

## **I.R.I.S. – Universal Privacy Notice**

This Privacy Policy explains how we process the personal information that we collect from you when you attend our events or premises, or use our websites, apps, platforms and services governed by this Privacy Policy (our "Services").

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.
- Ordering a Product from our Webshop
- Taking part in research, for example a survey or contest.
- Using our Partner Portal or Therefore Partner Portal.
- 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 Service we offer: You will be asked for several personal details that are necessary to create your Partner 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 Partner Portals) 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, including via a Partner Portal.

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 a I.R.I.S. website 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.
  - When you install a I.R.I.S. mobile app, a unique application number along with information about your device is sent to I.R.I.S., making it easier for I.R.I.S. to maintain its apps and Services and offer automatic updates.
- 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 Facebook 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.

### **2.4.2. Product Details, Product Usage and Support & Service History**

This is information about your I.R.I.S. products (such as product model, serial number and purchase date), of how you set up and use your I.R.I.S. products (e.g. scanner and/or software settings) and our Services, as well as details on your Customer Service, Warranty and Repairs interactions with I.R.I.S.. Sometimes, this information is linked to your business, but at other times it must necessarily be linked to you personally.

Some of the information under this category does not qualify as personal information, but we will apply any necessary safeguards to ensure as well the privacy of this information. We will process this data for the following purposes:

- To provide you with more useful information, more relevant content and offers, latest updates of bug fixing, and latest news about products and events: For example, understanding the scanner settings you like to use means we can provide you with more personalized and helpful information, such as expert hints and tips, learning resources, or details about relevant training courses.
- To provide, maintain, protect and improve products and services, and to develop new ones: Understanding how our customers use our products help us identify features that we need to improve or add to future products.
- To help solve any issues you might have with I.R.I.S. products and Services:
  - We require your product information so that we can troubleshoot your queries more effectively, providing you with information which is specific to your I.R.I.S. product.
  - Understanding your Operating System (OS) allows us to troubleshoot your query more effectively, for example, by providing you with information about relevant driver downloads.
  - We will use this information to evaluate whether your I.R.I.S. product is eligible for warranty coverage.

## **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. To send out surveys and use the results to improve our products and services**

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 (you can usually opt out of this during the survey, if you're not interested).

## **2.8. Purchase Information**

We keep records about goods and services you buy through I.R.I.S. Services. 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. Payment Information**

We do not process or store your bank or credit/debit card details used when purchasing goods and services through I.R.I.S. Services. Payments for purchases are completed through third-party payment platforms which do not share your banking details with I.R.I.S..

## **2.10. 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.

## **2.11. 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 group of companies who have a “need to know” such information. For example, we may pass any personal data we collect about you to our local sales businesses or local service centres in order to provide our Services where you are located.

### **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. group companies.

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 warehousing and delivery, maintenance and servicing partners, software development, website 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. and/or other I.R.I.S. group companies 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: [helpdesk@irislink.com](mailto:helpdesk@irislink.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 machine-readable 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 accessing your Partner Portal accounts (in some circumstances), clicking on the link provided in our communication emails, or accessing the relevant section of the I.R.I.S. websites or apps or 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: [helpdesk@irislink.com](mailto:helpdesk@irislink.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. Please note that where you unsubscribe from our marketing communications, we will keep a record of your email address to ensure we do not send you marketing emails in future.

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 at a I.R.I.S. Services).

## **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.

## **11. Contacting I.R.I.S.**

Please contact I.R.I.S. with any questions or comments about this Privacy Policy from following I.R.I.S. global website:

<https://irisincorporate.com>

Alternatively you can contact I.R.I.S.'s Data Protection Officer at: [privacy@irisincorporate.com](mailto:privacy@irisincorporate.com)

We hope that I.R.I.S. will be able to resolve any concerns you may have. However, if you are still not satisfied, you may complain to your local data protection authority.

Also, you can contact I.R.I.S. Inc.'s marketing affiliates specified below according to your place of residence:

[Definition of I.R.I.S.]

In the Privacy Policy, "I.R.I.S." shall mean I.R.I.S. Group SA, Rue due Bosquet 10, 1348 Louvain-la-Neuve, Belgium and all of its affiliates specified below.

