

## Privacy Policy (Apartment Intercom System)

Panasonic Electric Works Co., Ltd. (hereinafter referred to as "we," "us," or "our") hereby sets out a privacy policy (hereinafter referred to as the "Policy") as follows, in relation to handling the information of customers (hereinafter referred to as "Customer(s)," "you," or "your") that use the Apartment Intercom System (hereinafter referred to as the "System"). When you intend to use the System, please do so after consenting to the Policy. The System handles information concerning a dwelling unit. When using the System, we request that other members residing in the same dwelling unit understand and consent to the content of the Policy.

### 1. Definition of terms

The terms used herein shall be defined as follows.

- (1) The term "**Apartment Intercom System (i.e., the System)**" refers to our apartment intercom system that is connected to the Server. When AiSEG is installed through linkage of the Apartment Intercom System with the local network within your residence, AiSEG shall be included in the System.
- (2) The term "**House Information Panel**" refers to the intercom base unit installed within a dwelling unit.
- (3) The term "**AiSEG**" collectively refers to AiSEG, AiSEG2 and AiSEG3, each of which is our Home Energy Management System (HEMS). Relevant information is collected via a power measurement unit and Linked Equipment installed at your residence.
- (4) The term "**Server**" refers to a cloud server that we are authorized to manage.
- (5) The term "**Linked Equipment**" refers to equipment, such as housing equipment, household appliances, and air conditioners linked through the System as well as local networks within an apartment or residence.
- (6) The term "**Server Registration**" refers to registration within the Server of the Linked Equipment necessary for use of the Services and Linked Services. We request that you undertake the Server Registration via the prescribed apartment server service registration processes from the House Information Panel.
- (7) The term "**Service(s)**" refers to an IoT service linked with the System that we provide. Names of the Services are given as follows.
  - (i) LiFIT
  - (ii) "インターホン (Intercom)" dedicated app
  - (iii) "Mobakan"
- (8) The term "**Linked Service(s)**" refers to IoT service linked with the System provided by another company with which we have partnership. The Linked Services include services using the Unlocking Mode.

- (9) The term "**API**" stands for Application Programming Interface and refers to an interface through which functions are provided related to linkage between the System and the Linked Equipment connected to the System.
- (10) The term "**Service Provider(s)**" refers to a company providing the Linked Services.
- (11) The term "**Information Distribution Function(s)**" refers to the function for distributing information to the House Information Panel. The Information Distribution Functions include the bulletin board function of LiFIT and the bulletin board service of Mobakan.
- (12) The term "**Information Distribution Function Contracting Party(ies)**" refers to a party that executes a service contract related to the Information Distribution Function with us, such as a management association that uses the bulletin board function of LiFIT, a management company that uses the bulletin board service of Mobakan, and the Service Provider(s) that uses the API for the Information Distribution Function.
- (13) The term "**Unlocking Mode**" refers to a method of unlocking an automatic lock for a common apartment entrance by entry and transmission of authentication information and the number of the dwelling unit to be visited via an apartment lobby intercom.
- (14) The term "**Panasonic Group**" refers to Panasonic Holdings Corporation as well as consolidated subsidiary companies and equity-method associated companies thereof.

## 2. Acquired information

### (1) Information acquired via the Information Distribution Function

We shall obtain the following information based on consignment via the Information Distribution Function Contracting Party(ies).

- Administrative information that identifies dwelling units and provides the Services and the Linked Services
- Information distributed to the House Information Panel
- Information related to your use of the Information Distribution Function, such as previously read information distributed to the House Information Panel and your questionnaire replies entered via the House Information Panel

### (2) Information acquired via the Server Registration

- Administrative information that identifies dwelling units and provides the Services and the Linked Services
- AiSEG device IDs
- List of the Linked Equipment (product type and model number)

