



## Privacy Policy (7<sup>th</sup> October 2021)

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").

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## 1 Controller and data protection officer

**Controller in accordance with Art. 4 VII GDPR is:**

Konica Minolta Business Solutions Europe GmbH

Europaallee 17, 30855 Langenhagen

Tel.: +49 (0)511 7404-0

Email: [info@konicaminolta.eu](mailto:info@konicaminolta.eu)

(See our [Imprint](#))

**If you have any questions concerning data protection, you are welcome to contact our company data protection officer:**

**Dr. Frederike Rehker**

Konica Minolta Business Solutions Europe GmbH

Europaallee 17, 30855 Langenhagen

Tel.: +49 (0)511 7404-0

Email: [dataprotection@konicaminolta.eu](mailto:dataprotection@konicaminolta.eu)



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## 2 What are my rights as a data subject?

As a data subject, you have the following rights:

**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- A processing of your personal data took place solely on the basis of your consent, which you have now withdrawn, and there is no other legal basis that legitimises a processing of your personal data.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.

The address of the supervisory authority responsible for our company is:

Barbara Thiel  
Die Landesbeauftragte für den Datenschutz Niedersachsen  
Prinzenstraße 5  
30159 Hannover  
Telefon 0511-120 4500  
Fax 0511-120 4599  
[poststelle@ldf.niedersachsen.de](mailto:poststelle@ldf.niedersachsen.de)

**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.



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#### **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**

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,



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- 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**

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





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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.

**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



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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, in other European countries (EU/EEA) and additionally in the United Kingdom. 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 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 Cookies

### 7.1 General information regarding the topic „cookies“

We use cookies on our website. Cookies are small text files that are stored on your hard drive in accordance with the browser you are using and through which certain information flows to the website that sets the cookie. Many of the cookies we use are deleted after the browser session ends (so-called session cookies). Other cookies remain on your end device and enable us to recognize your browser on your next visit (persistent cookies).

Cookies are used on our website for various purposes. For a better overview, each cookie has been assigned to one of the following categories:

#### **Technically necessary**

Cookies that belong to this category are necessary to ensure the core functionality and/or security of this website.

#### **Functionality**

Cookies of this category are used to increase user comfort e.g. by storing preferences such as language settings, text size adjustments, user names or local settings.

#### **Marketing**

These cookies are used by advertisers to serve ads that are relevant to their prospects.



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### Performance and analysis

This type of cookie is used to help us analyze website usage in order to measure and improve performance.

In the settings of the browser you use, you have the option of rejecting the acceptance of cookies or, for example, to limit this rejection to cookies from other parties, so-called third-party cookies. However, the browser settings you have made may mean that you may not be able to use all the functions of our website to their full extent.

Here you will find further information on the administration of cookies for corresponding browsers:

- [Internet Explorer](#)
- [Google Chrome](#)
- [Firefox](#)

### 7.2 Cookie overview

[Download our cookie overview here.](#)

## 8 Central administration tool – Google Tag Manager

On our website we use the Google Tag Manager, by the Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. With the help of the Tag Manager, we can integrate and manage any software solution, such as Google Analytics, centrally on our website via corresponding code sections – also called tags. These code sections also serve to collect data about your browser, your website visits or to set cookies. However, the Google Tag Manager is only a domain that neither sets cookies nor processes personal data. A processing of your personal data takes place exclusively through the solutions integrated via the code sections, such as Google Analytics itself.

Further information on the processing of your personal data within the framework of the individual solutions used can be found in the separate sections of the individual solutions in the following.



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

### 9.1 Processing activity – visiting of our website

Insofar as you use our website solely for informational purposes, i.e. if you do not register or otherwise transmit information to us, we only collect the personal data that your personal browser transmits to our server. This data is technically necessary so that the website can be displayed to you. Furthermore, this data is technically necessary to ensure the stability and security of our website. The legal basis for the processing of your personal data in this case is Art. 6 I lit. f GDPR; the legitimate interest in this case is the provision and optimal presentation of this website as well as the protection of this against external attacks and their traceability. We delete this personal data after the end of the usage process, unless we need it for purposes of abuse detection and abuse traceability; in such a case, we retain this data for up to a maximum of 30 days.

