

## GLOBAL EMPLOYEE PRIVACY NOTICE

Last updated: [30 June 2023]

Johnson Controls International plc and its affiliated companies (collectively, **Johnson Controls**) care about your privacy and are committed to processing your Personal Information in accordance with fair information practices and applicable data privacy laws.

**As a sign of our commitment to privacy, we have adopted a set of Binding Corporate Rules (“BCRs”). These contain our global privacy commitments, including our policy on transfers of personal information and associated individual privacy rights, with the aim of ensuring that your Personal Information is protected while processed by our affiliates around the world. These BCRs have been approved by the European Data Protection Authorities. You can consult our BCRs on the [Privacy Portal](#).**

### 1. Scope

This global notice explains how Johnson Controls handles the personal information of employees, applicants, interns, former employees, dependents, beneficiaries, contractors, consultants and temporary agency workers in the course of its activities.

Personal Information means any information relating to an identified or identifiable natural person; one who can be identified, directly or indirectly, by reference to an identifier such as name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special Categories of Personal Information (also known as Sensitive Personal Information) means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and the processing of data concerning health or sex life, genetic data or biometric data.

### 2. Identity of Data Controller

Generally, the Johnson Controls entity responsible for the processing of your personal information (often referred to as a ‘data controller’), is the Johnson Controls entity with which you have an employment relationship (or, where you are not an employee, the Johnson Controls entity responsible for your work). If you are in any doubt you can contact the Human Resources Department or contact the Privacy Office ([privacy@jci.com](mailto:privacy@jci.com)).

### 3. Categories of Personal Information

In the normal course of human resources and business activities, we process the following categories of Personal Information:

- Personal identification information, such as your name, place of birth, home address, date of birth, gender, work-related photographs, and home phone number;
- Government-issued identification numbers, such as social security number and national ID for payroll purposes;
- Immigration status, right-to-work and residence status;
- Family and emergency contact details;
- Job-related information, such as years of service, work location, employment ID, work record, vacation absences, and contract data;

- Educational and training information, such as your educational awards, certificates and licenses, vocational records and in-house training attendance;
- Recruitment and performance-related data, such as objectives, ratings, comments, feedback results, career history, work equipment, career and succession planning, skills and competencies and other work-related qualifications and background information;
- Information related to your usage of Johnson Control's assets, in particular its computers, mobile devices, and telecommunication systems, and traffic generated via the Internet;
- Information collected by mobile device management software including your name, mobile number, business e-mail address, country of your mobile provider and information contained in corporate applications installed on your device.
- Information needed for compliance and risk management, such as disciplinary records, background check reports and security data;
- Payroll and payment or benefits related information, such as marital status, salary and insurance information, dependents, government identifier or tax numbers, bank account details, and employment related benefits information, family and dependent information;
- Information related to location and time and attendance management;
- Travel and passport information;
- Business-related voice/video recordings; and
- Photographs.

In addition, we may process Special Categories of Personal Information, for example:

- Health and sickness information, such as symptoms, diagnosis, treatment and medication where necessary, medical certificates and workplace injury and illness information;
- Information related to occupational health and safety;
- Race and nationality, where required by law or where permitted by law;
- Biometric information, including facial recognition information, where our locations operate such systems, in compliance with applicable law;
- Precise geographic location data, in situations where your role requires it, where permitted under law, including where you operate one of our vehicles;
- Trade union membership;
- Criminal convictions and prosecutions and other background check information (where permitted under law in certain countries); and
- In certain jurisdictions, your passport number, social security number or national identification number.
- In India, passwords and financial information (such as bank account, or credit or debit card, or other payment instrument details) are considered Sensitive Personal Information.

As well as collecting Personal Information directly from you, we may also collect your Personal Information from other sources, including:

- Government organisations, health providers and benefits providers;
- Service providers e.g. companies that perform background checks;
- Your supervisors, colleagues or nominated referees; and
- Publicly available information.

