

# Data Privacy Sheet

Verasys



## 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).

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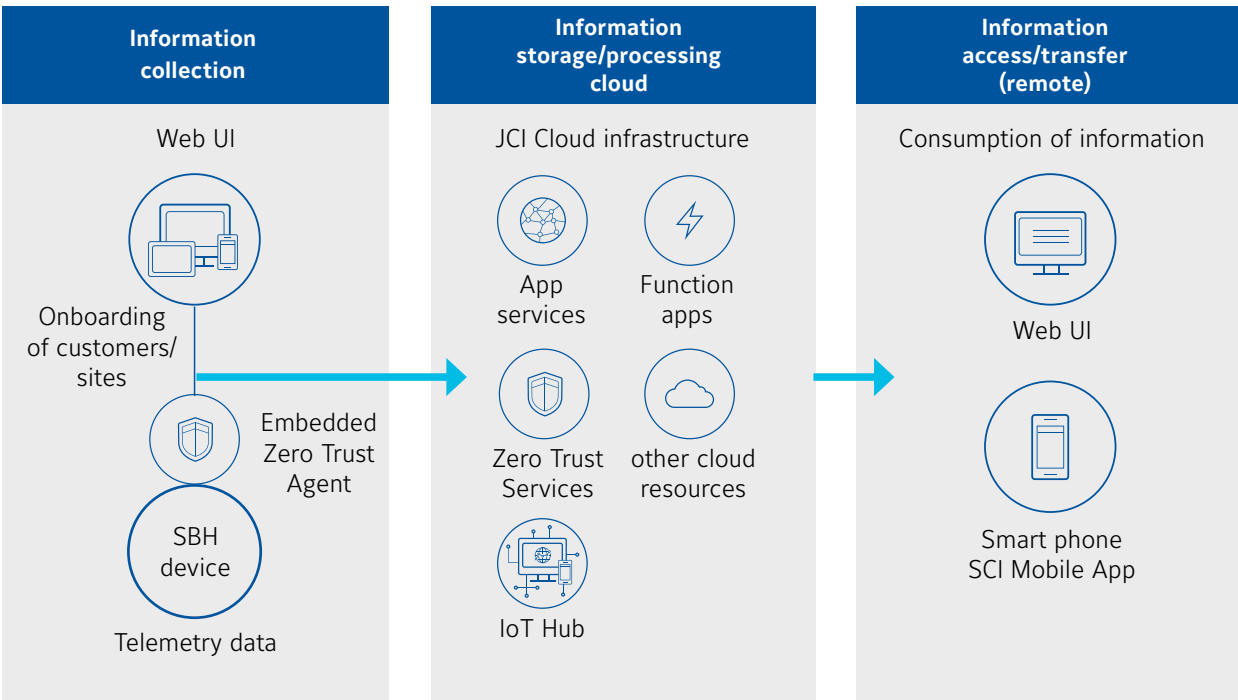
## 2. Overview of Verasys

The Verasys system provides bundled equipment and controls solutions that are well-proven. Verasys is a plug and play solution that is part of the Johnson Controls SMART Systems. The Verasys system features both simple, configurable controllers and Heating Ventilation Air Conditioning and Refrigeration (HVACR) equipment from the factory or installed in the field. You can use Verasys to configure many HVACR controls applications for one building or an entire enterprise of multiple buildings, without using special programming tools or control engineering.

Through the Smart Building Hub (SBH), you can access the system using either a laptop, smart phone or tablet. The SBH connects to an Ethernet backbone to enable remote connectivity and additional features, such as email and text alarms. Verasys supported devices automatically connect the point, alarm, trend and graphical definitions. The points appear when you connect devices to the system, thereby making Verasys an easy-to-use, light commercial building automation system (BAS).

## 3. Information flow map for Verasys:

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



## 4. Personal data processing details of Verasys:

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

Personal Data Category	Personal Data	Purpose of Processing
Work-related identification details	<ul style="list-style-type: none"><li>First name</li><li>Last name</li><li>Email</li><li>Contact number</li></ul>	Account management

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## 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 Global 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 Global 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 Global 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 Verasys:

Data Category	Retention Period	Reason for Retention
User and account information	For the period of active subscription	Required to manage subscription
Telemetry data	Three years	Required to provide efficient service

## 6. Sub-processors for Verasys

Please see below the list of current sub-processors utilized for Verasys:

Sub-Processor	Personal Data	Service Type	Location of Data Centers
Microsft Azure Cloud	<ul style="list-style-type: none"><li>First name, last name</li><li>User email ID</li><li>Language preference</li></ul>	Third-party cloud hosting	<ul style="list-style-type: none"><li>United States</li><li>Asia Pacific</li><li>UAE</li><li>Canada</li></ul>

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## 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 <a href="#">Johnson Controls TRUSTe validation page</a> 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 <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 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 <a href="#">Johnson Controls PRP TRUSTe validation page</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, 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.