

# Data Privacy Sheet

## AirCloud Pro



### 1. Introduction to the Johnson Controls Global Privacy Office and Global Privacy Program

Johnson Controls has a Global Privacy Office and a Global Privacy Program, involved at the beginning and throughout the design and development of our processes, activities, products, services and solutions, in accordance with internationally accepted principles of Privacy by Design.

The Johnson Controls Global Privacy Office is led by the Chief Privacy Officer, and supported by Global Privacy Counsel, Global Privacy Professionals, Global Privacy Champions, analysts and support staff.

The Johnson Controls Privacy Program is designed with the most stringent global privacy and data protection laws in mind, including the General Data Protection Regulation (GDPR) of the European Union (EU), Brazil's Lei Geral de Proteção de Dados (LGPD), Singapore's Personal Data Protection Act (PDPA), and the California Consumer Privacy Act (CCPA).

For more information on the Johnson Controls Global Privacy Office and Global Privacy Program, please visit [www.johnsoncontrols.com/privacy](http://www.johnsoncontrols.com/privacy).

# Data Privacy Sheet

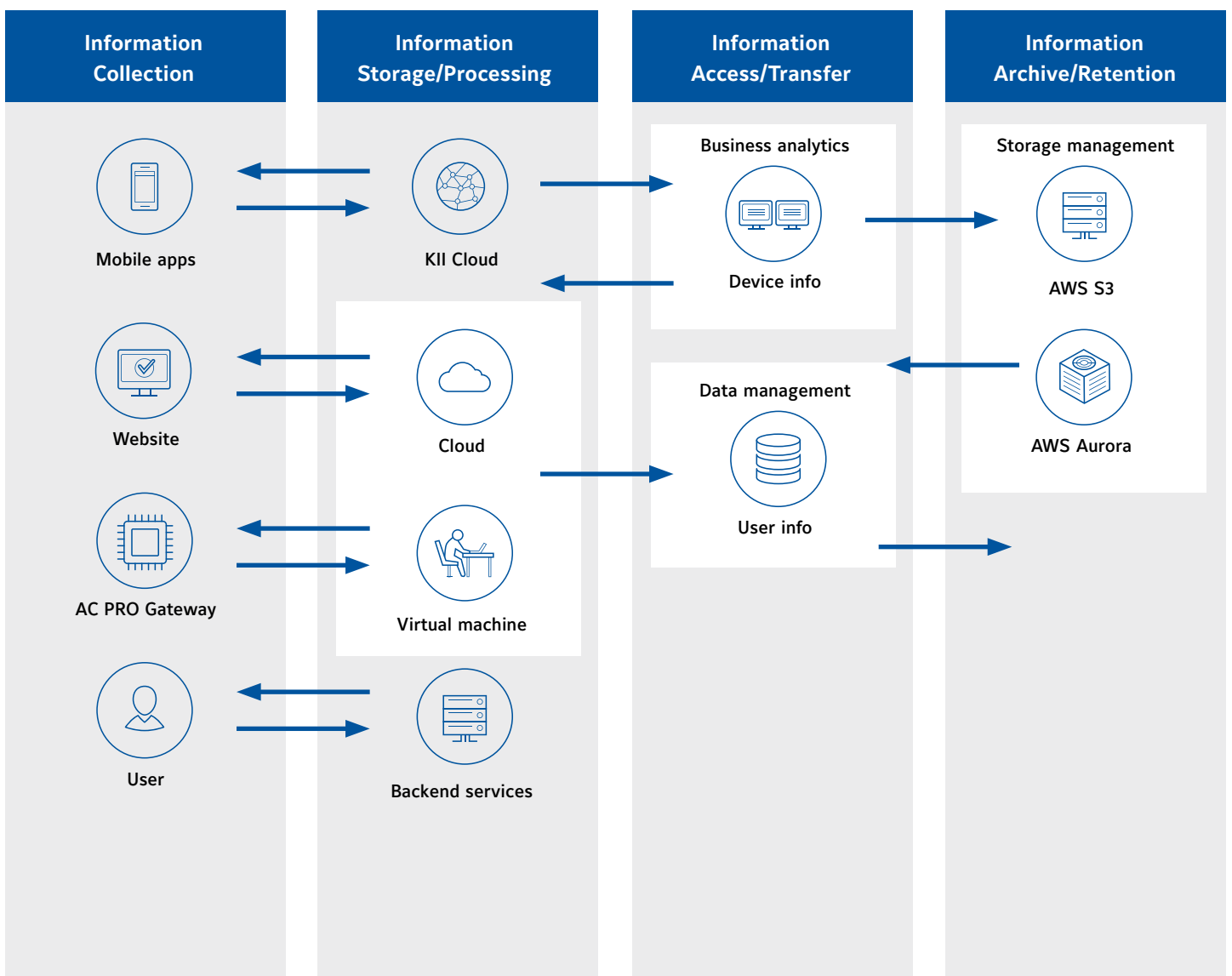
## 2. Overview of AirCloud Pro

Air Cloud Pro is an IOT solution for VRF HVAC systems. By using this IOT product customers can control and monitor their VRF HVAC system over the internet from anywhere in the world by using a mobile phone app or website. Users can perform the below activity using AirCloud Pro:

- adjust temperature, fan speed and mode
- view current weather conditions
- view energy consumption data
- modify equipment parameters based on a schedule

## 3. Information flow map for AirCloud Pro

Please see below the information flow map for AirCloud Pro, identifying where information is collected, stored and processed, and accessed and transferred. Please note the specifics of this flow depend on the components chosen by our customer and deployed.



# Data Privacy Sheet

## 4. Personal data processing details of AirCloud Pro

See below details on each category of personal data processed by AirCloud Pro, types of personal data within each category, and the purpose of processing each type:

S. No.	Personal Data Category	Types of Personal Data	Purpose of Processing
