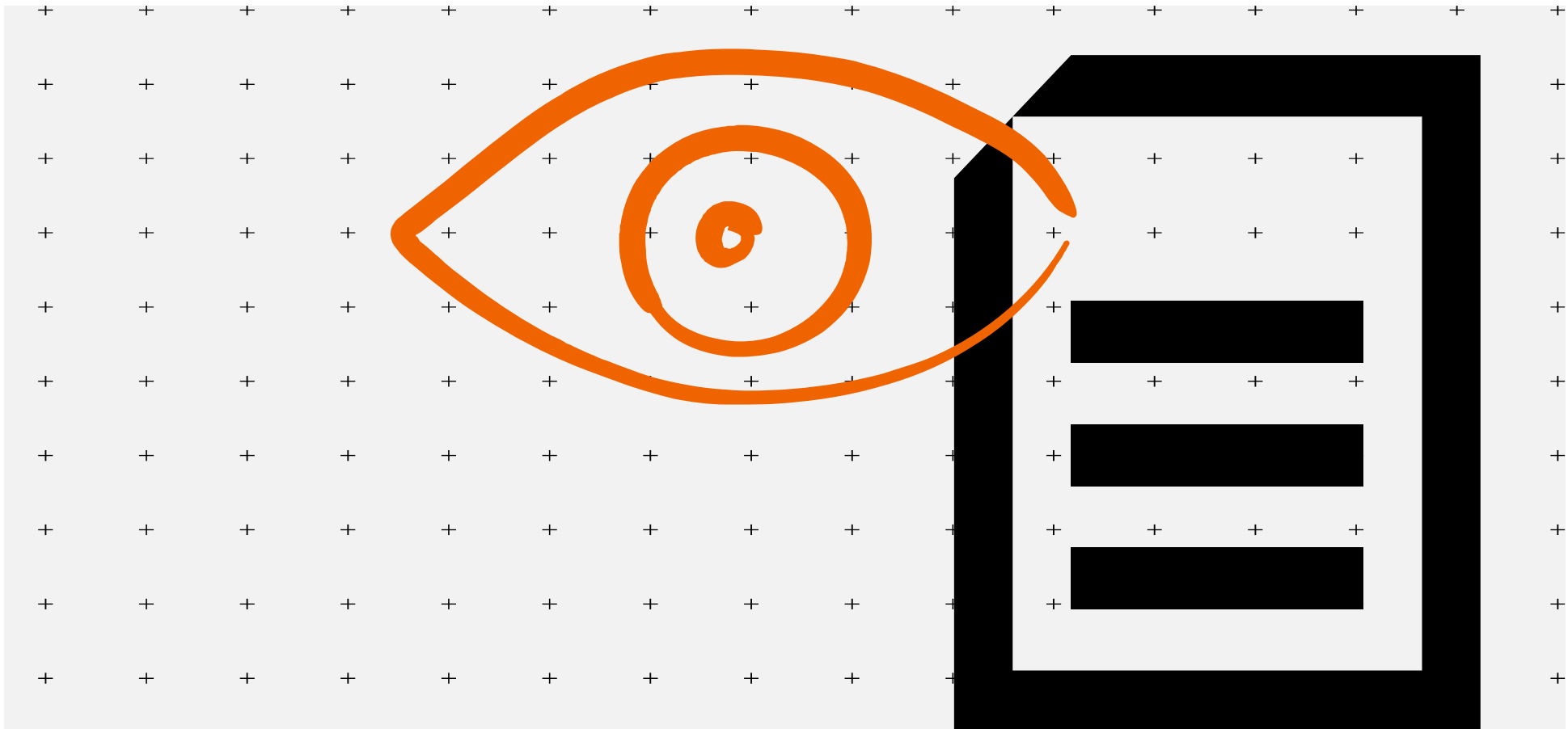




Kyocera Sub - Processors

November 2023



KYOCERA Document Solutions Europe B.V. and its EU subsidiaries engage both KYOCERA entities and third parties as sub-processors to deliver KYOCERA services. Here you find a list of sub-processors who may process personal data to deliver KYOCERA services.



