

Lenovo Smart Lockers Services Privacy Notice

**Effective date April 1st, 2022**

The Lenovo Smart Lockers Services Privacy Notice (“Privacy Notice”) describes: (i) how Lenovo collects, uses, stores or otherwise processes an individual's personal data in the context of Lenovo Smart Locker Services (ii) describes the data sharing relationship between Lenovo and Microsoft Azure

This Privacy Notice governs the relationship between you and Lenovo, and the specific personal data processing activities conducted in connection with the Lenovo Smart Lockers Services. To learn more about how Lenovo handles your personal data, please visit the [Lenovo Global Product Privacy Statement](#). Such privacy notice includes among others, a description of your data protection rights and how you can exercise them, how we may share your personal information or how we protect personal data in our products.

**What personal data does the Lenovo Smart Lockers Services process?**

Please be aware that personal data means any information which is related to an identified or identifiable natural person.

When you choose to use Lenovo Smart Locker Services, Lenovo requires you to provide certain personal data, as described in the table below for the purpose of enabling you to use the services available through the Smart Lockers, such as assign assets, loan & return assets, collect assets and reservation of a locker compartment to return a faulty item, assign loaner item, send items to colleagues, fix of the broken asset, distribute office supplies, storage of a personal item, storage and management of parts.

Please see the following table below for more detailed information.

Data type	Source of the data	Legal basis	Purpose
<ul style="list-style-type: none"><li>E-mail address</li></ul>	From your organization’s authorized administrators.	<ul style="list-style-type: none"><li>Contract performance</li></ul>	<ul style="list-style-type: none"><li>To create user account</li><li>To deliver the features and functions of Smart Lockers Services to you.</li><li>To send you important notifications to you, related to the services that you use.</li></ul>
<ul style="list-style-type: none"><li>Account login credentials</li></ul>	Directly from you, when you log in to the Enterprise User Portal.	<ul style="list-style-type: none"><li>Contract performance</li></ul>	<ul style="list-style-type: none"><li>For user authentication and identification.</li></ul>

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<ul style="list-style-type: none"> <li>▪ Event Data</li> </ul>	From the server, as a result of your usage of the services.	<ul style="list-style-type: none"> <li>▪ Contract performance</li> </ul>	<ul style="list-style-type: none"> <li>▪ To enable your authorized administrator to manage the assets that your organization is providing through Smart Lockers Services.</li> <li>▪ To send reminders to users</li> </ul>
<ul style="list-style-type: none"> <li>▪ Employee Badge ID number</li> </ul>	From your organization's authorized administrators.	<ul style="list-style-type: none"> <li>▪ Contract performance</li> </ul>	<ul style="list-style-type: none"> <li>▪ This feature is only activated if requested by Customer, in order to deliver the features and functions of Smart Lockers Services to you.</li> </ul>
<ul style="list-style-type: none"> <li>▪ QR code/ Authorization Code(s)</li> </ul>	From the server	<ul style="list-style-type: none"> <li>▪ Contract performance</li> </ul>	<ul style="list-style-type: none"> <li>▪ This feature enables safe and touchless authentication.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Transaction history</li> </ul>	From the server	<ul style="list-style-type: none"> <li>▪ Contract performance</li> </ul>	<ul style="list-style-type: none"> <li>▪ To enable your authorized administrator to manage the assets that your organization is providing through Smart Lockers Services.</li> </ul>

Additionally, Smart Lockers System uses the following functional (essential) cookies: a) Authentication cookies, which are session cookies to authenticate user; b) Multimedia player session cookies – to remember which user uploaded multimedia on admin portal.

At the end of a transaction, we will ask you to rate the service. Please note that this is optional.

### How Long do we keep your personal data?

When we design a product, we focus on delivering the best user experience. In order to do so, we will process personal data for the purposes described in this Privacy Notice, but we will only retain your personal information as long as necessary to achieve proper performance of the product. In some cases, we may need to retain your personal data when it is required by law.

Please see below detailed information about the data retention schedule within the context of the Lenovo Smart Lockers Services

Type of data	Retention Period
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<ul style="list-style-type: none"><li>▪ Email address</li><li>▪ Account login credentials</li><li>▪ Corresponding event data</li><li>▪ Account login credentials</li><li>▪ Employee badge number (if feature is activated by Customer)</li><li>▪ Transaction data</li></ul>	We will delete/purge such data 3 years after user account is deactivated.
<ul style="list-style-type: none"><li>▪ Event Data</li></ul>	We will delete Event Data after 7 years from point of collection. If you are still an active user, we will still store your user email address and login credentials so you can use your account.
<ul style="list-style-type: none"><li>▪ QR code/ Authorization Code(s)</li></ul>	Deleted after the completion of transaction.

### How do we share your personal data?

In order to provide the service, we will share your information with Microsoft Azure for storage purposes. As part of Lenovo's data processor arrangement with them, Lenovo requires that Microsoft maintains information security best practices, makes all reasonable efforts to secure your data and only processes your data for the purposes listed in the table below.

### Changes to this Privacy Notice

Our mission is to be as transparent as possible. We might update this privacy notice to let you know about any changes in the way the product, or Lenovo process your personal data and ask you if you are happy with those changes when necessary by law. We will let you know via in-app push notification or e-mail about such changes to make sure you are up to date.

On April 8 2022, we updated this privacy notice in relation to:

- Added "assign loaner item", "send items to colleagues", "fix of the broken asset", "distribute office supplies", "storage of a personal item", "storage and management of parts" as new use cases.
- Added QR Code/ Authorization Code(s) and Transaction data as data collected if Customer requests it.
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- Added new data attributes to the data retention table
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### Contact us

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For any privacy related matters please contact the Lenovo Privacy Program at [privacy@lenovo.com](mailto:privacy@lenovo.com). We will get back to you as soon as possible.