When visiting our website, the following personal data may thus be processed, which is automatically transmitted by your browser to our servers and stored there in the form of so-called "log files":

- IP address of the terminal device used to access the website
- Date, time and duration of the request
- Country of origin of the request
- Content of the request (specific page / file)
- Access status/http status code (e.g. "200 OK")
- Internet address of the website from which the request to access our website was made
- Browser and installed add-ons (e.g. Flash Player)
- Operating system and interface
- Language and version of the browser software
- Amount of data transferred in each case
- Time zone difference to Greenwich Mean Time (GMT)

We can only provide some of the services offered on our website if we are able to contact you. In this respect, the possibility of using these services depends on you providing us with certain personal (contact) data. We collect, use and process this personal data only to the extent necessary to provide you with the respective service. If you contact us by e-mail or via a contact



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form, the personal data you provide in each case (your e-mail address and other information you provide voluntarily, such as your name/telephone number) will be stored by us in order to process your request and, if necessary, answer your questions.

Here, the legal basis for the processing of your personal data is Art. 6 I 1 lit. f GDPR; the legitimate interest is to answer your request. After a final response to your request, we delete your request and the information on the processing with a period of three years after the end of the respective calendar year.

### 9.2 Processing activity – Birlasoft / Microsoft Azure

Our website is managed by Birlasoft (UK) Limited, 53–54 Grosvenor St, London W1K 3HU (hereinafter: Birlasoft) and hosted in the Microsoft Azure cloud, on servers of the external service provider Microsoft.

Thus, your personal data collected on this website is stored on the designated web servers of Microsoft Azure in the Netherlands. This data may be, for example, your IP address, meta and communication data or data from a contact form.

Birlasoft provides the software maintenance and infrastructure management support. The legal basis for the use of Birlasoft as a hosting provider of our website is our legitimate interest pursuant to Art. 6 I 1 lit. f GDPR. Our legitimate interest here is to ensure the operation and security of our website.

Due to the storage of your personal data on Microsoft Azure web servers, in exceptional circumstances, due to Microsoft's headquarters, your personal data may be transferred to the United States of America and thus be transferred to a so-called third country.

The processing of your personal data outside the EU/EEA will be based on your consent according to Art. 49 I lit. a GDPR. In the USA no guarantees for an adequate data protection level are in place. As a result, the processing of personal data is affected by additional risks to the rights and freedoms of data subjects. Rights of data subjects might, in the worst case, not be able to be exercised. Information on your right of withdrawal can be found under point 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.

### 9.3 Processing activity – Content Management System / Drupal

For our website we use the Content-Management-System (short: CMS) called Drupal. Drupal is operated by Drupal Association, 3439 NE Sandy Blvd #269, Portland, OR 97232, United States of America. Drupal is a free and open-source web content management framework written in PHP and distributed under the GNU General Public License. The CMS is used to create, present and manage our website.



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In the course of using the CMS, we collect activity data from all visitors of our website in an anonymous form. Once visitors to our website identify themselves by filling out a contact form, this information is attached to their email address. For more information on the contents of a contact form, please refer to "9.1 Processing activity – visiting our website".

As part of the technical implementation of the individual functions of the CMS, Drupal sets cookies. Further information on the subject of cookies and the individual cookies used by Drupal can be found under "7. Cookies".

The legal basis for the processing of your personal data in the scope of the visitor activities collected within the scope of the use of Drupal is our legitimate interest pursuant to Art. 6 I 1 lit. f GDPR. Our legitimate interest here is to ensure the operation and security of our website.

Further information on data protection at Drupal can be found under the following address:  
<https://www.drupal.org/privacy>

### 9.4 Processing activity – Consent Management Platform / User Centrics

On our website 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 website 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)



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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 2002/58/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. 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 and on the other hand from the regular statute of limitations according to § 195 German Civil Code (BGB). 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.

### 9.5 Processing activity – Cloudflare

On our website we use the service from Cloudflare, Inc. 101 Townsend St, San Francisco, CA 94107, USA. Cloudflare is a web infrastructure and website security company that provides content delivery network and DDoS mitigation services. Data transmission between your browser and our servers flows through Cloudflare's infrastructure and is analyzed there to prevent attacks by acting as a reverse proxy for websites. Cloudflare secures and ensures the reliability of your external-facing resources such as websites, APIs, and applications in this way.

