

# OpenBlue

## Central Utility Plant

### Data Privacy Sheet

OpenBlue Central Utility Plant  
– Plant Optimizer



## 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 the California 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 Central Utility Plant – Plant Optimizer

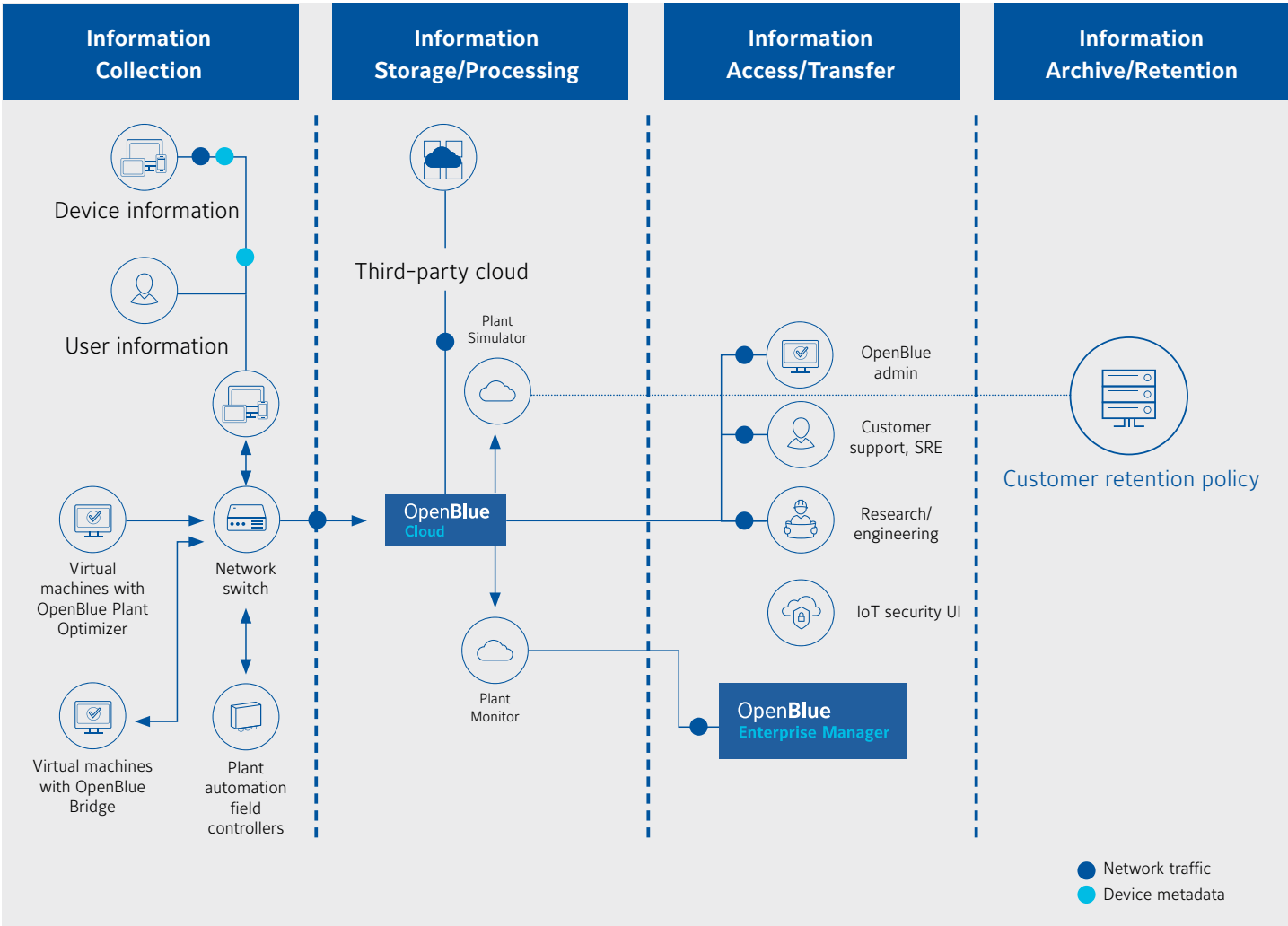
Johnson Controls OpenBlue Central Utility Plant – Plant Optimizer is a package of software applications that use real-time information to reduce energy use and operating cost, without sacrificing reliability, in central utility plants that produce cooling, heating and electricity for a campus. One such application is OpenBlue Central Utility Plant – Plant Optimizer. OpenBlue Central Utility Plant – Plant Optimizer integrates with any type of plant automation system and can be applied to a wide variety of piping configurations or equipment types.

The OpenBlue Central Utility Plant – Plant Optimizer application is an advanced supervisory monitoring and control software that helps plant operators save utility costs and increase reliability by optimizing setpoints for “free variables” in real-time (equipment selections, loading allocations, system level temp/flow/pressure setpoints) using math and a physics-based model rather than IF>THEN sequence logic rules to make an exhaustive search for the combination of equipment and setpoints to minimize utility bills and provide the transparency to identify reliability risks early. It only focuses on the central plant (not space temperatures, air handlers, cooling coil valves, etc.).

The Plant Optimizer application can send setpoint commands automatically in real time to turn equipment on and off, while informing operators of each change well in advance.

### 3. Information flow map for OpenBlue Central Utility Plant – Plant Optimizer

Please see below the information flow map for Plant Optimizer, 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 OpenBlue Central Utility Plant – Plant Optimizer

See below details on each category of personal data processed by OpenBlue Plant Optimizer, 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	<ul style="list-style-type: none"><li>• First name, last name</li><li>• User login ID</li><li>• User email ID</li><li>• Language preference</li></ul>	<ul style="list-style-type: none"><li>• Required to run an active subscription</li><li>• Required for licensing</li><li>• Required for user notifications</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 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 OpenBlue Central Utility Plant – Plant Optimizer:

S. No.	Data Category	Retention Period	Reason for Retention
1	User account information <ul style="list-style-type: none"><li>• First name, last name</li><li>• User login ID</li><li>• User email ID</li><li>• Language preference</li></ul>	10 years as per Johnson Controls Records Retention Policy or as per Customer Data Retention Policy agreement at time of signing subscription	<ul style="list-style-type: none"><li>• Required to run an active subscription</li><li>• Required for licensing</li><li>• Required for user notifications</li></ul>
2	General <ul style="list-style-type: none"><li>• User feedback</li><li>• Help and support tickets</li></ul>	Three years as per Johnson Controls Records Retention Policy or as per Customer Data Retention Policy agreement at the time of signing subscription	<ul style="list-style-type: none"><li>• Required for app feedback and collecting usability issues</li></ul>

## 6. Sub-processors for OpenBlue Central Utility Plant – Plant Optimizer

Please see below the list of current sub-processors utilized to provide Plant Optimizer:

Sub-Processor	Personal Data	Service Type	Location of Data Center	Security Assurance
Microsoft 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>	For information regarding Microsoft Azure see <a href="https://www.microsoft.com/en-ie/trust-center/compliance/compliance-overview-which-includes-audit-reports-and-https://docs.microsoft.com/en-GB/compliance/regulatory/offering-home">www.microsoft.com/en-ie/trust-center/compliance/compliance-overview-which-includes Audit reports and https://docs.microsoft.com/en-GB/compliance/regulatory/offering-home</a> for comprehensive compliance information

## 7. Cross-border data transfers

Many countries and jurisdictions have laws governing the transfer of personal data. As a multinational organization, 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 for personal data no matter where in the 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 PRP 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="https://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, 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 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.