

DATANAVI Privacy Notice

Last updated 01/10/2022

Panasonic is committed to ensuring that your “Personal Data” (as explained below) is used fairly, lawfully, and securely and that your privacy is protected at all times. We place high importance on compliance with the applicable privacy and data protection laws and regulations, including, but not limited to the European Union (EU) Regulation 2016/679 General Data Protection Regulation (“GDPR”).

This Privacy Notice is intended to tell you how we “process” (as explained below) information about you ("Personal Data" as explained below) that you provide to us or that we collect through your use of this website, products, devices or applications, your contacts with our customer service, or your subscription to marketing communications (collectively our “Services”), or when you engage with us on social media or otherwise interact with us. It also applies if explicit reference is made to it via link or in a similar manner. Wherever we process your Personal Data and a different privacy notice is required (e.g. for other specific websites or portals), Panasonic will provide a specific privacy notice. This Privacy Notice supplements other privacy notices and is not intended to override them.

This Privacy Notice explains what Personal Data we collect, store, use, disclose and transfer (hereinafter “process”), how we do it, for which purpose and what our legal bases are. It also provides you with information on your rights under the GDPR and how you can contact us if want to exercise your rights or have a complaint.

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1. Information about us

This Privacy Notice is issued by Panasonic Corporation, having its business office at 1006, Oaza Kadoma, Kadoma City, Osaka Prefecture 571-8501, Japan on behalf of ourselves and the Panasonic Group of Companies. The Panasonic Group of Companies consists of Panasonic Corporation,

headquartered in Kadoma, Osaka Prefecture, Japan, as well as a number of Affiliates can be found here <http://www.panasonic.com/global/corporate/profile/group-companies.html#renketsu>

In this Privacy Notice, when we refer to “Panasonic”, “we”, “us” or “our”, this means the relevant company/companies (in the case of joint controllers) in the Panasonic Group that is/are responsible for processing your Personal Data.

2. What is Personal Data?

For the purposes of this Privacy Notice, "Personal Data" consists of any information about an individual from which that person can, directly or indirectly, be identified. When we combine other information (i.e. information that does not, on its own, identify an individual) with Personal Data, we treat the combined information as Personal Data.

3. What Personal Data do we collect about you and how?

Depending upon your use of this website/our Services, see Section 4 below, Panasonic collects and processes some or all of the Personal Data set out in the table below, using the methods and channels also set out in the table.

Types of collected Personal Data	How we collect the Personal Data
“Identity Data” : Including your first name, last name, and username or similar identifier.	From you directly, if you choose to share this information with us.
“Business Contact Data” : Including office address, work email address, work telephone numbers (landline and mobile).	From you directly, if you choose to share this information with us.
“Product/Device/Application Data” : Including the name of the product/device and service, product category, model number, serial number, your hardware model, IMEI number, the MAC address of the device’s wireless network interface and the mobile phone number used by the device, mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting, IP address, operating system details, and other technology on the product or device you use to access the Services.	Automated, through our use of technologies set on your product, device or our application.
“Profile and Usage Data” : Including information collected about your use of this website/our Services such as the time and duration of your use, passwords and login data, your referral website, links you click, searches you conduct, actions you take, pages	Automated, through our use of cookies and similar technologies set on your product, device or our application, if you consented to our usage on beforehand.

you visit, your web browsing history, patterns of your usage and information from forms you fill in.	
Any additional Personal Data you voluntarily provide to us	From you directly

4. How do we use your Personal Data (purpose and legal basis)?

We process your Personal Data in the context of the activities and for the purposes set out in the table below and rely on one or more of the following the specified legal bases:

- **Performance of a contract:** Where we need to perform a contract which we are about to put in place or have put in place with you as a party, or (at your request) take steps before putting such a contract in place (Art. 6(1)(b) GDPR);
- **Legal obligation:** Where we need to comply with a legal obligation to which we are subject (Art. 6(1)(c) GDPR);
- **Legitimate interests:** Where we are acting in our legitimate interests, provided that they are not overridden by your fundamental rights (Art. 6(1)(f) GDPR). We assess our legitimate interests for processing your Personal Data and balance them against any potential impact on you. Where we rely on our legitimate interests you have the right to object to such processing at any time under the conditions set out in the GDPR; for more information on our legitimate interests or our balancing test please contact us by using the communication means set out in Section 13 below;
- **Consent:** Where we rely on your consent we will ask for it separately (6(1)(a) GDPR).

