

# PRIVACY POLICY

## Introduction

This privacy policy (“Privacy Policy”) governs the collection and utilisation of PI and/or SPDI, by Panasonic from End User(s). This Privacy Policy applies to all End Users residing in India at the time of the collection of the PI and/or SPDI. If an End User resides in any territory outside India, and this Privacy Policy is not acceptable to the End User or the applicable law of the End User’s country of residence does not allow the acceptance of this Privacy Policy then such End User should not access and/or use the Product(s).

This Privacy Policy should be read in conjunction with the terms of use applicable to the access and use of the Products, available at [hdvc.in.panasonic.com](http://hdvc.in.panasonic.com)

This document is an electronic record in terms of Information Technology Act, 2000 and rules thereunder, as applicable and the amended provisions pertaining to electronic records in various statutes as amended by the Information Technology Act, 2000. This electronic record is generated by a computer system and does not require any physical or digital signatures.

The End User’s access and use of the Product(s) is deemed to constitute the End User’s unconditional and irrevocable consent to the collection, possession, storage, processing, dealing in, handling, transfer, sharing, and/or disclosure, of PI, and the End User’s irrevocable consent to and acceptance of the terms of this Privacy Policy.

Definitions: For the purposes of this Privacy Policy, the following terms shall have meaning(s) as ascribed below:

- “End User(s)” means and includes all users of the Product(s), including the following:
- Users using or benefitting from Panasonic’s customer service and/or training programs;
- Users using or benefitting from Panasonic’s sales and marketing programs.
- “Panasonic” means Panasonic India Private Limited, its group companies, affiliates, subsidiaries, in India.
- “PI” bears the meaning ascribed to it under the Rules, and includes any SPDI collected from End User(s) as detailed in this Privacy Policy. For the avoidance of doubt, PI consists of any information that relates to an identified or identifiable individual, including any information which does not identify an individual but that Panasonic links to such individual.
- “Products” means and includes the Panasonic Cloud based Application named as ‘HDVC Wave’ Video conferencing meeting application\_ software, website, application, digital/online platform owned and/or operated by Panasonic
- “Rules” means the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011.
- “SPDI” bears the meaning ascribed to it under the Rules.

What Information does Panasonic Collect from End Users?

PI collected by Panasonic and/or, as provided by the End User pursuant to or during the course of access, use of any Product, may include the following:

- Any information provided by the End User, including information provided by an End User to Panasonic's customer service representatives. Panasonic may also create logs/reports that are useful in diagnosing product or application performance related issues, and capture information relating to the same;
- Contact information including name, email id, address, contact number, location;
- Uniform resource locator, IP address, unique device identifiers, settings of the device used by an End User to access the Product(s);
- Log information such as the time and duration of End User's use of the Product(s), search query terms, any information stored in cookies;
- Business contact details of the End User such as location of business premises, contact number, fax number, contact number;
- Operating system, browser type, browser version, browser configuration, name of internet service provider, and other types of computer and connection related information relevant to identifying End User's type of device;
- Information provided while subscribing to Panasonic's promotional communications and newsletters;
- Any other information provided by an End User and/or collected by Panasonic.

Why does Panasonic collect PI from End Users?

Panasonic collects PI from End User(s) for, inter alia, the purposes set out below. All collection of PI is undertaken in compliance with the applicable laws in India.

- To make available the Products to the End User, including to enable End User(s) to create a profile to use the Products;
- To register End User(s) or their devices or products for any of Panasonic's Products;
- To conduct surveys in connection with End User's usage/experience with the Products;
- To improve the efficiency, quality, and to enhance the user experience of the Products;
- To support and maintain the Products including for providing support to End Users;
- To identify, assess, evaluate user behaviour and preferences, in relation to various products and services;
- To generate and provide recommendations, marketing content, sponsored content, promotional offers to the End User in connection with the Product(s);
- To evaluate the End User(s) eligibility for certain Product(s), and the suitability of certain Product(s) for an End User;
- To ask for End User's opinions or comments in relation to the Products;
- To assess and analyse Panasonic's market, customers, devices, and Products;
- To protect an End User's vital interests of those of another natural person;
- To create anonymous, aggregated statistics about the use of the Products;
- To protect the End Users (e.g. to prevent spam or attempts to defraud users of Products); to operate and maintain the security of the Products (e.g. to prevent or stop an attack on Panasonic's systems or networks); or to protect the rights or property of Panasonic, including enforcing any terms or agreements governing the use of the Products;

- To communicate with the End User(s), including communicating with End User(s) about the End User's account, profiles or transactions with Panasonic, giving the End User important information about Panasonic's Products, endeavouring to send the End User notice about any material changes to the Privacy Policy;
- To manage corporate transactions involving Panasonic including 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;
- To accomplish Panasonic's legitimate interests which include:
- To benefit from cost-effective Product(s) (e.g. Panasonic may opt to use certain platforms offered by suppliers);
- To protect the security of Panasonic's IT systems, architecture and networks and protect its customers;
- To meet Panasonic's corporate and social responsibility objectives.
- Any purpose as may be required by applicable laws.