- Event information reported through a mobile security function, such as an alarm warning, the presence of a visitor (including an image of a visitor), the fact of a return home (including an image of the resident who returned home), and arrival or shipment of goods via home delivery boxes
- (3) Information acquired via LiFIT (excluding the bulletin board function)
- (i) Information acquired via the System
- Information related to use of the Linked Equipment control function, such as scene information that you establish through the House Information Panel (e.g., scene name, name of equipment to be operated, and operational processes), instructions for device control and scene execution, results of device control and scene execution, and device status
  - Information on turning on and off the security mode of a mobile security function that you set via the House Information Panel
  - Failure-related information for the Linked Equipment and AiSEG
- (ii) Information acquired via smartphone apps
- CLUB Panasonic ID
  - Information related to use of smartphone apps, such as a nickname for a key that you register in a smartphone app, and your usage and access history relating to a smartphone app
  - Information about your devices
  - Information regarding the detection of GPS location data entering or exiting from a pre-set area (for the following functions only: Security Setting Reminder, Locking Reminder, Delivery Notification, Control Collectively when going out and return home)
    - ※The smartphone app will continue to collect GPS location data in the background, even after the smartphone app is closed.
    - ※We do not directly collect GPS location data to our Server.
- (iii) CLUB Panasonic Information
- Information you registered with CLUB Panasonic, such as name, address, telephone number, email address, and gender
  - Information related to use of CLUB Panasonic, such as browsing history of the CLUB Panasonic website and usage time of the CLUB Panasonic app
- (iv) Credit card number etc.
- In the case of credit card payments, the credit card number, expiration date, PIN, security code, phone number, email address, etc. will be handled. Please note that the phone number and email address will be collected separately for EMV 3-D Secure authentication, distinct from those mentioned in (3) (iii) above.

- (4) Information acquired via the "インターホン (Intercom)" dedicated app
  - Information related to apartment lobby intercom usage
  - Information about your devices
- (5) Information acquired for so as to have the Service Provider(s) provide the Linked Services

Information acquired for the individual Linked Services shall include some or all of the following items below. The Service Provider(s) shall provide you with items for information acquired for each Linked Service through the Linked Service.

- Information acquired via the Information Distribution Function described in (1) above, information acquired via the Server Registration described in (2) above, and Information acquired via the System described in (3) (i) above
  - Information for operation of the Unlocking Mode (including images of parties executing the Unlocking Mode)
  - Information transmitted by the Service Provider(s) to the Server in order to provide the Linked Services
- (6) Other information acquired from a third party
    - Information provided to us within the scope of your consent when you use the Linked Services and services provided by other companies that are linked with the System

### 3. Purpose of use of acquired information

We shall use acquired information for the following purposes of use.

We shall also use the acquired information for further purposes of use with your consent, which we shall separately obtain.

- (1) Purpose of use of information acquired via the Information Distribution Function described in 2 (1) above
  - To back up information on the Server
  - To provide the Information Distribution Function Contracting Party(ies) with the Information Distribution Function
  - To provide Information Distribution Function Contracting Party(ies) with information related to your use of the Information Distribution Function
  - To respond to inquiry and contacts, maintenance, support, repair, and after-sales services concerning the Information Distribution Function that you and/or Information Distribution Function Contracting Party(ies) requested.
  - To ameliorate and improve the System and the Services related to the Information Distribution Function as well as to improve the quality thereof
  - To create statistical information
- (2) Purpose of use of information described in 2 (2) through (5) above (excluding

information acquired via the Information Distribution Function, visitors' images, images of residents who returned home, and images of parties executing the Unlocking Mode)

- To back up information on the Server
  - To upgrade a firmware version of the System
  - To respond to your inquiry and requests for maintenance, support, repair, and after-sales services concerning the System, the Services and the Linked Services used by you and our Linked Equipment
  - To provide services subject to the terms and conditions necessitating CLUB Panasonic membership registration
  - To ameliorate and improve Panasonic Group's products, apps, and services, including the System, the Services, and our Linked Equipment, as well as to improve the quality thereof and conduct new development related thereto
  - To create statistical information
  - To provide the Services used by you
  - To provide to the corresponding Service Provider(s) the API related to the System necessary for the Linked Services used by you
  - To provide to the corresponding Service Provider(s) information necessary for the Linked Services used by you that is acquired via the System
  - To conduct sales promotion and marketing activities for products and services handled by the Panasonic Group, such as posting and distributing of advertisements and content on the House Information Panel and smartphone apps concerning the Services
  - To transmit or supply information associated with products and services handled by us, Panasonic Group, and companies that we separately and voluntarily choose via the CLUB Panasonic app, direct mail (including email), printed materials, and other forms of media
  - To analyze and predict attributes, such as your tastes and preferences, for the purpose of effective implementation of the aforementioned items
  - To provide to a third party your information within the scope you consented to and within that permissible under laws and regulations (including for the purpose of processing the same for statistical information and anonymized personal information in order to provide the same to a third party)
  - To obtain your consent for use of your new information in the future
- (3) Purpose of use of visitors' images and images of residents who returned home
- For you to confirm visitors and residents who returned home via LiFIT or the Linked Services

