



## Privacy Policy – User of AIRe Link Portal

Dated 23 April 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 (7) 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)



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- A processing of your personal data took place solely on the basis of your consent, which you have now withdrawn, and there is no other legal basis that legitimises a processing of your personal data.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



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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.

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):** Right to lodge a complaint with the supervisory authority (Art. 77 DPA): 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 +49 (0) 511-120 4500

Fax +49 (0) 511-120 4599

[poststelle@lfd.niedersachsen.de](mailto:poststelle@lfd.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 section of withdrawal.



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### 3 General information regarding the topic „purposes“

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

### 4 General information regarding the topic „legal bases“

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

#### 4.1 Legal bases for the processing of personal data

##### **Consent**

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

##### **Contract or pre-contractual measure**

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 our processing 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.



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### **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.

Legal bases for the processing of special categories of personal data

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

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

by you, this processing is based on one of the following legal bases, which are defined 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.





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#### **Protection of vital interests**

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

#### **Manifestly public data**

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

#### **Establishment / Exercise / Defence of legal claims**

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

#### **Substantial public interest**

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

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

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

#### **Public interest in the area of public health**

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



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## 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 they are necessary for the fulfilment of our contractual and legal obligations. Personal data that is no longer required after the purpose has been fulfilled will be regularly deleted, unless further processing is required for a limited period of time, which may result from other legally permissible purposes. In order to fulfil documentation obligations as well as to comply with statutory obligations to preserve records in Germany, the necessary documents are kept for six years in accordance with § 257 I Commercial Code (HGB) and for ten years in accordance with § 147 I of the Fiscal Code of Germany (AO).

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

### **Recipient of your data**

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

### **Locations of the processing of your personal data**

In principle, we process your data in Germany and in other European countries (EU/EEA). If your data is processed in countries outside the European Union (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 site 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:

#### **Necessary**

Cookies that belong to this category are required to ensure the core functionality of this website. Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies. Legal basis: Art. 6 I 1 lit. f GDPR

#### **Preferences**

Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in. Legal basis: Art. 6 I 1 lit. a GDPR

#### **Statistics**

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously. Legal basis: Art. 6 I 1 lit. a GDPR

#### **Marketing**

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers. Legal basis: Art. 6 I 1 lit. a GDPR

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.

Internet Explorer: [How to delete cookie files in Internet Explorer \(microsoft.com\)](https://support.microsoft.com/en-us/help/17416/how-to-delete-cookie-files-in-internet-explorer)

Google Chrome: [Clear, enable, and manage cookies in Chrome – Google Chrome Help](https://support.google.com/chrome/answer/9364672)

Firefox: [Delete browsing, search and download history on Firefox | Firefox Help \(mozilla.org\)](https://support.mozilla.org/en-US/kb/delete-browsing-search-and-download-history-on-firefox)



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## 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.

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

### 9.1 Processing activity – AIRe Link Portal

#### 9.1.1 Registration and Login

To use the website you must first register on the AIRe Link portal. The following data will be collected as part of the registration process and will be processed in order to provide the service:

- first name and last name
- e-mail address
- IP address

Additionally, you must indicate a password for your account. After registration you must log in with provided information in order to use the website.



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### 9.1.2 General use

The AIRe Link solution is hosted on server by Amazon Web Services EMEA SARL (AWS), 38 AVENUE JOHN F. KENNEDY, L-1855 LUXEMBOURG, registered with the R.C.S. Luxembourg under registration number B186284. Thus, your personal data collected on this website is stored on the servers of this service provider. When using the AIRe Link Portal, we collect and store certain data automatically. This includes:

- IP address
- Email address
- Phone number
- Full name
- Images
- Video
- Audio
- Transcriptions
- Chats
- Location

In principle, the data are stored on the designated web servers of AWS in Frankfurt, Germany. Due to the storage of your personal data on AWS web servers, in exceptional circumstances, due to Amazon's headquarter, your personal data may be transferred to the USA and thus be transferred to a so-called third country.

The platform database is provided by MongoDB Limited, Building Two, Number One Ballsbridge, Ballsbridge, Dublin 4, Ireland. MongoDB is a document oriented no-sql database engine that is designed to provide scalability and data security. MongoDB Atlas is a managed service that provide MongoDB instances with increased security and resiliency. Following data will be processed in MongoDB:

- IP address
- Email address
- Phone number
- Full name
- Location



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This data processing takes place in order to facilitate the use of the website and the service. Furthermore, this data is technically necessary to ensure the stability and security of our website, like the protection from external attacks and their follow-up. The legal basis for the processing of your personal data is therefore in this case Art. 6 I 1 lit. f 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.