Cloudflare uses cookies to enable you to access our website by identifying individual users through cookies and applying security settings. The personal data collected by Cloudflare corresponds to the data from the log files explained in 9.1 "Processing activity – visiting our website" in this Privacy Policy. This includes the name of the requested website/file or the date and time of the request. These log files are used by Cloudflare to perform statistical analyses for the purpose of the operation and security of this website.

The use of Cloudflare is in the interest of a safe use of our website and the defense against harmful attacks from the outside. This constitutes a legitimate interest within the meaning of Art. 6 I 1 lit. f GDPR.



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Due to Cloudflares localization, the transfer of your personal data to Cloudflare may involve a third country transfer, i.e. a transfer of personal data to a destination that is neither in the European Union nor in the European Economic Area, in this case especially to the USA. The processing of your personal data outside the EU/EEA will be based on your consent according to Art. 49 I lit. a GDPR. In the USA no guarantees for an adequate data protection level are in place. As a result, the processing of personal data is affected by additional risks to the rights and freedoms of data subjects. Rights of data subjects might, in the worst case, not be able to be exercised. Information on your right of withdrawal can be found under point 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.

You can find more details about Cloudflares privacy policy under the following link: [Cloudflare's Privacy Policy | Cloudflare](#)

### 9.6 Processing activity – Microsoft Bookings

On our website we use the Microsoft Bookings service from (Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18 D18 P521), to schedule appointments with prospects/customers. When you visit the booking page, Microsoft Bookings offers options to book an appointment, get a confirmation email and a calendar invitation. Prospects/Customers who book an appointment online can easily reschedule or cancel it themselves to keep everyone in sync. If desired, an appointment can also be booked by Konica Minolta employee on behalf of a prospect/customer by entering the appointment details into the Bookings form so that they receive confirmations and reminders. With Bookings, it is possible to monitor all changes made to appointments.

The legal basis for processing your data in relation to the service "Microsoft Bookings" is Art. 6 I 1 lit. f GDPR (Our legitimate interest). The legitimate interest arises from our claim to offer you a user-friendly website with a wide range of functions and to give you the opportunity to make an appointment with our staff quickly and easily at any time if necessary. We would like to point out that you are not obliged to use Microsoft Bookings to make an appointment. If you do not wish to use the service, please use another option to contact us to make an appointment. We delete the collected data within the scope of this processing with a period of three years after the end of the respective calendar year.

Due to the Microsoft headquarters, your personal data may be transferred to the USA and thus to a so-called third country. As a result, the processing of personal data is affected by additional risks to the rights and freedoms of data subjects. Rights of data subjects might, in the worst case, not be able to be exercised. Information on your right of withdrawal can be found under point 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy. The processing





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of your personal data outside the EU/EEA is based on your consent pursuant to Art. 49 I lit. a GDPR.

For more information on the handling of user data, please refer to Microsoft's privacy policy: <https://privacy.microsoft.com/en-GB/privacystatement>.

### 9.7 Processing activity – Webanalytics

#### 9.7.1 Google Analytics

On our website we use the service Google Analytics. This is a web analytics service provided by the Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter: Google). We use Google Analytics to analyze the use of our website and to improve it regularly. We can use the statistics obtained to improve our offer and make it more interesting for you as a user.

Within the scope of the use of Google Analytics, cookies are set on your end device which enable an analysis of your visit / use of our website. You can find further information on the topic of cookies under "7. cookies".

You can prevent the storage of cookies by making the appropriate setting in your browser; however, we would like to inform you that you may then not be able to use all functions of this website to their full extent. In addition, you can prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) and the further processing of this data by Google by downloading and installing the browser plugin available under the following link (<https://tools.google.com/dlpage/gaoptout?hl=en>).

When the information stored in the cookies about your visit and use of our website is transferred to Google's servers, it may be transferred to a third country (e.g. to the USA) due to its localization. However, due to the activated anonymization function, your IP address will be shortened within the European Union or the European Economic Area even before it is transferred to Google. Furthermore, the IP address transmitted by your browser will not be merged with other Google data.

On behalf of the provider of this website, Google will use the information received to evaluate your use of the website, to compile reports regarding the website activities and to provide further services to the website provider in connection with the use of the website and the internet.

