

Ricoh Canada Inc. ("Ricoh") is committed to protecting personal information of its customers and employees. In this regard, it has implemented this Privacy Policy to describe our privacy practices, including how we collect, use or disclose personal information. Ricoh is committed to meeting its obligations under applicable privacy legislation, including those set out in the *Personal Information Protection and Electronic Documents Act* (Canada) ("PIPEDA")

WHAT IS PERSONAL INFORMATION?

Personal information means any information about an identifiable individual, but does not include the name or business contact information of an employee of an organization. Personal information includes, without limitation, name, address, telephone number, e-mail address, social insurance number, and credit card number.

PRIVACY CODE

The following is Ricoh's Privacy Code, which sets out a summary of the principles that govern our collection, use, and disclosure of personal information:

Ricoh Canada's Privacy Code

Principle 1 - Accountability

Each employee or agent of Ricoh Canada is responsible for personal information under his or her control and for compliance with this Code.

Principle 2 - Identifying Purposes

The purposes for which personal information is collected shall be identified before or at the time the information is collected.

Principle 3 - Consent

The prior knowledge and permission of the individual are required for the collection, use or disclosure of personal information other than as permitted or required by law.

Principle 4 - Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified. Personal information shall be collected by fair and lawful means.

Principle 5 - Limiting Use, Disclosure and Retention

Personal information will not be used, disclosed or retained for purposes other than those for which the information was collected, except with the permission of the individual, or as permitted or required by law.

Principle 6 - Accuracy

Personal information shall be as accurate, complete and current as is necessary for the identified purposes for which it is to be used.

Principle 7 - Safeguarding Information

Personal information will be protected by safeguards appropriate to the sensitivity of the information.

Principle 8 - Openness

Ricoh Canada will make readily available to its employees and customers specific information about our policies and procedures relating to the management of their personal information.

Principle 9 - Individual Access

Upon request, an individual will be informed of the existence, use and disclosure of his or her personal information and shall be given access to it. An individual will be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Principle 10 - Handling Complaints and Suggestions

Individuals can address any complaint regarding compliance with the above principles with Marc Cotie, Chief Privacy Officer at (905) 795-6921.

HOW WE COLLECT, USE AND DISCLOSE EMPLOYEE AND CUSTOMER PERSONAL INFORMATION

We will only collect, use and disclose personal information in accordance with this Privacy Policy and the Privacy Code set out above.

Personal information is kept confidential and access to it is restricted internally to people with a business need to know. Ricoh will collect only the information that is required and justified for the stated purpose, and only disclose or use the information for the same purpose for which it was initially collected. Disclosure of such personal information to outsiders other than for the purpose for which the information was collected is not permitted without employee or customer consent (as the case may be) or otherwise in compliance with applicable law.

Collection

Employee Personal Information: Ricoh may request employee personal information for reasons such as:

- to determine eligibility for Ricoh's Group Benefit programs
- to identify the employee to government agencies to which we make remittances on their behalf
- to contact the employee in case of business emergency
- to meet regulatory or contractual requirements relating to the employee's employment at Ricoh.

Customer Personal Information: Ricoh may request customer personal information for reasons such as:

- to complete a purchase or other business transaction
- to schedule merchandise deliveries
- to create a customer account
- to bill the customer's credit card for a purchase
- to confirm and track customer orders
- to respond to customer service inquiries or requests
- to register for a contest or other promotion
- to register as a user of Ricoh's website
- to participate in a review, survey, a consumer research panel, or similar type of activity
- to provide promotional and other communications, if the customer chooses to receive them

- to offer products that the customer may want

Ricoh will only collect, use or disclose personal information with the permission of the discloser, or strictly to the extent necessary to provide its goods and services to the customer. Permission may be expressed in writing, implied through the completion of a company form or by the customer's subscription to a company program or benefit plan. In the case of employee personal information, failure to sign and return an acknowledgement or consent form, either accidentally or deliberately, may jeopardize the employee's access to benefits to which they might otherwise be entitled as an employee of Ricoh.

Consent to collect, use and disclose personal information may be withdrawn at any time, subject to legal and contractual restrictions and reasonable notice. In such an event, the customer or employee will be responsible for any events that may occur as a result of withdrawal of previously provided consent.

We do not share personal information with our affiliated companies without consent of the discloser or strictly to the extent necessary to provide our goods and services or other company programs requested.

Use

Personal information is collected and maintained for the purpose of identifying the customer or employee and providing our goods or services or company programs. Ricoh does not sell personal information it receives.

In the case of employee personal information, a recruiting supervisor or manager can view employment history data, including performance information, of employees being considered for a position in their department.

Personal information will not be released to a third party without the individual's consent or strictly to the extent necessary to provide our goods and services or other company programs requested.

Participation in any promotional activities is voluntary and we will only use the personal information provided for the purposes for which it was collected. We will not send the customer any promotional communications unless they expressly consent to receive such communications from us. Customers will always have the opportunity to "unsubscribe" from receiving e-mail or other communications at any time, by indicating their choice on the applicable consent form, or alternatively by contacting our Chief Privacy Officer.