We delete these personal data after the end of the usage process, unless we need them for the purposes of misuse detection and misuse prosecution; in such a case, we retain these data for a maximum of 30 days.

You can find more information about data protection of AWS under <https://aws.amazon.com/compliance/gdpr-center/>. Regarding MongoDB you can find further information about data protection under <https://www.mongodb.com/cloud/trust/compliance/gdpr>

### 9.1.3 Inline Manuals

To provide our users inline manuals on our platform we are using the Usetiful Product Tours. This solution is provided by Dobbytec OÜ, Sepapaja tn 6, 15551 Tallinn, Estonia. Such manuals guide the user directly in the application and in real time during use.

We would like to point out that the inline manuals can only be provided if the user accepts the useful-visitor-ident cookie that is provided by Usetiful.com. The Cookie sets an unique identifier that expires after one year. Usetiful will process the identifier and your IP-address to provide you inline manuals. The inline manual will start automatically by clicking on different sections in the portal, if the cookie was accepted before. In this way each consent will be given before an inline manual starts. Therefore, the legal basis for the processing of your personal data in the context of inline manuals is your consent pursuant to Art. 6 I 1 lit. a GDPR. Information on your right of withdrawal can be found under point 2.9 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.



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## 9.2 Processing activity – Payment management

For our payment management we are using the online payment service Stripe Paygate. This service is provided by Stripe Payments Europe, Ltd., The One Building, 1 Grand Canal Street Lower, Dublin 2, Ireland. We are managing with Stripe payments and also finance reportings, VAT rate and automatic renewals. Following data are processed by Stripe:

- Bank account details
- Payment card details
- Cardholder name
- IP address
- Email address
- Location

The legal basis for the processing of your personal data is in this case Art. 6 I 1 lit. b GDPR, it is necessary to process these data for the fulfilment of a contract with you. We will store the payment data for ten years in accordance with § 147 I of the Fiscal Code of Germany (AO). Due to Stripe´s headquarter localization, the transfer of your personal data to Stripe 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 2.9 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.

You can find more information about data protection of Stripe under <https://stripe.com/en-de/guides/general-data-protection-regulation>.



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### 9.3 Processing activity – AIRe Link Community Forum

To provide our customers with interesting information about the AIRe Link solution, we have developed the AIRe Link Community Forum. Here you can find information on technical and support topics, important documents, resources and other information about AIRe Link. Additionally, in the community area you can share your experiences with other users, get answers to questions and discuss improvements with the development team.

We process your personal data only when you are logged in with your AIRe Link user credentials. The following personal data is processed in the Community Forum:

- IP address
- Email address
- Full name

Your personal data will be processed in the same way as for the general use of the AIRe Link Portal. Under section 9.1.2 General use you can find further information.

The legal basis for the processing of your personal data in the Community Forum is your consent pursuant to Art. 6 I 1 lit. a GDPR. Due to Amazon's localization, the transfer of your personal data to Amazon 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 2.9 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.





#### 9.4 Processing activity – Consent Management Platform

On our website we use the Cookiebot Consent Management Platform which is provided by Cybot A/S, Havnegade 39, 1058 Copenhagen, Denmark. 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, 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 Cookiebot Consent Management Platform, the following data may be processed, among other things:

- Consent data
- Consent -ID
- Consent status (Opt-in, Opt-out)
- Consent timestamp
- Version of the banner template
- Device data (http Agent, http Referrer)
- Anonymous IP Address
- Country via IP Address

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



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Deletion of your personal data in connection with the use of the Cookie 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 – Special fonts / Google fonts

On our website, we use fonts from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. These fonts are grouped together by Google under the name Google Fonts. By using Google Fonts, no cookies are set on your device. The fonts are loaded and integrated via the corresponding application programming interfaces (APIs for short) from Google (fonts.googleapis.com and fonts.gstatic.com). The request to load and integrate the Google Fonts takes place shortly after your visit to our website. The request transmits personal data such as your IP address or the version of your browser to the Google servers and requests the corresponding cascading style sheets (CSS files) and font files from Google. Style sheets are files that are used to change the design of a website, such as the font or font size. A font file contains any information about how the font is displayed. Requests for CSS files are stored by Google for one day and requests for font files are stored for one year. The legal basis for the processing of your personal data in the context of the use of Google Fonts is your consent pursuant to 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 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 2.9 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.

