

Data Privacy Sheet

Connected Fire Sprinkler Solutions (CFSS)



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.

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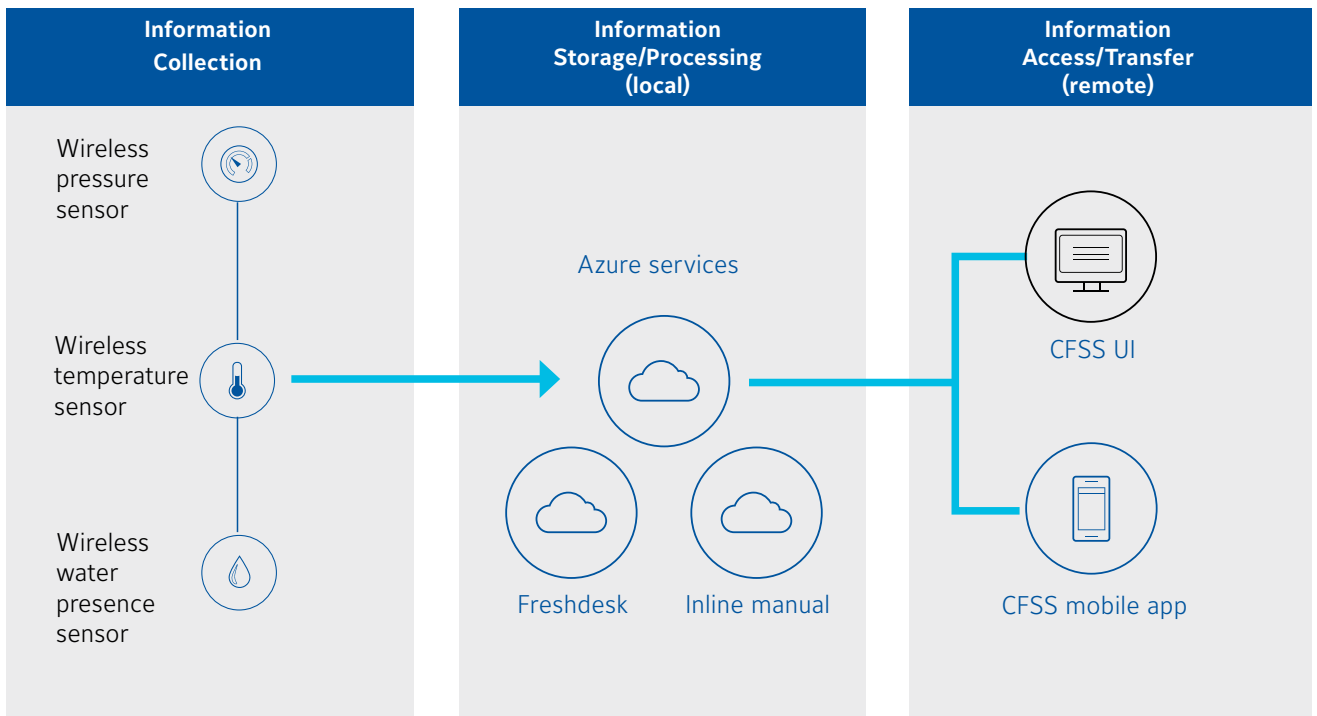
2. Overview of Connected Fire Sprinkler Solutions

Connected Fire Sprinkler Solution (CFSS) is a software and hardware as a service solution featuring wireless edge sensors that connect to your existing sprinkler system, central hub, cloud and mobile applications to keep you informed – in real time – of your sprinkler system health.

Our sensors continuously gather fire sprinkler system data, such as pressure, temperature and water presence, and send the information to your dashboard via the Cloud. We send notifications identifying the time and location of any adverse conditions.

3. Information flow map for Connected Fire Sprinkler Solutions

Please see below the information flow map for CFSS, 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.



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4. Personal data processing details

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

Personal Data Category	Types of Personal Data	Purpose of Processing
Work-related identification details	<ul style="list-style-type: none">• Full name• Full email ID• Full mobile number	<ul style="list-style-type: none">• Account management• Notification routing

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 Connected Fire Sprinkler Solutions:

Data Category	Retention Period	Reason for Retention	Personal Data Included?
User and account information	For the period of active subscription	Required to manage subscription	Yes
Application logs	For the period of active subscription	Used only for troubleshooting issues	Yes
Error logs	For the period of active subscription	Known errors are saved for longer durations for troubleshooting issues and tracking customer tickets over time	No
Analytics data	For the period of active subscription	Used only for troubleshooting issue	No
Audit logs	For the period of active subscription	Used only for troubleshooting issue	Yes

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6. Sub-processors

Please see below the list of current sub-processors utilized to provide Connected Fire Sprinkler Solutions:

Service Type	Sub-Processor	Location	Security Assurance
Cloud hosting service	Microsoft Azure	<ul style="list-style-type: none"> United States EU (upcoming) Australia (upcoming) 	https://docs.microsoft.com/en-us/compliance/regulatory/offering-home
Manual/training	Inline manual	<ul style="list-style-type: none"> United Kingdom 	https://support.inlinemanual.com/support/solutions/articles/80000983389
Service tickets	Freshdesk	<ul style="list-style-type: none"> United States 	https://support.freshdesk.com/en/support/solutions/articles/196893-data-storage-and-data-security-in-freshdesk-

7. Cross-border data transfers

Many countries and jurisdictions have laws governing the transfer of personal data. 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 that 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.
Asia-Pacific Economic Cooperation Privacy Recognition for Processors (APEC PRP)	The PRP is a government-backed privacy certification that enables Johnson Controls to demonstrate to customers our accredited enterprise-wide Privacy Program, and to transfer data processed on behalf of our customers (including our cloud solutions) between the United States, Mexico, Japan, Canada, Singapore, Republic of Korea, Australia, Chinese Taipei and the Philippines. Please see the PRP Directory and the Johnson Controls PRP TRUSTe validation page for more information.
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 www.johnsoncontrols.com/dpa 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.

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8. Privacy certifications

Johnson Controls has substantial experience with global privacy issues, and has achieved the below global privacy certifications that demonstrate our commitment to creating solutions that respect global fair information practices and Privacy by Design.

Asia-Pacific Economic Cooperation Privacy Recognition for Processors (APEC PRP)	The PRP is a government-backed privacy certification that enables Johnson Controls to demonstrate to customers our accredited enterprise-wide Privacy Program, and to transfer data processed on behalf of our customers (including our cloud solutions) between the United States, Mexico, Japan, Canada, Singapore, Republic of Korea, Australia, Chinese Taipei and the Philippines. Please see the PRP Directory and the Johnson Controls PRP TRUSTe validation page for more information.
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 CBPR Compliance Directory and the Johnson Controls CBPR TRUSTe validation page 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 Johnson Controls TRUSTe validation page 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.