

Epson Cloud Solution PORT Membership Service Privacy Policy

(Privacy Statement)

31 July, 2020
SEIKO EPSON CORPORATION
EPSON EUROPE B.V.

Seiko Epson Corporation, including subsidiaries and affiliated companies, ("Epson", "We", "Us" or "The Company") provides Epson Cloud Solution PORT Membership Service ("The Service" or "This service") to all users ("Users" or "you"). We believe that it is important to properly protect the information about users ("personal information") as a social responsibility and strive to handle personal information appropriately based on our personal information protection policy. As part of this, the handling of personal information ("Privacy Statement"), including matters that should be announced in accordance with the "Personal Information Protection Law," will be posted as follows.

Please also read the "Epson Cloud Solution PORT Terms of Use for Member Service" along with this privacy statement.

The controller and European representative

Seiko Epson Corporation is the controller of your personal information.

Seiko Epson Corporation
80 Harashinden, Hirooka,
Shiojiri-shi, Nagano-ken
399-0785
Japan

The representative for Seiko Epson Corporation within the European Union is:

Epson Europe B.V.
Azië Building, Atlas Arena
Hoogoorddreef 5
1101BA Amsterdam Zuid
The Netherlands

1. Collection method and information collected

We collect personal information from users by the following methods. In order to improve the service, we may collect additional information other than those listed below, but we will notify the user before starting acquisition of additional information.

1-1. Collection of information for user registration

We will manage personal information, including but not limited to, such as name, e-mail address, password, company name, department name, location, type of business, number of employees and telephone number provided to us for user registration of this service.

1-2. Collecting information for understanding usage environment

In order to understand the environment for using this service, information including but not limited to, such as your OS, version number, product type and service pack is managed as personal information.

1-3. Collecting device information registered in the system

Device information (model name, series name, serial number, etc.) of the printer that is the target of this service, installation environment information (temperature, humidity, atmospheric pressure, etc.), operation information (printer usage status, error information, job information, consumables and media information) is managed as personal information.

1-4. Collecting information when a user accesses the service

When a user accesses this service, we may collect information such as page browsing history as information regarding the user's behaviour and use it for improving convenience of the service. This information includes website usage history and session cookies.

As one of the cookies, we use Google Analytics of Google Inc. to collect and analyse usage history. Google Analytics uses first party cookies to record information about your access.

The privacy policy of Google Analytics is set in the privacy policy of Google Inc.

You can refuse to receive cookies on your decision; however, you may not be able to use some of the functions of this website or this service.

*We do not use Do-Not-Track signals.

2. Legal basis and Purpose of use of personal information

The legal basis for this Service is that it is necessary for the legitimate interests of Epson or companies within the Epson group in providing this Service to you.

We will use personal information within the scope of the purpose of use notified to you when acquiring personal information, or the following purpose ("purpose of use"). Except for the purpose of use, we will not use it unless it is described in "3. Sharing information to third parties" or with the prior consent of you.

- Your registration and certification to use this service.
- Contact with you regarding this service.
- Provision, maintenance, protection and improvement of this service.
- Response to complaints related to privacy information with regards to this service.

However, in the following cases, we may use personal information even if it is outside the scope of the purpose of use.

- When required by law.
- When it is necessary to protect the life, body or property of a person and it is difficult to obtain the consent of the person.
- When it is particularly necessary to improve public health or promote the healthy development of children, and it is difficult to obtain the consent of the person.

- In cases where it is necessary for a national institution or local government or a person entrusted with it to carry out the affairs stipulated by law, and with the consent of the person concerned, the execution of the affairs When there is a risk of hindrance.

3. Sharing information to third parties

We will not provide personal information to third parties except with the consent of you. However, regarding the following cases, we may provide personal information to a third party.

3-1. About shared use

To the extent necessary to achieve the purpose of use, we may disclose or provide the acquired personal information and the content of inquiries to each company of the Seiko Epson Group in a paper or electronic medium.

Please refer to "1. Collection method and information collected" for the personal information items shared with group companies, and "2. Legal basis and purpose of use of personal information" for the purpose of use.

The following is the person responsible for the management and operation of personal information when sharing the Seiko Epson Group.

SEIKO EPSON CORPORATION
Epson Cloud Solution PORT Personal Information Protection Manager

3-2. About outsourcing to a third party

We may entrust all or part of the handling of personal information to a third party ("consignee") within the range necessary for achieving the purpose of use.

When entrusting, we will entrust personal information to the minimum extent necessary to carry out our business under strict control and will supervise the consignee as necessary and appropriate.