1	User and account details	<ul style="list-style-type: none"><li>• First name, middle name, last name</li><li>• User login (email ID)</li><li>• Contact number</li></ul>	For account login purpose
2	User location details	<ul style="list-style-type: none"><li>• Address</li><li>• City</li><li>• State</li><li>• Country</li></ul>	To set user location and for use in outside temperature forecasting
3	User device energy consumption	<ul style="list-style-type: none"><li>• Voltage (like 440V)</li></ul>	Use in energy data calculation

## 5. Data retention and deletion

Johnson Controls has a Global Records Management Program, which includes a Global Records Retention Policy and procedures. The purpose of our Global Records Management Program is to detail the responsibilities and working instructions necessary for the use, maintenance, retention or destruction of data, and to assign appropriate responsibilities to the right individuals.

When Johnson Controls processes personal data for our own purposes, the Johnson Controls Global Records Management Program applies to all records, on all media, and must be maintained in accordance with the Johnson Controls Records Retention Policy and Records Retention Schedule for the specific country and business in which the record has been stored.

The Global Records Management Program applies to all worldwide locations and legal entities controlled by Johnson Controls. Similarly, when Johnson Controls processes personal data on behalf of a customer, or when our products are operating on customer site, those offerings can be configured to meet customer data retention periods.

See below the default retention periods applied to AirCloud Pro

S. No.	Data Category	Retention Period	Reason for Retention
1	User and account information <ul style="list-style-type: none"><li>• First name, middle name, last name</li><li>• User login ID (email ID)</li><li>• Contact number</li></ul>	Lifetime of product	<ul style="list-style-type: none"><li>• For account login purposes</li></ul>
2	User location details <ul style="list-style-type: none"><li>• Address</li><li>• City</li><li>• State</li><li>• Country</li></ul>	Lifetime of product	<ul style="list-style-type: none"><li>• To set user location and for use in outside temperature forecasting</li></ul>
3	User device energy consumption <ul style="list-style-type: none"><li>• Voltage (like 440V)</li></ul>	Lifetime of product	<ul style="list-style-type: none"><li>• For use in energy data calculation</li></ul>