#### **4. Purposes of Processing**

We process Personal Information for the following purposes:

- Human resources and employment including workforce planning, recruitment and staffing; workforce administration, payroll, compensation and benefit programs, performance management, learning and development, advancement and succession planning;
- Mergers, acquisitions and divestitures;
- Legal compliance, including corporate management, compliance with government authority requests for information, liens, garnishments and tax compliance;
- Workplace management, such as travel and expense programs and internal health and safety programs;
- Internal reporting;
- Audit;
- To protect Johnson Controls, its workforce, and the public against injury, theft, legal liability, fraud or abuse or other injury;
- Training and product demonstrations;
- Product development that would involve or relate to employees; and
- Other legal and customary business-related purposes.

Johnson Controls also monitors and filters the use of devices, our network, and internet traffic for lawful business purposes, and in particular for:

- Ensuring adequate Information Systems integrity and detecting and preventing criminal activity, including cyber-crime;
- Protecting information, including, but not limited to, personal information, confidential information, and high-value business information against destruction, loss, alteration, unauthorized access, disclosure or hacking;
- Securing the effective operation of its Information Systems;
- Ensuring compliance with applicable regulatory and self-regulatory obligations; and
- Detecting instances of non-compliance with Johnson Controls' policies on internet use and the Code of Ethics.

Where mobile device management software has been installed on your personal device (in order for you to access Johnson Controls e-mail, network services and data), Johnson Controls may need to make changes to the device's security configuration in order to comply with Johnson Controls mobile security requirements. Any monitoring and/or filtering of usage of this device, for the above mentioned purposes, is limited to corporate applications. For more information please see 'How to contact us' below.

## **5. Legal bases for Processing**

We process your Personal Information based on one of the following bases:

- Where the processing is necessary for us to perform our contract with you, such as to recruit you, pay you and manage your employment relationship with us;
- Where the processing is necessary for the purposes of our legitimate interests, such as for internal reporting and auditing; protecting Johnson Controls, its workforce, and the public against injury, theft, legal liability, fraud or abuse or other injury; ensuring the integrity of information systems; ensuring compliance with applicable regulatory and policy obligations; in connection with mergers, acquisitions and divestitures; product development; training and product demonstrations; business-related meetings and calls.
- Where the processing of is necessary for compliance with a legal obligation, such as tax and social security purposes; checking your right to work; compliance with government authority requests; liens,

garnishments and tax compliance; and

- Where you have given your consent.

We process Special Categories of Personal Information based on one of the following bases:

- Where you have given your explicit consent;
- Where processing is necessary for the purposes of carrying out obligations and exercising rights in relation to employment law;
- Where processing relates to Personal Information which is manifestly made public by you; and
- Where processing is necessary for the establishment, exercise or defence of legal claims.

## 6. Recipients of Personal Information

We may disclose your Personal Information in the following circumstances to:

- Other Johnson Controls entities, joint ventures, subcontractors, vendors or suppliers who perform services on our behalf for the aforementioned purposes;
- A newly formed or acquiring organization if Johnson Controls is involved in a merger, sale or a transfer of some or all of its business;
- Third party service providers (that help us carry out our business activities) such as IT providers, benefits providers, payroll service providers, and advisers (for example lawyers, accountants and auditors);
- Any recipient, if we are required to do so, such as by applicable court order or law;
- Any recipient, with your consent, such as for employment verification or bank loans; or
- Any recipient when reasonably necessary such as in the event of a life-threatening emergency.

## 7. International Transfers

The third parties, subsidiaries and affiliates to which your Personal Information can be disclosed may be located throughout the world, including the United States, India, Slovakia and Mexico; therefore information may be sent to countries with different privacy laws than your country of residence. In such cases, we take measures to ensure that your Personal Information receives an adequate level of protection, which include our Binding Corporate Rules, setting forth our high standards for processing personal information, and Standard Contractual Terms. Where required, in accordance with local law, we may request your consent.

