

PRIVACY POLICY

This Privacy Policy applies to the provision of any audio content through the Internet-connected audio device (the “**Service**”) operated and provided by Panasonic Entertainment & Communication Co., Ltd. of Japan having its registered office of 1-10-12, Yagumohigashi-machi, Moriguchi City, Osaka 570-0021, Japan (hereafter referred as “Panasonic”, “we”, “us” or “our”).

Panasonic is represented for any data protection related matters in the European Economic Area (i.e. the European Union, Iceland, Liechtenstein and Norway) and Switzerland, by its German entity, Panasonic Business Support Europe GmbH, having its registered office at The Data Protection Officer Hagenauerstrasse 43 D-65203 Wiesbaden, Germany or by e-mail: Data_Protection@eu.panasonic.com.

If you are located in Brazil, an additional privacy notice applies to you, in accordance with the General Data Protection Law (LGPD). Please see Appendix in the link below.

https://panasonic.jp/support/share2/eww/en/audio/brazil_privacy/english_appendix.pdf

The purpose of this Privacy Policy is to inform you how and why we use and collect information about you (referred to in this Privacy Policy as “**Personal Data**”, as further defined in Section 1 below) when you use the Service. It also explains what your rights and our obligations are in relation to the processing of your Personal Data, in accordance with all applicable data protection legislation (the “**Applicable Data Protection Legislation**”) including without limitation the European data protection legislation and, as from 25 May 2018, the General Data Protection Regulation (the “**GDPR**”) and the Federal Act on Data Protection of 19 June 1992 (the “**FADP**”).

Please read this Privacy Policy carefully as it contains important information for you.

This Privacy Policy does not apply to information that may be collected by or through third party applications that are available through the Service. To the extent the Service may be used by other members of your household or your visitors, we invite you to provide those other users with this Privacy Policy.

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1. What is Personal Data?

For the purposes of this Privacy Policy, “**Personal Data**” consists of any information that relates to an identified or identifiable individual (such as you) or, in Switzerland, an identified or identifiable legal entity. Examples are a specific Panasonic product/device identification number that you purchased, including universally unique identifier, and an online identifier such as your IP address. Information which does not identify you on its own but that we link to you also qualifies as Personal Data.

What Personal Data does Panasonic collect about you?

We automatically collect the IP address of your device’s wireless network interface, device configurations and/or universally unique identifier whenever you connect your audio device to the Internet. Simultaneously, we automatically collect the product/device identification number of the Panasonic product you purchased.

2. On which legal basis do we process personal data?

We are not allowed to process Personal Data if we cannot rely on a valid legal ground. Therefore, we will only process your Personal Data when:

- I. the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request;
- II. the processing is necessary to comply with our legal or regulatory obligations;
or
- III. the processing is necessary for our legitimate interests except where they are overridden by your private interests or fundamental rights and freedoms (or also, in relation to Switzerland, the public interest). Such ‘legitimate interests’ include:
 - (i) to protect the security of our IT systems, architecture and networks;
 - (ii) to protect the rights or property of Panasonic, including enforcing any terms or agreements governing the use of our Service; and

(ii) to meet our corporate and social responsibility objectives.

3. Why do we use your Personal Data?

We will use your Personal Data for the following purposes: to provide the Service, to protect our customers (e.g. to prevent spam or attempts to defraud users of our Service), to operate and maintain the security and integrity of our Service (e.g. to prevent or stop an attack on our systems or networks) or to protect the rights or property of Panasonic, including enforcing any terms or agreements governing the use of our Service (hereinafter together the “Purposes”).

4. To whom and where do we disclose your Personal Data?

We disclose your Personal Data to the entities listed in this Section 5, and in Switzerland, on a strict need-to-know basis, for the Purposes. We require these third parties to take steps to maintain the confidentiality of any Personal Data they may receive from us to perform their functions, consistent with our Privacy Policy, and they may not use the information for any other purpose. We may disclose your information as follows:

I. Panasonic Affiliates

We may need to transfer your Personal Data to other Panasonic Affiliates to provide the Service you require or any other services/assistance. All Panasonic Affiliates are required to follow the privacy practices set forth in this Privacy Policy. In this Privacy Policy, “Affiliates” shall mean any corporate entity that directly or indirectly controls, is controlled by or is under common control with Panasonic Corporation.

