

OpenBlue Enterprise Manager

Data Privacy Sheet



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.

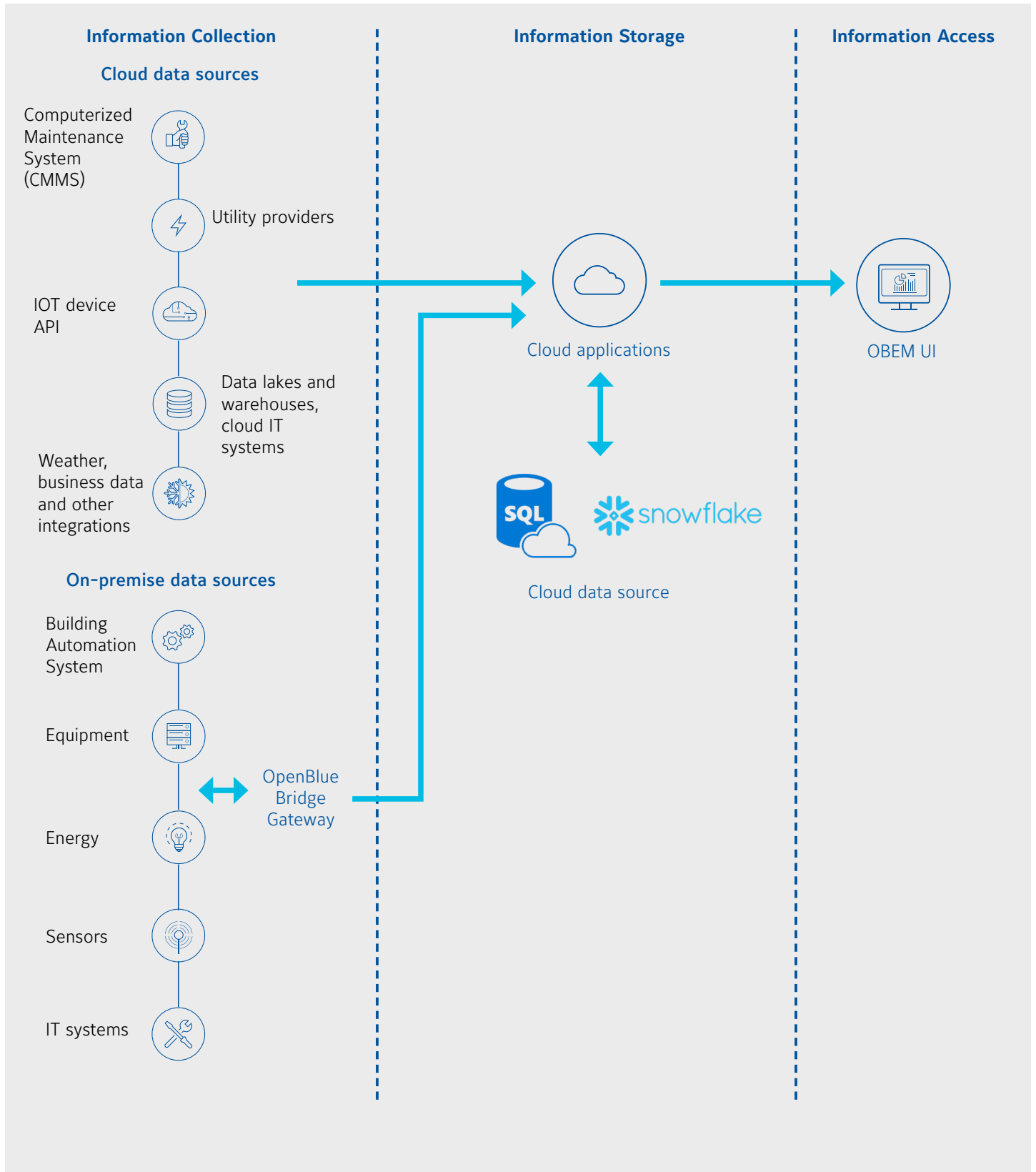
2. Overview of OpenBlue Enterprise Manager

OpenBlue Enterprise Manager (EM) is a single-pane-of-glass solution for cloud-based building performance analytics and optimization. EM is a multi-tenanted Software as a Service (SaaS) solution that supports high-volume building data aggregation sourced from Johnson Controls and third-party BMS platforms and external sources.

EM hosts a number of subscription-based apps that provide the intelligence and experiences to support building operations, asset performance management, tenancy, work order management, and advanced machine learning-enabled analytics. This includes energy analytics and forecasting, air quality monitoring, social distance alerting, space usage performance, and equipment fault detection information.

3. Information flow map for Enterprise Manager

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



4. Personal data processing details of Enterprise Manager

See below details on each category of personal data processed by Enterprise Manager, 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 nameFull email ID	Account management

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 Enterprise Manager:

Data Category	Retention Period	Reason for Retention	Personal Data Included?
User and account information	For the period of active subscription	Required to run an active subscription	Yes
Application logs	90 days	Used only for troubleshooting issues	Yes
Error logs	365 days	Known errors are saved for longer duration for troubleshooting issues and tracking customer tickets over time	No
Analytics data	3 years	Standard retention is three years, unless customer requests longer retention, which can be up to nine years	No
Audit logs	1 year standard 3 years on request		Yes

6. Sub-processors for Enterprise Manager

Please see below the list of current sub-processors utilized to provide Enterprise Manager. The specific sub-processors in scope will depend on the what was agreed between Johnson Controls and our customer.

Service Type	Sub-Processor	Location	Security Information
Cloud hosting service	Microsoft Azure (choice)	US, China, UAE (upcoming) Singapore (upcoming)	https://docs.microsoft.com/en-us/compliance/regulatory/offering-home
Cloud hosting service	AliCloud (choice)	China (upcoming)	https://www.alibabacloud.com/trust-center/compliance-repository?spm=a3c0i.20978445.6439058820.2.3bba1aadYhgkFo
Data hosting and computing service	Snowflake	Azure US	https://1amiydhcmj36tz3733v94f15-wpengine.netdna-ssl.com/wp-content/uploads/2019/12/Snowflake-Security-Overview-Q4-2019-2.pdf
Cloud hosting service	Google Cloud	US	https://cloud.google.com/security/compliance/offerings

7. Cross-border data transfers

Many countries and jurisdictions have laws governing the transfer of personal data. As a multinational organisation, Johnson Controls has substantive 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 utilise 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 for 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 European Union 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: United States of America, Mexico, Japan, Canada, Singapore, Republic of Korea, Australia, Chinese Taipei and 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 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.

8. Privacy certifications

Johnson Controls has substantive 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 Privacy Recognition for Processors (APEC PRP)	The PRP certification 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 USA, Mexico, Japan, Canada, Singapore, Republic of Korea, Australia, Chinese Taipei and the Philippines. Please see the PRP Directory 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 and is not legal advice. 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.

About OpenBlue

OpenBlue is a complete suite of connected solutions that serves industries from workplaces to schools, hospitals to campuses, and beyond. This platform includes tailored, AI-infused service solutions such as remote diagnostics, predictive maintenance, compliance monitoring, advanced risk assessments, and more. A dynamic new space from Johnson Controls, OpenBlue is how buildings come alive.



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