Your personal data will not be stored by us as the controller.



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## 9.6 Processing activity – Google Maps

In the AIRE Link Portal we use the location APIs by Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. We use the services of Google to provide you with map previews. In this way, it is possible to calculate various statistics that give you, for example, an overview of your effectiveness or saved routes through the use of the portal. We are using the proxy to route requests to the Google servers. We are processing your location through the Google APIs and create the route with Google Maps Static APIs. The legal basis for the processing of your personal data in the context of the use of Google Maps 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 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 section 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy. Further information on data protection at Google can be found at the following address: <https://policies.google.com/privacy?hl=en>



## 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 ([Google Analytics Opt-out Browser Add-on Download Page](#))

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 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.



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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 section 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 [Safeguarding your data – Analytics Help \(google.com\)](#) or <https://www.google.com/intl/en/analytics/privacyoverview.html>.

## 9.8 Processing activity – Social networks on our website

### 9.8.1 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:

LinkedIn: [AIRe Link Remote Visual Support | LinkedIn](#)

Youtube: [AIRe Link – YouTube](#)

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.



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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 messages. You can assert your rights as a data subject both against us (see also section 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 section "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.

#### 9.8.2 Possibilities of objection in social networks

For a detailed presentation of the respective processing and the possibilities to object (opt-out) to the data processings by the social networks, we refer to the information of the providers.

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 "Your ad choices" section on [YourOnlineChoices.eu](http://YourOnlineChoices.eu) – [Your ad choices](http://YourOnlineChoices.eu) 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 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.



## 9.9 Processing activity – Targeting und Advertisement

### 9.9.1 Google Adwords

On our website we use the service Google Adwords from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter: Google). This service enables us to draw attention to our appealing offers on external websites by means of advertising material (so-called Google Ads). These advertising materials are delivered by Google via so-called "Ad Servers". Ad server cookies are used for this purpose. For further information on the topic of cookies, please go to "7. cookies". Ad server cookies enable the evaluation of performance parameters (e.g. ad impressions, clicks or conversions). In this way we can determine how successful the individual advertising measures are. If you come to our website via an ad from Google, Google Adwords stores a cookie on your end device. This cookie stores analysis values (unique cookie ID, number of ad impressions per placement (frequency), last impression, opt-out information (marking that the user no longer wants to be addressed)). The cookies set by Google Adwords lose their validity after 30 days. These cookies are not intended to identify you personally. Rather, they enable Google Adwords to recognize your internet browser. If you visit certain pages on the website of an Adwords client, Google and the client will recognize that you have been redirected to the client's page via a clicked advertisement. Google provides us as an Adwords customer with a statistical analysis. This analysis enables us to measure the effectiveness of our advertising measures. We do not receive any further data beyond this.

The legal basis for the processing of your personal data in the context of the use of Google Adwords is your consent according to Art. 6 I 1 lit. a GDPR. When the information stored in the ad server cookies is transferred to Google's servers. Due to Google's localization, the transfer of your personal data to Google 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 section 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.

Further information on data protection at Google can be found here:

[Privacy Policy – Privacy & Terms – Google](#)

[GDPR & Google Ads FAQ – Google Ads](#)



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### 9.9.2 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. 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 | 1 lit. a GDPR.

Because of LinkedIn's localization, the transfer of your personal data to LinkedIn may involve a transfer of personal data to a third country, which is neither in the European Union nor 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 | 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 the worst case, not be able to be exercised. Information on your right of withdrawal can be found under section 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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### 9.9.3 MailChimp

We use the services of MailChimp for customer communication and sending newsletters. The provider is Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA.

MailChimp is a service with which, among other things, the sending of newsletters can be organized and analyzed. If you enter data for the purpose of receiving newsletters (e.g. email address), this data will be stored on MailChimp's servers in the USA.