- To provide the Service Provider(s) with visitors' images and images of residents who returned home for the aforementioned purposes
- (4) Purpose of use of images related to parties executing the Unlocking Mode
- For you to confirm visitors related to the Linked Services using the Unlocking Mode
  - To undertake security measures related to the Linked Services using the Unlocking Mode
  - To provide the Service Provider(s) with images related to parties executing the Unlocking Mode for the aforementioned two purposes

4. Joint use of acquired information

We shall jointly use your information utilizing the System as follows.

(1) Items of jointly used information

Information described in 2 (2) through (5) above (excluding information acquired via the Information Distribution Function)

(2) Scope of parties jointly using the relevant information

Companies incorporated under the laws of Japan among those within the Panasonic Group

(3) Purpose of use of parties jointly using the relevant information

Purpose of use described in 3 (2) above

(4) Information management supervisor jointly using the relevant information

Information management supervisor described in 6 below

5. Provision to a third party of acquired information

(1) If any of the following matters are applicable, we shall provide to a third party your information obtained by us concerning the Services and the Linked Services. Your information provided by us may be obtained as personal information at the site(s) of Information Distribution Function Contracting Party(ies) or the Service Provider(s) as recipient(s).

(i) Provision to the Information Distribution Function Contracting Party(ies)

We shall provide to relevant Information Distribution Function Contracting Party(ies) information related to your use of the Information Distribution Function obtained based on consignment by the relevant such Information Distribution Function Contracting Party(ies).

(ii) Provision to the Service Provider(s)

When you use the Linked Services, we shall provide to the relevant Service Provider(s) information acquired in order for the Service Provider(s) to provide the Linked Services described in 2 (5) above.

(iii) Provision to the payment service provider and the credit card company

When you subscribe to the LiFIT smartphone app contract on the website, we

provide the Credit card number etc. mentioned in section 2 (3) (IV) to the credit card company via a payment processing company for credit card payment.

- (2) We may provide to a third party with your information acquired by us, limited to any of the following cases as well as per (1) above.
  - (i) If the relevant information is provided to outsourcing companies within a scope necessary for utilizing it in line with the purpose of use
  - (ii) To provide information acquired via the System (limited to information that is impossible to use to identify you through such information alone) and statistical information as well as anonymized personal information that is processed in a state that is impossible to use to identify you
  - (iii) If relevant information is provided along with a succession of business due to a merger, etc.
  - (iv) If relevant information is jointly used in accordance with 4 above
  - (v) If relevant information is used based on relevant laws and regulations
  - (vi) If it is necessary to protect the life, health, assets, rights, etc. of you, a third party, and any of our officers or employees, or our assets, rights, etc.
  - (vii) In case that cooperation is required to carry out clerical affairs under laws and regulations by state organs, local government organs, or parties delegated thereby, if there is a likelihood that hindrance to the carrying out of the same would be caused through obtaining your consent
  - (viii) If courts, police organs, public prosecution offices, or other state organs, or institutions similar thereto, request disclosure of relevant information pursuant to laws and regulations
  - (ix) If you consent to the provision of your information to a third party separately from consent to the Policy
- (3) In the case set forth in (2) (ii) above, even if relevant information is transferred to a foreign country, such as cases in which a third party is a foreign corporation or a third party's server is located overseas, we may provide a third party therewith.
- (4) If we provide relevant information to a third party pursuant to (2) (ii) above, the corresponding third party may utilize the same, disclose the same to another third party and/or transfer the same to a given country for the purpose of supplying products and/or services of such third party, development thereof, etc. A third party to which relevant information is disclosed may also provide services after such information has been associated with your personal information within a scope to which you separately consent.
- (5) We shall use Google Analytics for Firebase within the scope necessary for the purpose of after-sales services, improvement, etc. of the System, the Services, our Linked Equipment, and the like as described in 3 (3) and (4) above. Google Analytics for Firebase automatically collects operation histories (i.e., event

information reported through the mobile security function described in 2 (2) above, information related to use of the Linked Equipment control function and information on turning on and off the security mode of a mobile security function described in 2 (3) (i) above, and information related to use of smartphone apps and information about your devices described in 2 (3) (ii) above, (excluding information specifying devices, such as UUID)) and transmits the same to a provider of information collection modules (including a foreign provider), such as Google LLC, in a form that does not allow you to be identified. In accordance with (2) (ii) above, we shall transmit operation histories to a provider of information collection modules, and transmitted operation histories shall be managed and used pursuant to the privacy policy and other regulations specified by such provider.

