:

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2 What are my rights as a data subject?

As a data subject, you have the following rights. To exert any of your rights, the easiest way is to send an e-mail to your employers contact address for data protection purposes, as you were informed by your employer.

2.1 Right of access (Art. 15 GDPR): You have the right to be informed at any time of the categories of personal data processed, the purposes of processing, any recipients or categories of recipients of your personal data and the planned storage period.

2.2 Right of rectification (Art. 16 GDPR): You have the right to request the rectification or completion of personal data concerning you that is incorrect or incomplete.

2.3 Right to erasure („right to be forgotten“) (Art. 17 GDPR): You have the right to request the immediate erasure of your personal data. In particular, we are obliged as the controller to delete your data in the following cases:

- Your personal data is no longer needed for the purposes for which it was collected.
- A processing of your personal data took place solely on the basis of your consent, which you have now withdrawn, and there is no other legal basis that legitimises a processing of your personal data.
- You have objected to a processing which is based on the legitimate or public interest and we cannot prove that there are legitimate grounds for processing.
- Your personal data has been processed unlawfully.
- The erasure of your personal data is necessary in order to comply with a legal obligation to which we are subject.
- Your personal data has been collected in connection with information society services offered in accordance with Art. 8 I GDPR.

Please be aware that the right to erasure is subject to a limitation in the following cases, so that a deletion is excluded:

- Your personal data is used to exercise the right to freedom of expression and information.
- Your personal data serves to fulfil a legal obligation to which we are subject.
- Your personal data is used to carry out a task that is in the public interest or in the exercise of official authority that has been assigned to us.
- Your personal data serves the public interest in the field of public health.
- Your personal data are necessary for archiving purposes in the public interest, for scientific or historical research or for statistical purposes.
- Your personal data serve for us to establish, exercise or defend legal claims.



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2.4 Right of restriction of processing (Art. 18 GDPR): You also have the right to request that the processing of your personal data be restricted; in such a case, your personal data will be excluded from any processing. This right applies if:

- You contest the accuracy of your personal data and we have to verify the accuracy of your personal data.
- The processing of your personal data is unlawful and instead of erasing your personal data, you request a restriction of processing.
- We no longer need your personal data for the fulfilment of the specific purposes, but you still need this personal data to establish, exercise or defend legal claims.
- You object to the processing of your personal data and it has not yet been determined whether your or our legitimate reasons override this.

2.5 Right of data portability (Art. 20 GDPR): You have the right to receive the personal data concerning you that you have provided to us as a controller in a structured, common and machine-readable format and to transfer it to another controller. Furthermore, you also have the right to request that your personal data be transferred from us to another controller, insofar as this is technically feasible.

The requirements for the applicability of data portability are:

- Your personal data is automatically processed based on your consent or a contract.
- Your personal data does not serve to fulfil a legal obligation to which we are subject.
- Your personal data will not be used to perform a task that is in the public interest.
- Your personal data do not serve for the performance of a task which is performed in the exercise of an official authority delegated to us.
- The exercise of your right shall not interfere with the rights and freedoms of others.

2.6 Right to object (Art. 21 GDPR): You have the right at any time to object to the processing of your personal data on grounds arising from your particular situation. This also applies to profiling. The requirement for this is that the processing is based on a legitimate interest on our part (Art. 6 I 1 lit. f GDPR) or the public interest (Art. 6 I 1 lit. e GDPR).

Furthermore, you may also at any time object to the processing of your personal data for the purposes of direct marketing or profiling linked to such direct marketing.

Should you object to the processing of your personal data based on a legitimate interest, we will check in each individual case whether we can show grounds worthy of protection that override your interests and rights and freedoms. In the event that there are no reasons worthy of protection on our part or your interests as well as rights and freedoms override our own, your personal data will no longer be processed. An exception is made if your personal data is still used for the establishment, exercise or defence of legal claims.



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If you object to the processing of your personal data for the purposes of direct marketing or profiling, insofar as this is linked to such direct marketing, your personal data will no longer be processed for these purposes.