Disclosure

Before any personal information is made available to third parties (other than as may be required by law, court order or in connection with a dispute) Ricoh will advise employees/customers who is asking for the information, the kind of information requested and why and obtain their written consent to release it.

Third parties will need to request in writing information they require and explain the proposed use of it. Unless we are prohibited from doing so, this request will then be forwarded to the individual concerned for consent. In such a case, Ricoh will only disclose the personal information once we have received the original signed request or have received acknowledged consent via email.

STORING AND DISPOSING OF PERSONAL INFORMATION

Ricoh maintains and stores personal information electronically or in hard copy. Personal information shall be protected by security safeguards appropriate to the sensitivity of the information and be handled and stored in a secure manner to protect the personal information from unauthorized access or disclosure.

All personal information, regardless of format, shall be protected against loss or theft, as well as unauthorized access, disclosure, destruction, copying, use or modification. More sensitive information (e.g. medical information, credit card data, etc.) will be safeguarded by a higher level of protection.

The methods of protection will include:

- physical measures such as locking filing cabinets or storage areas;
- organizational measures such as limiting access to restricted information or year of birth (optional – for security purposes);
- technological measures such as passwords or use of encryption technologies.

Personal information shall be kept only as long as required to fulfil the stated purposes of collection, after which it shall be destroyed in such a way as to make the personal information unusable by unauthorized persons.

Ricoh will keep personal information for a reasonable period of time in order to fulfill legitimate business purposes, or as required or permitted by law or business custom, whichever is longer.

Ricoh will take care in the disposal or destruction of personal information, to prevent unauthorized parties from gaining access to the information. When personal information is no longer required to fulfill the identified purposes it will be destroyed under guidelines prescribed by the company in such a manner as to protect the personal information from unauthorized access or disclosure. Destruction guidelines shall also apply to personal information which an individual has requested be deleted.

Employee personal information may be stored on a server in another country. That country may have privacy laws different from those in Canada. Ricoh has made all reasonable efforts to protect this personal information in the same manner as if it were stored in Canada. Any questions with respect to this matter should be directed to Ricoh's Chief Privacy Officer.

RIGHT TO ACCESS PERSONAL INFORMATION

Active and former employees and customers have the right to be aware of the personal information which Ricoh holds, as well as to view that information.

Any requests by a customer for access to its personal information should be forwarded to Ricoh's Chief Privacy Officer.

Active employees may arrange with the Human Resources or Payroll personnel to view the information in their file. They will be supplied with copies of personal information upon request. Active employees have the right to place their written comments. A copy of such comments must

be provided to the employee's supervisor. If the records are inaccurate, incomplete or equivocal, the employee may request the information be corrected.

The company may levy a charge for the service of retrieving and reproducing files requested by former employees or customers.

HOW TO REQUEST AN UPDATE OR CORRECTION

Ricoh will respond to any request an individual makes in writing, with supporting documentation as appropriate, requesting an update or correction to their personal information which is inaccurate or incomplete. Employees should forward such requests to their Human Resources representative. Customers should forward their requests to Ricoh's Chief Privacy Officer.

Employees or customers may register privacy-related complaints by contacting Ricoh Canada's Chief Privacy Officer, Marc Cotie at (905) 795-6921. The Chief Privacy Officer will explain Ricoh's complaint procedure and investigate all complaints. If a complaint is justified, the Chief Privacy Officer will take all appropriate steps to resolve, including modifying our policies and practices if necessary.

PROVIDING THIRD PARTY REFERENCES AND VERIFICATION OF EMPLOYMENT

Ricoh, as the former employer of an individual, possesses a special knowledge of the employee's character and skills, and has a duty to exercise due skill and care in the preparation of a reference before making it available to a third party. The answers to a reference checker's questions are important to both the prospective employer and the ex-employee. The former wants to ensure that it is selecting the most capable person for the position and relies on the accuracy and comprehensiveness of the information supplied.

All requests for references shall be referred to Human Resources Management. Managers and supervisors should not respond to requests for references, either verbally or in writing.

If an employee requests a written reference, the manager should prepare a draft. Where possible and appropriate, the employee should be permitted input into the contents of the reference letter and/or reference script. The manager forwards the draft reference to Human Resources, who will be responsible for issuing the final reference.

Frequently, organisations require verification of employment information for purposes of approving mortgages, loans, etc. Payroll and Human Resources personnel will **only confirm** information already given to such an organisation by an employee. If the information is significantly inaccurate, the information will not be confirmed. All requests for verification of employment are to be referred directly to the Human Resources Department.

FOR MORE INFORMATION

For more information regarding Ricoh's Privacy Code or Privacy Policy, please contact Marc Cotie, Chief Privacy Officer at (905) 795-6921 or by email at privacy@ricoh.ca.