

## PRIVACY POLICY

This Privacy Policy applies to the use of any internet-based interactive applications, services and products (each, a “Service”, and collectively, the “Services”) that are operated and provided by Panasonic Entertainment & Communication Co., Ltd. of Japan having its registered office at 1-10-12, Yagumo-higashi-machi, Moriguchi City, Osaka, Japan (together, “Panasonic”, “we”, “us” or “our”) and which can be accessed by means of a Panasonic-branded smart television, portable electronic device with internet connection (including a smart phone or tablet PC) or PC used to access the same Services which you can access from your Panasonic-branded smart television.

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

[Appendix to the Panasonic Privacy Policy Brazilian Legislation]

<[https://av.jpn.support.panasonic.com/support/share2/eww/en/tv/brazil\\_privacy/LGPD\\_Appendix\\_PrivacyPolicy\\_e.pdf](https://av.jpn.support.panasonic.com/support/share2/eww/en/tv/brazil_privacy/LGPD_Appendix_PrivacyPolicy_e.pdf)>

This Privacy Policy explains (1) how and why we use any information about you (referred to in this Privacy Policy as “Personal Data”) that you provide to us or that we collect through your use of the Services through your Panasonic-branded smart television or other devices which are connected to the internet and (2) 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 including, 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.

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 Hagenauer Strasse 43, 65203 Wiesbaden, Germany].

This Privacy Policy does not apply to information that may be collected by or through third party applications that are available through the Services or to services offered by us which

cannot be accessed through your Panasonic-branded smart television or other devices which are connected to the internet.

We may change this Privacy Policy over time. The “Date last updated” mentioned at the end of this document states when the policy was last updated and any changes will become effective upon our notification of the revised Privacy Policy to you. Where required by applicable law, we will request your consent to any such changes. We will notify you of these changes by contacting you via email if you have provided your email address and/or by posting a notice on this page to ensure that you are aware of any changes.

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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. For example, information which identifies you may consist of your name, address, telephone number, payment details, a specific Panasonic product/device identification number that you purchased, location data, an online identifier (e.g. your IP address). Information which does not identify you on its own but that we link to you also qualifies as Personal Data.

#### 2. What Personal Data do we collect about you?

##### A. Personal Data you directly provide about yourself

You can use your Panasonic-branded smart television or other devices which are connected to the internet without providing any Personal Data by not connecting to the internet. However, to enable you to benefit from the Services and certain features within some Services you will

need to connect your Panasonic-branded smart television or other device to the internet and we will request Personal Data from you. You can choose whether or not to provide this information, but you may not be able to access our full Services if you choose not to submit it. We have detailed below the circumstances where we collect your Personal Data in relation to the Services:

#### I. When you create an account for Panasonic ID

To access some Services or functions within these Services you will need to register with us and enter a username and password ("Panasonic ID"). A separate privacy policy <<https://csapl.pcpf.panasonic.com/Agreement/ShowDocuments?docId=pf00010002>> applies to the processing of Personal Data through registration of Panasonic ID.

#### II. When you communicate with us

If you contact us to exercise your rights under Applicable Data Protection Legislation or make inquiry about this Privacy Policy, we may ask you to provide certain additional information, including your name, mailing address, phone number, email address and unique device identifier.

#### B. Information about your use of the Services

In addition to the information that you provide, we automatically collect information about the Services that you use and how you use them via your Panasonic-branded smart television or other devices. For example, when you use the Services, we automatically collect certain information from you such as IP address, unique device identifier, device configurations and device, service and application usage data (however we do not collect data on what you do on such applications). Please note that the IP address of your device's network interface will be collected as soon as you connect your Panasonic-branded smart television or other device to the internet.

#### 3. 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. we have obtained your prior freely given, specific, informed, and unambiguous consent;
- II. the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request;
- III. the processing is necessary to comply with our legal or regulatory obligations; or
- IV. 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). Relevant 'legitimate interests' include:

- i. to benefit from cost-effective services (e.g. we may opt to use certain platforms offered by suppliers);
- ii. to protect the security of our IT systems, architecture and networks; and
- iii. to meet our corporate and social responsibility objectives.

