

Data Privacy Sheet

Performance Verification Tool (PVT)



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 California's 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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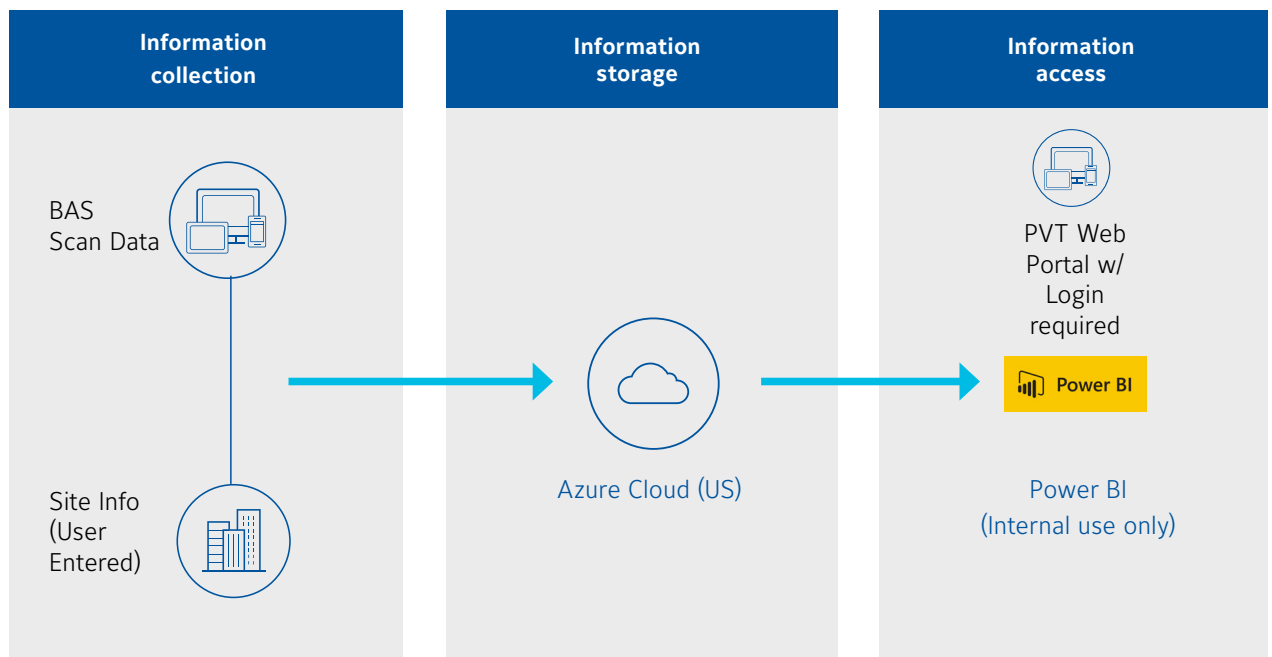
2. Overview of Performance Verification Tool (PVT)

PVT (Performance Verification Tool) is a Building Automation System (BAS) site scanning tool installed in a technician's laptop or a customer's computer/server, and is a cloud data repository for storing the scan data with a web portal for viewing the results of the scans. The PVT scans a BAS at a customer site and collects an inventory of hardware and software installed as part of the BAS. In addition, it captures spaces, equipment and point information that can be used to assess the performance of the BAS such as energy optimization.

PVT operates in two modes. In interactive mode, the PVT is installed on a technician's laptop and connected to a BAS to perform ad-hoc scans. In auto-scan mode, PVT is installed on a customer's computer / server and scans are performed on a scheduled basis. In auto-scan mode, the PVT tool can only be accessed by a Johnson Controls employee signing in using their Johnson Controls Global ID (GID) and password.

3. Information flow map for Performance Verification Tool (PVT):

Please see below the information flow map for Performance Verification Tool (PVT), identifying where information is collected, stored and processed as well as accessed and transferred. Please note the specifics of this flow depend on the components chosen and deployed by the customer.



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4. Data processing details of Performance Verification Tool (PVT):

See below details on each category of data processed by Performance Verification Tool (PVT), types of personal data within each category, and the purpose of processing each type.

S. No.	Building Data Category	Types of Data	Purpose of Processing
1	BAS Inventory Data	Equipment model number, software version, MAC address, IP address, points, bus types, FQR	Equipment inventory
2	Site information	Project/site name	Ability to associate a scan to a site
3	BAS Health and Performance Data	Hardware <ul style="list-style-type: none"> • CPU and memory loading • Object counts • Board Temp • Battery condition • BACNet stats BAS <ul style="list-style-type: none"> • Alarms • Energy optimization (schedules, economizers, etc.) • Comfort (deviation from set point etc.) • Reliability (dirty filters, overridden points, broken object references) • Features in use/not in use 	BAS diagnostic (health condition)

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 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 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 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 Performance Verification Tool (PVT):

S. No.	Data Category	Retention Period	Reason for Retention
1	IP Address	Permanent	Required to preserve state of site for support and maintenance purposes
2	BAS Inventory Data	Permanent	Required to preserve state of site for support and maintenance purposes
3	BAS Health and Performance Data	Permanent	Required to preserve state of site for support and maintenance purposes

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6. Sub-processors for Performance Verification Tool (PVT):

Please see below the list of current sub-processors utilized for Performance Verification Tool:

Sub-Processor	Service Type	Location of Data Centers
Microsoft Azure Cloud	Third-party cloud hosting	<ul style="list-style-type: none">• United States• Asia Pacific• UAE• Canada

7. Cross-border data transfers

Many countries and jurisdictions have laws governing the transfer of personal data. As a multinational organisation, 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 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 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.