



PRIVACY POLICY

I.R.I.S SOLUTIONS AND EXPERTS SA

VERSION: 3.0

September 6th, 2023

PRIVACY POLICY

I.R.I.S. Solutions and Experts S.A.

Version 3 – September 6th, 2023

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This Privacy Policy explains how we process the personal information that we collect from you when you attend our events or premises; use our websites, apps, platforms and services.

We will also determine or we are processing your data during our recruitment process.

I.R.I.S. is the data controller of your personal information, that is, the entity that determines the 'purposes and means' of the processing of the personal information processed about you, or, in other words, the uses for which I.R.I.S. processes your personal information and the manner in which it is done. Please see "Definition of I.R.I.S." at the bottom of this Privacy Policy for further details about I.R.I.S..

If you do not accept the use of your personal data in accordance with this policy, you should not make use of our Services.



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1. WHEN THIS PRIVACY POLICY APPLIES

The following Services are subject to this Privacy Policy:

- Completing a form on one of our apps or websites.
- Taking part in research, for example a survey or contest.
- Attending one of our events or attending one of our kiosks at an event.
- Taking a query from you, for example about the repair or upgrade of a service or product we offer, and fulfilling our obligations towards you.
- Our marketing of our goods and/or services we think may be of interest to you and your business.
- Contacting our Support Teams and/or opening a Support Ticket in our JIRA Ticketing System.

2. INFORMATION WE COLLECT AND WHAT WE USE IT FOR

We collect personal information in the following circumstances:

- When you have expressed interest in a product or service we offer: we take your name and business contact details down where we interact. For example, if you approach us online, attend our stall at an event and/or call us about a potential service or product, we will make a note of your details so that we may follow up on your query as well as offering other products and/or services that may be of interest to your business.
- Upon registering for a Support Service we offer: you will be asked for several personal details that are necessary to create your Support Portal account and offer you our Services. Some of these fields are marked as compulsory. If you do not provide us with information which is marked as compulsory we may be unable to provide all or part of the Services to you.
- When you use our Services: we may collect and process personal information regarding your use of such Services to improve your overall experience and to fulfill our obligations to you aiming to reach your 100% satisfaction.
- When we research our market and find potential buyers: to make sure we are reaching the appropriate business audiences, we may from time to time purchase marketing lists and other contact supply databases. These may contain your name, business email address and business phone number. However, we do not buy marketing lists which contain your private, outside-of-work contact details except if those lists are fully in line with the opt-in Regulations described in General Data Protection Regulation.



- To improve your user experience and the overall quality of our Services: knowing your basic personal details lets us personalize any communications we send to you. For example, we collect your appointment details to ensure we provide marketing which is relevant to your role in your business.

We go into more detail on how we use the information we collect in these circumstances, below.

2.1. To Provide Online Accounts

This is personal information you give us when setting up an online account (for example, our Support Portal) which personally identifies you rather than your business, such as your name, position within your business, business email address or telephone number. There are a number of reasons we need this information:

- To verify your identity and assist with the identification of users: for example, your email address acts as your username to sign into your online account and access I.R.I.S. Services.
- To send important notices: for example, we ask for your email address so that we can send you a confirmation of your orders. We will also send you communications about purchases or changes to our terms, conditions, and policies.

2.2. Responding to customer queries

Your personal details will be processed to respond to queries and assist with the identification of users. We may need to collect your phone number when you click to call us and may then be used as an identifier in future, and whenever you fill in an e-form on our website or app, we may store relevant identity data so that we can trace the history of your query and deal with it more efficiently.

2.3. Events management

We collect your information to register you for an event which you have expressed interest in, process your payment for the event (where applicable) and provide you with the relevant materials for that event.

For example, we collect your name, telephone number (please supply your business telephone number only), emergency contact details (where absolutely necessary), dietary requirements and any other information necessary to enable you to get the most out of your experience.



