

**Update: March 2018**

## **GLOBAL EMPLOYEE PERSONAL INFORMATION PRIVACY NOTICE**

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 Information in the following categories: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health or sex life or sexual orientation, genetic data, and biometric data where processed to uniquely identify a person.

### **2. Identity of Data Controller**

To identify the Johnson Controls entity responsible for the processing of your personal information, 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, home address, date of birth, gender, work-related photographs, and home phone number;
- Government-issued identification numbers, such as national ID for payroll purposes;
- Immigration, 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;

**Update: March 2018**

- Information related to your usage of Johnson Control's assets, in particular its computers and telecommunication systems, and traffic generated on Internet;
- Information needed for compliance and risk management, such as disciplinary records, background check reports and security data; and
- Payroll and payment or benefits related information, such as salary and insurance information, dependents, government identifier or tax numbers, bank account details, and employment related benefits information, family and dependent information.
- Travel and passport information
- Photographs

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

- Health and sickness information, such as medical certificates;
- Trade union membership; and
- Criminal convictions and prosecutions (in certain countries)

**4. Legal bases for Processing**

We will process your Personal Information on the following legal bases:

- The performance of a contract with you;
- The legitimate interests of Johnson Controls, to run our businesses efficiently and effectively;
- As required by law;
- Your consent, where required and to the extent of applicable law; and
- Your vital interests.

We will process Special Categories of your Personal Information on the following legal bases:

- Your explicit consent;
- Employment law;
- Your vital interests;
- Publicly available data; and
- Legal claims.

**5. Purposes of Processing**

We process Personal Information for the following purposes:

- workforce planning, recruitment and staffing;
- workforce administration, payroll, compensation and benefit programs;
- performance management, learning and development;
- advancement and succession planning;
- legal compliance, including 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; and
- other legal and customary business-related purposes.

## **Update: March 2018**

Johnson Controls also monitors and filters the use of company 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.

### **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;
- 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; 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.

### **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 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.

## Update: March 2018

- **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.

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. **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:

- Consult the [Privacy Portal](#) to identify your local Data Privacy point of contact,

**Update: March 2018**

- 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,
- If applicable in your country, you may also contact Johnson Controls 24-hour Integrity Helpline at: [www.johnsoncontrolsintegrityhelpline.com](http://www.johnsoncontrolsintegrityhelpline.com).

**13. Modifications to our Privacy Notice**

We may amend this notice from time to time, should it become necessary to do so. 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.