The legal basis for the processing of your personal data in the context of the use of Google Analytics is your consent in accordance with Art. 6 I 1 lit. a GDPR. Due to Google's localization, the transfer of your personal data to Google may involve a third country transfer, i.e. a transfer



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of personal data to a destination that is neither in the European Union nor in the European Economic Area, in this case especially to the USA. The processing of your personal data outside the EU/EEA will be based on your consent according to Art. 49 I lit. a GDPR. In the USA no guarantees for an adequate data protection level are in place. As a result, the processing of personal data is affected by additional risks to the rights and freedoms of data subjects. Rights of data subjects might, in the worst case, not be able to be exercised. Information on your right of withdrawal can be found under point 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.

You can find more information on the terms of use and data protection of Google under <https://www.google.com/analytics/terms/de.html> or <https://www.google.com/intl/de/analytics/privacyoverview.html>.

### 9.7.2 Hotjar

This website uses features of the web analytics service tool Hotjar. The provider is Hotjar Inc., Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta.

We use Hotjar to analyse and regularly improve the user experience of our website. Additionally we can use the statistics obtained to improve our offer and make it more interesting for you as a user. On behalf of the operator of this website, Hotjar will use this information to evaluate the use of the website, to compile reports on website activity, and to provide other services related to the use of the website. The information generated by the cookie, about your use of this website, is generally transmitted to a Hotjar server and stored there.

We use Hotjars Anonymization function on this website. This will truncate your IP address and make sure the analytics data is not personally identifiable. We will not merge the information with other personal information. The service provider was carefully chosen in accordance with Art. 28 I GDPR, taking into account the technical and organizational measures taken to ensure the security of the processing. In addition, in accordance with Art. 28 III GDPR, a Data processing agreement was concluded to regulate the processing.

You may Opt-out against the analytics function simply by activating the "Do not Track" standard function in your browser. In this case, we will not process your personal data in the way described here. You may find an explanation on how to enable the "Do not Track" function at this link: <https://www.hotjar.com/legal/compliance/opt-out/>

The legal basis for the use of Hotjar is your consent, Art. 6 I 1 lit. a GDPR. Further information on your right of withdrawal can be found under point 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.



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### **9.7.3 Processing activity – Social networks on our website**

On our website, we offer you the possibility to share or recommend individual content with your contacts or your network on social platforms or simply to access our page in the corresponding social network (Facebook, Instagram, Twitter, or LinkedIn). For the above mentioned purposes, the common buttons of the respective social networks are available. By simply visiting our website, no personal data is initially transmitted to the providers of the social networks. Only when you yourself become active and click on one of the corresponding buttons of the social networks to share or recommend content, data such as your IP address, the date and time of the click and the address of the website on which you are currently located will be transmitted, if applicable. If you are simultaneously logged in to the corresponding social network at the time you click on a social network button on our website, the social network will automatically assign your page view to your profile. Even if you use the button of the social network in order to recommend content from this website, the social network can still associate this information with your profile. If you do not want the social network to associate your visit to our website with your profile, please log out of the social network before clicking on the button of the respective social network.

Furthermore, please note that your data will also be transferred to the respective social network provider if you do not have an account on the social network or are simply not logged in and still click on one of the corresponding buttons of the social networks on our website. In this case, your data can be used by the social networks to create usage profiles and subsequently for the purposes of advertising, market research or the demand-oriented design of the own website. You can object to this type of processing in accordance with Art. 21 GDPR. To exercise this right, however, you need to contact the respective provider of the social network.

You will find information on the individual objection possibilities of the individual providers of the social networks under point "9.6.2 Possibilities of objection in social networks " in this privacy policy.

You should also take into account that due to the localization of Facebook, Instagram, LinkedIn, or Twitter, when your personal data is transferred to the provider of the respective social network, a transfer to a third country, i.e. a transfer of personal data to a destination that is neither in the European Union nor in the European Economic Area, such as the USA, may occur.

Furthermore, we would like to point out that we ourselves do not collect any personal data that is transferred to the respective social network by clicking on one of the corresponding buttons.



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By clicking on the respective button of a social network on our website, you give your consent in accordance with Art. 6 I 1 lit. a GDPR for your browser to establish a connection to the servers of the corresponding social network and for the aforementioned data to be transmitted. On the other hand, by clicking on the respective button you are also giving your consent in accordance with Art. 49 I lit. a GDPR. In the USA no guarantees for an adequate data protection level are in place. As a result, the processing of personal data is affected by additional risks to the rights and freedoms of data subjects. Rights of data subjects might, in the worst case, not be able to be exercised. Information on your right of withdrawal can be found under point 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.