Third-party sub-processor for KFS	Location	KYOCERA service	Measures to ensure that level of data protection is not undermined
Microsoft Operations Pte Ltd. Singapore, represented by Microsoft Ireland Operations, Ltd. (Microsoft Azure, region North Europe)	Ireland	Provision of cloud hosting services for KFS	Transfer is based on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 (Microsoft Data Processing Addendum). After assessing Microsoft's implemented technical and organizational measures, Kyocera concluded that these provide data subjects a level data protection equivalent to GDPR.
Twilio, Inc*	USA	Provision of email services within KFS	Transfer is based on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 (Twilio Data Protection Addendum). After assessing Twilio's implemented technical and organizational measures, Kyocera concluded that these provide data subjects a level data protection equivalent to GDPR.
Skyline Product LLC*	Ukraine	KFS, (remote) maintenance	Transfer is based on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679. After assessing Skyline Product's implemented technical and organizational measures, Kyocera concluded that these provide data subjects a level data protection equivalent to GDPR. Personal data is masked before it is sent to sub-processor.

KYOCERA sub-processor for KFS	Location	KYOCERA service	Measures to ensure that level of data protection is not undermined
KYOCERA Document Solutions Europe B.V.*	Netherlands	KFS, License management and activation	n/a
KYOCERA Document Solutions Inc.*	Japan	KFS, (remote) maintenance	Transfer is based on EU-Japan adequacy decision, Art. 45(1) GDPR.
KYOCERA Document Solutions Development America, Inc. (KDDA)*	USA	KFS, (remote) maintenance	Transfer is based on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679. After assessing KDDA's implemented

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KYOCERA Document Solutions Development Philippines, Inc. (KDDP)*	Philippines	KFS, (remote) maintenance	Transfer is based on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679. After assessing KDDP's implemented technical and organizational measures, Kyocera concluded that these provide data subjects a level data protection equivalent to GDPR.

Proposed sub-processor for KFS and (remote) maintenance	Location	Kyocera service	Objection deadline
None			

Third party sub-processors for remote maintenance	Location	KYOCERA service	Measures to ensure that level of data protection is not undermined
Toshiba Information Systems (Japan) Corporation*	Japan	Remote maintenance	Transfer is based on EU-Japan adequacy decision, Art. 45(1) GDPR. Additionally, the parties concluded standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679.
Advance World Solutions, Inc.*	Philippines	Remote maintenance	Transfer is based on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679. After assessing Advance World Solutions implemented technical and organizational measures, Kyocera concluded that these provide data subjects a level data protection equivalent to GDPR. Personal data is masked before it is sent to sub-processor.
Software Research Associates, Inc.*	Japan	Remote maintenance	Transfer is based on EU-Japan adequacy decision, Art. 45(1) GDPR. Additionally, the parties concluded standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679.
Technical Group Laboratory, Inc.*	Japan	Remote maintenance	Transfer is based on EU-Japan adequacy decision, Art. 45(1) GDPR. Additionally, the parties concluded standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679.

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KYOCERA sub-processors for remote maintenance	Location	KYOCERA service	Measures to ensure that level of data protection is not undermined
KYOCERA Document Solutions Europe B.V.*	Netherlands	License management and activation	n/a
KYOCERA Document Solutions Inc.*	Japan	Remote maintenance	Transfer is based on EU-Japan adequacy decision, Art. 45(1) GDPR.
KYOCERA Document Solutions Development America, Inc. (KDDA)*	USA	Remote maintenance	Transfer is based on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679. After assessing KDDA's implemented technical and organizational measures, Kyocera concluded that these provide data subjects a level data protection equivalent to GDPR.
KYOCERA Document Solutions Development Philippines, Inc. (KDDP)*	Philippines	Remote maintenance	Transfer is based on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679. After assessing KDDP's implemented technical and organizational measures, Kyocera concluded that these provide data subjects a level data protection equivalent to GDPR.