2.7 Right to lodge a complaint with the supervisory authority (Art. 77 GDPR): You also have the right to lodge a complaint with a supervisory authority at any time, in particular with a supervisory authority in the Member State of your residence, place of work or place of suspected infringement, if you consider that the processing of personal data concerning you is in breach of the data protection regulations.

2.8 Right of withdrawal (Art. 7 GDPR): If you have given us consent to process your personal data, you can withdraw this consent at any time without giving reasons and in an informal manner. Withdrawal of consent does not affect the lawfulness of the processing that has taken place on the basis of the consent up to the point of withdrawal.

3 General information regarding the topic „purposes“

As a matter of principle, the processing of your personal data by us is always linked to a specified, explicit and legitimate purpose, which has already been defined before the processing activity is commenced, in accordance with the principle of purpose limitation under Art. 5 I lit. b GDPR. In the further course of this privacy policy, when a processing activity is cited, a description of the specific purpose is also included.

4 General information regarding the topic „legal bases“

We process your personal data in accordance with the GDPR. Accordingly, the processing of your personal data is always founded on a legal basis. Article 6 of the GDPR defines legal bases for the processing of personal data.

4.1 Legal bases for the processing of personal data

Consent

If we obtain your consent for the processing of your personal data, the processing will be carried out on the legal basis of Art. 6 I 1 lit. a GDPR. The following example serves to clarify this legal basis: You receive advertising from us by electronic mail and/or telephone and have given your prior consent.

Contract or pre-contractual measure



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If the processing of your personal data is necessary for the fulfilment of a contract with you or for the implementation of pre-contractual measures taken in response to your request, the legal basis on which the processing of your personal data is based is Art. 6 I 1 lit. b GDPR.

Legal obligation

In cases where the processing of your personal data is necessary to comply with a legal obligation to which we are subject, this processing is based on Art. 6 I 1 lit. c GDPR.

Vital interest

Should the processing of your personal data be necessary to protect your vital interests or those of another person, this processing is carried out in accordance with Art. 6 I 1 lit. d GDPR.

Public interest

In cases where we process your personal data in order to perform a task which is in the public interest or in the exercise of official authority delegated to us, Art. 6 I 1 lit. e GDPR constitutes the legal basis.

Legitimate interest

If the processing of personal data is necessary to safeguard a legitimate interest of our company or a third party and at the same time the interests, basic rights and fundamental freedoms of the data subject, which require the protection of personal data, do not override our legitimate interest, Art. 6 I 1 lit. f GDPR serves as the legal basis for the processing.

4.2 Legal bases for the processing of special categories of personal data

If, in extraordinary cases, we need to process special categories of personal data, such as

- data on racial or ethnic origin (e.g. skin color or special languages),
- data on political opinions (e.g. party memberships),
- data on religious or philosophical beliefs (e.g. membership of a sect),
- data on trade union membership,
- genetic data,
- biometric data (e.g. fingerprints or photographs),
- health data (e.g. identification numbers for disabilities),
- or data concerning the sex life or sexual orientation

by you, this processing is based on one of the following legal bases, which are de-fined in Article 9 GDPR:

Explicit consent



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If you have given us your explicit consent for the processing of the above categories of personal data, this constitutes the legal basis for the processing in accordance with Art. 9 II lit. a GDPR.

Performing duties under social security/protection and employment law

If the processing of special categories of personal data relating to you is necessary in order to comply with a legal obligation arising from social security/protection or employment law, the legal basis for this processing is Art. 9 II lit. b GDPR.

Protection of vital interests

If the processing of special categories of personal data relating to you should be necessary to protect your vital interests or those of another person, such processing is carried out pursuant to Art. 9 II lit. c GDPR.

Manifestly public data

Insofar as special categories of personal data of yours are processed, which have previously been made public by yourself, the processing of these data is based on Art. 9 II lit. e GDPR.