2.4. To learn about your activities

2.4.1. Browsing Behavior, Device Information and Interaction

We sometimes record details of your actions (repeated site visits, interactions, keywords, online content production, cookies, etc.) when you access and use our Services so that we can build a customer 'picture' over time. It also includes information about the devices and methods you use to interact with I.R.I.S. Services and content.

We combine behavioral information (such as your browsing activity) with your personal details, but we will not store any personal details related to fields left blank by you during your sign-up process. When the use of information which personally identifies you is not necessary to achieve the purposes set out in this section, we will only process behavioral information on an aggregate basis.

We capture information about your Operating System and Internet Browser when you visit our websites or use our Services, including information that is automatically logged when you use our Services (e.g. requested information, timestamp, IP address). Where required by applicable laws, prior to the storage or caching (temporary storage) of or access to data on your device, we will obtain your consent after providing you with clear and comprehensive information about the purposes of the processing of your personal information.

We will process your behavioral, device and interactions information for the following purposes:

- To provide, maintain, protect and improve products and Services, and to develop new ones:
 - For example, information about how you browse our websites or search for products can be used for data analysis and research, to deliver better user journeys, provide more relevant search results or structure the way the information is shown in our Services.
- To improve your user experience and the overall quality of our Services:
 - Your activity such as the pages you visit or the items you view teaches us what you find important and most interesting to you on our Services so that we can tailor your experience around what matters to you most and display personalized content.
 - Device and platform identifiers let us know which device you are using to access our Services in order to customize and optimize them to your device and improve your overall user experience (e.g., providing more relevant content and advertising on the device or browser you are using).
 - Storing data locally on your device allows us to improve things like website performance and loading of content even when you are offline.
- To provide you with marketing communications, for example, more relevant content and offers, and latest news about products and events which we think will be of interest to you and your business:
 - For example, following a link to a tutorial from a marketing email, or following I.R.I.S. on LinkedIn or Twitter.



- Understanding how and where you interact with I.R.I.S. means we can provide you with more personalized and helpful information through your preferred communication channels.
- To protect our other users and I.R.I.S.:
 - We can monitor unusual or suspicious activities on our Services, such as automated abuse, so that we can address it quickly and inform you about potentially fraudulent activities affecting your account.
 - We might also use your personal information for internal auditing, in order to comply with applicable legal requirements.

2.5. For fulfilment purposes

In order to support your business and perform our contract for the Services with you, we may need to collect personal data to arrange repairs and perform services. We will need to arrange appointments to do so, and therefore need to get the contact details of someone at your business. Examples include:

- when you log a call to arrange a repair or service;
- when you fill in a form we send you about one of our products; and
- when you arrange site visits or equipment collection.

When we have to perform technical operations on your IT infrastructure, we may have access to personal data held by your organization. Where we use third parties for our fulfillment activities, we make sure to choose trusted partners who share the same values that we do.

2.6. To find new customers

To offer our products and services to others who may be interested in them, we sometimes obtain your contact details from our partners in the industry, as well as professional bodies who provide this information to businesses. When we obtain contact details this way we ensure that your contact details are not part of any national opt-out service.

2.7. Surveys and related information

We occasionally send our customers surveys and feedback forms. Where you provide your name and contact details, we will use these to respond to any feedback, provide you with information we think



you'll be interested to hear given your responses and add you to our marketing database (for which you have to opt-in, if you're interested).

2.8. Purchase Information

We keep records about goods and services you buy. These help us to provide, maintain, protect and improve products and services, and to develop new ones. We also send important notices, such as communications about purchases or changes to our terms, conditions, and policies.

2.9. Cookies and other technologies

Cookies and similar technologies (e.g. web beacons) are small pieces of information used to store technical and/or personal details, identify users of a service and enable certain functionalities. To learn more about the cookies used by our Services and how to reject them, please visit the Cookie Policy applicable to each of the Services, which can be accessed through the homepage of our websites or the relevant section of our apps.

2.10. Legal and regulatory requirements and other business purposes

We sometimes need to process your personal information to comply with applicable laws and regulations, for example where we have an obligation to report suspected fraud. There may also be other business-related purposes for processing your information, including negotiating, concluding and performing contracts, managing accounts and records, supporting corporate social responsibility activities, legal, regulatory and internal investigations.