### 9.7.4 Online presence in social networks

Within social networks, we, as the provider of the website, use the offers of online platforms to inform active users about information offers and services from Konica Minolta and, if interested, to communicate directly via the platforms. The social media channels thus complement our own website presence and offer interested parties who prefer this type of information an alternative means of communication. We are currently represented in the following networks with our own online profiles:

- Facebook: <https://www.facebook.com/KonicaMinoltaEU/>
- Instagram: <https://www.instagram.com/konicaminoltaeu>
- LinkedIn: [Konica Minolta Business Solutions Europe GmbH | LinkedIn](#)
- Twitter: <https://twitter.com/KonicaMinoltaEU>

As soon as you access the respective Konica Minolta profiles on the corresponding social network in your network, the terms and conditions and data processing guidelines of the respective providers apply.

We have no influence on the data collection and its further use by the social networks. Thus, we only know that your data will be processed for market research and advertising purposes and that usage profiles will be created from your usage behavior and the resulting interests. Furthermore, advertising can also be placed to this effect on the basis of supposed interests. For this purpose, cookies are usually stored on your end device.

We therefore expressly draw your attention to the fact that the personal data of users (e.g. the IP address) is stored by the providers of the networks in accordance with their data usage guidelines and used for business purposes. We would also like to point out that your data may be processed outside the European Union or the European Economic Area.

We process the data of users in Konica Minolta's presences on the corresponding social networks only insofar as they contact and communicate with us via comments or direct



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messages. You can assert your rights as a data subject both against us (see also point 2 "What are my rights as a data subject?") and against the provider of the social network. You can find information on the processing of your personal data by the individual social network providers as well as the options for objecting to this under point "9.6.2 Possibilities of objection in social networks" of this Privacy Policy.

The processing of users' personal data is based on our legitimate interests in effective information of users and communication with users in accordance with Art. 6 I 1 lit. f GDPR. If you are asked by the respective providers to give your consent to data processing (i.e. declare your consent, e.g. by ticking a check box or confirming a button), the legal basis for processing is Art. 6 I 1 lit. a GDPR, i.e. your consent.

### 9.7.5 Possibilities of objection in social networks

For a detailed presentation of the respective processing and the possibilities of objection (opt-out), we refer to the following linked information of the providers.

Information on the individual providers of the social networks:

**Facebook Ireland Ltd.**, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland)

- Privacy Policy: <https://www.facebook.com/about/privacy/>,  
[https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data),  
[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum),  
<https://help.instagram.com/519522125107875>
- Opt-Out: <https://www.facebook.com/ads/preferences/>

**Twitter Inc.**, 1355 Market Street, Suite 900, San Francisco, CA 94103, USA

- Privacy Policy: <https://twitter.com/de/privacy>
- Opt-Out: <https://twitter.com/personalization>

**LinkedIn** (LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2, Ireland)

- Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>
- Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>

In addition, European marketing providers offer a new possibility of objection under the following link: <http://www.youronlinechoices.com/>. This is an initiative to educate about online advertising. In the preference management section <http://www.youronlinechoices.com/de/praeferenzmanagement/> you will find an overview of providers whose online advertising can be deactivated or activated there. Also in the case of access requests and the assertion of further rights of data subjects, we would like to point out that these can most effectively be asserted with the providers. Only the providers have access



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to the personal data of the users and can directly take appropriate measures and provide information. Should you nevertheless require assistance, you can contact us.

### 9.8 Processing activity – Targeting und Advertisement

#### 9.8.1 LinkedIn Insight Tag

On our website we have included the conversion tool "LinkedIn Insight Tag" from the LinkedIn Ireland Unlimited Company (hereinafter: LinkedIn).

The LinkedIn Insight Tag is a small JavaScript code snippet that we have implemented on our website. With the help of the LinkedIn Insight tag, data about the visit of our website is collected and transmitted to LinkedIn. This data includes the referrer URL, IP address, device information, browser information, and a timestamp for the visit of our website. LinkedIn does not provide us with access to the personal data collected in detail. LinkedIn uses this information to provide us with reports on website audiences and ad performance, based on aggregate data, so that we can optimize our website based on the information we receive. In addition, LinkedIn provides us with the ability to track conversions and retarget our website visitors through the LinkedIn Insight tag. This allows us to display targeted advertising outside of our website without identifying the website visitor.