Establishment / Exercise / Defence of legal claims

Insofar as the processing of the special categories of personal data relating to you serves us to establish, exercise or defend legal claims, Art. 9 II lit. f GDPR constitutes the legal basis for the processing.

Substantial public interest

In the case of the processing of special categories of personal data concerning you in order to safeguard a substantial public interest arising from EU or national law, the processing is based on Art. 9 II lit. g GDPR.

Assessment of the person's work capacity or other medical purposes such as health care

If the processing of special categories of personal data relating to you arises from a law of the EU or a Member State or a contract concluded with a member of a health profession and is carried out for the purposes of preventive health care, occupational medicine, assessment of an employee's work capacity, medical diagnosis, care or treatment in the health or social field or the management of systems and services in the health or social field, this processing is based on Art. 9 II lit. h GDPR.

Public interest in the area of public health

If the processing of special categories of personal data of yours should be necessary for public health reasons, including protection against cross-border health threats such as pandemics, this processing is carried out on the legal basis of Art. 9 II lit. i GDPR.



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Archival purposes, scientific / historical research purposes, statistical purposes

Should the processing of special categories of personal data relating to you arise from a right of the EU or a member state, which stipulates processing for archiving, scientific or historical research or statistical purposes in the public interest, this processing is based on Art. 9 II lit. j GDPR.

5 General information regarding the topic „obligation to preserve records and time limits of erasure“

Unless otherwise stated, we delete personal data in accordance with Art. 17 GDPR or restrict its processing in accordance with Art. 18 GDPR. Apart from the retention periods stated in this privacy policy, we process and store your personal data only as long as the data are necessary for the fulfilment of our contractual and legal obligations. Personal data that are no longer required after the purpose has been fulfilled will be regularly deleted, unless further processing is required for a limited period of time, which may result from other legally permissible purposes. In order to fulfil documentation obligations as well as to comply with statutory obligations to preserve records in Germany, the necessary documents are kept for six years in accordance with § 257 I Commercial Code (HGB) and for ten years in accordance with § 147 I of the Fiscal Code of Germany (AO).

6 General information regarding the topic „disclosure of personal data“

Recipient of your data

We do not sell or rent user data in principle. A transfer to third parties beyond the scope described in this privacy policy will only take place if this is necessary for the processing of the respective requested service. For this purpose, we work together with service providers in the areas of marketing, sales, IT, logistics and human resources, among others. We select these service providers extremely carefully. In other cases we transfer data to requesting governmental authorities. However, this only takes place if there is a legal obligation to do so, for example if a court order exists.

Locations of the processing of your personal data

In principle, we process your data in Germany and in other European countries (EU/EEA). If your data is processed in countries outside the European Union or the European Economic Area (i.e. in so-called third countries), this will only take place if you have expressly consented



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to it, if it is stipulated by law or if it is necessary for our service provision to you. If, in these exceptional cases, we process data in third countries, this will be done by ensuring that certain measures are taken (i.e. on the basis of an adequacy decision by the EU Commission or by presenting suitable guarantees in accordance with Art. 44ff. GDPR).

7 In the context of which processing activities are my personal data processed?

7.1 Processing activity – Usage of the bizVIEW portal

When using bizVIEW portal, the following information is processed:

- Your name
- Company E-mail address
- Company Name
- Company Address (Street, PostCode, City, Country)
- IP address
- Information supplied during the use of bizVIEW
- Information added by a user on behalf of Konica Minolta's customer in the columns: "User Defined Fields 1–6" (within sole responsibility of Konica Minolta's customer)

How will your information be used?

The Controller uses your information above for the following purposes:

- a) performance of the contract to supply the services of bizVIEW
- b) identification;
- c) answer to inquiry;
- d) processing of an order;
- e) license management;
- f) updating firmware/software;
- g) sharing patch of bug fix;
- h) important security announcement;
- i) sending information on
 - I. items d) and e) above;
 - II. release of new application;
 - III. release of upgrade for my application;



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- j) furthermore, anonymized statistics of a user's use of bizVIEW will be produced to help ensure the user experience and quality of the product. This includes information about the browser you use and the settings you have configured in the operating system you use, as well as information about the Internet connection with which you access the bizVIEW website.