3. LEGAL BASIS FOR USING YOUR PERSONAL INFORMATION

I.R.I.S. will only process your personal information where we have a legal basis to do so.

The legal basis will depend on which of the above purposes for which we have collected and use your personal information. In almost every case the legal basis will be one of the following:



- **The legitimate business interests of I.R.I.S.:** where it is necessary for I.R.I.S. to understand our customers, promote our goods, products and Services and operate effectively as a multinational IT service provider and manufacturer of imaging and photography products. For more information see section 3.1 below.
- **Performance of a contract with your business:** where you have ordered or requested products or Services from us and we need to use your contact details and payment information in order to process your order and deliver the products or Services.
- **Compliance with law:** where I.R.I.S. is subject to a legal obligation and needs to use your personal information in order to comply with that obligation.
- **Consent:** for example, where you have provided information to us voluntarily in order to enter a competition. You can withdraw your consent at any time, including by sending us an e-mail to the contact address below or sending us a letter to any of the addresses of I.R.I.S. below.

3.1. Our Legitimate Interests

I.R.I.S.'s legitimate interests include where it is necessary for I.R.I.S. to understand our customers in sufficient detail so we can create and publicise new products and Services, and offer our customers a better experience. For example:

- We perform analytics on this legal basis as they are necessary for provide you with a tailored experience and so that we can improve, maintain and manage our products and services in a way which meets your expectations as a customer;
- We need to use your information so that we can better support your organisation and maintain the products and services which you use;
- We engage in product development to better our products and services and will use your feedback, from surveys and elsewhere, as part of this process; and
- like most businesses, where permissible we market new products and services which we think you may be interested in these, always offering you the option to unsubscribe.

4. HOW WE SHARE YOUR INFORMATION

4.1. Within I.R.I.S.

We restrict access to personal data to people within our company who have a “need to know” such information. For example, we may pass any personal data we collect about you to our sales team or support team in order to provide our Services.



4.2. Outside I.R.I.S., to our partners and third parties

Except as described in this policy or where you have provided your consent, the personal information processed when you use our Services will not be shared with or disclosed to other individuals or businesses, for their own use, other than I.R.I.S..

We may disclose your personal information to the following third parties, amongst others, for the purposes described here:

- vendors or other subcontractors with whom we have a business relationship and who provide products and services to us so that we can provide our Services to you (such as technology vendors, maintenance and servicing partners, software development, hosting and management);
- Third party service providers which carry out marketing campaigns or run customer surveys on our behalf;
- Payment processing companies, credit reference agencies and anti-fraud screening service providers in order to process payments and (where necessary) to carry out fraud-screening;
- With our professional and legal advisers for the purposes of obtaining commercial, financial or legal advice;
- In the event that we sell any business assets, personal information may be disclosed to a potential buyer. In these circumstances, we will make reasonable attempts to ensure the buyer will be bound by the terms of this Privacy Policy;
- In exceptional circumstances, personal information may be shared with third parties, such as the police and regulatory authorities, to protect our rights, property, or the safety of our customers, staff and assets;
- We may also disclose your personal information if it is necessary to comply with a legal obligation in any jurisdiction, including where that obligation arises as a result of a voluntary act or decision by us (e.g. our decision to operate to a country or a related decision).

5. HOW WE PROTECT YOUR INFORMATION

Your personal information is held on secure servers and is not processed for any purposes other than those set out in this Privacy Policy. The servers I.R.I.S. uses to store this information are accessible to authorized staff only and I.R.I.S. ensures that adequate security measures are in place.

Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us at the contact details below.



We use vendors and service providers based around the world. Consequently, your personal information may be processed in countries outside of the country where you live, including if you live in Europe, and such countries may include some where you may have fewer legal rights in respect of your personal information than you do under local law. If we transfer personal information outside to a country that provides a lower standard of legal protection for your personal information, we will ensure that your privacy rights are protected by appropriate safeguards, in particular through the use of the EU's standard contractual clauses if your personal information is transferred from inside the European Economic Area to outside. Please contact us if you would like more information about these safeguards.