Panasonic may combine or aggregate any or all of the PI with personal data or information including sensitive personal data or information, for any of the purposes set forth in this Privacy Policy, and the End User expressly consents to the combination, aggregation of the PI in the manner set forth herein.

What is the basis for collection and use of PI by Panasonic?

Without limiting the deemed consent pursuant to the use or access of the Products, the End User also expressly, unconditionally, and irrevocable consents to the collection, possession, storage, processing, dealing in, handling, transfer, sharing, and/or disclosure, of SPDI by Panasonic.

The End User also expressly, unconditionally, and irrevocable consents to the disclosure of PI including SPDI by Panasonic as set forth in this Privacy Policy.

In the event the End User does not wish to consent as per this paragraph, then the End User has the option to not use/access the Product(s).

Panasonic will have the right to retain PI including SPDI for as long as is necessary to fulfil the 'purposes' set forth in this Privacy Policy. The storage of PI including SPDI for any longer period shall be undertaken in accordance with requirements of the applicable laws in India.

What are the terms applicable for disclosure of PI by Panasonic?

The disclosure of the PI including SPDI shall be governed by the following:

Panasonic shall use commercially reasonable measures to protect PI from unauthorised use or disclosure.

Panasonic however reserves the right to disclose the PI including SPDI to, inter alia, its partners, service providers, group companies, affiliates, vendors, customers, employees, agents, third party service providers who assist Panasonic, in connection with any of the 'purposes' set forth in this Privacy Policy. Panasonic will endeavour to

ensure that the recipient of the PI or SPDI utilizes the same level of protection measures as are used by Panasonic to preserve the security of the PI including the SPDI. The End User acknowledges that if the recipient is located in a country other than India, then the level of protection afforded to PI and/or SPDI in such country may differ from the level of protection mandated under the applicable laws in India, and the End User expressly consents to the disclosure of the PI including SPDI to such recipient(s) located outside the territory of India. For the avoidance of doubt, PI shall not be 'transferred' by Panasonic to any person that does not ensure the same level of data protection that is adhered to by Panasonic as detailed in this Privacy Policy.

Panasonic may be required to disclose PI including SPDI to in whole or in part, to a third party, pursuant to a merger, reorganization, consolidation, acquisition, sale of assets, or in the event of Panasonic's bankruptcy. Panasonic will endeavour to ensure that the recipient of the PI or SPDI utilizes the same level of protection measures as are used by Panasonic to preserve the security of the PI including the SPDI. The End User acknowledges that if the recipient is located in a country other than India, then the level of protection afforded to PI and/or SPDI in such country may differ from the level of protection mandated under the applicable laws in India, and the End User expressly consents to the disclosure of the PI including SPDI to such recipient(s) located outside the territory of India. For the avoidance of doubt, PI shall not be 'transferred' by Panasonic to any person that does not ensure the same level of data protection that is adhered to by Panasonic as detailed in this Privacy Policy.

Panasonic will have the right, to be exercised in its reasonable discretion, to disclose or share the PI including SPDI with law enforcement authorities, regulatory bodies, and/or pursuant to any order of a regulatory or judicial authority, pursuant to any legal claims, actions, proceedings, suits, and/or to prevent any form of harm to a third party including injury to any person, and/or to prevent any illegal or unlawful or legally actionable activity. Panasonic may also provide PI including SPDI, in whole or in part, to any governmental, judicial, or regulatory authorities, including any tax authorities, pursuant to a claim or demand from them.

End Users acknowledge and agree that PI including SPDI collected by Panasonic, may be stored by Panasonic on its servers which may be located outside the End User's country of residence. By using Product(s), End Users consent to the storage of the same by Panasonic at its server(s) including storage and processing of PI outside of End Users' country of residence consistent with this Privacy Policy. Recipients of PI including SPDI may be located in countries other than India, and the level of protection afforded to PI including SPDI may differ under the applicable laws of such countries, and hence the protection measures utilized by such recipients in territories outside India may also differ from the standards deployed and maintained by Panasonic. End User hereby expressly consents to the disclosure and/or transfer of PI including SPDI, pursuant to this Privacy Policy, with recipients located in countries other than India. For the avoidance of doubt, PI shall not be 'transferred' by Panasonic to any person that does not ensure the same level of data protection that is adhered to by Panasonic as detailed in this Privacy Policy.

