

# OpenBlue Location 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).

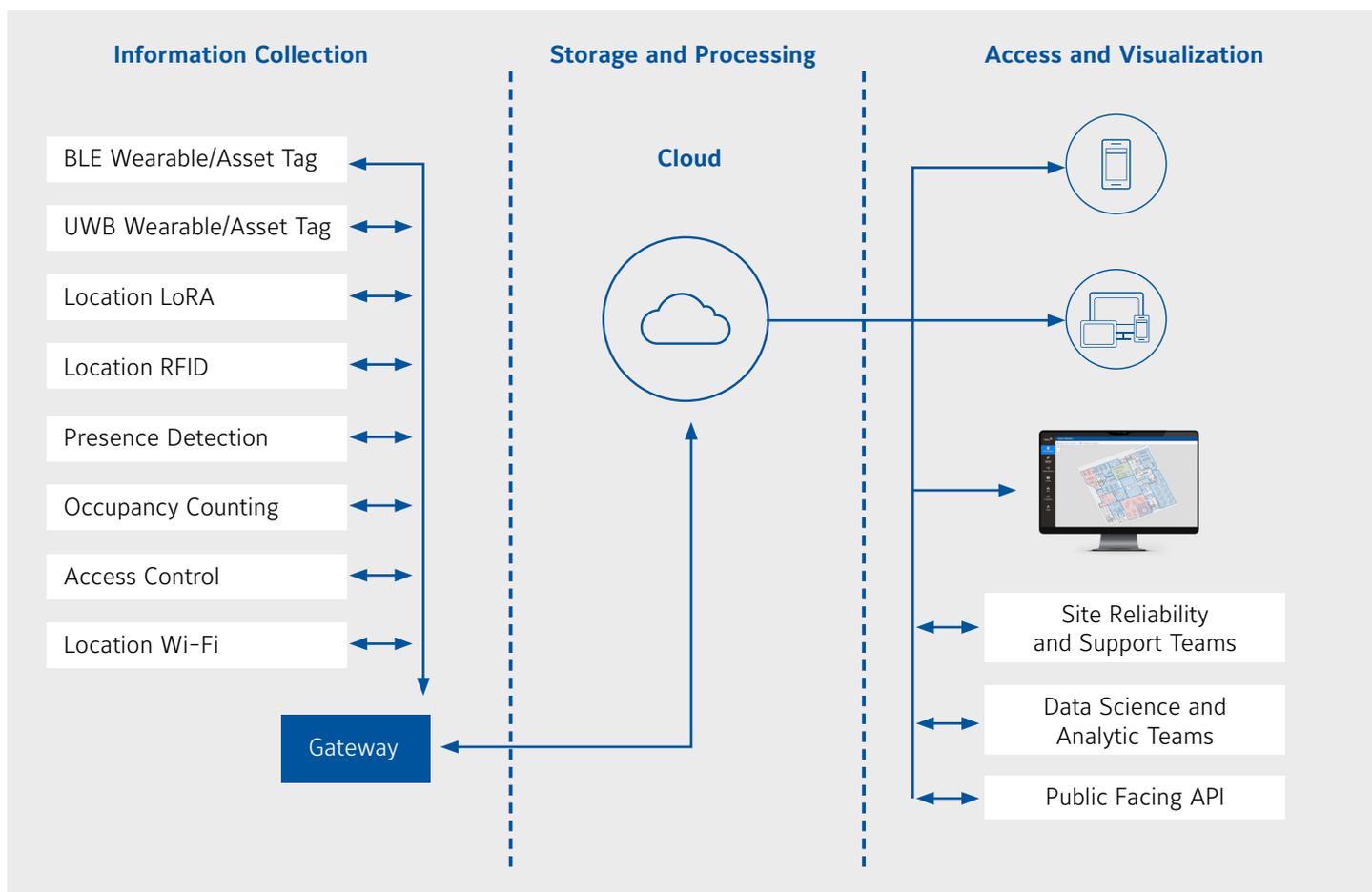
For more information on the Johnson Controls Global Privacy Office and Global Privacy Program, please visit [www.johnsoncontrols.com/privacy](http://www.johnsoncontrols.com/privacy).

### 2. Overview of OpenBlue Location Manager

OpenBlue Location Manager is a real-time location solution, powered by the indoor movement and location of people and things, utilisation of critical equipment and microclimate measurement. Location Manager supports the return to work and healthy buildings through its Social Distance Monitoring and Contact Tracing capability by proactively minimizing the impact of employees testing positive for COVID. As the new normal takes shape, Location Manager, via its Space, Workflow, Asset Advisor and Intelligent laboratories capabilities, enables informed real estate decision-making and agile space change management to support new ways of working.

### 3. Information flow map for Location Manager

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



### 4. Personal data processing details of Location Manager

See below details on each category of personal data processed by Location 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
System configuration and access	<ul style="list-style-type: none"> <li>Persistent Badge ID, pseudo anonymized by default</li> <li>Email and or Mobile phone number (Optional)</li> <li>User name</li> <li>In-building badge location</li> </ul>	<ul style="list-style-type: none"> <li>To support grouping of badges for space use analytics</li> <li>Essential for health and safety outcomes such as contagion prevention, social distancing monitoring, space management, and contact tracing</li> <li>Essential for security processing in order to detect unauthorized access/movement</li> <li>Email and or mobile number used for sending alerts from the system to select individuals</li> <li>Admin user name and password required for role-based system access (approved by customer)</li> </ul>

## 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 Location Manager:

Data Category	Retention Period	Reason for Retention
User and account information	For the period of active subscription	Required to run an active subscription
Application logs	For at least 45 days, after which they become overwritten	Used only for troubleshooting issues
Error logs	For at least 365 days	Known errors are saved for longer duration for troubleshooting issues and tracking customer tickets over time
Analytics data	Retention time will match the SaaS subscription term unless a different time period is agreed. For example, a 1 year subscription term provides for 1 year of analytics data retention, a 3yr term provides for 3 years of analytics data retention	Space utilisation, workflows and space layouts may change by month, quarter and year over year. Aligning the retention period to the SaaS agreement term facilitates views and analytics over that term. Shorter retention periods are supported by request
Audit logs	365 days	

## 6. Sub-processors for Location Manager

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

Sub Processor	Personal Data	Service Type	Location of Data Center	Security Assurance
Microsoft Azure	Unique badge ID Email address Mobile phone number System name and password log-in details	Third-party cloud hosting	*United States (default) Europe China	For information regarding Azure see <a href="http://www.microsoft.com/en-ie/trust-center/compliance/compliance-overview">www.microsoft.com/en-ie/trust-center/compliance/compliance-overview</a> , which includes audit reports and <a href="http://docs.microsoft.com/en-GB/compliance/regulatory/offering-home">docs.microsoft.com/en-GB/compliance/regulatory/offering-home</a> for comprehensive compliance information
HID	Unique badge ID	RTLS engine data processing	United States	See <a href="http://www.hidglobal.com/sites/default/files/resource_files/gdpr_hid_statement_february_2018.pdf">www.hidglobal.com/sites/default/files/resource_files/gdpr_hid_statement_february_2018.pdf</a> , and <a href="http://www.hidglobal.com/security-center">www.hidglobal.com/security-center</a>

## 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 <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.

## 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 that 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 <a href="#">PRP Directory</a> 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 <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 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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