Because of LinkedIn's localization, the transfer of your personal data to LinkedIn may involve a transfer of personal data to a third country, in this case especially to the USA, which is neither in the European Union nor the European Economic Area.

The legal basis for the processing of your personal data in the context of the use of LinkedIn is your consent pursuant to Art. 6 I 1 lit. a GDPR. The processing of your personal data outside the EU/EEA will be based on your consent according to Art. 49 I lit. a GDPR. In the USA no guarantees for an adequate data protection level are in place. As a result, the processing of personal data is affected by additional risks to the rights and freedoms of data subjects. Rights of data subjects might, in the worst case, not be able to be exercised. Information on your right of withdrawal can be found under point 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.

The data processed in the LinkedIn Insight tag is encrypted and anonymized within seven days. After 90 days at the latest, the anonymized data is automatically deleted if it is no longer required for the fulfillment of the defined purpose.

For more information about LinkedIn's privacy policy, please visit the following address:  
<https://www.linkedin.com/legal/privacy-policy>



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### **9.8.2 Marketo**

Within the scope of registration for the newsletter as well as for sending information to you, we use the marketing automation software Marketo from Marketo Inc, 901 Mariners Island Blvd. suite 500, San Mateo, CA 94404, USA. With the help of Marketo, we collect statistical data on the usage of our website and communication activities in order to optimize our services/products accordingly and to conduct e-mail marketing and sales activities. The processing is partly automated, with the aim of evaluating certain personal aspects (profiling). Marketo records your IP address and uses cookies to track and analyze the use of the website in order to provide information specifically tailored to the interests of the user. For more information on the subject of cookies, please refer to "7. cookies". The information generated by the cookies is transferred to a Marketo server (located within the EU/EEA) and stored there. On our behalf, Marketo uses this information to evaluate the use of the website by registered persons and to compile reports on website activities. You can prevent the storage of cookies by adjusting your browser settings accordingly. However, your browser settings may result in not being able to use all the functions of our website. In exceptional and unforeseen cases where personal data is transferred to the USA, we have concluded a contract with Marketo.

Further information on data protection at Marketo can be found at: <https://documents.marketo.com/legal/privacy/>

The legal basis for the processing of your personal data within the framework of Marketo is your consent in accordance with Art. 6 I 1 lit. a GDPR. Information on your right of withdrawal can be found under point 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.

### **9.8.3 Newsletter**

Konica Minolta offers a newsletter to customers and interested parties on a consent-based approach. The only mandatory data for receiving the newsletter is your e-mail address. The provision of further, separately marked data is voluntary and will be used to address you personally. Registration for the newsletter takes place by means of the so-called double opt-in procedure. This means that after your registration, we will send you an e-mail to the e-mail address you provided, in which we ask you to confirm that you wish to receive the information. If you do not confirm your registration by clicking on the link provided in the e-mail, the link sent to you will be deactivated and your data will be deleted. If you agree to receive information, you will have access to the following information:

- News and information about Konica Minolta's product portfolio
- Exclusive invitations to events, trade fairs and webinars
- Sending of testimonials and success stories



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- Market trends in the form of studies, market research and white papers
- Possibility of taking part in customer satisfaction surveys

As part of the double opt-in process carried out during registration, we store the IP addresses you use for a period of 30 days as well as the times of registration and confirmation. Based on your consent, we will evaluate your user behavior on our websites as well as within the newsletters which we send out and assign them to your e-mail address / user profile within our database. In addition, we store information about the browser you use and the settings made in your operating system as well as information about your Internet connection with which you have accessed our website. Via the newsletter sent to you, we receive, among other things, receipt and read confirmations as well as information about the links you have clicked on in our newsletter. We also store which areas you have visited on our website and in our apps. By creating a personal user profile, we want to tailor our advertising approach to your interests and optimize our offers on our website for you.