Please note that Panasonic does not base any decision solely on automated processing including profiling that significantly affects you or has legal effects for you (Art. 22 GDPR).

Activity and purpose	Types of Personal Data	Legal basis
Manage this website and our Services To securely provide and administer this website and our Services, this includes continuously improving its functioning, including monitoring performance of data centres and networks, maintaining the security of our infrastructure and Services, testing, reporting and troubleshooting.	Identity Data	Performance of a contract
	Business Contact Data	
	Product/Device/Application Data	
	Profile and Usage Data	
	Any additional Personal Data you voluntarily provide to us	
Creating an Account or Profile When you create an account or profile on a Panasonic website or application, such as when you register for the [My Panasonic or the Toughbook Service Cloud] and register products or services there.	Identity Data	Performance of a contract
	Business Contact Data	
Provide our Services To provide our Services or any specific feature that you request, including to enable us to fulfil our obligations under any	Identity Data	Performance of a contract
	Business Contact Data	

contract with you (such as, any product or device warranty), providing customer support services and dealing with any other support query you may have (such as, complaint handling), and providing for staff training and informing.	Product/Device/Application Data	
	Profile and Usage Data	
	Any additional Personal Data you voluntarily provide to us	
Updates To communicate with you, including communicating with you about your account, profiles or transactions with us, giving you important information about your products, devices, application or other Services and sending you notices about any material changes to our terms and conditions or policies, e.g. this Privacy Notice.	Identity Data	Performance of a contract Legal obligation
	Business Contact Data	
Service Improvement and Surveys To develop and improve new and existing Panasonic products and Services, recommendations, advertisements and other communications and learning more about your preferences including asking you for your opinions on our products and Services and carrying out surveys. This also includes creating anonymous, aggregated statistics about the use of our Services.	Identity Data	Performance of a contract
	Business Contact Data	
	Product/Device/Application Data	
	Profile and Usage Data	
Compliance and legal action Ensure administration, operation and compliance with all applicable laws and regulations and internal Panasonic policies and processed, as well as enforcement of legal rights and defence in the event of a legal dispute	Identity Data	Legal obligation
	Business Contact Data	
	Product/Device/Application Data	
	Profile and Usage Data	

5. To whom do we disclose your Personal Data?

We will not disclose your Personal Data to third parties for their own independent marketing or business purposes, unless you have given your explicit consent to do so. However, we may have to disclose your Personal Data to the following entities for the purposes we collected it as set out in Section 4 relying on the legal bases specified therein:

I. Panasonic Corporation and Affiliates

We may need to transfer your Personal Data within the Panasonic Group of Companies to provide the Services you require or any other services/assistance you request. All companies within the Panasonic Group are required to follow the privacy practices set forth in this Privacy Notice, or another privacy policy that they may notify to you and to process your Personal Data in accordance with the applicable privacy and data protection laws and regulations.

II. Service Providers

We use third party service providers who provide information technology and system administration services to us and help us to administer certain activities and services on our behalf and they will operate only in accordance with our instructions as data processors.

III. Channel Partners

If you have contacted us regarding a potential sales opportunity, we may provide your Business Contact Data and Identity Data to our approved channel partners in order for them to follow up the request for contact and further qualify your requirements.

IV. Third parties when required by Law or to Protect our Business and Services

We will disclose your Personal Data to comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies; to protect our customers (e.g. to prevent spam or attempts to defraud users of our Services); to operate and maintain the security of our Services (e.g. to prevent or stop an attack on our systems or networks); to protect the health and safety of our colleagues and others with whom we have contact; or to protect the rights or property of Panasonic, including enforcing any terms or agreements governing the use of our Services.

V. Other Parties in Connection With Corporate Transactions

We may disclose your Personal Data to a third party or within the Panasonic Group of Companies as part of a reorganisation, 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.

VI. Other Parties With Your Consent or At Your Direction

We may share Personal Data about you with third parties when you consent to or request such sharing.

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

The security of your Personal Data is of greatest importance to Panasonic. We have put in place a range of appropriate physical and technical measures as well as robust policies and processes. The purpose thereof is to safeguard your Personal Data and to protect it against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access and against other unlawful forms of processing. These measures take into account the state of the art of the technology, the costs of its implementation, the nature of the Personal Data, and the risk of the processing.

Information security, including the protection of Personal Data is organized in a global Panasonic Program called Information Security Management ("ISM"). The related aim, standards and implementation measures are organized in a globally valid Policy, and further standards and guidelines.