3-3. Use of information provided to the outside the company

We may provide statistical information to third parties so that we cannot identify individuals.

3-4. Business transfer, etc.

As a company, we may take over the business due to merger or other reasons. In that case, personal information will be handled even after succession to the extent necessary to achieve the purpose of using the personal information before succession.

3-5. Provision based on laws and regulations

We may provide personal information to a third party in the following cases.

- When required by law.
- When it is necessary to protect the life, body or property of a person and it is difficult to obtain the consent of the person.
- When it is particularly necessary to improve public health or promote the healthy development of children, and it is difficult to obtain the consent of the person.
- In the case where it is necessary for a national institution or local public entity or a person entrusted with it to carry out the affairs stipulated by law, and with the consent of the person concerned, the execution of the affairs when there is a risk of hindrance.

3-6. Transfer of data outside the European Economic Area (EEA)

Epson uses third parties to perform some processing activities on its behalf. Some or all of your personal information may be disclosed to them, but they are only permitted to use the disclosed data for the purposes for which Epson holds your information and in accordance with Epson's directions.

Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Epson shares your personal data within Epson's companies. This involves transferring your personal information outside the EEA.

Whenever Epson transfers your personal information outside the EEA, Epson ensures that a similar degree of protection is afforded to it by the implementation of at least one of the following safeguards:

- Epson will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission. In 2019 Japan has been granted adequacy deal on Data Protection by the European Commission.
- When Epson shares your personal information within Epson's companies or uses certain third parties, Epson uses the Model contracts for the transfer of personal information to third countries approved by the European Commission, which give personal information the same protection it has in Europe.

4. Safety management of personal information

In order to properly manage personal information, the Company will supervise employees and will exercise due diligence to ensure proper management. In addition, personal information is kept accurate and up to date within the range necessary to achieve the purpose of use, and is safely managed by a server protected by a firewall, etc. to prevent unauthorized access, loss, destruction, falsification, leakage, etc.

For personal information entrusted to us by the user, we will delete the user registration information and delete the printer information when the service is no longer required for the user, such as when the user has finished using the service.

The password entered by the user when using this service shall be managed by the user himself and shall not be disclosed or leaked to a third party.

In addition, if we learn of the fact that the password has been stolen or used by a third party, we will inform you immediately of that fact, and if we receive instructions from you, we will comply with it.

5. Contact point for personal information

For inquiries and complaints about personal information, please contact the following contact.

Contact point for personal information

80 Harashinden, Hirooka, Shiojiri-shi, Nagano-ken 399-0785
SEIKO EPSON CORPORATION
Epson Cloud Solution PORT Personal Information Protection Manager
E-mail: privacy.ecsp@exc.epson.co.jp

*Inquiries regarding the use and consideration of this service and products cannot be answered at this window, so please inquire at the contact information for each product.

Contact point if you reside in the European Economic Area. The European representative of the controller of the information and its European Data Protection Officer may be contacted by writing to:

The EDPO
Epson Europe B.V.
Azië Building, Atlas Arena
Hoogoorddreef 5
1101BA Amsterdam Zuid
The Netherlands.

or, using E-mail: edpo@epson.eu

6. Retention period, Exercise of your rights: disclosure, correction, suspension of use, deletion, etc. of personal information

Epson will hold your personal data for the duration of the Services. After that time some information may be held but only in an anonymised form or as part of archived records.

If you require disclosure of the content of personal information, purpose of use, or make corrections regarding personal information, please contact the person in charge of the company who accepted the application for using this service, or please contact the "5. Contact point for personal information". After confirming your identity, we will promptly perform procedures such as disclosure of personal information.

If you are an individual resident within the European Economic Area, Epson is subject to the legal requirements contained in the GDPR. As a "data subject" you have statutory rights to request from Epson access to and rectification or erasure of personal data or restriction of processing concerning yourself or to object to processing as well as the right to data portability and the right to lodge a complaint with a supervisory authority. Please contact: The EDPO, Epson Europe B.V., Azië Building, Atlas Arena, Hoogoorddreef 5, 1101BA Amsterdam Zuid, The Netherlands, or, using Email: edpo@epson.eu.

7. Compliance with laws and regulations / Revision of privacy statement

Epson manages and uses personal information in accordance with laws and regulations in Japan and any applicable data protection law (e.g. GDPR). We may revise the privacy statement in order to comply with changes in laws and regulations in Japan, to ensure the protection of personal information more securely, or for other reasons. We will inform you when updating.

8. Revision history

31 July, 2020 Initial release