OpenBlue
Risk Insight

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).

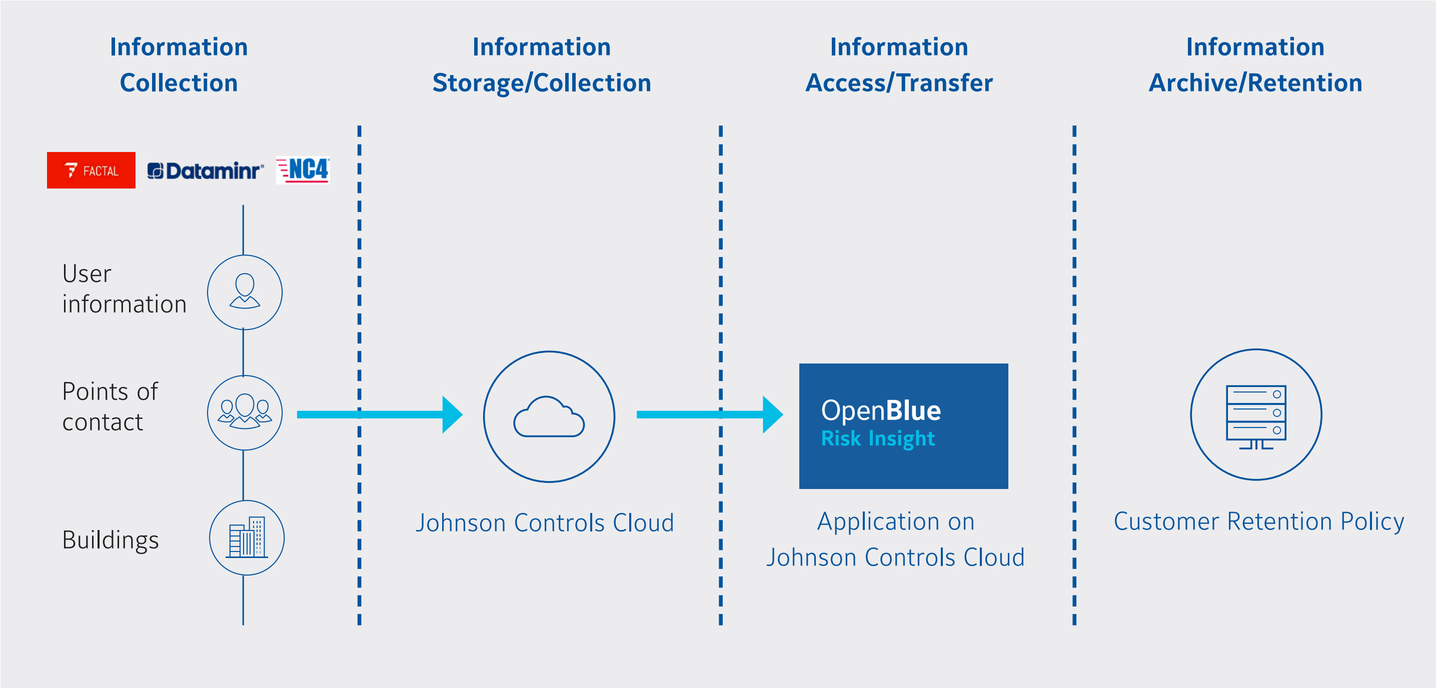
For more information on the Johnson Controls Global Privacy Office and Global Privacy Program, please visit www.johnsoncontrols.com/privacy.

2. Overview of OpenBlue Risk Insight

Johnson Controls OpenBlue Risk Insight (Risk Insight) is a visual tool to detect, assess, and respond to threats to your built assets. Risk Insight uses the threat, vulnerability, and consequence (TVC) methodology to configure and score risks based on your business processes and building locations. Risk scores help a Security Operations Center (SOC) and Regional Security Teams prioritize security focus and respond to assets that experience the highest levels of risk. Customizable risk profiles enable organizations to adjust the vulnerability sensitivity level of their assets to more than 100 threat types. Risk Insight allows you to report on and monitor current and historical asset risk metrics to improve collaboration between the SOC team and Regional Security Teams to mitigate risk.

3. Information flow map for Risk Insight

Please see below the information flow map for Risk Insight, which identifies where information is collected, stored, processed, accessed and transferred. Please note the specifics of this flow depend on the components chosen by our customer and deployed.


Information Collection
Information Storage/Collection
Information Access/Transfer
Information Archive/Retention
FACTAL
Dataminr
NC4
User information
Points of contact
Buildings
Johnson Controls Cloud
OpenBlue
Risk Insight
Application on Johnson Controls Cloud
Customer Retention Policy

4. Personal data processing details of Risk Insight

See below details on each category of personal data processed by Risk Insight, types of personal data within each category, and the purpose of processing each type.

S. No.	Personal Data Category	Types of Personal Data	Purpose of Processing
1	User Account Information	• First Name • Last Name • Username • Email address	• Required to access the Risk Insight application • Required for user notifications
2	Points of Contact Information (User Work Location and Contact Details)	• First Name • Last Name • Role • Phone • Email address	• POCs are associated with one or more buildings • Buildings are associated with one or more SOPs • POC contact details are displayed when an SOP is associated with a building, which in turn is associated with the POC
3	Alerts	• Subscription credentials	• Needed to subscribe to third-party Data Sources for alerts • Alerts that are sent from various third-party data sources and classified by RI according to their threat level

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 Risk Insight:

S. No.	Data Category	Retention Period	Reason for Retention
1	User Account Information • First Name • Last Name • Username • Email address	10 years as per Johnson Controls Records retention policy or Customer Data Retention Policy agreement at time of signing	• Required to access the Active Responder application • Required for user notifications
2	Points of Contact Information (User Work Location and Contact Details) • First Name • Last Name • Role • Phone • Email address	10 years as per Johnson Controls Records retention policy or Customer Data Retention Policy agreement at time of signing	• POCs are associated with one or more buildings • Buildings are associated with one or more SOPs • POC contact details are displayed when an SOP is associated with a building, which in turn is associated with the POC
3	Alerts • Subscription credentials	10 years as per Johnson Controls Records retention policy or Customer Data Retention Policy agreement at time of signing	• Needed to subscribe to third-party Data Sources for alerts • Alerts that are sent from various third-party data sources and classified by RI according to their threat level

6. Sub-processors for Risk Insight

Please see below the list of current sub-processors utilized to provide Risk Insight:

Sub-Processor	Personal Data	Service Type	Location of Data Center	Security Assurance
Microsoft Azure Cloud	• First Name • Last Name • Username • Email address • POC role • POC phone • API credentials • SOP-related data entry	Third-Party Cloud Hosting	• United States • Asia-Pacific • UAE • Canada • LATAM	• Managing compliance in the cloud • Compliance offerings for Microsoft 365, Azure and other Microsoft services • Service Trust Portal

7. Cross-border data transfers

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