Explanations of the product range:

You will receive information from the following areas:

- Global Dashboard: graphical performance data for the entire fleet
- Inventory Data: Key inventory-related data help track individual output devices regardless of where in the world they are situated
- Volume Data: Individual output inventory volume data are the most significant indicators of effective machine deployment – but also a key indicator of potential print policy breaches
- Invoice Data: Both historical and near real-time invoice data are available
- Product Basket: Overview of portfolio based on contracted frame agreement
- Order status and history: Overview of placed orders via bizVIEW, as well as orders placed via other channels

What is the legal basis for processing your personal data?

- For purposes of item a) to i) I., the performance of the contract is legal basis for processing (Article 6 para. 1 subpara. 2 letter b).
- For purposes of items i) II. to III. and j) above, legitimate interest is legal basis for processing (Article 6 para. 1 subpara. 2 letter f).

Storage period

The Controller will process personal data during the duration of your membership of “bizVIEW”, therefore the Controller will process the personal data until your personal account is deleted or your company terminates the contract. The data collected by the Controller may also be transferred to external auditors and/or tax consultants for purposes of auditing and consulting. The data collected by the Controller for the purpose of contractual performance will remain stored in its operating systems as long as any warranty claims or other purposes under these data privacy guidelines continue to exist. Thereafter, data subject to retention will be archived and deleted upon expiry of the respective retention periods. All other data will be deleted immediately, unless further



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purposes exist pursuant to these data privacy guidelines. The legal bases for this data processing are Art. 6 para. 1, sentence 1, letter b GDPR with respect to warranty claims and Art. 6 para. 1, sentence 1, letter c GDPR with respect to compliance with legal obligations.

7.2 Processing activity – Usercentrics

On our portal we use the Usercentrics Consent Management Platform. This is a consent management tool based on JavaScript. With the help of this tool, we can give the visitor of our portal both an overview of the essential software solutions used and the possibility to decide on the use of any other software solutions that require prior consent. Furthermore, the platform offers the visitor the possibility to withdraw any given consent at any time without giving reasons and thus to prevent the future processing of personal data by the respective software solution. Furthermore, with the help of the platform, we can meet the requirement resulting from the GDPR for consent management, which provides, among other things, the possibility to prove that consents have been given or not.

In the context of the use of the Usercentrics Consent Management Platform, the following data may be processed, among other things:

- Consent data
 - Consent –ID
 - Consent status (Opt-in, Opt-out)
 - Consent timestamp
- Language of the consent banner
- Version of the banner template
- Device data (http Agent, http Referrer)

The use of the Usercentrics Consent Management Platform and the associated processing of personal data serves to fulfill legal obligations within the meaning of Art. 6 I 1 lit. c GDPR. Thus, the use of the platform is necessary both to comply with the obligation to provide documentary evidence within the meaning of Art. 5 II GDPR and the legal obligation resulting from the judgment "ECLI:EU:C:2019:801" of the European Court of Justice and the related judgment "I ZR 7/16" of the German Federal Court of Justice, according to which § 15 III 1 of the German Telemedia Act (TMG) is to be interpreted with regard to Art. 5 III 1 of Directive 2020/58/EC in such a way that the service provider may only use cookies to create usage profiles for the purposes of advertising or market research with the consent of the user.

Deletion of your personal data in connection with the use of the Usercentrics Consent Management Platform will take place as soon as it is no longer required to fulfill the purpose.



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In case of withdrawal of consent, we retain the information regarding the withdrawal for three years. The retention results on the one hand from the accountability according to Art. 5 II GDPR. The period of this limitation begins according to § 199 BGB with the end of the year in which the claim arose. Thus, the statute of limitations begins at the end of December 31 of the year in which the withdrawal occurred and ends three years later on December 31 at 00:00.

8 Konica Minolta Global Policy

To the [Global Personal Data Protection | KONICA MINOLTA](#)