We request that you confirm at the following site how your operation history is collected and handled when we use Google Analytics for Firebase.

<https://policies.google.com/technologies/partner-sites?hl=en>

6. Information management supervisor involved with acquired information

Company name: Panasonic Electric Works Co., Ltd.

Address: 1048, Oaza Kadoma, Kadoma-shi, Osaka

Representative: Kiyoshi Otaki

7. Procedures for cessation of acquisition and use of your information and provision thereof to a third party

(1) Cessation of acquisition of your information from the System and transmission thereof to the Server

- (i) You may cease acquisition of information as per 2 (2) through (4) above from the System and transmission thereof to the Server by the resetting procedure for entering or leaving via the House Information Panel. You may also undertake relevant processes via the LiFIT smartphone app. However, cessation of use of LiFIT and the "インターホン (Intercom)" dedicated app alone does not suspend acquisition of information from the System and transmission thereof to the Server.

If resetting takes place, we may not provide you with the content related to the purposes of use listed in 3 (2) through (4) hereof in whole or in part, and you may not use the Linked Services in whole or in part.

Even in the case of resetting, a list of the Linked Equipment, CLUB Panasonic ID, or CLUB Panasonic Information that is stored in the Server may not be deleted.

- (ii) You may cease acquisition of information related to home returns listed as per 2 (2) above from the System and transmission thereof to the Server by

changing setting of the notification for returning home to "Off" via the House Information Panel.

(2) Cessation of acquisition of information from the Service's smartphone apps and transmission thereof to the Server

(i) You may cease acquisition of information listed as per 2 (3) (ii) above and transmission thereof to the Server by deleting registered data via LiFIT's smartphone app.

If deletion of registered data takes place, we may not provide you with content related to the purposes of use listed in 3 (2) through (4) hereof, in whole or in part.

Even in the case of deletion of registered data, CLUB Panasonic ID or CLUB Panasonic Information that is stored in the Server may not be deleted.

(ii) You may cease acquisition of information listed in 2 (4) above and transmission thereof to the Server by deleting or resetting of registered equipment via the "インターホン (Intercom)" dedicated app.

If deleting or resetting of registered equipment takes place, we may not provide you with content related to the purposes of use listed in 3 (2) through (4) hereof, in whole or in part.

(3) Please contact Information Distribution Function Contracting Party(ies) concerning cessation of acquisition of information obtained via the Information Distribution Function described in 2 (1) above.

(4) Please contact the Service Provider(s) concerning cessation of acquisition of information obtained, in order for it to provide the Linked Services described in 2 (5) above.

8. Request for disclosure of personal information, etc.

We hold your personal information, limited to cases in which you use the LiFIT smartphone app.

Please request notification concerning purposes of use of your personal information held by us, disclosure thereof, disclosure of records of provision to a third party, revision, addition, or deletion of your personal information, cessation or deletion of use of your personal information, cessation of provision of the same to a third party, etc. via the link below.

CLUB Panasonic Desk: <https://panasonic.jp/membership/inquiry.html>

9. Security control measures

(1) We undertake various measures to appropriately manage your information. Please refer to CLUB Panasonic's "Personal data supplied by you" (<https://panasonic.jp/membership/data-privacy.html>) concerning specific measures.

- (2) We ensure that third parties providing credit card numbers and other related information comply with PCI DSS security requirements.
- (3) We implement non-retention measures for credit card numbers and other related information to ensure proper management. In practice, we will not retain customers' credit card numbers, which will only be stored on the servers of payment processing companies and credit card companies.

#### 10. Modification of the Policy

When we deem it necessary, we may change the Policy in whole or in part.

If content associated with services used by you is changed, we shall notify you thereof via a given method selected by us, provided that we will not do so concerning revision of descriptions and other minor changes. It should be noted that if you do not consent to the modified Policy, you may not use various services in whole or in part.

Panasonic Electric Works Co., Ltd.

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