6. MARKETING COMMUNICATIONS

I.R.I.S. may use your personal information for marketing purposes and to inform you about other products and services, which I.R.I.S. thinks might be of interest for you and your business. You can specify whether you wish to receive such information by ticking the appropriate box in your registration form.

You will be able to opt out from receiving such information at any time by editing your emailing preferences of your account or by unsubscribing using this e-mail address: unsubscribe@irisims.com. If you unsubscribe from marketing, please note we may still contact you with service messages from time to time (for example, to confirm an order you have made or to confirm delivery details).

7. HOW TO EXERCISE YOUR RIGHTS

In certain jurisdictions you have the right to access, correct, update, restrict, receive a machinereadable copy of your personal information or delete your data as well as any other right applicable in your jurisdiction. You can request to exercise these rights by contacting us using the contact details set out at the end of this Policy.

We will delete your personal information once it is no longer necessary for the purposes for which it was originally collected.

Furthermore, a deletion can always be requested using the contact details below or this e-mail address: unsubscribe@irisims.com. We will comply immediately within the then-valid legal requirements.

You also have the right to object to your personal information being used for certain purposes, including to send you marketing. See 'Marketing' above, for more details of how to opt-out of marketing.



We will comply with any requests to exercise your rights in accordance with applicable law. Please be aware, however, that there are a number of limitations to these rights, and there may be circumstances where we are not able to comply with your request. To make any requests regarding your personal information, or if you have any questions or concerns regarding your personal information, you should contact us using the details below. You are also entitled to complain to your local data protection authority.

8. RETENTION OF YOUR INFORMATION

I.R.I.S. will keep your personal information for as long as we need it for the purposes set out in section 2 of this Privacy Policy and in accordance with any retention periods required by applicable laws and during the relevant statutes of limitations. This term should typically not exceed 6 years in most jurisdictions. For example, where you have made a purchase with us, we will keep a record of your purchase for the period necessary for invoicing, tax and warranty purposes. We may also keep a record of correspondence with you (for example if you have made a complaint about a product or our Services) for as long as is necessary to protect us from a legal claim. Where we no longer have a need to keep your personal information, we will delete it.

I.R.I.S. will not delete your personal information where it refers to an active relationship or a product or service explicitly requested by you (e.g. a recent purchase made with us).

9. YOUR COMMITMENTS

You guarantee the quality of the information provided in our Services. All personal information you send to I.R.I.S. must be real, accurate and kept up to date. You take full responsibility that your information is accurate, updated and that it complies with this principle.

10. CHANGES TO THIS PRIVACY POLICY

We will update our Privacy Policy from time to time to ensure you are promptly informed of I.R.I.S.'s data processing activities. We will not engage in any processing operations that might put in risk your personal information, and will gather your explicit consent where necessary to safeguard your right to privacy. We will keep you updated on any changes to this Privacy Policy through the Services. We will also use any of the communication methods provided by you to inform you on important changes to



this Privacy Policy. If you continue using our Services after having been unequivocally informed on the updated Privacy Policy, you agree to be bound by the updated terms.

12. COOKIE POLICY

Our website uses so called "cookies", which are used to make our website more user-friendly, more effective and more secure - for instance to enable faster navigation. Cookies also provide us with information about the frequency of page views of our website and about the general navigation. We advise you, that some of these cookies are transmitted from our server on your computer system, most of these are so called "session cookies". "Session Cookies" are automatically deleted from your hard drive at the end of your browser session. Other cookies remain on your computer system and allow us to recognize your computer the next time you visit our website (so called "permanent cookies"). Of course, you can always refuse cookies in your browser's settings at any time, if your browser supports this. However, we point out that in this case any features of our website can not be used completely.

12.1. Use of Plugins

YSC	.youtube.com	Advertisement	YSC cookie is set by Youtube and is used to track the views of embedded videos on Youtube pages.
VISITOR_INFO1_LIVE	.youtube.com	Advertisement	A cookie set by YouTube to measure bandwidth that determines whether the user gets the new or old player interface.
_ga	.irisims.com	Analytics	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.