The program and all its parts follow a strong yearly Plan-Do-Check-Act (PDCA) approach to secure the confidentiality, integrity and availability of all data (including your Personal Data) for the whole information lifecycle from collection to destruction of such information.

7. Accessing your Personal Data and other rights you have

What are your rights?

Your rights under the GDPR include, the right to be informed, the right to access a copy of your Personal Data, the right to request the rectification or the update of any inaccurate Personal Data we hold, and the right to request erasure of your Personal Data.

You also have the right to obtain restriction of the processing of your Personal Data, the right to object to the processing of your Personal Data at any time under the conditions set out in the GDPR, and the right not to be subject to a decision based solely on automated processing.

In addition, you 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, without hindrance from us and subject to your own confidentiality obligations.

You also have the right to not provide consent and, where you have consented to our 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.

Your rights are further specified in Art. 7 and Chapter 3 of the GDPR and other applicable data protection legislation.

Exercising your rights

If you wish to exercise any of the above rights, then please contact us by using the communication means set out in Section 13 below.

Complaints

If you are not satisfied with how we process your Personal Data, then please contact us by using the communication means below in Section 13 or alternatively file a complaint with the competent supervisory authority:

- EEA/EU authorities: [Members | European Data Protection Board \(europa.eu\)](#)
- United Kingdom (UK): [Make a complaint | ICO](#)

8. International Transfers

Where we transfer your Personal Data to recipients located outside of the European Economic Area ("EEA") we ensure that your Personal Data remains protected by transferring it only to countries that offer an adequate level of protection as recognised by the European Commission such as e.g. Japan and the United Kingdom and/or by using the Standard Contractual Clauses approved by the European Commission and where required putting supplementary measures in place to afford your Personal Data with essentially the same level of protection it has in the EEA.

In the same way, if we transfer your Personal Data outside of Serbia, Switzerland, Turkey, or the UK, we will ensure that your Personal Data remains protected in line with the requirements set out in the applicable data protection legislation.

You may request additional information in this respect and obtain a copy of the appropriate safeguards we provide for through sending a request to the contact indicated in Section 13.

9. Data Retention – How long we will retain your Personal Data?

We will only retain your Personal Data for the period necessary to fulfil the purposes for which it has been collected. This includes the purposes of fulfilling our contract with you, satisfying any legal, regulatory, accounting, reporting obligation we are subject to and the establishment and defence of legal claims.

10. Third-party links and products on our Services

Our websites, applications and products may contain links to third party websites, plug-ins and applications such as YouTube, LinkedIn and Facebook. These linked websites and applications are not under Panasonic's control and we are not responsible for their privacy practices or the content of any linked websites and applications. If you choose to use any third party website or application, Personal Data collected by the third party's website or application will be controlled by the privacy policy of that third party. We strongly recommend that you take the time to review the privacy policies of any third parties to which you provide Personal Data.

11. Children's Personal Data

This Website is not intended for children (anyone under the age of 16 years) and we do not knowingly collect or try to collect Personal Data from or about children.

12. Changes to this Privacy Notice or to your Personal Data

It also is important that you check back often for updates to the Privacy Notice, as we may change it from time to time. The "Date last updated" Section at the top of this page states when this Privacy Notice was last updated and any changes will become effective upon our posting of the revised Privacy Notice.

We will provide additional notice to you if these changes are material by adding a statement to this website or by sending you a notification through any relevant Services or email.

We encourage you to review the Privacy Notice whenever you access the Services or otherwise interact with us to stay informed about our information practices and the choices available to you. It is important to us that the Personal Data we hold about you is accurate and up-to-date at all times. If any of the Personal Data we hold about you changes, please keep us informed.

13. Contact Us

If you have any questions regarding the collection, processing, or use of your Personal Data or if you wish to exercise your rights, please contact us at:

Please contact us via "Contact Us" on this Service.

If you have questions about Data Protection in Europe, please contact us at:

Panasonic Business Support Europe GmbH (PBSEU)
The Data Protection Officer
Hagenauerstrasse 43
D-65203 Wiesbaden
or by e-mail: Data_Protection@eu.panasonic.com

Please note that Panasonic Marketing Europe GmbH acts as **Representative** of the data controller (Art. 27 GDPR) if you reside in a member state of the European Economic Area.

If you have any questions about Data Protection in the United Kingdom (UK), please contact us at:

UK Legal Department

Panasonic Business Support Europe GmbH(PBSEU) (UK branch)

Maxis 2, Western Road,

Bracknell, Berkshire,

RG12 1RT

or by e-mail: UKLegal@eu.panasonic.com