With the help of MailChimp, we can also analyze our newsletter campaigns. When you open one of our emails, a file contained in the email (so-called web beacon) connects to MailChimp's servers in the USA. This makes it possible to determine whether a newsletter message has been opened and which links, if any, have been clicked. In addition, technical information is recorded (e.g. time of retrieval, IP address, browser type and operating system). This information cannot be assigned to the respective newsletter recipient. It is used exclusively for the statistical analysis of newsletter campaigns. The results of these analyses can be used to better adapt future newsletters to the interests of the recipients.

If you do not want any analysis by MailChimp, you have to unsubscribe from the newsletter. For this purpose, we provide a corresponding link in every newsletter message. Furthermore, you can also unsubscribe from the newsletter directly on the website.

Due to MailChimp's server localization, the transfer of your personal data to MailChimp 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 section 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.



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#### 9.9.4 Newsletter

Konica Minolta offers newsletters to customers and interested parties on a consent-based approach. The only mandatory data for receiving the newsletter is your email 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, we will send you information about the Aire Link solution.

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.

The data you provide us with for the purpose of receiving the newsletter will be stored by us until you unsubscribe from the newsletter and will be completely deleted after you unsubscribe from the newsletter. Data that has been stored by us for other purposes (e.g. email addresses for the member area) remains unaffected by this.

The legal basis for the processing of your personal data for the above-mentioned purposes is your consent pursuant to Art. 6 I 1 lit. a GDPR. Your consent can be withdrawn at any time without giving reasons. 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 section 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.



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### 9.9.5 Everflow

We cooperate with Everflow Technologies Inc, 530 Showers Drive Suite 7-302, Mountain View, San Francisco, CA 94040, USA to support the sales through our partner network of the AIRe Link solution. To be able to see from which partner channels customers are coming, we are using the Everflow affiliate tracking solution to attribute the traffic to partners. Our partners have a unique ID that is transmitted to us if you are coming from a partner channel to register you for the AIRe Link portal. This way we can assign from which partner you come. Your IP-address and email address are the only personal data that are processed with Everflow. The IP-address is necessary to ensure the security of our portal against fraud. The email address is used for your identification. Additionally it is possible that we use Everflow to assign you to the correct Konica Minolta entity, if you are not coming via a partner channel to the AIRe Link portal. The Konica Minolta group consists of a number of national companies, depending on your origin, you will be assigned to the respective local entity. The legal basis for the processing of your personal data is in both cases Art. 6 I 1 lit. f GDPR. Due to Everflow's localization, the transfer of your personal data to Everflow 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 section 2.8 "Right of withdrawal (Art. 7 GDPR)" in this privacy policy.



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### 9.10 Processing activity – CloudFront

This website uses the content delivery network (CDN) CloudFront. This is a service of Amazon Web Services Inc., 410 Terry Avenue North, Seattle, WA 98109-5210, USA (hereinafter: Amazon Web Services). The CDN is integrated in the form of Java script code on our website and reloaded during a visit. CloudFront allows us to provide increased loading performance, improved availability and data loss prevention by providing duplicate data (e.g. graphics or scripts) from this website on different servers around the world. The CDN can speed up the delivery of websites, whether its static objects (e.g., images, style sheets, JavaScript, etc.) or dynamic content (e.g., videos, audio, motion graphics, etc.), to users across the globe. The CDN offers a multitier cache by default that improves latency and lowers the load on origin servers when the object is not already cached at the server.

When you visit this website, Cloudfront is acting like a proxy server between you and the origin server and request data in an automated way to increase the performance. These automated requests may lead to a processing of personal data, such as photo/video files and your IP address, on the servers of Amazon Web Services. Because of Amazon's localization, the transfer of your personal data to Amazon may involve a transfer of personal data to a third country, which is neither in the European Union nor 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. Due to the fact that Cloudfront is embedded on our website by means of Java Script, you can prevent its execution by disabling Java Script in your browser or by installing a so-called Java Script blocker (e.g. <https://www.ghostery.com>).

The legal basis for the processing of your personal data in the context of the use of Cloudfront is our legitimate interest, which in this case is to ensure the security and availability of this website, according to Art. 6 I 1 lit. f GDPR.

You can obtain further information on the subject of data protection at Amazon Web Services at the following address(es): [Data Privacy – Amazon Web Services \(AWS\)](#) or [GDPR – Amazon Web Services \(AWS\)](#)

## 10 Konica Minolta Global Policy

[To the Global Personal Data Protection Policy](#)