

Honeywell Global Data Privacy Program Overview

As a global organization, Honeywell (“we” or “us”) is committed to protecting the personal data that we process and complying with applicable data privacy laws in the countries in which we operate. Honeywell’s Global Privacy Program includes a dedicated in-house data privacy team (the “Data Privacy Function”), led by our Chief Privacy Officer, which monitors developments in data privacy regulation globally, including the General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA) and the China Personal Information Protection Law (PIPL). The Data Privacy Function is responsible for overseeing our data protection strategy and its implementation to ensure compliance with applicable data protection regulations worldwide.

Honeywell’s Global Privacy Program includes the following features:

Privacy by Design. We design our products and services to comply with applicable privacy laws and regulations, including GDPR. We have a dedicated product security team that works extensively with Honeywell’s strategic business groups and the Data Privacy Function to ensure that data privacy principles are considered from the earliest stages of any initiatives involving personal data throughout the lifecycle of the data management process.

Privacy Impact Assessment Program. We use privacy impact assessments to assess and mitigate privacy risks associated with personal data processing activities carried out by our business.

Transparency. We are transparent about our data processing practices and provide notice to data subjects to give them information on Honeywell’s collection and use of their personal data.

Data Subject Rights. We have procedures and mechanisms in place to give effect to data subjects’ rights in accordance with the time limits prescribed by applicable privacy laws.

Retention. We have policies and procedures to determine the appropriate retention periods to be followed within Honeywell.

Contractual Assurances. We provide appropriate contractual assurances in our standard data processing agreements and require our processors to comply with all applicable privacy laws such as GDPR, CCPA and PIPL.

International Data Transfers. As a large global organization, we are required to make international transfers of personal data to maintain and support our global operations. We have taken steps to ensure there are appropriate safeguards in place, such as the EU Standard Contractual Clauses, to meet global data transfer requirements.

Data Security. We implement appropriate technical and organizational measures to keep personal data secure by implementing industry best practices and critical control frameworks, including NIST SP 800-171 and ISO 27001.

Incident Response. We have a global incident response program to deal with personal data breaches including timely security notifications and assistance as required by applicable privacy laws.

Training and Awareness. We train our employees to ensure that they are aware of their data protection responsibilities under applicable privacy laws and how to comply with them.