APEC Cross Border Privacy Rules System (CBPR): Johnson Controls privacy practices, described in this Privacy Notice, comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of personal information transferred among participating APEC economies. More information about the APEC framework can be found [here](#). Click [here](#) to view our APEC CBPR certification status.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at: <https://feedback-form.truste.com/watchdog/request>.

## 8. Retention

Your Personal Information will be retained as long as necessary to achieve the purpose for which it was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law. Johnson Controls Records Retention schedules can be found at: <https://my.jci.com/Ethics/Pages/RIM.aspx>.

## 9. Protection and Security

Johnson Controls takes precautions to protect Personal Information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. We have taken appropriate technical and organizational measures to protect the information systems on which your Personal Information is stored and we require our suppliers and service providers to protect your Personal Information by contractual and other means.

## 10. Your Rights

Your rights may depend on local law. Johnson Controls will be guided by local law in responding to privacy rights requests such as those listed below.

- Information and Access: You may request to access your Personal Information, be provided with supplemental information, and be provided with a copy of your Personal Information. The right to Information and Access has some restrictions. For example, access may be denied (i) in the case of recurrent access requests within a short time interval, or (ii) where providing such access or correction could compromise the privacy of another person or unreasonably expose sensitive company information.
- Rectification: You may request to rectify and/or update your inaccurate or out-of-date Personal Information.
- Erasure: You may have the right to have your Personal Information erased. This right is subject to restrictions.
- Restriction: You may have the right to have your Personal Information restricted. Restriction means that your Personal Information is only stored by Johnson Controls, and not further processed, while your complaint is dealt with.
- Object to Processing: You may have the right to object to specific types of processing. These types are direct marketing, processing for research or statistical purposes and processing based on legitimate interests. The right to object to processing based on legitimate interests may be subject to demonstration by Johnson Controls of grounds which override your right to object.
- Data Portability: You may have the right to request Data Portability. Data Portability is the provision of your Personal Information in a structured, commonly used and machine readable form so that it may be transferred by you or by Johnson Controls to another company easily. The right to Data Portability is subject to restrictions. For example, Data Portability does not apply to paper records, and must not prejudice the rights of others, or sensitive company information.
- Right not to be subject to decisions based solely Automated Decision Making: You may have the right not to be subject to decisions based solely on automated processing (i.e. without human intervention), if those decisions produce legal effects or significantly affect you. Automated Processing is Processing of your Personal Information by automated means. If we implement processing that employs automated decision-making which produces legal effects or that significantly affects you, then you shall have the right not to be subject to a decision based solely on automated processing.

You may also have the right to lodge a complaint with a supervisory authority.

You may request to exercise any of these rights through your local Human Resources contact or the Privacy Office at [privacy@jci.com](mailto:privacy@jci.com).

## 11. Consent and Withdrawal of Consent

If consent is the legal basis of the processing of your Personal Information or Special Categories of Personal Information, you may withdraw any consent previously granted for a specific purpose, free of charge, by contacting our Privacy Office at [privacy@jci.com](mailto:privacy@jci.com).

## **12. Modifications to our Privacy Notice**

We may amend this notice from time to time, should it become necessary to do so. If we propose to make any material changes, we will notify you by means of a notice on this page. This notice may also be supplemented by other statements as needed to comply with local requirements in the country where you live, or where employee representation agreements exist.

## **13. Privacy Concerns and How to contact us**

If you have any questions about this notice or if you believe that your Personal Information is not handled in accordance with the applicable law or this notice, you have several options:

- Contact the Privacy Office at [privacy@jci.com](mailto:privacy@jci.com);
- Discuss the issue with your supervisor or another supervisor or manager;
- Contact the Human Resources department; or
- You may also contact Johnson Controls 24-hour Integrity Helpline at: [www.johnsoncontrolsintegrityhelpline.com](http://www.johnsoncontrolsintegrityhelpline.com).