#### 4. How do we deal with children's Personal Data?

The Service is available for individuals of 16 years or older. We do not solicit or knowingly collect Personal Data from or about children under the age of 16 without the consent of a parent or guardian. If we nevertheless become aware that Personal Data that relates to children under the age of 16 has been submitted to us without the consent of a parent or guardian, we will delete such information from our systems as quickly as possible or, where deletion is not possible, we will ensure that the Personal Data is not used for any purpose or disclosed to any third party.

#### 5. Why do we use your Personal Data?

We will use your Personal Data for the following purposes:

- I. To register you and your device for any of our Services, in particular, to connect your Panasonic ID to make sure your commands are properly communicated to your Panasonic-branded smart television or other devices;
- II. To provide the latest version of this Privacy Policy on the Panasonic-branded smart television or other devices;
- III. To provide the Services;
- IV. To provide customer support service for the Services or to deal with any other support queries you may have (such as complaint handling);
- V. To maintain the security and integrity of our systems;
- VI. To analyse, improve, enhance and personalize the Services;
- VII. To abide by the laws of (i) the European Union and of its Member States if you are located in the European Union or (ii) Switzerland if you are located in Switzerland. We reserve the right to access, process and disclose any information that we reasonably believe is necessary to comply with the laws of the European Union or any of its Member States and/or Switzerland, as applicable, or to comply with an order from a court, public authority or competent regulator of the European Union or any of its Member States or Switzerland, as applicable.
- VIII. To protect us and others. We reserve the right to access, read, preserve and disclose any information that we reasonably believe is necessary to comply with the law, subpoena or court order, in full compliance with all applicable laws (including without limitation the Applicable

Data Protection Legislation).

IX. To enforce or apply our Terms and Conditions of Use and other agreements; investigate, prevent or take action regarding illegal activities or suspected fraud; or protect the rights, property or safety of the Company, our employees, our users or others.

X. If you subscribe to Services which require a Panasonic ID, we will process the information you provide in order to obtain such Panasonic ID.

XI. To protect our customers (e.g. to prevent spam or attempts to defraud users of our Services); to operate and maintain the security and integrity of our Services (e.g. to prevent or stop an attack on our systems or networks); or to protect the rights or property of us, including enforcing any terms or agreements governing the use of our Services.

XII. To manage corporate transactions involving our company, including reorganization, merger, transfer, sale, joint venture, assignment or other disposition of all or any portion of our business, assets or stock, including, without limitation, in connection with any bankruptcy or similar proceeding.

#### 6. How long do we store your Personal Data?

We will retain your Personal Data (A) as long as strictly necessary following the collection of the Personal Data for the purposes as outlined in this Privacy Policy with a maximum of 5 years, or (B) until you deactivate the Services, whichever longer, provided however that in no event we will retain your Personal Data after we terminate all of the Services.

You may deactivate the Services on your smart television by taking the following steps; (i) display the menu by press the "MENU" button, (ii) in the menu, select "Network", (iii) select "Terms of Service and Settings" (for some models select "my Home Cloud Settings" and then select "Notices"), and (iv) uncheck the checkbox saying "I agree to the Terms & Conditions of Use and I have read and understood the Privacy Policy".

#### 7. To whom and where we disclose your Personal Data?

##### A. Third party recipient of the Personal Data.

We may disclose your Personal Data to third parties to the entities listed in this Section 7, and in Switzerland, on a strict need-to-know basis, to achieve the purposes described in this Privacy Policy. We require these third parties to take steps to maintain the confidentiality of any Personal Data they may receive from us to perform their tasks, consistent with our Privacy Policy, and we require them not to use this 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 Services you require or any other related services/assistance. All Panasonic Affiliates are required to follow the privacy related rules set forth in this Privacy Policy. For the purpose of this clause, "Affiliates" means any corporate entity that is directly or indirectly controlled by Panasonic.

#### II. Service Providers

We share Personal Data about you with third party service providers solely for the purpose of enabling them to perform services on our behalf that are related to the Services and provided they operate in compliance with our instructions. Examples of such third party service providers are:

service providers who provide us with data hosting services for storing data used for or collected through the Service; and

service providers who provide us with maintenance service for the Service.