_gid	.irisims.com	Analytics	Installed by Google Analytics, _gid cookie stores information on how visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously.
_gat_gtag_UA_212114458_1	.irisims.com	Analytics	Set by Google to distinguish users.
_ga_FM1JJP06VM	.irisims.com	Analytics	This cookie is installed by Google Analytics.
CONSENT	.youtube.com	Analytics	YouTube sets this cookie via embedded youtube-videos and registers anonymous statistical data.
TawkConnectionTime	www.irisims.com	Functional	Tawk.to, a live chat functionality, sets this cookie. For improved service, this cookie helps remember users so that previous chats can be linked together.
twk_idm_key	www.irisims.com	Other	No description

13. RECRUITMENT POLICY

Article 1 – Scope of the policy

This Policy relates to IRIS IMS's processing of personal data in relation to recruitment. This Policy will provide job applicants ("you" or "your") with general information about the processing of personal data by IRIS IMS and the rights you have under data protection legislation. In this Policy, we define this type of information as "Recruitment Data". Please read this Policy carefully before providing your Personal Data to, for example, the IRIS IMS Online Recruitment System.

Article 2 - Collection of Personal Data

We collect Recruitment Data in order to manage our recruitment, planning and organisational activities. Therefore, the information we may collect from you includes:

- **Application information:** This information will tell us in general about you and allow us to make an idea of your skills and suitability for the job. This type of information may include your name, address, telephone number, email address, other contact details and preferred means of communication. It may also include information contained in your cover letter, CV (e.g. professional qualifications, previous work experience, level of education, skills and abilities, current basic salary, bonuses and/or additional commission and personal interests and experience), information contained in your publicly available social networking or other such accounts (such as LinkedIn or Twitter), how you became aware of the role, information about the type of work and projects you have been involved in and any other information you wish to provide to us in connection with your application.



- **Recruitment Process Information:** This is information collected as a result of the recruitment process, such as your test or interview results, and information provided by your references.
- **Future Opportunities Information:** This information is collected in order to keep in touch with you about future opportunities within IRIS IMS, such as your name, email address, LinkedIn profile, location, area of expertise and the type of position you are interested in. You can unsubscribe from this database during your application if you wish.

IRIS IMS may also conduct background checks and analyses with third parties and store the resulting information during the recruitment process ("Pre-Employment Screening"). Personal data relating to any criminal convictions or medical information (e.g. status as a disabled worker) will only be searched where permitted by applicable legislation.

If you wish to provide us with the contact details of a reference or any third party with your CV, it is your responsibility to ensure that such third party consents to us receiving their information. By providing such data, IRIS IMS will assume that you have done so.

We will tell you when the information we have requested is mandatory or optional. We will also explain the consequences if you decide not to provide the information we have indicated as mandatory. In some circumstances, this may mean that we are unable to process your application.

Article 3 - Use of personal data

We use this information for the purposes of evaluating and selecting candidates, in particular to:

- Examine and process your application, for example, so that we can assess your ability to meet the specifications, select candidates and check references, as well as the professional qualifications provided by candidates;
- Organise and conduct interviews and tests;
- To manage our on-site security, for example to ensure that our premises, assets, information, employees and other personnel are secure;
- To evaluate and analyse the results of interviews and tests; and
- To carry out any other activities necessary in the recruitment process, including final recruitment.

We may also use Recruitment Data for legal and regulatory compliance purposes, for example to ensure compliance with health and safety requirements and other legal or tax obligations, or in connection with litigation or an internal investigation or audit, and to ensure compliance with our anti-money laundering, anti-bribery and anti-corruption and equal opportunities policies.

Where we verify Recruitment Data provided to us during the recruitment process as part of pre-employment checks, you will be informed in advance of the aspects of your Recruitment Data that will be analysed, including with an explanation of how such pre-employment checks will be conducted, and information relating to criminal convictions (if any) or medical information will only be collected from authorised official sources and in accordance with applicable legislation.