Proposed sub-processors for remote maintenance	Location	Kyocera service	Objection deadline
None			

Third party sub-processor for KCPS	Location	KYOCERA service	Measures to ensure that level of data protection is not undermined
Amazon Web Services Japan G.K, represented by Amazon Web Services Germany GmbH (Amazon Web Services EU (Frankfurt Region))	Germany	Provision of cloud hosting services for KCPS	Transfer is based on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 (AWS GDPR Data Processing Addendum). After assessing AWS's implemented technical and organizational measures,

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KYOCERA sub-processors for KCPS	Location	KYOCERA service	Measures to ensure that level of data protection is not undermined
KYOCERA Document Solutions Europe B.V.* (KDE)	Netherlands	KCPS support services, license management and activation	n/a
KYOCERA Document Solutions Inc.* (KDC)	Japan	KCPS (remote) support service, hosting of KCPS on AWS servers	Transfer is based on EU-Japan adequacy decision, Art. 45(1) GDPR.
KYOCERA Document Solutions Development America, Inc. (KDDA)*	USA	KCPS (remote) support services	Transfer is based on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679. After assessing KDDA's implemented technical and organizational measures, Kyocera concluded that these provide data subjects a level data protection equivalent to GDPR.

Proposed sub-processors for KCPS	Location	Kyocera service	Objection deadline
None			

Third-party sub-processor for KCIM	Location	KYOCERA service	Measures to ensure that level of data protection is not undermined
Google Cloud Japan G.K. (Google data center in Belgium)	Belgium	Providing cloud hosting services for KCIM	Transfer is based on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 (AWS GDPR Data Processing Addendum). After assessing Goo's implemented technical and organizational measures, Kyocera concluded that these provide data subjects a level data protection equivalent to GDPR.

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KYOCERA sub-processor for KCIM	Location	KYOCERA service	Measures to ensure that level of data protection is not undermined
KYOCERA Document Solutions Europe B.V.* (KDE) (Branch Office in Germany)	Germany	KCIM support services	n/a
KYOCERA Document Solutions Inc.* (KDC)	Japan	KCIM (remote) support services	Transfer is based on EU-Japan adequacy decision, Art. 45(1) GDPR.
KYOCERA Document Solutions Development America, Inc. (KDDA)*	USA	KCIM (remote) support services	Transfer is based on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679. After assessing KDDA's implemented technical and organizational measures, Kyocera concluded that these provide data subjects a level data protection equivalent to GDPR.
OPTIMAL SYSTEMS GmbH, Germany	Germany	KCIM (remote) support services	n/a

Proposed sub-processor for KCIM	Location	Kyocera service	Objection deadline
None			

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Kyocera Document Solutions Europe B.V. is a group company of Kyocera Document Solutions Inc. , a global leading provider of total document solutions based in Osaka, Japan. The company's portfolio includes reliable and eco-friendly MFPs and printers, as well as business applications and consultative services which enable customers to optimize and manage their document workflow, reaching new heights of efficiency. With professional expertise and a culture of empathetic partnership, the objective of the company is to help organisations put knowledge to work to drive change.

Kyocera Document Solutions Inc. is a group company of Kyocera Corporation (Kyocera), a leading supplier of semiconductor packages, industrial and automotive components, semiconductor packages, electronic devices, smart energy systems, printers, copiers, and mobile phones. During the year ended March 31, 2023, the Kyocera Group's consolidated sales revenue totalled 2 trillion yen (approx. US\$15.1 billion). Kyocera is ranked #672 on *Forbes* magazine's 2023 "Global 2000" list of the world's largest publicly traded companies, and has been named by *The Wall Street Journal* among "The World's 100 Most Sustainably Managed Companies."

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