

Olympus Dictation Delivery Service

Declaration of Conformity to the GDPR

Appropriately managing and safeguarding personal data is fundamental to OM Digital Solutions Corporation (“We” or “OMDS”), our core values, external business partners, employees, and customers. We are committed to ensuring the security and protection of the personal data that we process and to providing a compliant and consistent approach to data protection.

We have created this declaration to explain our approach to implementing our GDPR compliance program in relation to the Olympus Dictation Delivery Service (“ODDS”). It describes the implementation of our data protection roles, policies, procedures, controls, and measures to ensure ongoing compliance with the GDPR.

Our GDPR Principles

OMDS takes the privacy and security of data subjects and their personal data very seriously. Our principles for processing personal data are as follows:

- We will process all personal data fairly and lawfully.
- We will process personal data only for specified and lawful purposes.
- Where practical, we will keep personal data up to date.
- We will not keep personal data for longer than is necessary.
- We will conclude an agreement with our contractor regarding processing personal data as required.

Our Privacy Policy

OMDS has established a privacy notice for ODDS in compliance with the transparency and information obligations under the GDPR. Please refer to the privacy notice via the link below.

- Olympus Dictation Delivery Service (ODDS) Privacy Notice
<https://cs.olympus-imaging.jp/en/support/imshow/digicamera/download/policy/olympusdictation/eulaen.html>

Our Data Security

OMDS is committed to protecting the data that we collect through ODDS. We have implemented appropriate technical and organizational measures to ensure a level of security appropriate to the risk. Examples of these measures are:

- Only authorized employees may access personal data and then only in the context of authorized business functions.

- We use encryption when transferring your sensitive personal data.
- We use firewalls to ensure that unauthorized persons do not gain access to your information.
- We have established data breach protocols to follow in the event of a data breach.

Data Retention

We will retain your personal data for only as long as necessary to provide ODDS to you and as long as necessary for our essential business purposes. We have established appropriate criteria for ODDS.

International Data Transfers

Where we store or transfer personal data outside the EU, we have robust procedures and safeguarding measures. Our procedures include a continual review of countries with sufficient adequacy decisions, as well as provisions for binding corporate rules; standard data protection clauses, or approved codes of conduct for those countries without sufficient adequacy decisions.

Data Subjects Rights under the GDPR

At OMDS, a data subject can request information about:

- What personal data we hold about him/her/them;
- The categories of personal data we collect;
- The purposes of collecting and processing personal data;
- How long we plan to keep the personal data;
- The process to have incomplete or inaccurate personal data corrected or completed; and
- Where applicable, the process to request the erasure of personal data or restrict the processing of personal data in accordance with data protection laws, as well as to object to any direct marketing from us.

Our GDPR Compliance Plan

An overview of the steps that we are taking to ensure compliance with the GDPR at OMDS is as follows:

- We have established procedures and policies to restrict the processing of personal data.
- We have updated our procedures for data breaches and incident responses.
- We have updated our company's Data Protection Policy, Data Retention Policy, Information Security Policy, Cookies Policy, and Privacy Policy.
- We have reviewed all processing activities to identify the legal basis for processing personal data and to ensure that each basis is appropriate for the activity it relates to.

EU Representative

We have appointed an EU Representative. Our EU Representative is responsible for liaising with local data protection authorities in the EU and answering data subjects' questions about their rights. To contact our EU Representative regarding GDPR-related questions, please send an email to data-protection@om-digitalsolutions.com.

Contact us if you have GDPR-related questions

If you have any questions about this declaration or our privacy or security practices, please contact us:

- Email: data-protection@om-digitalsolutions.com