We will only process your Recruitment Data where we have a legal basis to do so. Generally, we will process this data to enable us to decide whether or not to enter into a contract of employment with you. Otherwise, we will process your Recruitment Data because you have consented to this processing, but you may withdraw your consent at any time.



We may also process your recruitment data in order to comply with our legal obligations or as part of our legitimate business interests (for example, where it is necessary for us to know enough about our candidates to be able to carry out an effective recruitment process).

Article 4 - Disclosure of personal data

We restrict access to Recruitment Data to those people within our group of companies who need to know that information. For example, certain people within IRIS IMS will have access to your Recruitment Data in order to process your application and manage the recruitment process (this may include people within our Human Resources team and the people you will report to if you are hired).

Article 5 - Storage of your personal data

IRIS IMS is a global organisation with subsidiaries, business processes, management structures and technical systems that cross national borders. As a result, IRIS IMS may use resources and servers located in various countries throughout the EMEA region. As a result, your personal data may be transferred and processed outside the country in which you use an IRIS IMS website or provide your personal data. This includes countries outside the European Economic Area (EEA) or the United Kingdom which do not have laws providing adequate or specific protection for personal data.

Where we transfer your Recruitment Data outside the EEA or the UK, we will take legally necessary measures to ensure that adequate protections are in place to safeguard your Recruitment Data and to ensure that it is processed securely and in accordance with this Policy. If you are located in the EEA or the United Kingdom, you may contact us for a copy of the safeguards we have in place to protect your Recruitment Data and your privacy rights in those circumstances.

Article 6 - Retention of your personal data

We retain your Recruitment Data in accordance with our internal retention policies and procedures. IRIS IMS will retain your personal data with your consent for 6 months from the date of submission or last update of your contact or account information. However, if you do not wish to be contacted for future positions, you can let us know during the recruitment process and, at the end of the process, we will delete your information. After 12 months from the transmission or last update of your profile, your personal data will be deleted and will not be available for consultation or access. If you wish your personal data to be retained in our talent pool after the above period, you can simply respond to the reminder sent and IRIS IMS may retain your data for a further 12 months.

If you are hired during the IRIS IMS recruitment process and become an employee, your personal data may become part of your personnel file, may be used for other employment or work related purposes and may be retained in the IRIS IMS talent pool for potential future positions. Your personal data may also be subject to additional confidentiality arrangements relating to Canon employees.

Article 7 – Your rights

As an individual whose personal data IRIS IMS processes, you will have the right to access, rectify or delete your Recruitment Data. You will also have the right to object to or restrict certain types of



processing of your Recruitment Data and to request a copy of the Recruitment Data you have provided to us.

If you notice an error in your application that you would like us to correct, please contact us using the details below.

You may exercise your rights by contacting us using the contact details provided in the section below. Any request to exercise any of these rights will be considered by us on a case-by-case basis. In certain situations, we may not be legally obliged to comply with your request, in particular due to the relevant legal exemptions provided by the applicable data protection legislation.

If you have any queries about how we have handled your Recruitment Data, please contact us in the first instance. If you do not agree, you have the right to complain to your Data Protection Authority.

We may delete your personal information (including your CV) at any time without notice. We therefore recommend that you keep your own copy of the personal data you have provided to us.

Article 8 - Contact IRIS IMS

IRIS IMS is committed to protecting your personal data in compliance with applicable personal data protection law. If you have any questions about this Policy, you can contact the IRIS IMS Data Protection Officer at the following address hr@irisims.com. You may also contact IRIS IMS at the following address:

Rue du Bosquet 10, 1435 Mont-Saint-Guibert.

14. UPDATE OF OUR PRIVACY POLICY

We may update this policy as necessary and at any time to reflect changes in legislation, regulatory guidance or privacy practices in accordance with the law. Where this occurs and to the extent required by law, we will provide you with a new or updated policy setting out the changes in the use of your Recruitment Data, including what, if anything, you should do.