#### III. Third parties when required by law or to protect our Services.

We will disclose your Personal Data as required by the laws of the European Union and of its Member States and/or Switzerland, as applicable, such as in response to an order from a court, public authority or competent regulator of the European Union, or one of its Member States or Switzerland, as applicable.

#### IV. Third parties when required by applicable law outside of the European Union and/or Switzerland, as applicable or to protect our Services.

We will disclose your Personal Data in connection with legal requirements, such as in response to an authorized subpoena, governmental request or investigation, or as otherwise required by law, in full compliance with all applicable laws (including without limitation, the GDPR and the FADP).

#### V. Other Parties in connection with corporate transactions.

As our business develops, we may sell, buy, or transfer corporate assets. In such transactions, customer information, including your Personal Data, can be part of the transferred business assets to the extent permitted by applicable law. Also, in the event that we, the Service, or substantially all of our assets are acquired, your Personal Data will be one of the assets transferred in such acquisition to the acquiring company.

#### B. International Transfer of 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 your country of residence, including, in respect of residents (or, for Switzerland, legal entities) to a country outside the European Economic Area (the "EEA") or outside Switzerland, respectively, including but not limited to

the U.S. and Japan or in any other country which do 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 we or our affiliates or service providers maintain facilities. Your Personal Data may also be processed by staff operating inside or outside your country of residence, including staff located outside of the EEA or Switzerland, who work for us or for one of our suppliers or service providers.

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. For the processing of your Personal Data using our Panasonic-branded smart television and other connected devices, 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 section 10 below.

#### 8. What do we do to keep your Personal Data secure?

We maintain physical, technical and procedural safeguards to keep secure the Personal Data about you we collect in connection with the Services. We restrict access to your Personal Data to those persons who need to know it for the purpose described in section 5.

In addition to the above, information security, including the protection of Personal Data, is organized by way of a global Panasonic Program called "Information Security Management" (ISM). The related standards and implementation measures are organized in global policies, standards and guidelines.

Nevertheless, although we take appropriate steps to protect your Personal Data, no website, product, device, online application or transmission of data, computer systems wireless connection is completely secure and therefore we cannot guarantee the security of your Personal Data.

The internet is a global environment. By using the Services you will be sending information to us electronically and such data may be transferred internationally over the internet depending upon your location. Internet is not a secure environment and this Privacy Policy applies to our use and disclosure of your Personal Data once it is under our control only. Given the inherent

nature of the internet, all internet transmissions are done at your own risk.

9. How about third party websites and applications?

The Service includes links to third party websites and/or applications that are not operated by us. The linked sites and applications are not under our control and as such, we are not responsible for the privacy practices or the content of these websites or applications and we encourage you to read carefully the privacy policies provided by these developers before you provide Personal Data to them.

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

A. What are your rights?

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

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

You also have the right to request the erasure of your Personal Data and, where you have consented to the processing of your Personal Data, you have the right to withdraw such consent at any time (without this withdrawal affecting the lawfulness of the processing prior to such withdrawal).

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 by writing at the following contact; <<http://av.jpn.support.panasonic.com/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.

#### C. Opt Out

In addition to the above, you can opt out of our collection and processing of the following Personal Data:

Information about your use of Services.

You may stop our collection and processing of your Personal Data as described in subsection B “Information about your use of the Services” of section 2 taking the following steps; (i) display the menu by press the “MENU” button (ii) in the menu, select “Network”, (iii) select “Terms of Service and Settings” (for some models select “my Home Cloud Settings” and then select “Notices”), and (iv) uncheck the checkbox saying “I agree to the Terms & Conditions of Use and I have read and understood the Privacy Policy”.

#### D. Complaints

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.

You can also contact our representative at, for the European Union and for Switzerland, Panasonic Business Support Europe GmbH, Hagenauer Strasse 43 65203 Wiesbaden Germany, or by email: [datenschutz@eu.panasonic.com](mailto:datenschutz@eu.panasonic.com).

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