Cookies

Panasonic may use cookies to collect certain PI from an End User. A cookie is a small file of letters and numbers that Panasonic puts on the End User's device. The cookies allow Panasonic to distinguish an End User from other users of the Product(s), assist Panasonic to provide End Users with the best possible experience when End Users browse the Products, and also allow Panasonic to make improvements. Cookies improve an End User's browsing experience by:

- Remembering settings, so an End User does not have to keep re-entering them whenever the End User visits a new page;
- Remembering information given by an End User so that the End User does not have to keep entering it;
- Analysing how an End User uses the Products to improve the way it works, to make sure that the End User finds what such End User is looking for easily, and to ensure that it meets the End User's needs;
- Monitoring the efficiency of Panasonic's advertising.

If the use of such cookies is not acceptable to the End User, then such End User should adjust the browser settings (typically found in the 'options' or 'preferences' menu of the browser) or delete/disable the use of such cookies on the End User's device. The End User is however advised to take note that Panasonic may be unable to provide, make available, any or all of the Products if the End User chooses to disbar the use of cookies in accordance with the terms of this paragraph.

The End Users must take note that Panasonic sometimes uses external suppliers to deliver services on Panasonic's behalf, which means these cookies may be set by a third party (third-party cookies). Panasonic does not control these cookies so if an End User would like more information about them or information on how to opt out, such End User must see their individual privacy and/or cookie policy.

#### Third Party Sites

End User acknowledges that Panasonic may make available, provide, embed links, promotions, notifications of third party websites, applications, platforms, products, services ("Third **Party Site(s)**"), on or through its Products, and that the access and use of such Third Party Sites are governed by the terms of use made available by the operator, owner, controller of such Third Party Site(s). In the event that any PI or SPDI is collected, processed, dealt in, handled, transferred, shared, and/or disclosed by such Third Party Site(s) or the controller, owner, operator of such Third Party Site(s), then the End User acknowledges that the collection, processing, dealing in, handling, transfer, sharing, and/or disclosure of such PI including SPDI is governed by the privacy policy made available by the Third Party Site(s). The End User expressly acknowledges and affirms that Panasonic is not in any manner responsible or liable for any PI including SPDI that may be collected by Third Party Site(s) and/or that may be provided by the End User to such Third Party Site(s), and that Panasonic does not endorse or support such Third Party Site(s) including any products, services, or content offered on them.

What Security Measures does Panasonic use?

Security measures used by Panasonic to protect the security of PI including SPDI are consistent with industry standards and are commercially reasonable. The security measures implemented by Panasonic, inter alia, take into account, the state of the art of the technology, the costs of its implementation, the nature of the information, and the risk of the processing. However, End Users should take note that security measures cannot guarantee that the PI and/or SPDI provided by an End User will be a hundred percent secure. End Users are therefore advised to use discretion in providing SPDI to Panasonic and to refrain from providing SPDI if the same is not expressly requested by Panasonic or if the nature of the request or the purpose of provision does not necessitate the provision of any SPDI.

#### Queries and Concerns

Grievance Officer

[pimsil.helpdesk@in.panasonic.com](mailto:pimsil.helpdesk@in.panasonic.com) is the contact point designated as the grievance officer for the purposes of this Privacy Policy (“Grievance Officer”). If the End User has any concerns, grievances, queries concerning this Privacy Policy or any term hereof, including any changes, deletions, updates required to PI including SPDI of such End User, then all of the foregoing should be addressed vide a written communication to the Grievance Office by the End User at the contact details provided below:

[pimsil.helpdesk@in.panasonic.com](mailto:pimsil.helpdesk@in.panasonic.com)

All communications addressed to the Grievance Officer will be dealt with within thirty (30) days from the receipt of the communication. Any communication not marked to the Grievance Officer will not be construed to be a communication covered by this Privacy Policy.

Customer Service

If the End User has any queries concerning any of the Product(s), then such queries may be addressed to Panasonic’s customer service personnel at:

[pimsil.helpdesk@in.panasonic.com](mailto:pimsil.helpdesk@in.panasonic.com)

Corrections and Deletion

The End User will have the right to rectify, correct, update, or delete any PI provided to Panasonic, or collected by Panasonic, by addressing an appropriate written communication to such effect to the Grievance Officer as per the details provided in paragraph IX above. Panasonic will correct or amend such PI, as feasible. If the End User chooses to delete any PI, then such End User agrees and acknowledges that Panasonic may be unable make available or provide access to any or all of the Product(s) pursuant to such deletion.

Changes to Privacy Policy

Panasonic reserves the right to update the Privacy Policy or any specific terms thereof from time to time including to align the terms of the Privacy Policy with Panasonic’s then current business practices and Products. Unfortunately, it will be infeasible for Panasonic to notify End Users in the event of such update(s), and it will

be the End User(s) responsibility to review such updated Privacy Policy on this page. End User's continued use of the Products will be deemed to constitute the End User's unqualified and irrevocable acceptance of the updated Privacy Policy.

[Unsubscribe](#)

If the End User wants to stop receiving any email communications from Panasonic, then the End User may do so by clicking on the 'unsubscribe' option. End User must be advised that the withdrawal from receipt of such communications may not be immediate.