II. Other Parties in Connection With Corporate Transactions

We may disclose your Personal Data to a third party (or other Panasonic Affiliate) as part of a reorganization, merger, transfer, sale, joint venture, assignment or other disposition of all or any portion of Panasonic's business, assets or stock, including, without limitation, in connection with any bankruptcy or similar proceeding.

5. Where do we store your Personal Data?

The Personal Data that we collect from you may be stored and processed in your region, or transferred to, stored at or otherwise processed outside the European Economic

Area (“EEA”) or Switzerland, respectively, including but not limited to, Hong Kong and Japan or in any other country which does not offer an adequate level of data protection as recognized by the European Commission or the Swiss Federal Data Protection and Information Commissioner, as applicable, and where Panasonic or its Affiliates, subsidiaries or service providers maintain facilities.

Where we transfer your Personal Data outside the EEA or Switzerland, we will ensure that suitable safeguards are in place to help ensure that our third party service providers provide an adequate level of protection to your Personal Data. In the case at hand, we have put in place an appropriate transfer agreement incorporating the Standard Contractual Clauses approved by the European Commission or the Swiss Federal Data Protection and Information Commissioner, as applicable. You may request additional information in this respect and obtain a copy of the relevant safeguards upon request through sending a request to the contact indicated in section 8 below.

6. What do we do to keep your Personal Data secure?

Panasonic maintains physical, technical, and procedural safeguards to keep the Personal Data we collect in connection with the Service secure. We restrict access to such information to those persons who need to know that information to provide products or services to you and any persons you have authorized to have access to such information. However, please note that although we take appropriate steps to protect your Personal Data, no website, product, device, online application or transmission of data, computer system or wireless connection is completely secure and therefore we cannot guarantee the security of your Personal Data.

7. What are your rights and how can you exercise them?

A. What are your rights?

Panasonic will collect, store and process your Personal Data in accordance with your rights under Applicable Data Protection Legislation.

Your rights under the Applicable Data Protection Legislation include, the right to access a copy of your Personal Data, the right to request the correction or the updating of any inaccurate Personal Data and the right to request the erasure of your Personal Data or to object to the processing of your Personal Data under the conditions set out in the Applicable Data Protection Legislation.

In addition, you also have the right to data portability in certain cases. This is the right to request the return of the Personal Data you have provided to us in a structured, commonly used and machine-readable format and to request the transmission of such Personal Data to a third party, where technically feasible, without hindrance from us and subject to your own confidentiality obligations.

B. Exercising your rights

If you wish to exercise any of the above rights, please contact us in writing at the following contact: <https://panasonic.jp/support/global/cs/contact.html>

We will respond to your request without undue delay and no later than one month from receipt of any such request, unless a longer period is permitted by Applicable Data Protection Legislation.

If you are not satisfied with how we process your Personal Data, you may file a complaint with the competent supervisory authority if you are located in the EEA and with the Swiss Federal Data Protection and Information Commissioner if you are located in Switzerland, in addition to your rights outlined above.

8. How long do we store your Personal Data?

We will retain your Personal Data for three (3) months after you stop using our Service.

9. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. The “Date last updated” mentioned at the bottom of this pages states when the policy was last updated and any changes will become effective 7 days following the posting of the substantive change to the Privacy Policy at the support page of audio device, <https://panasonic.jp/support/global/cs/audio/> and the simultaneous issuing of notifications to all users of the audio device about the substantive change to the Privacy Policy via email or any other means of communication Panasonic disposes of to inform the users of the Service prior to any such changes. Where required by applicable law, we will request your consent to any such changes.

Date last updated: 8 February 2023