- a. I.R.I.S. Solutions & Experts S.A, Rue due Bosquet 10, 1348 Louvain-la-Neuve, Belgium;
- b. I.R.I.S. SA, Rue due Bosquet 10, 1348 Louvain-la-Neuve, Belgium;
- c. I.R.I.S. ICT NV, Rue due Bosquet 10, 1348 Louvain-la-Neuve, Belgium;
- d. ONDIT NV; Sint Jobssesteenweg 102, 2930 Brasschaat, Belgium
- e. I.R.I.S. Nederland BV, Bergerweg 170, 6135KD Sittard, The Netherlands
- f. I.R.I.S. AG, Heusstr. 23, 52078 Aachen, Germany;
- g. I.R.I.S. France S.A., 68 avenue de la Victoire, 94310 ORLY, France;
- h. I.R.I.S. Financial Services S.A. & I.R.I.S. Luxembourg S.A, Ecoparc – SolarWind - Rue de 'Industrie,13, 8399 Windhof, Luxembourg.
- i. I.R.I.S. Inc., 955 NW 17th Avenue, Unit D, 33445 Delray Beach, Florida, USA

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## 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.

### **1. Use of Plugins**

#### Use of Google analytics [with anonymization]

Our website uses Google Analytics, a web analysis service from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, hereinafter referred to as "Google". Google Analytics employs so-called "cookies", text files that are stored to your computer in order to facilitate an analysis of your use of the site. The information generated by these cookies, such as time, place and frequency of your visits to our site, including your IP address, is transmitted to Google's location in the US and stored there. In using Google Analytics our website employs the extension, "\_gat.\_anonymizeIp". In doing so, Google abbreviates and thereby anonymizes your IP address before transferring it from member states of the European Union or signatory states to the Agreement on the European Economic Area. Google uses this information to analyze your use of our site, to compile reports for us on internet activity and to provide other services relating to website and internet use. Google may also transfer this information to third parties where required to do so by law or where such third parties process this data on Google's behalf. Google states that it will in never associate your IP address with other data held by Google. You can prevent cookies from being installed by adjusting the settings on your browser software accordingly. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our website. Furthermore, Google offers a deactivation add-on for most current browsers that provides you with more control over what data Google can collect on websites you access. The add-on tells the JavaScript (ga.js) used by Google Analytics not to transmit any information about website visits to Google Analytics. However, the browser deactivation add-on offered by Google Analytics does not prevent information from being transmitted to us or to other web analysis services we may engage. You can find additional information on how to install the browser add-on at the following link:

<https://tools.google.com/dlpage/gaoptout?hl=de>

#### Google-Adwords

Our website uses the Google ad tool "Google-Adwords" for the purpose of promotion. As part of this, our website employs the analysis service "Conversion-Tracking" from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, hereinafter referred to as "Google". If you access our site by way of a Google ad, a cookie is placed on your computer. Cookies are small text files that your internet browser downloads and stores to your computer. These so called "conversion cookies" cease to be active after 30 days and are not used to identify you personally. If you visit certain pages of our website while the cookie is still active, we and Google know that you, as user, have clicked on ads placed on Google and were redirected to our site. Google uses the information obtained through "conversion cookies" to compile statistics for our website. These statistics tell us the total number of users who have clicked on our ad as well as which pages of our site were then accessed by each user. However, neither we nor other advertisers who use "Google-Adwords" receive any kind of information that can be used to personally identify users. You can prevent the installation of "conversion cookies" by making the appropriate change to your browser settings, for example by setting your browser so that the automatic placement of cookies is deactivated or by blocking cookies from the domain "googleadservices.com".

You can obtain the relevant data privacy policy from Google at the following link:

<https://services.google.com/sitestats/de.html>

### LinkedIn Plugins (Share Button)

Our website uses plugins provided by the network LinkedIn. LinkedIn is a service of LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Each time our website receives an access request equipped with a LinkedIn component, the component prompts your browser to download an image of this component from LinkedIn. Through this process, LinkedIn is informed exactly which page of our website is being accessed. By clicking the LinkedIn “recommend button“ while logged into your LinkedIn account, you can link content from our website to your LinkedIn profile. This allows LinkedIn to associate your visit to our site with your LinkedIn account. We have no control over the data that LinkedIn collects thereby, nor over the extent of the data that LinkedIn collects. Nor do we have any knowledge of the content of data transferred to LinkedIn. Details on data collection by LinkedIn as well as your rights in this regard and your browser setting options may be obtained from the LinkedIn data privacy policy, which may be accessed at: <http://www.linkedin.com/legal/privacy-policy>

### Vimeo Plugin

On our website features of the service of Vimeo are involved. These features are offered by Vimeo, LLC 555 West 18th Street New York, New York 10011. For further information, please visit <http://vimeo.com/privacy>

Integration of services and contents of third parties

It is possible that, within the scope of our website, third party contents like, e.g. YouTube videos, map images provided by Google-Maps, RSS feeds, or graphics are integrated from other websites. This always implies that the providers of these contents (hereinafter referred to as "third-party providers") detect the user's IP address, as without the IP address they could not send the contents to the browser of the respective user. This means that the IP address is necessary to display such contents. We make an effort to exclusively use contents whose providers use the IP address only for the delivery of contents, but we have no way of ensuring that third party providers will not store the IP address for statistical purposes.