Our newsletter contains information and news from Konica Minolta Business Solutions Europe GmbH and other affiliated group companies (Konica Minolta Business Solutions Deutschland GmbH, Konica Minolta Business Solutions Austria GmbH, Konica Minolta Business Solutions (Belgium) N.V., Konica Minolta Business Solutions Nederland B.V., Konica Minolta Business Solutions Spain S.A., Konica Minolta Business Solutions Italia S.p.A., Konica Minolta Business Solutions Portugal, Unipessoal Lda., NEA RENT – ALUGUER E COMÉRCIO DE EQUIPAMENTOS S.A., Konica Minolta Business Solutions Sweden AB, Konica Minolta Business Solutions Denmark A/S, Next Agenda ApS, Konica Minolta Business Solutions Finland Oy, Konica Minolta Business Solutions Norway AS, Konica Minolta Business Solutions Czech spol. s r.o., Konica Minolta Business Solutions Bulgaria EOOD, WEBCOM Poland Sp. z o.o., Konica Minolta Hungary Business Solutions Ltd., Konica Minolta Business Solutions SE Ltd, Konica Minolta Croatia – business solutions, Ltd, Konica Minolta Poslovna Rjesenja BH d.o.o., Konica Minolta Business Solutions Polska Sp.z o.o., Konica Minolta Slovakia spol. s r.o., Konica Minolta Business Solutions Romania s.r.l., Konica Minolta Business Solutions Slovenija, poslovne resitve, d.o.o., Konica Minolta Baltia, UAB, Konica Minolta Business Solutions Greece S.A., Konica Minolta Marketing Services Limited, Konica Minolta Marketing Services Ireland Limited, Konica Minolta Marketing Services B.V., Charterhouse Print Management AG, Charterhouse AB, Indicia Group Limited, Hamsard 3099 Limited, Evolving Media Limited, Indicia Limited, Indicia Edinburgh Limited, Konica Minolta Business Solutions France S.A.S., Conibi S.A.S, Dactyl Buro du Centre S.A.S., OMR Impressions S.A.S., Konica Minolta Business Solutions (UK) Ltd., Konica Minolta Business Solutions East Ltd., KONICA MINOLTA Business Solutions (Northern Scotland) Ltd, Capture Imaging Ltd, ProcessFlows Holdings Ltd, ProcessFlows (UK) Ltd, Software Paradise Ltd, Digital Document Solutions Ltd, Konica Minolta Business Solutions (Ideal) Ltd., Konica Minolta





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Printing Solutions (UK) Ltd., Konica Minolta Business Solutions (Wales) Ltd., Konica Minolta Sensing Europe B.V., Mobotix AG).

The legal basis for the processing of your personal data for the above-mentioned purposes is your consent pursuant to Art. 6 | 1 lit. a GDPR. Your consent can be withdrawn at any time without giving reasons. You can revoke your consent [here](#). The withdrawal of your consent does not affect the lawfulness of the processing carried out on the basis of the consent until the withdrawal. For more information about your right of withdrawal, please see point 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.

### 9.9 Processing activity – Youtube

On our websites we have integrated YouTube videos. These are stored at [www.youtube.com](http://www.youtube.com), but can be played directly from our website. YouTube is a platform of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter: Google). We have activated the enhanced privacy mode when embedding the videos on our website. This means that no information about you will be sent to YouTube if you do not play the videos. However, when you play videos, data is transferred to YouTube. First, YouTube is notified that you have visited the appropriate subpage of our website where the video is embedded. In addition, other data may be transferred to YouTube that we are not aware of. We also have no influence on the data transfer. If you are registered on YouTube, the transferred data is directly associated with your account. YouTube stores your data as usage profiles and uses them for the purpose of advertising, market research and/or the needs-based design of the website. Such an evaluation can be carried out in particular (even for users who are not logged in) for the purpose of providing need-based advertising. You have the right to object to the creation of usage profiles by YouTube in accordance with Art. 21 GDPR, which you must assert directly with YouTube.

Further information on the purpose and scope of data collection and processing can be found in the YouTube privacy policy.

Due to Google's localization, the transfer of your personal data to Google may involve a transfer to a third country, i.e. a transfer of personal data to a destination that is neither in the European Union nor in the European Economic Area, in this case especially to the USA.

The legal basis for the processing of your personal data in the context of the use of YouTube, which is initialized by playing a YouTube video, is your consent in accordance with Art. 6 | 1 lit. a GDPR. The processing of your personal data outside the EU/EEA will be based on your consent according to Art. 49 | 1 lit. a GDPR. In the USA no guarantees for an adequate data protection level are in place. As a result, the processing of personal data is affected by additional risks to the rights and freedoms of data subjects. Rights of data subjects might, in



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the worst case, not be able to be exercised. Information on your right of withdrawal can be found under point 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.

## **10 Konica Minolta Global Policy**

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