# Data Privacy Sheet

## 6. Sub-processors for Cloud

Please see below the list of current sub-processors utilized for Cloud:

Service Type	Sub-Processor	Location	Security Information
Cloud hosting service	Amazon Web Services (AWS)	Tokyo	<a href="https://aws.amazon.com/compliance/">https://aws.amazon.com/compliance/</a>
Cloud hosting service	KII	Tokyo	<a href="https://en.kii.com/">https://en.kii.com/</a>
SQL Database	AWS Dynamo DB	AWS Tokyo cluster	<a href="https://aws.amazon.com/compliance/">https://aws.amazon.com/compliance/</a>

## 7. Cross-border data transfers

This offering is designed to run on customer premises, solely within the control of the customer. In that situation, Johnson Controls will not process the personal data of this offering in any way. As a result, any cross-border data transfer issues and restrictions are a matter for our customer.

As a multinational organization, Johnson Controls has substantial experience in dealing with cross-border transfer issues and restrictions. When Johnson Controls processes personal data for our own purposes or on behalf of a customer, we utilize the following transfer mechanisms which can assist our customers:

Binding Corporate Rules (BCRs)	The Johnson Controls BCRs are designed to ensure an adequate level of protection of personal data no matter where in the world it is processed by Johnson Controls. With respect to the European Union (EU), the Johnson Controls BCRs have been specifically approved by the EU Data Protection Authorities (DPAs) for transfer of EU personal data globally within Johnson Controls.
Asia-Pacific Economic Cooperation Cross-Border Privacy Rules (APEC CBPR)	The CBPR is a government-backed privacy certification which demonstrates that Johnson Controls complies with internationally recognized data privacy protections and is the framework approved for the transfer of personal data by Johnson Controls between participating APEC member economies: the United States, Mexico, Japan, Canada, Singapore, Republic of Korea, Australia, Chinese Taipei and the Philippines.
EU Standard Contractual Clauses (SCCs)	Johnson Controls incorporates the EU's approved standard contractual clauses, also referred to as the "Model Contract," into the Johnson Controls Data Protection Agreement located at <a href="http://www.johnsoncontrols.com/dpa">www.johnsoncontrols.com/dpa</a> to afford the contractual protection under the SCCs to our customers.
EU-US Privacy Shield Framework and Swiss-US Privacy Shield Framework	Johnson Controls was and continues to be certified under the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework. Although the Privacy Shield Framework has been invalidated by the Court of Justice of the European Union (CJEU), Johnson Controls intends to continue to maintain its certification for the foreseeable future, until a replacement framework is created.

# Data Privacy Sheet

## 8. Privacy certifications

As explained above, this offering is designed to run on customer premises, solely within the control of the customer. In that situation, Johnson Controls will not process the personal data of this offering in any way. However, Johnson Controls has substantial experience with global privacy issues, and has achieved the below global privacy certifications which demonstrate our commitment to creating solutions which respect global fair information practices and Privacy by Design.

Asia-Pacific Economic Cooperation Cross-Border Privacy Rules (APEC CBPR)	The CBPR is a government-backed privacy certification which demonstrates that Johnson Controls complies with internationally recognized data privacy protections. Please see the <a href="#">CBPR Compliance Directory</a> and the Johnson Controls CBPR <a href="#">TRUSTe validation page</a> for more information.
TRUSTe Enterprise Seal	The Johnson Controls TRUSTe Privacy Certification Seal demonstrates our responsible data collection and processing practices consistent with regulatory expectations and external standards for privacy accountability. Please see the <a href="#">Johnson Controls TRUSTe validation page</a> for more information.

Please note that this document is for customer guidance purposes only, is not legal advice and is subject to changes from time to time due to modifications of our solutions. Johnson Controls is not a law firm and does not provide legal advice. While Johnson Controls products and solutions are designed for use in compliance with applicable law, implementation and deployment of Johnson Controls products and solutions should be reviewed by appropriate customer advisors and stakeholders for such compliance.